



City of Tustin

Final

Housing Element 2021-2029

October 2022



**Final Revised
Housing Element
2021-2029**

**TUSTIN
GENERAL PLAN**

SEPTEMBER 2022

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INTRODUCTION TO THE HOUSING ELEMENT

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. Of the mandated General Plan Elements, the Housing Element is the only one that is required to be updated on a specific schedule. The Housing Element is also subject to review by the State Department of Housing and Community Development (HCD).

In order to address a community's changing housing needs, Housing Elements are to be updated every four to eight years. State Planning Law mandates that jurisdictions within the Southern California Association of Governments (SCAG) region adopt revisions to their Housing Elements by October 15, 2021. There are two relevant Housing Element time periods:

- 2013-2021: The previous planning period began on October 15, 2013, and ended on October 15, 2021
- 2021 -2029: The current Housing Element planning period began on October 15, 2021 and ends in October 15, 2029.

The planning period for the 6th Cycle Regional Housing Needs Assessment (RHNA) as prepared by SCAG, is from June 30, 2021 to October 15, 2029, an eight-year period.

The Housing Element includes the following sections:

Section	I	Introduction
Section	II	Summary of Issues, Needs, Constraints and Opportunities
Section	III	Goals and Policies
Section	IV	Housing Programs
Appendix	A	Review of Past Performance
Appendix	B	Housing Sites Inventory Assessment
Appendix	C	Affordable Housing Resources
Appendix	D	Affirmatively Furthering Fair Housing
Appendix	E	Public Participation (Community Engagement Plan)
Appendix	F	References

PURPOSE OF THE HOUSING ELEMENT

The purpose of the Housing Element is to achieve an adequate supply of safe, affordable housing for all economic segments of the community, including individuals with special housing needs. An effective housing element provides the necessary conditions for conserving, preserving and producing an adequate supply

of housing affordable at a variety of income levels and provides a vehicle for establishing and updating housing and land-use strategies to reflect changing needs, resources, and conditions.

The Land Use Element of the City's General Plan 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 goals, policies, 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. Section II and Appendix D for additional information on the City's demographic profile.

SCOPE AND CONTENT OF ELEMENT

The State Legislature recognizes the role of the local general plan, and particularly the Housing Element, in implementing statewide housing goals. Furthermore, the Legislature emphasizes the promotion of and affirmatively furthering fair housing opportunities throughout the State, regional and local levels of government and for all economic segments of a community. The Legislature's major concerns with regard to the preparation of Housing Elements are:

- Recognition by local governments of their responsibility to consider economic, environmental and fiscal factors and community goals set forth in the General Plan in contributing to the attainment of State housing goals;
- Recognition of responsibility by the State and local governments to utilize vested powers to facilitate, improve and ensure the provision adequate housing for all economic segments within a community;
- Cooperative efforts by all levels of government to provide housing to low- and moderate-income households;
- Cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate housing needs; and
- Designating and maintaining a supply of land and adequate suitable sites suitable, feasible and available for housing development.

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

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. This Housing Element complies with statutory requirements of Government Code Sections 65580 – 65588.

GENERAL PLAN CONSISTENCY

According to State planning law, the Housing Element must be internally consistent with the other General Plan elements. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong base for the execution of plans and programs and ultimate attainment of community goals. The Housing Element is most closely tied to the Land Use Element as residential development capacities established in the Land Use Element are incorporated into the Housing Element.

The Tustin General Plan includes the following elements:

- Land Use
- Housing
- Circulation
- Conservation/Open Space/Recreation
- Public Safety
- Noise
- Growth Management

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

Similar to the Public 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 Tustin Housing Element is consistent with the goals and policies set forth in the adopted General Plan, and also incorporates new residential development opportunities presented by the Red Hill Avenue Specific Plan and the Downtown Commercial Core Specific Plan, Tustin Legacy Specific Plan and other parts of the City.

Pursuant to new State law, the City is updating the Public Safety Element, Land Use Element and Circulation Element following the Housing Element update as part of an overall Citywide General Plan update. This update is anticipated to be completed by January 2024. If additional elements in the General Plan are amended in the future, the Housing Element will be reviewed and modified if necessary to ensure consistency among the various elements. The City will ensure that updates to these Elements achieve consistency with the Housing Element.

PUBLIC PARTICIPATION

The California Government Code section 65583, subdivision (c)(8) requires that local governments make diligent efforts to solicit public participation from all segments of the community in the development of the Housing Element. The City's comprehensive public participation plan is included in Appendix E - Community Engagement Plan. The following provides a brief summary of the City public participation opportunities the City provided during the Housing Element preparation process.

Public Engagement

The City of Tustin recognizes the importance of public participation and consultation during the preparation of the 2021 - 2029 Housing Element Update, and, therefore, developed a comprehensive Community Engagement Plan (Appendix E) to solicit input from residents, community members and stakeholders throughout the update process. The following provides a summary of the City's Community Engagement Plan outreach efforts:

- **Public Meetings** - Multiple public workshops and public hearings held providing opportunities for community and public participation and input,

including with residents, stakeholders, Planning Commission and City Council, and options for virtual community participation.

- **Online Community Survey** - Two separate releases of an online community survey in English and Spanish to gather feedback related to local housing needs;
- **Mailings** - Direct mailing and email notifications delivered to Tustin residents, businesses, apartment owners, service providers, and other agencies in English and Spanish;
- **Stakeholders** - Individual stakeholder meetings held with multiple organizations as part of the consultation process;
- **Website** - Creation of a focused webpage on the City's website dedicated to the Housing Element Update which was routinely maintained and updated with pertinent information;
- **Social Media and Multi-Media News Releases** - Specific information, provisions and updates advertised in English and Spanish through the City's website, social media posts, paid advertising via social media and in newspaper and magazine publications, press releases, video features, flyers, postcards, and posters; and
- **On-going public input** - Continuous opportunities for review and comment of the Draft Housing Element update using all the community outreach methods and media listed above. Details of the City's outreach efforts are described in the Community Engagement Plan (Appendix E).

Summary of Public Comments Received

The City received nineteen (19) public comments during the comment period. The majority of comments were received between June 30, 2021 and July 30, 2021 and a summary of all of the comments are provided below. The public comment period has been continuously open since June 30, 2021. More than half of the comments received during the beginning of the comment period expressed concern over the number of units planned, particularly the low-income distribution, being concentrated in one major area (Tustin Legacy) rather than distributed throughout the City. In response to these comments, the draft Housing Element, released in June 2021, was subsequently revised on August 17 and September 7, 2021 by the City Council during public meetings. Specifically, the revisions added and redistributed units to The Tustin Market Place and the Enderle Center sites. These revisions also included adjustments to the distribution of units at various income levels (based on RHNA percentages) evenly and proportionately throughout the sites.

- Concern over the apportionment, density and geographic placement of additional low-income housing primarily identified to occur within the Tustin

Legacy area. Respondents encouraged the City to consider the overall housing increase, and, particularly the lower-income housing to be more equally apportioned/distributed throughout the City and be available to all rather than concentrated within the Tustin Legacy area.

- Affordable housing should be dispersed equitably throughout the community.
- Resident within current Tustin Legacy neighborhood expressed displeasure of current high taxes in addition to the Tustin Legacy identified to being the recipient of the majority of homeless and low-income housing allocations.
- Concern that they did not physically receive or receive communication about the available survey.
- Concern that the City is not providing enough site capacity for very low-income housing. RHNA requires 1,724 very low-income units and the Draft Element provides a capacity for 1,699; a deficiency. Their suggestion is to provide a fifteen (15) to thirty (30) percent capacity buffer at each level of income to avoid violating the No New Loss requirement.
- Concern regarding specific Site 6 being held by one (1) owner and unknown willingness by said owner to sell property to pursue housing which would result in a site inventory deficiency.
- Concern that the plan will not realize attainable housing options for residents and workers of Tustin.
- Encourage the City to adopt a compliant housing element update by the required due date of October 15, 2021.
- Inquiry regarding whether the City plans to build condominiums and small houses for young adults just starting their careers and want to live in the City of Tustin.
- Request for information regarding rental assistance programs.
- Request update regarding housing developments in Tustin.
- Request for the Housing Element Technical Memorandum.
- Concerns regarding the identification of zone or zones where emergency shelters are allowed without discretionary review and/or permit, assessing the need and capacity for emergency shelters, emergency shelter standards; analysis for special needs; analysis of governmental and nongovernmental constraints; site inventory analysis and capacity, including ADUs; assessment of fair housing issues related to AFFH; programs within the Draft Housing Element including preserving assisted housing developments, and public engagement and outreach efforts undertaken by the during the update process.
- Request for the City to consider utilizing skilled and trained workforce policies.

At the September 14, 2021 Planning Commission public hearing, the Commission received additional public comments from the Kennedy Commission and Tustin Planning Partnership. The concerns generally expressed include the following:

- Concern that site analysis is deficient relative to physical viability and allocation of lower income sites at Tustin Market Place and Enderle Center.
- Concern that proposed update is creating inconsistencies that are contrary to the City's land use and Zoning Code and affordable housing policies.
- Concern regarding public participation and outreach to underserved, minority and special needs population, site inventory analysis, bed counts of emergency and transitional housing projects within the City, ADU calculation and analysis, impact of local ordinances on the cost of housing and lack of analysis regarding special needs populations and resources available.

These comments were similar to those comments received by the City from HCD and Public Law Center which the City has addressed in the revised Draft Housing Element. At the conclusion of the September 14, 2021 meeting, the Planning Commission unanimously voted 5-0, adopting Resolutions No. 4439 and 4440 with the recommendations that the City Council approve the Housing Element Update and the accompanying Negative Declaration

The Notice of Intent to Adopt a Negative Declaration (ND) and the Initial Study (IS) were advertised for public review from August 24, 2021 to September 23, 2021. The City provided notification of the availability of the IS and ND to those included on the City's Interested Party List which includes various organizations (i.e. youth, seniors, veterans and disabled), homeless shelters, housing advocates, religious & cultural organizations, fair housing council, service providers, housing builders and developers, homeowners' associations, CDBG funding recipients, multi-family apartment managers (TEAMs), and online survey respondents.

As of September 23, 2021, two (2) public comments were received on the proposed Negative Declaration. The comment questioned whether the adequacy of the environmental analysis conducted based on the City's RHNA allocation and the number of units that could be potentially constructed within the City. A response was provided to this question along with other questions to the City's website for information and assist the public in the Housing Element update process. In response to this comment and other related-comments, it is important to note that the Housing Element is a planning and policy document that does not approve, permit or entitle any residential development projects. A second comment letter was received by the City of Irvine but cited no major concerns.

The sites inventory and housing unit distribution has been modified several times since it was originally presented at the City Council and Planning Commission Housing Element Workshop held on May 11, 2021. In order for those properties identified in the Sites Inventory to accommodate additional housing units to meet the City RHNA allocation, it will require the creation of overlay zones and/or an amendment to Specific Plan and are therefore only considered candidate sites. Additional evaluation and a separate environmental assessment will be completed concurrently with the adoption of an overlay/rezone and/or amendment to the City's General Plan, and is required to take place within three years of the City's adoption of the 2021-2029 Housing Element.

On September 30, 2021, the ALUC considered the draft Housing Element and determined that the Housing Element and it is consistent with Airport Environs Land Use Plans (AELUPs) for the John Wayne Airport and Heliports. The current draft Housing Element has carried over two (2) key policies from the previous element:

1. Buildings and structures shall 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, applicants proposing buildings or structures that penetrate the 100: 1 Notification Surface shall 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.
2. Development projects that include structures higher than 200 feet above existing grade shall be submitted to ALUC for review. In addition, projects that exceed a height of 200 feet above existing grade shall file Form 7460 -1 with the Federal Aviation Administration FAA).

October 5, 2021, the Tustin City Council considered and adopted two Resolutions (No. 21-86 and 21-87), approving the 6th cycle of the City of Tustin Housing Element Update, and authorized staff to submit the adopted Housing Element to HCD for certification.

The City subsequently submitted the draft Housing Element to HCD on October 14, 2021 and received a letter of finding from HCD on January 12, 2022. The City revised the draft Housing Element to address the findings and provided the public an opportunity to review the revisions in accordance to Assembly Bill No. 215 for a minimum of seven (7) days, from March 15, 2022 through March 21, 2022. Prior to

resubmittal to HCD, the City considered public input and revised the draft Housing Element, as needed. On March 23, 2022, the City resubmitted a revised draft Housing Element, addressing HCD's finding.

SUMMARY OF ISSUES, NEEDS CONSTRAINTS AND OPPORTUNITIES

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 considerations 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.

SUMMARY OF HOUSING NEEDS

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 from when households are paying more than they can afford for housing;
- Housing needs resulting from the presence of “special needs groups” such as the seniors, large families, female-headed households, persons with disabilities (including physical and mental disability), and persons experiencing homelessness; and
- Housing needs resulting from the conversion of assisted housing developments to market rate housing.

Population Growth

As shown in Table II-1, between 2010 and 2014 the City’s population grew steadily from 75,540 to 80,617, an increase of 5.6 percent. Between 2014 and 2018, Tustin’s population growth decreased by approximately 1.0 percent, with a decrease from 80,617 to 79,787. The population growth in Tustin is comparable to the countywide growth rate. However, Tustin’s 5.6 percent population growth rate within the 2010-2018, eight-year period is greater than the nearby cities of Anaheim, Garden Grove, Orange and Santa Ana. These other cities experienced growth rates in the range of 1.0

percent to 4.7 percent, compared to Tustin’s 5.6 percent population increase. The City of Irvine experienced the largest population increase, with an increase of 33.1 percent within the same eight-year period.

TABLE II- 1
POPULATION GROWTH 2010-2018
CITY OF TUSTIN, NEARBY JURISDICTIONS AND ORANGE COUNTY

Jurisdiction	2010 ¹	2014 ²	2018 ³	Percent Growth	
				2014-2018	2010-2018
Tustin	75,540	80,617	79,787	-1.0%	5.6%
Anaheim	336,265	346,961	352,018	1.5%	4.7%
Garden Grove	170,883	175,085	172,652	-1.4%	1.0%
Irvine	212,375	248,521	282,584	13.7%	33.1%
Orange	324,528	139,826	139,502	-0.2%	2.0%
Santa Ana	325,483	334,924	332,727	-0.1%	2.2%
Orange County	3,018,963	3,145,515	3,185,968	1.3%	5.5%

Sources: 1 2010 U.S. Census, 2 2014 U.S. Census
3 American Community Survey (5-Year Estimate) 2018

Population projections are shown in Table II-2. According to Orange County Projections (OCP) 2020 Modified data, the population in the City of Tustin is expected to increase by approximately 6.3 percent within a 20-year period (2025-2045), from 84,265 persons in 2025 to 92,564 persons by the year 2045.

TABLE II- 2
POPULATION PROJECTIONS IN TUSTIN, CA 2025-2045

	2025	2030	2035	2040	2045	Percent Change (2025- 2045)
Tustin	84,265	85,239	87,932	90,576	92,564	6.30%

Source: OCP 2020 Modified, Prepared by Center for Demographic Research

Employment

An assessment of the needs of the community must take into consideration the type of employment held by City residents. Incomes associated with different jobs and the

number of workers in a household determines the type and size of housing a household can afford.

The American Community Survey (ACS) provides information about employment, specifically the number of City residents by industry type, who are employed by businesses either outside or within their community. As of 2018, the largest occupational category in the City was the service occupation in which a total of 17,418 residents (41.10 percent) were employed. The second largest category was the sales and office occupations, employing 9,585 residents (22.60 percent). Both of these categories and respective percentages are very similar to the previous housing cycle and have not changed significantly. Table II-3 shows the breakdown of employment by occupation.

Occupational Category	Number	%
Management, business, science, and arts occupations	8,293	19.5%
Service occupations	17,418	41.10%
Sales and office occupations	9,585	22.60%
Natural resources, construction, and maintenance occupations	2,581	6.1%
Production, transportation, and material moving occupations	4,571	10.8%
Total	42,448	100.0%

Source: U.S. Census: 2014-2018 American Community Survey

Table II-4 provides employment projections between the years 2016 and 2040. According to OCP-2018 Modified data, employment in the City of Tustin is expected to increase by approximately 42 percent between 2016 and 2040. The largest percentage of employment by occupation includes service occupations (41.1 percent). However, given the changes in retail shopping trends and more customers making purchases online, there is and will likely continue to be less demand for retail space in the future, which could potentially impact retail employment as well.

	2016	2020	2025	2030	2035	2040	Percent Change (2016- 2040)
Tustin	49,200	53,029	54,831	61,752	66,579	69,752	41.77%

Source: Center for Demographic Research at Cal State Fullerton - OCP, 2018

Table II-5 provides a list of the largest employers in Tustin in 2020. The list includes a variety of industries, including education, financial, government, manufacturing, health care and wholesale trade. There are fewer major retail employers within the City than in the past planning period.

Company/Address	No. Emp.	Product/Service
Tustin Unified School District 300 South C Street, Tustin 92780	2,850	Education
SchoolsFirst 14171 Red Hill Avenue, Tustin, CA 92780	983	Financial Services
Young's Market Company LLC 14402 Franklin Avenue, Tustin, CA 92780	681	Distributor
Costco Wholesale 2700 Park Ave., Tustin 92780; 2655 El Camino Real, Tustin, CA 92782	658	Wholesale Trade
New American Funding 4511 Myford Rd Ste. 100, Tustin, CA	645	Financial Services
City of Tustin 300 Centennial Way, Tustin 92780	409	Government
Avid Bioservices, Inc. 2642 Michelle Drive # 200, Tustin 92780	230	Manufacturing
Vita Best Nutrition 2802 Dow Avenue, Tustin, 92780	215	Manufacturing
Kaiser Foundations Hospitals, 2521 Michelle Drive, Tustin 92780; 17452 17 th Street, Tustin 92780	200	Medical
Logomark, Inc. 1201 Bell Avenue, Tustin 92780	196	Wholesale Trade

Source City of Tustin Comprehensive Annual Financial Report for the Year Ended, 2020

Jobs-Housing Balance

The jobs-housing ratio in a jurisdiction is a general measure of the total number of employment opportunities and housing units within the geographic area. The jobs-to-housing balance is a planning tool to review whether a community has a healthy balance between jobs and the housing supply available to potentially house workers for those jobs. This balance may be impacted by the match between wage levels and housing costs; whether all workers in a house have employment in the community in which they live; whether preferences are met within the community for either housing or employment; and whether options are available nearby for either housing or employment. A desired target is a jobs-to-housing-units ration of 1:1, indicating a

jurisdiction has reached an equilibrium between employment and housing opportunities.

Table II-6 shows the 2018 jobs-housing balance for Tustin, Orange County and the Southern California (SCAG) region. Recent data indicate that Tustin had a jobs-housing ratio of 1.78 in 2018, indicating that the City is jobs-rich in comparison to the countywide ratio of 1.57 and the SCAG region ratio of 1.28.

**TABLE II- 6
JOBS-HOUSING BALANCE
CITY OF TUSTIN, ORANGE COUNTY, SCAG REGION, 2019**

	Tustin	Orange County	SCAG Region
Total Jobs	50,169	1,726,003	8,465,304
Housing Units	28,118	1,094,169	6,629,879
Jobs-Housing Ratio	1.78	1.57	1.28

Sources: SCAG Local Profile City of Tustin 2019

Overcrowding

“Overcrowding” is generally defined as a housing unit occupied by more than one person per room in housing unit (including living room and dining rooms, but excluding hallways, kitchen, and bathrooms). An overcrowding can be caused by lack of affordable housing (which forces more than one household to live together) and/or a lack of available, adequately sized housing units. Overcrowding is an indicator of inadequate supply of affordable housing, especially for large families. Overcrowded and severely overcrowded households contribute to faster rates of deterioration due to more intensive use of individual housing units. The faster rates of deterioration are caused by excessive wear and tear, and the potential cumulative effect of overburdening infrastructure systems and exceeding service capacities. Furthermore, overcrowding in neighborhoods contributes to overall declines in social cohesion and environmental quality. Such decline can often spread geographically from housing units to neighborhoods and impact the overall quality of life and the economic vitality of a community."

According to the 2019 American Community Survey, 447 owner-occupied and 2,769 renter-occupied households in Tustin had more than 1.0 occupant per room. This data shows that overcrowding disproportionately affects renters, with 25 percent of renter-occupied units overcrowded compared to three percent of owner-occupied units.

Substandard Units - Type, Age and Condition of Housing Stock

Age is one measure of housing stock conditions and a factor for determining the need for rehabilitation. Without proper maintenance, housing units deteriorate over time. Thus, units that are older are more likely to be in need of major repairs (e.g., a new roof or plumbing). As a general rule of thumb, houses 30 years old or older are considered aged and are more likely to require major repairs.

According to the ACS of 2019, Tustin offers a mix of housing choices. Of the 25,315 housing units in the City, 54.5 percent (13,815) are comprised of one-unit (either attached or detached) structures, 20 percent (5,093) are comprised of two (2) - nine (9) units structures, approximately 24 percent (6,041) are comprised of 10 or more units structures, and two (2) percent (524) are mobile homes. As of 2020, approximately 64 percent (17,816) of the City's existing housing stock is over 30 years old, the age at which housing tends to require significant repairs.

The ACS of 2019 quantifies "Selected Conditions" which is a measure of substandard housing. The selected conditions are: incomplete plumbing or kitchens, overcrowding and 30 percent of the household income spent on rent or monthly owner costs. Of the 12,453 owner-occupied housing units, only 245 (less than two percent) housing units were indicated to have two or more "selected conditions". Of the 12,862 renter occupied housing units, 1,901 (14.77 percent) were indicated to have two or more "selected conditions". At this time the City's Building Division (Code Enforcement) estimates that approximately ten percent of the City's housing stock is in need of varying degrees of repairs, which is generally consistent with the "selected conditions" data.

Single Room Occupancy (SRO)

Single Room Occupancy ("SRO") units are one-room units intended for occupancy by a single individual and typically range in size from 250-500 square feet. SROs are typically more affordable than other housing and can be a source of housing for low- and moderate-income households. They are distinct from a studio or efficiency unit, in that a studio is a one-room units that must contain a kitchen and a bathroom. Although SRO units are not required to have a kitchen or a bathroom, many SROs have one or the other and could be equivalent to an efficiency unit. SRO units are allowed within the City's Multiple Family Residential districts and Planning Area 3 of the Tustin Legacy Specific Plan area. SRO units such as rest homes are also conditionally-permitted within Commercial Districts in the city. The City will review the Zoning Code and Tustin Legacy Specific Plan to determine if other zones or planning areas are appropriate for inclusion of SROs.

Affordability Gap Analysis

The purpose of the affordability gap analysis is to illustrate the "gap" between the cost of what households pay toward their housing expenses in relation to their incomes. State and federal guidelines indicate that a household paying more than 30 percent of its income for housing is overpaying. Those who pay an excessing amount of their income on housing are referred to as "cost-burdened." Overpayment for housing can create an imbalance in a household's overall budget. Evaluating incidents of overpayment can influence the supply and demand of housing. Federal and State agencies use cost burden indicators to determine the extent and level of funding and support that should be allocated towards a community. The cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," including mortgage payment, utilities, association fees, insurance, and real estate taxes.

**TABLE II- 7
HOUSEHOLD INCOME DISTRIBUTION OVERVIEW IN TUSTIN, CA 2017**

Income	Owner	Owner (%)	Renter	Renter (%)	Total
Household Income less-than or = 30% AMI	1,155	31.8	2,470	68.1	3,625
Household Income >30% to less-than or = 50% AMI	1,075	27.5	2,840	72.5%	3,915
Household Income >50% to less-than or = 80% AMI	1,820	36.7	3,135	63.3%	4,955
Household Income >80% to less-than or = 100% AMI	1,450	47.3%	1,610	52.6%	3,060
Household Income >100% AMI	7,085	-	3,540	-	10,625
Total Households	12,590	-	13,595	-	26,185

Source: Comprehensive Housing Affordability Strategy (CHAS), 2013-2017 estimates

The state and federal standard for housing cost burden is based on the income-to-housing cost ratio of 30 percent and above. According to the most recent Comprehensive Housing Affordability Strategy (CHAS) data published by the U.S. Department of Housing and Urban Development (HUD), 43.44 percent of Tustin households overpaid for housing in 2017. However, the total cost-burdened households have decreased by 5.82 percentage points, from the 49.26 percent reported in 2012. In addition, the number of households that pay 50 percent or more of their gross income toward housing has decreased by 16 percent within five years, from 21.95 percent in 2012 to 18.48 percent in 2017.

**TABLE II- 8
NUMBER OF HOUSEHOLDS WITH COST BURDEN IN TUSTIN, CA
COMPARISON, 2012 AND 2017**

Income	Cost burden > 30%		Cost burden > 50%		Total	
	2012	2017	2012	2017	2012	2017
Household Income less than or = 30% AMI	2,980	2,845	2,685	2,300	3,455	3,625
Household Income >30% to less than or = 50% AMI	2,870	3,345	1,540	1,715	3,340	3,915
Household Income >50% to less than or = 80% AMI	2,875	2,710	640	590	4,840	4,955
Household Income >80% to less than or = 100% AMI	1,125	1,120	190	125	2,420	3,060
Household Income >100% AMI	2,325	1,355	365	110	10,665	10,625
Total	12,175	11,375	5,424	4,840	24,715	26,185

Source: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012 estimates and 2013-2017 estimates

As exhibited in Table II-9 below, both owner and renter households in Tustin may be cost burdened. Overall, there is a higher rate of cost burden, among renters with 26.85 percent experiencing a cost burden whereas 16.61 percent of owners experience cost burden.

**TABLE II- 9
NUMBER OF HOUSEHOLDS WITH COST BURDEN IN TUSTIN, CA**

Cost Burden	Owner	Renter	Total
Cost Burden less-than or = 30%	8,150	6,415	14,565
Cost Burden >30% to less-than or = 50%	2,870	3,670	6,540
Cost Burden >50%	1,480	3,360	4,840
Cost Burden not available	90	150	240
Total	11,375	13,595	26,185

Source: Comprehensive Housing Affordability Strategy (CHAS), 2013-2017 estimates

Special Needs Groups

State law identifies certain households that historically have more difficulty in finding adequate and affordable housing due to special needs. Special needs populations include seniors, persons with disabilities, female-headed households, large households, and farmworkers. Many persons within these special needs groups

often have lower than average incomes because of their special needs. Special needs may be related to a person's employment and income, family characteristics, disability and household characteristics, or other factors. Consequently, certain residents in Orange may experience higher incidences of housing overpayment (cost burden), overcrowding, or other housing problems. Special needs groups required to be analyzed in the Housing Element include seniors, persons with physical and developmental disabilities, persons experiencing homelessness, single parents, large households, and farmworkers

Demographics regarding special needs groups are presented in Appendix D. Appendix D discussion incorporates planning and analysis, which is collectively referred to as an assessment of fair housing (AFH), and generally includes:

- A summary of fair housing issues in the City of Tustin and an assessment of the jurisdiction's fair housing enforcement and outreach capacity; and
- An analysis and summary of fair housing issues and identification of trends and patterns within the City of Tustin in comparison to surrounding cities and the larger Orange County region, including the topics of:
 - Integration and segregation;
 - Racially or ethnically concentrated areas of poverty;
 - Disparities in access to opportunity, including for persons with disabilities; and
 - Disproportionate housing needs (such as overpayment, overcrowding, housing conditions disproportionately affecting protected classes), and displacement risk. where the City's.

Discussion below includes a brief overview of these topics.

Seniors (65+)

The needs of many senior households are a result of their low and fixed incomes, physical disabilities/limitations, and need for assistance. The four main concerns for the 65+ age population are:

- Housing: considering that many seniors live alone, they may have difficulty maintaining their home
- Income: this population is typically retired and live on a limited income
- Healthcare: due to health conditions, they are likely to spend high amounts on health care
- Transportation: a decline in strength, vision, reaction times, and short-term memory may make it unsafe for a senior to drive thus may rely on public transportation

Table II-10 shows the tenure of households with the head of household aged 65 years or older in the City of Tustin in 2018. The City had 1,596 renter households and 2,913 owner households with a head of household aged 65 years or older. Households with a senior householder represented 17.3 percent of all households in the City. This is a 1.6 percent increase since 2011.

**TABLE II- 10
TENURE OF HOUSEHOLDS
HEAD OF HOUSEHOLD AGED 65 YEARS OR OLDER IN TUSTIN, CA 2018**

Tenure	# Households	% Households
Renters	1,596	6.1% ¹
Owners	2,913	11.2% ²
Total Households	4,509	17.3% ³

1 As a percentage of 13,600 renter households

2 As a percentage of 12,532 owner households

3 As a percentage of 26,132 total households

Source: U.S. Census, 2014-2018 American Community Survey

Table II-11 shows the estimated household income distribution for householders aged 65 years or older in 2018. Approximately 18.2 percent of elderly senior households in Tustin earned less than \$25,000 annually or about 25.3 percent of AMI for a household of two persons in 2018.

**TABLE II- 11
ESTIMATED HOUSEHOLD INCOME DISTRIBUTION
HOUSEHOLDS WITH HEAD OF HOUSEHOLD AGED 65 YEARS OR OLDER IN
TUSTIN, CA 2018**

Income Range	Number	Percent	Cumulative %
Less Than \$10,000	318	7.05%	7.05%
\$10,000-\$24,999	821	18.2%	25.3%
\$25,000-\$34,999	400	8.8%	34.1%
\$35,000-\$49,999	543	12.0%	46.2%
\$50,000-\$74,999	725	16.1%	62.3%
\$75,000-\$99,999	413	9.16%	71.4%
\$100,000 or More	1,289	28.6%	100.0%
Total Households	4,509	100.0%	

Source: U.S. Census Bureau: 20014-2018 American Communities Survey. Table B19037

According to the American Community Survey 2014-2018 5-year estimates, Tustin's seniors (65 and older) makeup 9.88 percent of the population, which is 4 percentage points lower than the regional share of 13.9 percent. As illustrated in Table II-12 below, in the City of Tustin, 64.6 percent, or 2,913, of all senior (65 years or older) headed households were owners. In comparison, 35.4 percent, or 1,596, of all senior-headed households were renters. However, countywide 75.7 percent of senior-

headed households are owners, and 24.3 percent of senior-Headed Households are renters. However, both owners and renters are cost-burdened at a higher percentage in Tustin than in the County overall, despite having a lesser percentage of the elderly population.

**TABLE II-12
SENIOR HOUSEHOLDS BY TENURE IN TUSTIN, CA 2018**

Jurisdiction	Total Elderly Population	Senior-Headed Households	Owner	Renter	Owner costs as a percentage of household income 30% >	Gross rent as a percentage of household income 30% >
Tustin	7,914	4,509	2,913	1,596	37.1%	73.2%
Orange County	440,488	246,942	186,944	59,998	33.0%	63.4%

Source: American Community Survey, 5-Year Estimates, 2014-2018

City demographics for senior households are further discussed in Appendix D.

Minority Populations

The City of Tustin racial demographic data is provided in Table II-13. The most common race/ethnicity amongst the city’s population is persons of Hispanic ethnicity (41.22 percent). The second largest population included persons White, Non-Hispanic (30.36 percent) followed by Asian/Pacific Island, Non- Hispanic (21.93. percent). Minority populations (non-White) are considered special needs population. Additional racial and ethnic patterns data and analysis for Tustin is provided in Appendix D.

**TABLE II-13
RACE AND ETHNICITY, TUSTIN, CA 2020**

Race/Ethnicity	Count	Percent
White, Non-Hispanic	24,289	30.36%
Black, Non-Hispanic	1,926	2.41%
Hispanic	32,982	41.22%
Asian/Pacific Island, Non- Hispanic	17,542	21.93%
Native American, Non-Hispanic	418	0.52%
Two+ Races, Non-Hispanic	1,949	2.62%
Other, Non-Hispanic	169	0.23%

Source: County of Orange, Analysis of Impediments, 2020

Persons With Disabilities

Health and safety are directly linked to housing, and yet, many people with disabilities face enormous barriers in finding suitable housing to accommodate their needs. Additionally, because people with disabilities have faced a history of institutionalization—in state hospitals, developmental centers, jails and prisons, etc. –

ensuring that appropriate community-based housing with appropriate supports exists is critical. People with disabilities are also overrepresented in the unhoused population and any solutions related to homelessness must address appropriate accommodations and accessibility. Many individuals with ambulatory, self-care, or independent living difficulties are able to live independently with appropriate supports in place. These supports include caregivers or In-Home Supportive Services (IHSS). Many seniors, for example, are able to continue living independently as they age and avoid institutionalization by making physical modifications to their homes or obtaining supportive services.

According to the 2014-2019 ACS, 6.6 percent or 5,238 persons in Tustin have one or more disabilities. Approximately 2,291 persons 65 and older in Tustin, or 28.4 percent, have one or more disabilities. Demographics by disability and age cohort are identified in Table II-14. The most common disability in the city was ambulatory difficulty, with 8.1 percent of total population and 14.9 percent of senior population having an ambulatory disability. The least common disability in the city is vision difficulty, with 2.6 percent of total population and 3.0 percent of senior population having a vision difficulty.

The tables below quantify the number of persons with disabilities in Tustin and further provides a breakdown of the persons with disabilities by race/ethnicity. The race with the highest percentage of disability is White alone (8.5 percent) followed by Black or African American alone (6.5 percent). The ethnicity with the highest population of disability is White alone, not Hispanic or Latin (10.3 percent).

**TABLE II-14
DISABILITY DEMOGRAPHICS, TUSTIN, CA 2014 -2019**

Disability	Total	Percent	Total Age 65+	Percent
With a hearing difficulty	1,359	4.3%	800	8.3%
With a vision difficulty	825	2.6%	287	3.0%
With a cognitive difficulty	1,867	5.9%	591	6.1%
With an ambulatory difficulty	2,573	8.1%	1,445	14.9%
With a self-care difficulty	1,179	3.7%	573	5.9%
With an independent living difficulty	2,125	6.7%	1,147	11.8%
Total Disability	5,238	6.6%	2,291	28.4%
Total Population	79,667		8,057	
Race/Ethnicity	Total	Percent of Race/Ethnicity		
White alone	3,294	8.5%		
Black or African American alone	138	6.5%		

TABLE II-14
DISABILITY DEMOGRAPHICS, TUSTIN, CA 2014 -2019

Disability	Total	Percent	Total Age 65+	Percent
American Indian and Alaska Native alone	0	0.0%		
Asian alone	918	5.1%		
Native Hawaiian and Other Pacific Islander alone	6	5.0%		
Some other race alone	599	3.6%		
Two or more races	283	7.7%		
White alone, not Hispanic or Latino	2,598	10.3%		
Hispanic or Latino (of any race)	1,412	4.4%		

Source: ACS 2014-2019

Many disabled persons receive Social Security Income (SSI) assistance; however, benefit payments are well below the level necessary to afford market rate housing in the Tustin community. The City supports a number of affordable housing facilities, as identified in Table II-17. Large family day care homes with seven or more individuals are permitted uses in all residential districts within the city. According to the California Department of Social Services, there are currently 10 adult residential facilities located in the City of Tustin that accommodate adults with disabilities. The City’s process and policies to provide reasonable accommodation to populations with disability are discussed within Housing Constraints, below.

Developmental Disabilities

According to Section 4512 of the Welfare and Institutions Code, a “developmental disability” means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual, which includes mental retardation, cerebral palsy, epilepsy, and autism. 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 California Department of Developmental Services provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers. The goal of these centers is to: 1) prevent/ minimize institutionalization of developmentally disabled persons and their dislocation from family and community; and 2) enable this population to lead more independent and productive lives. The Regional Center of Orange County (RCOC) serves approximately 22,000 individuals with developmental disabilities and their families.

Within Tustin’s two zip codes, the Regional Center currently provides services to 643 residents with developmental disabilities, generating an estimated need for 244 housing units:

**TABLE II-15
CDISABILITY DEMOGRAPHICS, TUSTIN, CA 2014 -2019**

Zip Code	0 - 17 years	18+ years	TOTAL
92780	238	223	461
92782	108	74	182
Citywide Total	346	297	643
Est. Housing Need ¹	147	97	244

Source: Regional Center of Orange County (RCOC), 2021

¹ The following need factors developed by the Golden Gate Regional Center can be used to estimate housing needs for the developmentally disabled population by age group: age 0-14 25% need hsg; age 15-22 50% need hsg; age 23-54 35% need hsg; age 55-65 25% need hsg; age 65+ 20% need hsg. Therefore, percentages were averaged for the overlapping age cohorts, which yield an estimated factor of 0-17 42.5% need hsg and 18+ 32.5% need hsg

As identified by RCOC, among Tustin residents served by the regional center, approximately 86 percent live with a parent, family member or guardian; 8 percent live as independent or in supported living; 2 percent live in a community care facility; and 3 percent live in another type of accommodation. These percentages highlight the need for people with developmentally disabled family members to have a variety of housing choices to provide ongoing care and support. The RCOC has several informational resources on their website about housing options for people with developmental disabilities. In 2013, the RCOC published a paper in conjunction with the Regional Centers Housing Advocacy Council that looked at the housing needs of developmentally disabled persons in the county.² The paper stated that the housing needs for developmentally disabled residents mirrored those of seniors and aging adults and safe, affordable housing options were needed. The regional centers have identified a number of community-based housing types appropriate for persons living with a developmental disability: licensed community care facilities and group homes; supervised apartment settings with support services; SB 962 homes (for persons with special health care and intensive support needs); and for persons able to live more independently, rent subsidized homes, inclusionary housing, and Section 8 rental vouchers. In addition to services offered through the Regional Center,

Project Independence in Costa Mesa has assisted hundreds of developmentally disabled individuals to gain the necessary skills to live independently.

Orange County has the following housing facilities to serve persons with developmental disabilities³:

1. Harbor Village in Costa Mesa - apartment complex that is a joint project between the RCOOC and the California Department of Developmental Services. Approximately 52 units are leased to persons with developmental disabilities and 15 of these units are certified to serve people with significant needs.
2. Integrity Cottages in Anaheim - a former motel that has been converted into 48 affordable rental units.
3. Parc Derian in Irvine - 4 units in this new complex are designated for persons with developmental disabilities. Other units are set aside for veterans and formerly homeless households.

Footnotes

1. California Department of Developmental Services, Consumer County by California ZIP Code and Residence Type.
2. Regional Center and Early Start Consumers, June 2020. 5 Regional Center of Orange County, "Housing for People with Developmental Disabilities in Orange County," January 20, 2013. 6
3. Regional Center of Orange County website: www.rcocdd.com/housing

Given the variety of persons with disabilities and demonstrated need for a variety of housing types for persons with development disabilities, especially for those living with a parent, the City of Tustin is proposing a new program to facilitate and incentivize the construction of housing that implement the Universal Design concept.

The City will establish a new Program 2.4d which will amend the code to establish a new Universal Design program which strives to produce dwellings that are accessible regardless of race, age, sex, culture, gender, weight and ability. Universal design avoids using special assistive technology, and instead employs design features and consumer products that are easy to use and widely acceptable. By January 2024, the City will amend the zoning code to adopt a Universal Design that incentives developers who implement Universal Design features in projects to be eligible for fee reduction or other development incentives. The program will incentive the development of two Universal Design units on an annual basis, starting in 2024 through 2029.

Large Households

The U.S. Census Bureau considers a household containing five or more persons is a large family. According to the County AI, the city contains 3,775 large family households. 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 lower-income, frequently resulting in the overcrowding of smaller dwelling units and accelerating unit deterioration. Data shows that the large families experience greater proportions of housing problems than other family types in the city (see Appendix D). Special needs of large family households in the city and policies to address identified needs are further discussed in Appendix D.

Female-Headed Households

Female-headed households require special consideration and assistance because of their greater need for daycare, health care, and other supportive services. Female-headed households with children, in particular, tend to have lower-incomes, thus limiting housing availability to this group. According to 2014-2019 ACS, there are 3,684 female householders and 1,799 female householders with children in the city. As identified in Appendix D, one census tract, 755.14, contained a substantial population of female-headed households. Additionally, 75 to 100 percent of households in this census tract were also identified as low to moderate income. Special needs of female-parent households in the city and policies to address identified needs are further discussed in Appendix D.

Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through seasonal agricultural work. Farm workers have special housing needs because they earn lower incomes than many other workers and move throughout the season from one harvest to the next. Statewide, farmworker housing is of unique concern and of unique importance. While only a small share of SCAG region jurisdictions have farmworkers living in them, they are essential to the region's economy and food supply.

According to the 2014-2018 ACS, 415 residents of Tustin's residents were employed in agriculture, forestry, or fishing, and hunting occupations, with 258 being employed full-time, year-round. Tustin is an urbanized community with no undeveloped parcels zoned for agriculture as a principal use; however, some residential zones allow a range of agriculture and related uses. However, some farmworkers may commute to nearby farming operations outside of the city.

**TABLE II-16
EMPLOYMENT IN AGRICULTURE INDUSTRY, TUSTIN, CA 2018**

Total	Percent	Employment
415	0.98%	Total in agriculture, forestry, fishing, and hunting
258	0.86%	Full-time, year-round in agriculture, forestry, fishing, and hunting

Source: American Community Survey 2014-2018 5-year estimates

Persons Experiencing Homelessness

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 challenging 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.

State law (Section 65583 (1) (6)) mandates that municipalities address the special needs of homeless individuals within their jurisdictional boundaries. The U.S. Department of Housing and Urban Development (HUD) defines homelessness as:

- (1) Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or a place not meant for human habitation immediately before entering that institution;
- (2) Individuals and families who will imminently lose their primary nighttime residence;
- (3) Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; or
- (4) Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.

In accordance with HUD's Continuum of Care (CoC) Program, Orange County's 2019 Sheltered Point In Time Count, Everyone Counts, is a biennial unsheltered count and an annual sheltered count of all individuals experiencing homelessness in the community on a single point in time, took place the night of Tuesday, January 22, 2019. The count revealed that 6,860 individuals in the County were experiencing

homelessness. Although some individuals may identify with more than one subpopulation of the individuals counted, 52.02 percent were chronically homeless, 33.73 percent had substance use issues, 31.17 percent had a physical disability, 26.82 percent had mental health issues, 14.03 percent has a developmental disability, 9.50 percent experienced domestic violence, and 1.80 percent were HIV/AIDS positive. The City of Tustin had 359 individuals total, 95 unsheltered and 264 sheltered.

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 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.

Homelessness is further discussed in Appendix D.

PRESERVATION OF UNITS AT RISK OF CONVERSION

State Housing Element law requires an analysis of the potential for currently rent-restricted low-income housing units to convert to market rate housing, and to propose programs to preserve or replace any units “at-risk” of conversion. This section presents an inventory of all assisted rental housing in Tustin and evaluates those units at risk of conversion during the ten-year, 2021-2031 planning period. This section presents an inventory of all assisted rental housing in Tustin and evaluates those units at risk of conversion during the ten-year, 2021-2031 planning period.

At-Risk Units Inventory

Table II-17 includes at-risk units within the city for the 6th planning cycle (2021-2029). Tustin Gardens is a Section 223(a) (7)/221(D) (4) project with a Section 8 contract for 99 units and is extended on an annual basis. The contract was due to expire on July 31, 2022; however, the City has confirmed that the contract has been extended for a new 20-year period which means the contract now expires on July 31, 2041. As a result, these 99 housing units are no longer considered at risk for this planning period. Table II-18 includes a full inventory of assisted housing within the city.

The following table provides a summary of the affordable housing projects at-risk of expiring during this planning period.

TABLE II-17 AT-RISK UNITS, TUSTIN, CA						
Project Name	Expiration Date	Very-Low Units	Low-Income Units	Moderate-Income Units	Total Units	At-Risk
Chatham Village	2027	0	212	0	212	Yes
Westchester Park	2029	0	149	0	149	Yes
Flanders Pointe	2029	32	16	9	57	Yes
Total		32	377	9	418	

Source: City of Tustin, 2021

As listed above, Westchester Park, Flanders Pointe and Chatham Village are at-risk communities within Tustin that could be converted towards the end of the planning period.

**TABLE II-18
ASSISTED HOUSING INVENTORY, TUSTIN, CA**

Project Name Address	Owner: Name, Address, Tel. #	Federal, State, or Local	Type(s) of Gov't Assistance	Type/ Length of Affordability Controls (including Sec. 8)	Earliest Potential Conversion Date(s)	# of Units	Tenant Type (i.e., Elderly, Family)	Bedroom Mix	Date Built (if known)	Condition (if known)
Tustin Gardens 275 E. 6 th , Tustin, CA 92780	Goldrich & Kest 5150 Overland Ave. Culver City, CA 90230	Fed.	HUD 223(a)(7)/221(D)(4) Section 8	---	July/2014	99 100	Elderly	100 1-br	1979	Good
Kenyon Pointe 17021-17121 Kenyon Drive Tustin, CA 92780	RPK Development 2566 Overland Ave. Suite 700 Los Angeles, CA 90064	Fed.	HUD 207/223(f)		January 2040	71	Family		1964	Good
Westchester Park (Orange Gardens) 1602 Nisson Rd. Tustin, CA 92780	Westchester Park, L.P.	State	California Tax Credit Allocation Committee	Income restricted. No rent restrictions	10/2029	149	Family	17-1br 93-2br 39-3br	N/A	Good
Flanders Pointe 15520 Tustin Village Way Tustin, CA 92780	Tustin Affordable Housing Corp.	State	California Statewide Communities Development Authority, 1999	Income restricted. No rent restrictions	10/2029	57	Family	50-2br 7-3-br	1966	Good
Anton Legacy 3100 Park Avenue Tustin, CA 92782	Anton Development Company 1610 R Street, Suite 250 Sacramento, CA 95811	State	California Tax Credit Allocation Committee	Income restricted.	May 2070	225	Family	78-1br 117-2br 30-3br	2015	Excellent

**TABLE II-18
ASSISTED HOUSING INVENTORY, TUSTIN, CA**

Project Name Address	Owner: Name, Address, Tel. #	Federal, State, or Local	Type(s) of Gov't Assistance	Type/ Length of Affordability Controls (including Sec. 8)	Earliest Potential Conversion Date(s)	# of Units	Tenant Type (i.e., Elderly, Family)	Bedroom Mix	Date Built (if known)	Condition (if known)
Coventry Court 16000 Cambridge Way Tustin, CA 92782	Meta Housing Corporation 1640 S. Sepulveda Blvd., Suite 425 Los Angeles, CA 90025	State	CTCAC	Regulatory Agreement	July 2067	153	Senior	80-1 br 73-2br	2012	Excellent
Tustin Grove Tustin, CA 92780	Tract 14934	Local	Redevelopment Agency	DDA ¹	N/A	21	Family	21-3br	N/A	Very Good
Ambrose Lane Tustin, CA 92780	Tract 15707	Local	Redevelopment Agency	DDA ¹	N/A	5	Family	5-3br	N/A	Very Good
Heritage Place Tustin, CA 92780	Tustin Heritage Place, L.P.	Local	County Revenue Bonds, Tax Credits, RDA Loans	Income restricted, Senior 62+	04/2057	54	Senior	42-1br 12-2br	2001	Very Good
Chatham Village (Hampton Square) 16331 McFadden Ave. Tustin, CA 92780	Fairfield Residential Corp.	Local	Southern California Home Finance Agency	Income restricted. No rent restrictions	2026	212	Family	126-1br 86-2br	1969	Good
Amalfi 16000 Legacy Road Tustin, CA 92782	Irvine Company 131 Theory Irvine, CA 92617	Local	Density Bonus	Income restricted	October/207 0	37	Family	21-1br 16-2br	2015	Excellent

**TABLE II-18
ASSISTED HOUSING INVENTORY, TUSTIN, CA**

Project Name Address	Owner: Name, Address, Tel. #	Federal, State, or Local	Type(s) of Gov't Assistance	Type/ Length of Affordability Controls (including Sec. 8)	Earliest Potential Conversion Date(s)	# of Units	Tenant Type (i.e., Elderly, Family)	Bedroom Mix	Date Built (if known)	Condition (if known)
Tustin Field I Tustin, CA 92782	Various owners	Local	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	Local	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	40	Family	40-3br	2007	Excellent
Arbor Walk Tustin, CA 92780	Various owners	Local	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	10	Family	10-3br	2006	Excellent
Cambridge Lane Tustin, CA 92782	Various owners	Local	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	Local	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	63	Family	22-2br 15-3br	2006- 2007	Excellent
Clarendon Tustin, CA 92782	Various owners	Local	Redevelopment Agency	Ownership income restricted.	45 years of initial purchase date	42	Family	42-3br	2006- 2007	Excellent
TOTAL						1,193				
N/A - Not available										
¹ DDA - Disposition and Development Agreement										
Source: Comprehensive Housing Affordability Strategy 2008 -2018, City of Tustin										

Various restrictions and incentives affect the likelihood that at-risk units will convert to other uses. Depending on the circumstances, different options may be used to preserve or replace the units. Preservation options typically include: (1) transfer of units to non-profit ownership; (2) provision of rental assistance to tenants using other funding sources; and (3) purchase of affordability covenants. The City currently enacts Program 3.7, which allows the City to ensure tenants are properly noticed regarding at-risk units and to work with potential purchasers or property owners to provide technical assistance, where feasible, to public and nonprofit agencies interested in purchasing and/or managing units at risk. Additionally, the City has included Program 3.9, which commits the City to registering through HCD so it is aware of any units at-risk of conversion. Program 3.1 requires developers 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 whenever a project proposes to convert affordable apartments and condominiums.

Transfer of Ownership

Transferring ownership of an at-risk project to a non-profit housing provider is generally one of the least costly ways to ensure that the at-risk units remain affordable over an extended period of time. By transferring property ownership to a non-profit organization, low income restrictions can be secured and the project would potentially become qualified for additional governmental assistance. This may be an option for Westchester Park, Flanders Pointe and Chatam Village developments and City staff will explore this option and others as a program to maintain the at-risk units.

Rent Subsidy

Tenant-based rent subsidies could also be used to preserve the affordability of housing. Similar to Section 8 vouchers, the City, through a variety of potential funding sources, could provide rent subsidies to tenants of at-risk units. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (“FMR”) for a unit minus the housing costs affordable by a lower income household. The FMR for Orange County for Fiscal Year (FY) 2020 and 2021 is identified below.

Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2021	\$1,678	\$1,888	\$2,331	\$3,227	\$3,716
FY 2020	\$1,563	\$1,785	\$2,216	\$3,098	\$3,578

Source: HUD User FY 2021 Fair Market Rent Documentation System

This section includes an analysis of potential rent subsidies needed to preserve the City’s at-risk affordable housing stock. The analysis assumes that all housing units would be occupied by very low-income households and calculates the total monthly rent income supported by the maximum allowable housing costs at these income levels. The maximum allowable housing costs were calculated as 30 percent of the very-low-income households as outlined by the 2021 HCD State Income Limits for Orange County. The occupancy assumptions used for this analysis are as follows:

- A one-bedroom unit assumes a two-person household.
- A two-bedroom unit assumes a three-person household.
- A three-bedroom unit assumes a four-person household.
- A four-bedroom unit assumes a five-person household.

The rent subsidy amount was calculated by subtracting the total monthly rent income supported by the housing costs of very-low-income households from the 2021 HUD Fair Market Rents for each project and unit size. Table II-20 below summarizes the analysis and estimates the total cost if rent subsidies were to be used to preserve the affordability of the various at-risk affordable housing developments in Irvine

Project Units	Chatham Village	Westchester Park	Flanders Pointe	Total
1 br	126	17	-	143
2 br	86	93	50	229
3 br	-	39	3	42
4 br	-	-	-	0
Total Monthly Rent Income Supported by Housing Cost of Very Low Income Households	\$299,653	\$229,213	\$80,731	\$609,596
Total Monthly Rent Allowed by Fair Market Rents	\$438,354	\$374,732	\$126,231	\$939,317
Total Annual Subsidies Required	\$138,702	\$145,520	\$45,500	\$329,721

Source: HUD User FY 2021 Fair Market Rent Documentation System

The total annual subsidy amount would be \$329,721 to preserve all 414 at-risk units in Tustin for one year. Therefore, the total cost to extend the affordability of all units for 20 years would be approximately \$6,594,420.

The California Department of Housing and Community Development maintains a list of entities with the capacity to oversee preservation of affordable housing. These entities have interest to purchase federally-assisted multifamily rental housing projects within Orange County pursuant to California Government Code Section 65863.11:

- Neighborhood Housing Services of Orange County Inc.
- Century Housing Corporation
- Civic Center Barrio Housing Corp.
- Long Beach Affordable Housing Coalition, Inc
- Housing Corporation of America
- Nexus for Affordable Housing
- Orange Housing Development Corporation
- Riverside Chartable Corporation
- Hart Community Homes
- Keller & Company
- Poker Flats LLC
- Coalition for Economic Survival
- A Community of Friends
- CSI Support & Development Services
- ROEM Development Corporation
- City of Newport Beach
- Abbey Road Inc.
- Jamboree Housing Corporation
- Innovative Housing Opportunities, Inc.
- L + M Fund Management LLC

In the event that a development becomes at risk of conversion to market-rate housing, the City will maintain contact with the qualified entities who may have an interest in acquiring at-risk units.

The City will assist the entities in identifying potential funding sources to acquire the at-risk units. Potential funding sources that could be used to preserve the affordability are discussed in Appendix C, Affordable Housing Resources. Potential funding sources identified include:

- Senate Bill 2 Grants
- City Non-profit Partnerships
- California Debt Limit Allocation Committee (CDLAC)
- Community Development Block Grant funds
- New Development

Purchase of Affordability Covenant

Another option to preserve the affordability of at-risk units is to provide an incentive package to the owner(s) to maintain the project as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, providing a lump-sum payment, and/or supplementing the rents to market levels. The feasibility and cost of this option depends on whether the units are too highly leveraged and interest on the owner's behalf to utilize the incentives found in this option.

Table II-17 includes at-risk units within the city for the 6th planning cycle (2021-2029). Table II-18 contains 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.

Programs for Preservation of At-Risk Units

The City will make efforts to preserve units "at risk" at, Westchester Park, Flanders Pointe and Chatam Village. The cost of acquiring and preserving each of the at-risk developments is less than replacing the units with new construction. The actual amount required to preserve each project 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 Programs 3.7 and 3.9.

Replacement of Affordable Units

Another option for maintaining the City's affordable housing inventory is to replace existing affordable housing units with new construction and application of new affordability covenants once the current covenants expire. Based on the HUD Total Development Cost (TDC) Limits. These development costs include land and acquisition, construction, architecture and engineering, interest and financing charges, developer fees, and other miscellaneous soft costs.

**TABLE II- 21
COST OF REPLACEMENT**

Year	Project 1	Project 2	Project 3	Average
Address	10861 Acacia Pkwy	16790 S. Harbor Blvd.	3312 W. First St.	-
City	Garden Grove	Fountain Valley	Santa Ana	-
Units	47	50	75	-
Total Development Costs	\$19.2 mil	\$29.6 mil	\$29.7 mil	-
Cost per Unit	\$408,510	\$592,000	\$396,000	\$465,503

Source: Jamboree Housing, 2022; Orange County Register, 2020; Multi-Housing News, 2019.

As shown above in Table II-21, the average development cost per unit in the Tustin area is \$465,503. Therefore, the total estimated cost to replace 414 at-risk units with new construction would be approximately \$192.7 million.

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. Housing trends and data, specifically regarding special needs groups, are discussed in Appendix D. Section C.2.5 identifies disproportionate housing needs of various groups within the City of Tustin.

Disproportionate Housing Needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.

The following conclusions were identified upon analysis of available data and documentation available regarding housing trends and characteristics within the City of Tustin:

- A higher percent of non-White households experienced housing problems than White households in Tustin.
- Non-White households that experienced the greatest proportion of housing problems include Hispanic (71.19 percent), Black (62.40 percent), and Native American (50.00 percent).
- The same trend occurred for the county population.
- A higher proportion of households are considered overcrowded in southern Tustin, which overlaps with census tracts that contain greater proportions of minority population and low-income households.
- According to the Orange County's 2020 Analysis of Impediments to Fair Housing Choice (AI), displacement of residents due to economic pressures may be a significant contributing factor to fair housing issues in Orange County and, in particular, in parts of Orange County that have historically had concentrations of low-income Hispanic and Vietnamese residents.

Additional data and analysis of housing issues can be found in Appendix D.

HOUSING CONSTRAINTS

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

High cost of renting or buying adequate housing is a primary ongoing constraint. High construction costs, rising land costs, labor shortages, market financing constraints and neighborhood opposition make it expensive for developers to build housing.

Construction Costs

Construction costs can vary depending on the type of development with multi-unit housing typically less costly to construct than single-unit homes. Such costs are also dependent on materials used and building height, as well as regulations set by the City's adopted Building Code.

The International Code Council (ICC) compiles an indicator of construction costs at six (6) month intervals which is referred to as 'Building Valuation Data'. The ICC was established in 1994 with the goal of developing a single set of national model construction codes, known as the International Codes, or I-Codes. These estimates provide the average cost of labor and materials for typical Type VA wood frame housing construction and are based on "good quality" construction, providing for materials and fixtures well above the minimum required state and local building codes.

In February 2021, the ICC estimates that the average per square foot for good quality housing was approximately \$125.18 for multi-unit housing and \$138.79 for single-unit homes. A reduction in amenities and quality of building materials (above a minimum acceptability for health, safety, and adequate performance) could lower costs and associated rents and 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.

According to an Orange County Register article published on March 12, 2021, California contractors are continuing to be confronted with a higher cost for materials, problems with the supply chain and project delays or cancellations due to COVID-19 - one year after the worldwide pandemic began. As a result, the overall cost of the housing unit is affected and this cost is a considerable factor during this particular planning period.

Another key component of construction cost is labor. Depending on the availability of construction worker and their respective wages can also affect the overall cost of the housing. The State of California does not have sufficient numbers of construction workers to meet Governor Newsom's stated housing goals. According to a study for Smart Cities Prevail, the State of California has a shortage of over 200,000 construction workers. The study concludes that California has lost about 200,000 construction workers since 2006 as a result of the economic recession and/or workers finding work in other industries. This, in turn, has impacted housing costs.

Overall, although construction costs are a significant portion of the overall development costs, they are consistent throughout the region and, especially in light of land costs, are not considered a major constraint to housing production in Tustin.

Land

Raw land and improvement costs comprise approximately 40-50 percent of the total development costs of a residential unit. Prices for land in Tustin have risen significantly in recent years. As referenced previously, basic construction costs including labor and materials for residential projects have increased rapidly, and together with land costs, have increased the cost of housing making homeownership unattainable for many households. These costs are fairly consistent throughout the region as the main components of labor and materials do not fluctuate much be area. Preparation of a site can be a substantial cost, but the variations and factors are more a function of the site, than of the jurisdiction.

Financing

The availability of financing affects a person's ability to purchase or improve a home. Interest rates can have an impact on housing costs. Some mortgage financing is variable rate, which offers an initial lower 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.

Even if Tustin homebuyers are able to provide a 3 percent down-payment and obtain a 3.2 percent 30-year loan (average loan rate for FHA or VA guaranteed loans for May 2021), 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 3.6 percent 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 II-22 and II-23).

TABLE II- 22
NEW AND RESALE PRICE OF HOMES AND CONDOMINIUMS
TUSTIN AND NEIGHBORING JURISDICTIONS 2020

City	Zip Code	Median Home Price- Q2 2020 ¹	Median Home Price- Q2 2019 ¹	% Change from 2019
Tustin	92780	\$702,000	\$648,500	+8.2%
Tustin	92782	\$779,000	\$805,000	-3.2%
Anaheim	92801	\$495,000	\$525,000	-5.7%
	92802	\$520,000	\$557,500	-6.7%
	92804	\$565,500	\$573,000	-1.3%
	92805	\$582,500	\$550,000	+5.9%
	92806	\$631,000	\$635,000	-0.6%
	92807	\$721,500	\$703,000	+2.6%
Garden Grove	92808	\$703,000	\$688,000	+2.2%
	92840	\$682,000	\$552,500	+23.4%
	92841	\$715,000	\$615,000	+16.3%
	92843	\$431,000	\$560,000	-22.9%
	92844	\$425,000	\$485,000	-12.4%
Irvine	92845	\$749,000	\$659,000	+13.7%
	92602	\$1,300,000	\$1,243,500	+4.5%
	92603	\$970,000	\$1,087,500	-10.8%
	92604	\$811,500	\$750,000	+8.2%
	92606	\$815,000	\$799,500	+1.9%
	92612	\$686,500	\$663,500	+3.5%
	92614	\$820,500	\$730,000	+12.4%
	92618	\$920,000	\$966,750	-4.8%
92620	\$954,500	\$1,030,000	-7.3%	
Orange	92865	\$755,000	\$640,000	+18.0%
	92866	\$735,000	\$738,500	-0.5%
	92867	\$737,500	\$737,000	+0.1%
	92868	\$550,000	\$472,500	+16.4%
Santa Ana	92869	\$655,250	\$670,000	-2.2%
	92701	\$300,000	\$380,000	-21.1%
	92703	\$575,000	\$493,000	+16.6%
	92704	\$550,000	\$510,000	+7.8%
	92705	\$1,060,000 ²	\$930,000 ²	+17.2%
	92706	\$730,000	\$650,000	+12.3%
	92707	\$497,500	\$500,000	-0.5%

**TABLE II- 22
NEW AND RESALE PRICE OF HOMES AND CONDOMINIUMS
TUSTIN AND NEIGHBORING JURISDICTIONS 2020**

City	Zip Code	Median Home Price- Q2 2020 ¹	Median Home Price- Q2 2019 ¹	% Change from 2019
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¹ Data include all home sales, new and resale, and condominiums.

² Includes Lemon/Cowan Heights (outside Tustin)

Source: Orange County Register, August 12, 2020, August 21, 2019, August 18, 2019, August 15, 2019, August 14, 2019

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.

**TABLE II- 23
AVERAGE RENTAL RATES 2021 - 1ST QUARTER
CITY OF TUSTIN**

Number of Bedrooms	Number of Units	Average Square Footage	Average Rent
Studio	834	425 SF	\$1,678
1 bedroom	3,727	516 SF	\$1,888
2 bedrooms	6,325	720 SF	\$2,331
3 bedrooms	2,044	1,087 SF	\$3,227
4 bedrooms	576	N/A	\$3,716
5 or more bedroom	94	N/A	\$N/A
Total	13,600	687 SF	\$2,568

Source: OCACS 2018 Housing Characteristics for Cities Places (2020), HUD FY 2021 Fair Market Rent (2021), Rent Café (2021)

*2021 Fair Market Rent indicates 92780 zip code.

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.

Governmental Constraints

In addition to market factors, housing affordability is also affected by factors in the public sector. Local policies and land use regulations can impact the price and availability of housing, and the provision of affordable housing.

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.

Residential Land Use Designations

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 II-24).

Residential projects, regardless of the number of units or density (even if density proposed is below anticipated level of density or development standard for that zone), can submit a preliminary review application for City Staff review and obtain City comments prior to submitting a formal application for review. This review process takes 30-days, requires a deposit and is facilitated by the Planning Division with written comments provided from the Building, Planning and Public Works Divisions or any other applicable divisions or agencies to the developer or applicant. This process facilitates a more streamlined review of a project prior to submitting for a formal review and provides certain project assurances to the developer or applicant. Other processes were presented as Programs in the Housing Element to support in streamlining development applications, including Program 1.10, Development and Permit Streamlining, and Program 1.5, Zoning Code Streamlining Program. When a formal application is submitted for a new construction project in the R-2 or R-3 zones formal Design Review is required and approval by the Planning Commission. Approximate application processing time can range from 3 months, for smaller projects, to 9 months, for larger projects depending on if there is a subdivision included with the application and the level of environmental review.

Parking requirements could be a potential constraint for single-family and multi-family residential development. Required parking for multi-family projects is two

covered spaces, in either a garage or carport, for each dwelling unit, plus one unassigned guest space for every four units. For Tustin, this is not considered overly excessive given the older age of many of the existing multiple family residential units and the fact that many units or complexes have non-conforming parking. Parking requirements for single-family residential includes two-car garage per dwelling, or three-car garage per dwelling with five or more bedrooms. Parking is a significant area of concern within several areas of the City, especially in the higher-density residential areas.

At the time of this update, the City is currently reviewing the City's permit parking requirements and overall process. A new program has been included in this Housing Element, Program 1.2, that commits to adopting new objective design standards that facilitate high-quality residential development; while ensuring the provision of adequate parking. Additionally, Program 1.13 commits to promoting adaptive reuse of historic resources for affordable housing and evaluate the use of alternate parking strategies. As existing multi-family parcels are recycled to conform to current parking requirements, the parking provided is more reflective of the actual occupancy and potential demand within the unit. A decrease in the number of required residential off-street parking spaces is allowed and limited to a maximum reduction of one (1) parking space through approval of a Minor Adjustment. Minor Adjustments are reviewed administratively by the Zoning Administrator and can take approximately 1 to 3 months to process the application.

Within the Multi-Family Residential District (R-3), a 35-foot height limitation and 65 percent coverage preclude the development of housing projects with building height above the 35-foot height limitation. While these height limits may place some restrictions on housing development, these limits are designed to maintain compatibility of land use intensity. They ensure proper and effective transportation within the community and are commonly used by local governments as a development tool. 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 for such development projects have been granted.

**TABLE II-24
SUMMARY OF RESIDENTIAL ZONING REGULATIONS
CITY OF TUSTIN**

Zoning	Minimum Lot Area	Density Max. du/ac	Lot Coverage	Building Height	Front Yard	Interior Side Yard	Corner Side Yard	Rear Yard	Parking
R-A Residential Agricultural District	7,200 square feet	7	40 percent	30 feet	20 feet	5 feet	10 feet	5 feet, but no less than 1,000 feet clear and unobstructed on open space.	2 car garage per dwelling, 3 car garage per dwelling with five or more bedrooms
E-4 Residential Estate District	10,000 square feet	7	40 percent	30 feet	20 feet	10% of lot width	10% of lot width	20 percent lot depth	2 car garage per dwelling, 3 car garage per dwelling with five or more bedrooms
R-1 Single-Family Residential District	7,200 square feet	7	40 percent	30 feet	20 feet	5 feet	10 feet	5 feet, but no less than 1,000 feet clear and unobstructed on rear 1/3 of lot.	2 car garage per dwelling, 3 car garage per dwelling with five or more bedrooms

**TABLE II-24
SUMMARY OF RESIDENTIAL ZONING REGULATIONS
CITY OF TUSTIN**

Zoning	Minimum Lot Area	Density Max. du/ac	Lot Coverage	Building Height	Front Yard	Interior Side Yard	Corner Side Yard	Rear Yard	Parking
R-2 Duplex Residential District	3,500 square feet	15	40 percent	30 feet	20 feet	5 feet	10 feet	-	2 car garage per dwelling; one of which shall be garage space
R-2 Duplex Residential District (single structure)	3,500 square feet	15	50 percent	35 feet	20 feet	5 feet	10 feet	10 feet	2 car garage per dwelling; one of which shall be garage space
R-3 Multiple Family Residential District	1,750 square feet	25	65 percent	35 feet	15 feet	5 feet	10 feet	10 feet	2 assigned covered spaces per unit, plus one unassigned open space per 4 units
R-4 Suburban Residential District	7,200 square feet	25		2 stories or 35 feet	20 feet	5 feet	10 feet	25 feet	2 assigned covered spaces per unit, plus one unassigned open space per 4 units

**TABLE II-24
SUMMARY OF RESIDENTIAL ZONING REGULATIONS
CITY OF TUSTIN**

Zoning	Minimum Lot Area	Density Max. du/ac	Lot Coverage	Building Height	Front Yard	Interior Side Yard	Corner Side Yard	Rear Yard	Parking
MPH Mobile Home Park District	Minimum 5-acre site for mobile home park. Travel trailer shall not exceed 10% of total spaces in mobile home park.	10	75 percent	30 feet	Trailer park-none. Individual lot-5 feet (measure from curb to actual structure, hitch excluded).				2 spaces per mobile home lot, plus 1 guest space for each 10 mobile home lots.
P-D Planned Development District	10,000	Range Incl. 4.485 (low) 11.834 (med) 17.39 (high)		To be determined with adoption of P-D District	To be determined with adoption of P-D District	To be determined with adoption of P-D District	To be determined with adoption of P-D District	To be determined with adoption of P-D District	2 assigned covered spaces per unit, plus one unassigned open space per 4 units

Source: City of Tustin, Zoning Code, 2021

The Land Use Element indicates that residential development that supports commercial uses may also be permitted in the City's Old Town commercial area and along a portion of Red Hill Avenue just north and south of the Interstate-5 freeway. 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 the respective specific plans for each area. New multi-family residential development continues to be an important supporting use for the City's mixed-use commercial/retail development areas.

RHASP and DCCSP Specific Plans

In 2018, the City of Tustin has adopted two specific plans, which offer a range and mix of uses and housing types. The City anticipates that while much of the residential growth will continue to be focused within the Tustin Legacy Specific Plan as the City owns and controls this land, the following two specific plan areas will also accommodate additional residential units.:

- Downtown Commercial Core Specific Plan (DCCSP) (adopted July 3, 2018)
- Red Hill Avenue Specific Plan (RHASP) (adopted November 6, 2018)

The Downtown Commercial Core Specific Plan (DCCSP) introduced mixed-use and infused the potential for 887 units into the area through a Residential Allocation Reservation (RAR) review process. To date, 140 new non-mixed-use units were constructed. While this development entailed all market rate units, the developer participated in the in-lieu fee option regarding affordable housing provisions.

The Red Hill Avenue Specific Plan (RHASP) introduced mixed-use to the area and similarly identified the potential for 500 new units in conjunction with the RAR review process. A total of 137 units have been entitled at this site and building and grading plans are nearing the conclusion of the plan check review and would shortly thereafter be permitted for construction.

Residential Allocation Reservation Process

Prior to adoption of the DCCSP and RHASP, the project areas were zoned for commercial use. Both Specific Plans retain commercial focus; however, they also introduce residential uses to serve as an economic engine to invigorate the businesses within the areas. The two Specific Plans do not entitle residential uses by right and there are no "growth caps" built into the DCCSP and RHASP. Rather, the Specific Plans establish a process called Residential Allocation Reservation (RAR) as a prerequisite for allocating residential units that have been analyzed within Program EIR for the respective Specific Plan. The intent of this approach is to allow for a streamlined process for developers to benefit by tiering of the already certified

environmental studies. Additional units can be added in the future with the appropriate environmental review (i.e. supplemental or addendum to EIR).

RAR Review Process Overview

The Specific Plan provides a two-step residential allocation reservation (“RAR”) application process: (1) a preliminary allocation (“Preliminary RAR”) application, and (2) a final allocation (“Final RAR”) application. At the Preliminary RAR stage, the Community Development Director (“Director”) reviews and considers whether a proposed project substantially complies with the applicable portions of the Specific Plan. If it does, the Director “shall make the Required Findings (approve the first phase of the Preliminary RAR process, which shall provide a preliminary allocation of residential units for the project.” If it does not, the Director must inform the applicant in writing of the standards with which the project does not substantially comply within thirty days of receiving the application (Gov. Code, § 65943, subd. (a).) To approve the Preliminary RAR, the Director must find the project substantially conforms to applicable Specific Plan provisions.

Preliminary RAR Review Considerations

The Community Development Director may approve the submitted plans if he/she finds that the location, size, architectural features, and general appearance of the proposed development will not impair the orderly and harmonious development of the area, the present or future development therein, the occupancy thereof, or the community as a whole. In making these findings, the Community Development Director shall consider the following for all new development projects within the DCCSP and RHASP:

- 1) The development is consistent with the overall vision, goals, and intent of the RHASP.
- 2) The development is consistent with the policies and intent of the Development Plan, including the Urban Design plan.
- 3) The project, including the proposed uses and requested entitlements, comply with the Permitted Land Use and Activities Table and complements and contributes to the project area.
- 4) The development substantially complies with or obtained approval of a modification to conformance with the Commercial and/or Mixed-Use Development Standards.
- 5) The development substantially complies with or has obtained approval of a modification to conformance with the Commercial and/or Mixed-Use Design Criteria.

- 6) Compliance or modification thereto with applicable Development Standards and Design Criteria is demonstrated and ensured through Design Review of the project site plan, building elevations, floor plan, parking plan, landscaping plan, lighting plan, access plans, refuse plans, and any other applicable plan(s) or document(s).
- 7) Required parking for the project is provided entirely on-site, or by an alternative means, which is approved concurrently or made a condition of approval. Approval of a parking alternative will have a beneficial impact and does not adversely affect development or the surrounding area.
- 8) The development demonstrates high-quality architectural design and site planning and reflects the nature of the site and the surrounding area through the following:
 - a) Incorporating roof forms and facades that provide building articulation, create visual interest, and reduce the appearance of uniform building massing.
 - b) Creating a design that is both cohesive and varying with respect to architectural style, architectural details, windows, doors, colors, and materials.
 - c) Facilitating pedestrian orientation through building placement, building scale, and architectural design.
 - d) Ensuring associated elements including parking, service areas, landscaping, lighting and pedestrian access, and amenities are functional and serve to enhance the overall appearance and experience of the project.
 - e) Siting and designing structures that relate to and respect adjacent development and sensitive land uses.
- 9) The development is supported by existing infrastructure or will be supported by infrastructure improvements paid for by the developer.
- 10) The developer consents to enter into a mutually agreeable Development Agreement if the City requests one.
- 11) The project impacts are assessed through the approved RHASP Program EIR or through subsequent environmental documentation in compliance with the CEQA guidelines.

Preliminary RAR Findings for Approval

Findings required for approval of the RAR include the following:

- 1) The project is substantially consistent with the uses, design criteria, and development regulations of the RHASP.

- 2) The project implements the vision of the Specific Plan related to excellence in architectural design, provision of substantial usable common open space, provision of public art (which may consist of murals, sculpture, decorative fountains or other art deemed acceptable) connectivity to adjacent parks and/or schools if appropriate, and pedestrian connections.
- 3) The number of units requested is within the thresholds established by the Specific Plan's Program EIR.
- 4) The overall project meets the findings for Design Review per Tustin City Code 9272 as follows:
 - a) To provide for the review of building design, site planning, and site development in order to protect the increasing value, standards, and importance of land and development in the City due to the urbanization of Orange County.
 - b) To retain and strengthen the unity and order of the visual community.
 - c) To ensure that new uses and structures enhance their sites and are harmonious with the highest standards of improvements in the surrounding area and total community.

RAR Process- Potential Constraints

During the draft Housing Element review, HCD staff identified the need to evaluate the RAR process as a potential governmental constraint to housing development as the process creates "uncertainty" and generally is a discretionary review process that requires review by the Community Development Director. In addition, the City was advised to consider and propose a Program(s) to address such a potential for a housing development constraint.

The RAR process and structure was created with public input during the Specific Plan preparation process, prior to its adoption. Upon considerations of HCD's input the City understands the perception that the RAR process could be perceived as a barrier to development due to the discretionary review process and decisions making authority that lies with the Community Development Director.

The City has revised Program 1.4(a) to incorporate the following:

- Conduct an analysis of the Residential Allocation Reservation (RAR) process applicable in the following Specific Plan areas: DCCSP and RHASP and identify any potential barriers to housing developments.
- Amend DCCSP and RHASP Specific Plans review procedures and/or applicable Specific Plan sections to eliminate governmental constraints that may pose a barrier to housing development, with an emphasis on eliminating redundant processes, ambiguities and discretionary action(s).

- Amend DCCSP and RHASP to provide for additional housing units aligned with economic objectives and infrastructure capacities by re-evaluating the housing units allocated to each geographic area in each Specific Plan.
- Conduct environmental analysis, as needed, to accommodate additional housing units in each Specific Plan area, aligned with economic objectives and infrastructure capacities.

In addition, the City is currently engaging with a consultant to provide recommendations for amendments and policy changes to both specific plans based on market factors and with the goal of incentivizing housing development, and the report will be completed by December 2022. Any recommended policy changes will be incorporated into the Specific Plans.

Furthermore, City's Design Review process is in place for Tustin to ensure that incremental development complements the City's historic character and to ensure that new development enhances the quality of life for the community. However, the process may pose a constraint to development by requiring compliance with subjective design guidance which potentially adds additional review times which results in additional project costs. As part of Program 1.2, the City will amend the Tustin City Code 9272 (Design Review) to remove subjective design guidance will and adopt objective design standards to facilitate high-quality, streamlined residential development. These new objective design standards would serve to further increase certainty and reduce inefficiencies related to project's design review and approval.

East Tustin Specific Plan

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.

Tustin Legacy Specific Plan (formally MCAS Tustin)

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

Within Neighborhood D of the Tustin Legacy 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.

Within Neighborhood G of the Specific Plan, there is a completed 225-unit affordable housing community with a 375-unit single-family neighborhood. This area is intended to include a range of housing types for single-family and multi-family residential (i.e., detached homes, carriage way units, courtyard housing, townhomes and flats. Similar to Neighborhood D, this area allows for up to six (6) stories in building height for multi-family, commercial and non-residential and up to three (3) stories in height for single-family units, thereby providing opportunities for the development of higher density residential products.

Tustin Legacy has been undergoing development since the early 2000's. Ultimate buildout is expected by 2035 is market demands will influence the timing of development at Tustin Legacy.

Where adequate infrastructure is in place and supports new development, this Phasing Plan would enable earlier response to positive market conditions and result in more rapid buildout of the Specific Plan area. Where a proposed development project is not supported by existing infrastructure, conditions of approval shall be established to ensure that appropriate infrastructure is constructed in accordance with this Phasing Plan and mitigation adopted in the supporting environmental documentation. Appendix B includes discussion of available housing opportunity within the Tustin Legacy Specific Plan area.

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 Tustin Legacy 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 II-21 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 contrast 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.

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.

Overlay Zones and Other Districts

Planned Development (PC) Zone

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 PC Zone also provides incentives such as no height limits when certain criteria 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.

Cultural Resource District

The Cultural Resource District is an overlay district that applies to those properties, structures and sites that are designated within the City. Currently there are 397 total residential structures (365 single-family and 32 multi-family), 73 commercial structures, 13 mixed use and 12 institutional structures designated as historic within the City. All of the residentially-zoned sites within this District can accommodate ADUs.

Density Bonus and Workforce Housing Ordinance

Government Code Section 65915 requires a jurisdiction to provide density bonus or other incentives or concessions for the production of lower income housing units or for the donation of land within the development if the developer agrees to construct a specified percentage of units for very low, low, and/or moderate-income households. Density bonus is a California state requirement and as a result, is not subject to discretionary review of local agencies or jurisdictions.

Current state law requires that jurisdictions must provide density bonuses and development incentives to all developers who propose to construct affordable housing on a sliding scale, whereby the amount of density bonus and number of incentives vary according to the number of affordable housing units to be provided.

AB2345 passed in September 2020, amended the Density Bonus Law to increase the maximum density bonus from 35 percent to 50 percent. For a developer to obtain the maximum density, a project must set aside a higher percentage of total units at a certain income level. Similarly, levels of density bonus between 35 and 50 percent are granted on the sliding scale.

The State's Density Bonus Law encourages development of housing for lower income households within the Red Hill Avenue and Downtown Commercial Core Specific Plan areas. The City's density bonus program will be updated in compliance with current State law. The City also enacts an inclusionary housing ordinance under Chapter 9B of the City's Municipal Code, Voluntary Workforce Housing Incentive Program. The ordinance is specifically applicable to the RHASP and DCCSP areas. Unlike the other cities within Orange County, Tustin's Inclusionary Housing Ordinance is voluntary. This means it only becomes applicable when a developer makes the voluntary election to request the discretionary and valuable benefit of adding residential units. If the subject area already provides residential zoning, unlike other cities' ordinances, Tustin does not require inclusionary housing.

The City's ordinance is similar to a housing residential overlay zone, whereby the underlying zone is unchanged and in the case of Tustin, the underlying zone maintains the commercial development rights. In the case of Tustin, the "overlay zone" allows residential development subject to meeting the Ordinance's criteria summarized in the table above, where the development of residential units requires compliance with the providing of affordable units and in some case, the payment of an in-lieu fee. The table below provide a summary of the percent of units required to be affordable and the various options available to satisfy the requirements. This table describes the applicability of the four options available to satisfy the ordinance requirement, for an example 137 unit residential project.

The in-lieu fee only applies to two of the four options shown in the table below. As the table shows, the requirement may be satisfied with the provision of affordable units, or a combination of the provision of units and the payment of an in-lieu fee.

The in-lieu fee only applies to half the base units. For example, a project with 137 units, which included Density Bonus units. The base units was 114 units. The Developer will pay to City an in-lieu fee totaling \$786,657, which is calculated by multiplying the \$13,801 voluntary housing incentive program in-lieu fee by 57 (one-half (1/2) the 114 base units provided on-site).

Other cities calculate the fee per unit for all units. If Tustin is to calculate per unit basis, the in-lieu fee of \$786,657 divided by 137 units and would equate to as little as \$5,742 per unit, which is well below other cities in Orange County. If this is translated to per square foot cost, with an average size of unit being 1,300 square feet, Tustin's

in-lieu fee would be \$4.41 per square foot, which is much lower than other cities in Orange County.

**TABLE II-25
INCLUSIONARY HOUSING OPTIONS FOR RESIDENTIAL PROJECTS WITH
FEWER THAN 20 UNITS**

Options for Projects with 20 or more residential units 114 "Base Units" plus 23 Density Bonus Units = 137 Total Units			Example for Calculations:			Average In-lieu fee for project	Per unit Cost
			Calculation	Requirement for On-Site Affordable Units	In-lieu Fee		
<i>All new residential projects shall include affordable units. Calculations on the number of units is based on the number of "base units" proposed for the project.</i>							
On-site	B9923 Option (a)(1)	15% of the "base units" SHALL BE AFFORDABLE	=114 * 15%	17	Not Applicable		
		6% of 15% shall be affordable to very low income households	=114 * 6%	7			
		4.5% of 15% shall be affordable to low-income households	=114 * 4.5%	5			
		4.5% of 15% shall be affordable to moderate-income households	=114 * 4.5%	5			
OR							
On-site	B9923 Option (a)(2)	12.5% of the "base units" SHALL BE AFFORDABLE	=114 * 12.5%	14	Not Applicable		
		7.5% of 12.5% shall be affordable to very low income households	=114 * 7.5%	9			
		5% of 12.5% shall be affordable to moderate-income households	=114 * 5%	6			
OR							
On or Off-site	B9923 *Option (a)(3)(a)	5% of the "base units" SHALL BE AFFORDABLE to very low income households plus payment of an in-lieu fee (see below)	=114 * 5%	6	\$ 786,657	= \$786,657 / 137	\$ 5,742
OR							
On or Off-site	B9923 *Option (a)(3)(b)	10% of the "base units" SHALL BE AFFORDABLE to low income households plus payment of an in-lieu fee (see below)	=114 * 10%	11	\$ 786,657	= \$786,657 / 137	\$ 5,742
	B9923(b)(1)	*Options (a)(3)(a) and (a)(3)(b) require payment of an in-lieu fee calculated by: = \$13,801 x Half the number of base units		= \$13,801 x 57	\$ 786,657		
<small>Notes: Per TCC B9924, in computing the total number of voluntary workforce housing incentive program units required in a residential project, fractions shall be rounded up to the next whole number.</small>							

For comparison, in La Habra, per a city staff report, a 30-unit project would be required to provide \$1,00,000 in-lieu fee which is based on the city's calculation for building five affordable units with an assumed valuation of \$200,000 per unit. In Huntington Beach, the cost per unit escalates with the cost for a project with 9 units being \$16,500 per unit. In Santa Ana the cost is \$15 per square foot and San Clemente is \$7.63 per square foot.

Tustin's program has proved successful in implementation with the approval of a 137 units project in 2021 and another 42 unit project is currently under review by the City which will also include the provision of on-site affordable units to very low income households and the payment of an in-lieu fee totaling \$262,219.

The table below describes the applicability of the four options available to satisfy the ordinance requirement, for a project with fewer than 20 units.

TABLE II-26

FEE OPTIONS FOR RESIDENTIAL PROJECTS WITH FEWER THAN 20 UNITS

Options for Residential Projects with fewer than 20 units:		
on-site	B9925(a)	The primary means of complying shall be the provision of on-site units. However, a developer may only satisfy the requirements by means of an alternative to on-site voluntary workforce housing incentive program units in accordance with the requirements and procedures of this Section B9923.
off-site	B9925(b)	Requirement may be satisfied, in whole or in part, by the construction of new units, or the conversion of existing market rate units to voluntary workforce housing incentive program units, offsite within the City's jurisdictional boundary.
in-lieu payment	B9925 (c)	Requirement may be satisfied in whole or in part, by payment to the City's established in-lieu fee. = \$12,651 x 19 \$ 240,369
land dedication	B9925(d)	Requirement may be satisfied, in whole or in part, by an alternative option acceptable to the City, which may include without limitation the dedication of land for affordable housing.

It should be noted, that the in-lieu fee for projects under 20 units is reduced as the project size becomes smaller.

TABLE II-27

FEE PER UNIT FOR RESIDENTIAL PROJECTS WITH FEWER THAN 20 UNITS

2022 Tustin In-Lieu Fee Per Unit For project with fewer than 20 units	
In-lieu per unit reduced for smaller projects	
1-4 units	\$9,200
5-9 units	\$10,350
10-14 units	\$11,501
15-19 units	\$12,651

This ensures that smaller projects are not cost burdened. In smaller projects, on-site units are not required to be constructed. A typical cost for constructing a 1,000 square foot unit on-site is approximately \$200,000. As an example, for a 19-unit project, a total of 3 affordable units would have been required at \$600,000 or more, if subjected to 15% affordable units on site. Instead, project developer could opt to pay in lieu fee of \$12,651 per unit. This is considerably lower than adjacent cities such as Irvine at \$17,000 per unit, Huntington Beach at \$16,500, Santa Ana at \$15,000 per unit and La Habra at \$200,000 per unit.

A memorandum titled, *Inclusionary Housing Ordinance Information and Comparison*, dated August 17, 2021 was prepared by the City's Community Development Department for City Council. The memo was prepared in consistency with the City's

desire to remain informed in order to create affordable and workforce housing options. The analysis prepared identified that 140 market rate units have been built and the City has collected over \$1,979,600 in In-Lieu fees in the Downtown Commercial Core Plan. The Fund is to be expended exclusively to provide housing to extremely low, very low, low, and moderate-income households in the City of Tustin, along with administration and compliance monitoring of the voluntary workforce housing incentive program which includes the following:

- Assistance with affordable housing projects with “gap” financing
- Assistance with extension of affordable deed restrictions on applicable units

At that time, the City was also reviewing a pending development application (13751 and 13841 Red Hill Avenue) which was approved and resulted in six new very low-income units and add approximately \$730,000 to the fund.

Staff reviewed a sampling of fifteen (15) other Orange County cities, and of those, nine (9) do not have an inclusionary housing ordinance, and six (6) cities have a mandatory affordable housing requirement, which allows the payment of in-lieu fees under certain circumstances. Based on the research conducted, the City’s fees and program are comparable or lower to other Cities’ ordinances in Orange County.

Below is a summary of the six cities with inclusionary housing ordinances.

**TABLE II-28
INCLUSIONARY HOUSING FEE COMPARISON**

City	Inclusionary Housing Ordinance	Applicability Threshold	Affordable Units Requirements	In-Lieu Fee Allowed?	In-Lieu Fee	Resources Link
La Habra	Mandatory	Projects with 10 or more units	15% of total units	Yes	TBD; Payment of per unit cost not provided on-site (based on the valuation of per unit) Example: Assumed valuation per unit is \$200,000 30 units proposed 15% required to be affordable (5 units) \$200,000 x 5 = \$1 million	http://www.lahabracity.com/DocumentCenter/View/11435/Ord-1833?bidId=
Huntington Beach	Mandatory	Projects with 3 or more units	10% of total units (Rental or For-Sale)	Yes for Projects with 9 or fewer units Fee is based on sliding scale	<ul style="list-style-type: none"> • Three Units \$9,430/unit • Four Units \$10,600/unit • Five Units \$11,780/unit • Six Units \$12,960/unit • Seven Units \$14,140/unit • Eight Units \$15,330/unit • Nine Units \$16,500/unit 	https://huntingtonbeach.legistar.com/View.ashx?M=F&ID=7228132&GUID=F3A37144-5D68-4CD1-AE1C-8F0329D08361 https://www.aqcode.us/codes/huntingtonbeach/view.php?topic=zoning_code-23-230-1-230_26&frames=on
Irvine	Mandatory	Project with 50 or more units	15% of total units	Yes for project with 50 or less units	\$17,000 per unit prior to 2007, TBD based on formula.	CHAPTER 2-3 – AFFORDABLE HOUSING IMPLEMENTATION PROCEDURE Zoning Irvine, CA Municode Library
Santa Ana	Mandatory *potential changes in progress	Project with 5 lots/units or more	For Sale: 10% of total units for moderate income For Rent: 15% of total units for low-income OR 10% Very low-income	Yes	<ul style="list-style-type: none"> • Projects with 5 to 20 units: \$5 per SF of habitable space • Projects with 20+ units: \$5 per SF of habitable space • Effective October 1, 2021 cost shall be reverted to \$15 per SF of habitable space 	
La Habra	Mandatory	Projects with 10 or more units	15% of total units	Yes	TBD; Payment of per unit cost not provided on-site (based on the valuation of per unit) Example: Assumed valuation per unit is \$200,000 30 units proposed 15% required to be affordable (5 units) \$200,000 x 5 = \$1 million	http://www.lahabracity.com/DocumentCenter/View/11435/Ord-1833?bidId=
Huntington Beach	Mandatory	Projects with 3 or more units	10% of total units (Rental or For-Sale)	Yes for Projects with 9 or fewer units Fee is based on sliding scale	<ul style="list-style-type: none"> • Three Units \$9,430/unit • Four Units \$10,600/unit • Five Units \$11,780/unit • Six Units \$12,960/unit • Seven Units \$14,140/unit • Eight Units \$15,330/unit • Nine Units \$16,500/unit 	https://huntingtonbeach.legistar.com/View.ashx?M=F&ID=7228132&GUID=F3A37144-5D68-4CD1-AE1C-8F0329D08361 https://www.aqcode.us/codes/huntingtonbeach/view.php?topic=zoning_code-23-230-1-230_26&frames=on
Irvine	Mandatory	Project with 50 or more units	15% of total units	Yes for project with 50 or less units	\$17,000 per unit prior to 2007, TBD based on formula.	CHAPTER 2-3 – AFFORDABLE HOUSING IMPLEMENTATION PROCEDURE Zoning Irvine, CA Municode Library
Santa Ana	Mandatory *potential changes in progress	Project with 5 lots/units or more	For Sale: 10% of total units for moderate income For Rent: 15% of total units for low-income OR 10% Very low-income	Yes	<ul style="list-style-type: none"> • Projects with 5 to 20 units: \$5 per SF of habitable space • Projects with 20+ units: \$5 per SF of habitable space • Effective October 1, 2021 cost shall be reverted to \$15 per SF of habitable space 	

Based on the foregoing, the based upon the foregoing, the City’s current Ordinance is not considered as a constraint, due to the many options provided to satisfy the requirement. However, the City’s current ordinance will be evaluated as part of Program 1.4 “(New) Voluntary Workforce Housing” in conjunction with the reassessment on the effectiveness of the DCCSP and RHASP to determine if adjustments are desired. The City is currently engaging with a consultant to provide recommendations for amendments and policy changes based on market factors, and the report will be completed by December 2022. Any recommended policy changes will be incorporated into to Zoning Code within 12-months of the City receiving the completed report. The City has amended Program 1.4 to incorporate changes to respond to identified constraints resulting from the study."

Housing for Persons with Disabilities/Reasonable Accommodation

As discussed in previously and shown in Table II-14, the City of Tustin includes a population of approximately 5,238 persons with a disability, or 6.6 percent of the population. As the population ages, the proportion of persons with disabilities generally increases. The City's population of persons with disabilities is inclusive of all races, ethnicities, and sexes. The City's population of disabled persons is relatively comparable or smaller compared to the County's disabled population, as discussed in Appendix D. Nevertheless, the City continues to assess and remove potential barriers to the provision of reasonable accommodation of housing persons with disabilities and the construction of new group homes and residential care facilities in the city.

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. Facilities serving more than six (6) persons are conditionally permitted within Planned Development District (P-D), Multiple Family Residential District (R-3), Suburban Residential District (R4), and Retail Commercial District (C-1).

It is the policy of the City of Tustin to comply with the federal Fair Housing Amendments Act of 1988 and the California Fair Employment and Housing Act to provide individuals with disabilities reasonable accommodation in regulations and procedures to ensure equal access to housing and to facilitate the development of housing for individuals with disabilities. Tustin City Code Section 9278, Reasonable Accommodation, addresses this and establishes a process for individuals with disabilities to make requests for reasonable accommodation when reasonable accommodation is warranted based upon sufficient evidence.

The City of Tustin, as described in Tustin City Code (TCC) 9278, provides for the reasonable accommodation of regulations and procedures to ensure equal access to housing, and to facilitate the development of housing, for individuals with disabilities. A request for reasonable accommodation may be made by any individual with a disability, a parent or legal guardian of a minor with a disability, his or her other legally authorized representative, or a developer or provider of housing for individuals with disabilities, when the application of a land use, zoning or building regulation, policy, practice or procedure, or other requirement acts as a barrier to fair housing opportunities. The request may be made by filing a completed development application form with the Community Development Department and would need to include the following information:

- A description of the requested accommodation;
- A reference of the specific code for which accommodation is being requested;
- The basis for the claim that the applicant is considered disabled;
- Reason(s) that the requested accommodation is necessary for the individual with disability to use and enjoy the dwelling;
- Confirmation that the property is the primary residence of the disabled person;
- Plans and detailed information of any proposed physical improvements to the property; and
- Any other information necessary to evaluate the proposed request for reasonable accommodation.

Requests for reasonable accommodation are administrative in nature, and the Community Development Director has the authority to grant reasonable accommodation requests, without a public hearing. The decision to grant, grant with conditions, or deny a request for reasonable accommodation must be consistent with fair housing laws and required findings below:

- The housing, which is the subject of the request for reasonable accommodation, will be occupied as the primary residence by an individual with a disability
- The requested accommodation is necessary to make housing available to an individual with disabilities protected under the fair housing laws

- The requested accommodation would not impose an undue financial or administrative burden on the City; and
- The requested accommodation would not require a fundamental alteration in the nature of the City's land use and zoning codes and policies.

The application and review process is designed to be a streamlined review process that is based on the facts provided by the requestor. The ability to grant with conditions, ensures that the department has the flexibility to consider the unique nature of the applicant's request and grant the accommodation that best suits the needs of the requestor.

As per the application materials listed above and required finding, the intent is only to verify that the request of the applicant and to ensure that the beneficiary of the reasonable accommodation is being properly considered in accordance with fair housing laws and the city codes.

The city code has a few provisions that may act as constraints for those seeking reasonable accommodations, including the following:

- The property for which the reasonable accommodation is being requested must be in compliance with the codes and regulations existing at the time of application submittal.
- If additional entitlement(s) are requested in addition to the request for reasonable accommodation, then, the approval body for the entire application, including the request for reasonable accommodation, is the same body that acts on both.
- Other provisions, as applicable, are identified in Section 9278 of the TCC. The City's Community Development Department may inspect annually or more often.
- An approved reasonable accommodation is a personal accommodation for the disabled individual requesting such accommodation and does not run with the land.
- At such time that the reasonable accommodation is no longer necessary or the disabled individual no longer resides at the property, the property shall be restored to its previous condition unless the Community Development Director determines that it would be impractical or financially unfeasible to return the property to its previous condition.
- A deed restriction shall be recorded against the property to ensure compliance with conditions of approval, potential removal of the accommodation, and use restrictions.
- Presently, applicants for reasonable accommodation must provide a \$500 deposit which is billed hourly for staff time.
- Requires that an applicant for reasonable accommodation to provide confirmation that the property is the primary residence of the disabled person.

The City will complete a code amendment as identified in a new program (Program 2.4d) to ensure that the code does not require the property to be in compliance with existing codes, so that the reasonable accommodation can proceed without the needs for any additional investments, which may prevent someone from seeking a reasonable accommodation. In addition, the code will be amended to state that a Reasonable Accommodation shall not be required to be reviewed with other requested entitlements, and rather, that it can be acted upon independent of any other applications. The City will also remove the annual inspection as they may be a deterrent to anyone seeking a reasonable accommodation. The code will also be amended to state the any reasonable accommodation may be transferred to another person with the same or similar accommodation, upon the City receiving a request to transfer the accommodation, which would serve the property a desirable location for persons with disabilities. The code will also be amended to clearly state that the reasonable accommodation shall not conditionally require the return of the property to its original condition as they may be a deterrent for some seeking a reasonable accommodation. The code will be amended to remove the deed restriction recordation so that it does not serve as a constraint for those seeking an accommodation. And finally, the City will take a resolution to the City council to remove the current applicable fee and remove the requirement that the applicant provide confirmation that the property is the primary residence of the disabled person since a disabled person may spend time at other properties other than their primary residence.

Homeless Accommodation

Recent legislation (AB 101 and AB 139) require revisions to local zoning regulations regarding the provision of Low Barrier Navigation Centers (LBNC) and emergency shelters. Specifically, AB 139 requires the assessment of shelter needs be based on the most recent Point-in-Time Count and the parking standards for shelters be based on staffing levels. Homelessness within the City is also discussed in Appendix D.

Emergency Shelters, Transitional Housing, and Supportive Housing

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.

Orange County's 2019 Sheltered Point-In-Time Count was taken on the night of Tuesday, January 22, 2019. In Tustin, the 2019 Point-In-Time count identified 95 unsheltered homeless persons and 264 sheltered homeless persons, for a total of 359 homeless persons.

SB 2 defines the following: “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. “Transitional housing” is rental housing for stays of at least six (6) months where the units are re-circulated to another person after a set period. “Supportive Housing” has no limit on the length of stay, provides supportive services and is occupied by low-income persons with disabilities and certain other disabled persons.

SB 2 requires the City to identify the needs for Emergency Shelters in its Housing Element and to designate zoning districts adequate to accommodate the need. In those districts, emergency shelters must be allowed without a conditional use permit or other discretionary approvals. The City may apply certain written, objective development and management standards, such as number of beds and length of stay, if no zoning district exists that meets this standard. Alternatively, a community may require a conditional use permit for emergency shelters if they already have enough shelters to satisfy the need; or have entered into partnership agreement with up to two other communities to develop an emergency shelter that will meet their collective needs. Transitional and Supportive Housing must be treated as a residential use of property, subject to only to same restrictions that apply to other housing of the same type in that zone.

Homeless Accommodation - Implementation

With the closure of the Marine Corps Air Station (MCAS) Tustin, the City was provided with opportunities to address homeless accommodations. 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 Agency (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), now known as the Tustin Legacy Specific Plan (TLSP). In developing the Reuse Plan, one criterion 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 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 TLSP 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 TLSP was adopted 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 TLSP:

- Provides emergency shelter beds;
- Offers transitional housing and support 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 TLSP provided sites and designated land uses to accommodate the identified homeless needs. The following sites were set aside in implementing the homeless accommodation at TLSP:

- An approximate five (5) acre transitional/emergency shelter site was set aside for accommodation of the homeless at Tustin Legacy (formerly 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 262-bed emergency housing facility, without the need for a Conditional Use Permit. The project has been completed and Village of Hope is currently operating and will be expanded in the near future to include 125 additional beds.
- 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 children and their families and emancipated youth facility with 90 bed 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 TLSP. These units are dispersed throughout the TLSP 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 TLSP. In addition to the homeless accommodation on-site at TLSP, 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.

Emergency Shelters, Transitional Housing and Supportive Housing

Emergency Shelters is defined 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 TLSP (see Table II-28). Planning Area 3 is a five (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 originally consisted of 192 units and now has been expanded to 262 beds capacity is available for emergency housing needs.

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 a 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 3 of the TLSP. Transitional homes and supportive housing are also designated as permitted uses within Planning Areas 1 and 3 of the TLSP. 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 II-29 summarizes zoning regulations for homeless accommodation.

TABLE II-29
SUMMARY OF HOMELESS ACCOMMODATION ZONING REGULATIONS

Housing Type	Permitted/ Conditionally Permitted	Zoning
Emergency Shelters	Permitted	Planning Area 3 of Tustin Legacy Specific Plan
Transitional Home	Permitted	Planning Area 3 of Tustin Legacy Specific Plan; All residentially zoned properties
Supportive housing	Permitted	Planning Areas 1 and 3 of Tustin Legacy 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 ¹	Permitted	All residentially zoned properties

¹Includes congregate care facility, single room occupancy hotel, and children's intermediate care shelter
Source: City of Tustin

The following are emergency/transitional/supportive homes that are provided at Tustin Legacy Specific Plan area:

- A 262-bed emergency shelter 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.
- Sixteen (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.¹
- Six (6) units at Columbus Grove operated by Human Options.

¹ 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.

- Six (6) units at Columbus Grove operated by Orange Coast Interfaith Shelter.
- A 77-bed temporary emergency shelter operated by Temporary Shelter Inc.

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.

Shelters Capacity and Vacancy Rate

The Village of Hope, a 262-bed transitional housing facility operated by the Orange County Rescue Mission (OCRM) is expanding to include 125 additional beds. When completed, the facility will provide 387 beds. The facility and entitled new expansion are located at 1 Hope Drive in Tustin Legacy Neighborhood A. The Village of Hope is the City's largest shelter operation.

Table II-30 provides the vacancy rate reported by the Orange County Rescue Mission Village of Hope. Generally, the shelter has an average vacancy rate of 50% for homeless individuals consisting of 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 Orange County Rescue Mission Village of Hope also provides a food service program of approximately 550 meals daily to the Armory.

TABLE II-30
MONTHLY VACANCY RATE VILLAGE OF HOPE (2021)

Month	Average Monthly Bed Occupancy	Total Available Beds ¹	Remaining Beds	Vacancy Rate
January	129	258	129	50%
February	128	258	130	50%
March	128	258	130	50%
April	139	258	119	46%
May	146	258	112	43%
June	146	258	112	43%
July	138	258	120	47%
August	127	258	131	51%
September	119	258	139	54%
October	121	258	137	53%
November	141	258	117	45%
December	133	258	125	48%

¹ Based on 84 beds for single men, 66 beds for single women, 56 beds for families, 52 beds for women with children.

Source: Orange County Rescue Mission

On October 26, 2018, the City of Tustin entered into a Settlement Agreement in litigation entitled “Orange County Catholic Worker et al. vs. County of Orange, et al”. As part of the Settlement Agreement, Tustin agrees to provide a minimum of 50-bed, emergency homeless shelter facility that is ADA accessible and serves homeless men, women, and families from within Tustin only. The facility’s primary focus is assisting program participants with creating a housing plan, making connections to housing resources and finding transitional and permanent housing as soon as possible.

The Tustin Temporary Emergency Shelter (TTES) provides a total capacity of 77 beds. Generally, the shelter has an average vacancy rate of 47%. The shelter provides shelter for women, men, couples, and families. The shelter is located on a 1.5-acre site at TLSF and consists of individualized sleeping areas, integrated healthcare, 24/7 intake and orientation, and 24-hour access to Orange County Behavioral Health staff. The expectation of the TTES operations is to provide a transitional emergency facility with the goal of transitioning persons experiencing homelessness into permanent housing as quickly as possible, with the understanding that each guest is unique and may require additional services in the transition into appropriate permanent housing. Table II-31 provides monthly vacancy rate for TTES.

**TABLE II-31
MONTHLY VACANCY RATE TUSTIN TEMPORARY EMERGENCY SHELTER (2021)**

Month	Average Monthly Bed Occupancy	Total Available Beds*	Remaining Beds	Vacancy Rate
January	32	77	45	58%
February	35	77	42	55%
March	37	77	40	52%
April	38	77	39	51%
May	39	77	38	49%
June	41	77	36	47%
July	40	77	37	48%
August	42	77	35	45%
September	50	77	27	35%
October	45	77	32	42%
November	46	77	31	40%
December	46	77	31	40%

Source: City of Tustin, Economic Development Department

Orange County’s 2019 Sheltered Point-In-Time Count taken on the night of Tuesday, January 22, 2019 identified 95 unsheltered homeless persons and 264 sheltered homeless persons were counted, for a total of 359 homeless persons identified in Tustin. Based on average monthly vacancy rates above, the City has capacity to accommodate unsheltered homeless persons year-round. In addition to existing vacancy, Village of Hope will provide additional capacity with the future expansion of 125 additional beds.

In addition to the homeless accommodation, the City also encourages the provision of 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. In the past, through inclusionary Zoning standards in the TLSP, a total of 8,792 affordable units or 20.8 percent of total authorized units at TLSP 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 and any provisions of California Community Redevelopment Law. Recently, with the provision of Surplus Land Act, new residential development projects are required to set aside twenty-five (25) percent of the total units for affordable housing.
- Adult education and training opportunities will be provided by the South Orange County Community College District within the

educational village at the Advanced Technology Education Park (ATEP) campus. The first building is complete and is operated by Irvine Valley College focused on engineering and robotics. The second building is in design and will be operated by Saddleback College focused on culinary arts and automotive design.

- Rancho Santiago Community College District Sheriffs Training Academy includes a 52,000-square-foot facility on 15 acres provides Peace Officer Standards on Training (POST) certified instruction through its Law Enforcement Basic Academy, as well as advanced officer training. The new state-of-the-art facility also serves all Orange County law enforcement agencies and functions as a regional training center bringing together local and federal agencies to train and collaborate in law enforcement and homeland security matters. The new Orange County Sheriff’s Regional Training Academy can accommodate 800 students annually.

Table II-32, Emergency Shelter/Transitional Housing Facilities/Homeless Resources, provides a summary of support services provided by a variety of non-profit organizations within the city.

TABLE II-32 EMERGENCY SHELTER/TRANSITIONAL HOUSING FACILITIES/HOMELESS RESOURCES	
Facility	Services Provided
Village of Hope	Operates a food service program, dental services, and 262 bed emergency shelter at the Village of Hope, operated by the Orange County Rescue Mission.
Sheepfold	Provides shelter, food, clothing, job training, and job-referral services to women with children.
Laurel House	Temporary housing for teenagers in crisis. The facility also provides food, informal counseling, and access to medical care and clothing.
Tustin Family Campus	90 beds intermediate care shelter for abused children and their parents operated by the Orange County Social Services Agency.
St. Cecilia’s	Distributes food supply to needy populations.
Red Hill Lutheran	Operates emergency food program where a person can receive food supply.
Tustin Presbyterian	Collects food supplies and distributes the food to various organizations involved in providing homeless services.

**TABLE II-32
EMERGENCY SHELTER/TRANSITIONAL HOUSING FACILITIES/HOMELESS
RESOURCES**

Facility	Services Provided
Aldersgate	Refers interested persons to Ecumenical Services Alliance in Santa Ana.
Salvation Army	Six (6) transitional units at Tustin Field I operated by Salvation Army.
Salvation Army	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.
Families Forward	Fourteen (14) transitional units at Columbus Grove operated by Families Forward, formerly Irvine Temporary Housing in Irvine.
Families Forward – Rapid Re-Housing Program	Provides rapid-rehousing services including individualized support and accountability to homeless parents working to locate housing, improve financial stability, and create a sustainable future for their children.
Human Options	Six (6) transitional units at Columbus Grove operated by Human Options
Orange Coast Interfaith Shelter	Six (6) transitional units at Columbus Grove operated by Orange Coast Interfaith Shelter.
Tustin Family and Youth Center	Distributes food supplies to needy populations.
Goodwill of Orange County	Provides emergency funding grants to address immediate and critical needs of veterans and their families, focusing on veterans on the verge of homelessness.
Mercy House	Offers low-thresholds emergency shelter services with case management services.
Veterans outpost	Operated by the Rescue Mission, the Veterans Outpost offers transitional housing for up to 71 people, along with veteran-specific services.
<i>Tustin Temporary Emergency Shelter</i>	Operated by Temporary Shelter Inc., TTES provides 77 beds low-barrier emergency shelter, integrated healthcare, and 24-hour access of OC Behavioral Health staff

Source: City of Tustin

Group Homes

Large family day care homes with seven or more individuals are permitted uses in all residential districts. The operation of large family care home is subject to the submittal of an application and review by City staff. The applicant is also required to submit a list of property owners within a 100-foot radius of the exterior property boundary of the proposed day care home, which is used by the City for public notification. Public hearings are not held unless it is requested by the applicant or a property owner within a 100-foot radius. If no hearing is requested, the permit shall be granted if the large family day care home complies with the provisions of the Tustin City Code. A permit is not granted for a new large family day care home that would be established within 300-feet of the exterior boundaries of any existing licensed large family day care home.

Residential Care Facilities

In 1969, the Lanterman Developmental Disabilities Services Act (aka Lanterman Act) was adopted by the California state legislature which stipulates that small State-licensed residential care facilities for six or fewer persons must be treated as regular residential uses and permitted in all residential districts; the City of Tustin is compliant with the Lanterman Act.

State-licensed residential care facilities for more than six persons are similar to “rest homes, extended care facilities, convalescent hospitals and sanitariums” as defined in the Tustin City Code and are conditionally permitted in the R-3 and R-4 zones. The Land Use Element and Tustin Zoning Code provide for the development of multifamily housing in the R-2, R-3 and R-4 zones. Traditional multifamily housing for persons with special needs, such as apartments for seniors and the disabled, are considered regular residential uses permitted in these zones. The City’s land use policies and zoning provisions do not constrain the development of such housing.

State-licensed residential care facilities for more than six persons are also conditionally permitted within the City’s Tustin Legacy Specific Plan, Red Hill Avenue Specific Plan and Downtown Commercial Core Specific Plan areas. Potential conditions for approval for these uses may include hours of operation, security measures, loading requirements, and management. Conditions would be similar to those for other similar uses in the same zones and would not serve to unduly constrain the development of residential care facilities for more than six persons. Occupancy standards for residential care facilities are the same as occupancy standards for all other residential uses. The City has not adopted a spacing requirement for residential care facilities.

Fees

Like cities throughout California, the City collects development fees to recover some of the capital costs of providing community services and the administrative cost associated with processing applications. New housing typically requires payment of the following fees: school fees, park fees, sewer and water connection, power, phone, cable tv and building permits, not all collected by the City. Various fees and assessments are charged by the City and other outside agencies (e.g., school districts, sewer district, transportation corridor, water district, etc.) to cover costs of processing permits and providing services and facilities, such as utilities, schools and infrastructure. These fees are necessary to pay for services rendered during the processing of the project, but can, however; add to housing costs. In addition, subdivisions and multi-family projects may incur the cost of preparing environmental documentation, traffic studies, soils reports, and filing fees for tentative and final maps. These are requirements of California law. Such fees are typically based on the rates of city employees (including overhead) and the number of hours spent processing the application or performing the associated work.

The City's development fees, impact fee zones, and planning fees are provided in Table II-33a, II-33b, and Figure II-2. These fees are assessed based on the concept of cost recovery for services provided. Additionally, planning processing fees cover the cost of City resources in reviewing and assisting in processing of proposed ministerial and discretionary planning actions.

Development impact fees are required to provide essential services and infrastructure to serve new residents. As shown in Tables II-32a and II 32b include park, school, transportation fees. These fees are pass-through fees required by the respective agencies. Impact fees are governed by State law to demonstrate a nexus between development and potential impacts.

Planning and Permitting fees (Figure II-2) are charged on an at-cost basis to cover staff services and administrative expenses for processing development applications. Based on a recent fee survey completed in 2021, the City's fees are comparable or lower than fees charged by surrounding jurisdictions located in Orange County.

Applicable project fee costs are respective to overall development costs and anticipated costs of units. Generally, fees are less for developments that include fewer units and slightly greater for developments with many units, but fee cost per unit generally decreases as the number of units increase.

An example of project development fees is provided below for the 137-unit Red Hill Avenue mixed-use condominium project which included six (6) very-low income affordable residential units and 7,000 square feet of retail commercial space, which was entitled and approved in 2021. Total City fees for this project are just over

\$408,000 equating to \$2,981 per unit and representing a fraction of a percentage of the total project development costs.

City Fees (137 units mixed use project including six (6) affordable units)

Processing fees:	\$ 52,000
Plan Check fees:	\$ 162,742
Permit fees:	\$ 193,741
Total Project Fees:	\$ 408,483
Fees per Unit:	\$ 2,981

As another example, for a 149-unit housing development project (Levity at TLSP), the percentage of fees to total development cost would be small portion of the total project development costs.

City Fees (218 housing units; breakdown: 117 detached homes, 129 triplex homes, and 154 stacked flats and townhomes - *approximated fees)

Processing Fees*	\$ 20,500
Plan Check fees:	\$ 266,898
Permit Fees	\$ 865,497
Total Project fees:	\$ 1,152,986
Fees per Unit:	\$ 5,288

In summary, Tustin’s development fees represent a small proportion of the overall valuation of residential development. The fees are lower than Orange County jurisdictions and have not served as a constraint to development. In addition, AB 641 helps to address the cash flow problems inherent in many affordable housing projects during the construction phase. For affordable housing developments in which at least 49 percent of the units are affordable to low or very low income households, the City will now allow deferral of local developer fees until certificate of occupancy.

Excessive fees do contribute to the total cost of development and impact the final purchase or rental price, which could be considered a constraint to development, specifically affordable housing. However, the City has committed to 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 (Program 1.18). Additionally, the City’s Voluntary Workforce Housing Program collects in-lieu housing fees from developments subject to the City’s affordable housing provisions. Monies in the program are expended exclusively to provide housing affordable to extremely low, very low, low, and moderate-income households. The City commits to partnering with affordable

housing developers and nonprofit groups to facilitate development of affordable housing in the city (Programs 1.1 and 3.4). Therefore, with programs in place, the City does not identify fees as a constraint to development.

Improvements

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. In its review of projects, staff works with the applicant to identify cost-effective site planning which minimize site improvement costs.

Both on-site improvements and off-site improvements required for new construction affect the cost of housing. On-site improvements typically include street frontage improvements including streets, curbs, gutters, and sidewalks. Underground utilities which add cost to housing include sewer lines, storm drains, water, power and telephone lines. Off-site improvements typically include drainage facilities, parks (or park-in-lieu fees), traffic improvements and water treatment plants and sewer treatment plants. While affecting the cost of housing, these improvements are necessary to ensure public health and safety. The cost of these required off-site improvements vary depending on the nature of development (i.e., vacant land, infill development). The City may also impose development fees on future housing developments in order to recover some of the cost of installing off-site improvements including upgrading the circulation system and other urban service systems to serve increased density. The developed portions of Tustin have the majority of necessary infrastructure, such as streets, electrical and water facilities already in place. The City has analyzed the Housing Element sites and determined that site improvements are not an impediment to their development.

Building Codes and Enforcement

Building and safety codes regulate new construction, alteration, and reconstruction of buildings, and are intended to protect occupants from unnecessary risk of fire, structural collapse, unsanitary conditions, and injury or loss of life. While building and safety codes are adopted for the purposes of preserving public health and safety, and ensuring the construction of safe and decent housing, they have the potential to increase the cost of housing construction and/or maintenance. The City of Tustin's building codes are based on regulations necessary to protect the public health, safety, and welfare of its residents. The City has adopted into its Codes and Ordinances the 2019 California Building Code, based on the 2018 International Building Code, as published by the International Code Council, which establish construction standards for all residential buildings. The City has adopted minor amendments to the CBC, none of which are expected to pose a constraint to development.

**TABLE II-33A
DEVELOPMENT FEES**

FEE TYPE	LAND USE	FEE RATE	
New Construction Tax	Residential	Single Family Dwellings	\$350.00 per unit
		Duplexes	\$350.00 per unit
		Multifamily dwellings, Townhouses, or Condominiums	\$350.00 per unit plus \$100.00 per bedroom over one (1) in each unit
		Mobile home park pads	\$100.00 per pad
	Commercial/Industrial 1	Commercial/Industrial	\$0.10 per sq. ft. of gross floor area, including any area upon or within a building designed for parking
		Hotel or motel rental unit without a kitchen	\$100.00 per unit
Park Fees	When a public park or public recreational facility is not provided within a proposed residential subdivision, the subdivision is less than fifty (50) parcels, or the project is a conversion of an existing apartment complex to a multi-owner occupancy not exempted in the Subdivision Code, a park fee will be required.		The fee is calculated on a per unit basis for each project, reflecting the fair market value of land required for park purposes. The value shall be determined by a Master Appraisal Institute (MAI) appraiser acceptable to the City and the expense of the subdivider. DCCSP: The fee shall be based upon the fair market value of the amount of land which would otherwise be required for dedication.

A park fee is also required for non- subdivisions within the Downtown CommercialCore Specific Plan (DCCSP) and the Red Hill Avenue Specific Plan (RHASP).

RHASP: Calculate the amount of land which would otherwise be required for dedication:

$$(\# \text{ of Dwellings}) \times (0.003 \text{ Acre/Person}) \times (2.24 \text{ Person/Dwelling Unit})$$

Afterwards multiply the amount of land computed requiredfor dedication by \$2,500,000/ Acre

School District Fees <i>Updated every July 1st</i>	Tustin	Residential	\$4.08 per sq. ft. of building area
	Unified School District	Commercial/Industrial	\$0.66 per sq. ft. of building area
	Irvine	Residential	\$4.08 per sq. ft. of building area
	Unified School District	Commercial/Industrial	\$0.66 per sq. ft. of building area

**TABLE II-33B
IMPACT FEES**

FEE TYPE	LAND USE	IMPACT FEE RATE	
Transportation Corridor Fees Foothill/Eastern Transportation Corridor Agency <i>Updated every July 1st</i>	Zone A	Single Family	\$6,056 per unit
		Multi-Family	\$3,536 per unit
	Non-Residential	\$8.42 per sq. ft. of building area	
	Zone B	Single Family	\$4,310 per unit
		Multi-Family	\$2,513 per unit
Non-Residential	\$4.88 per sq. ft. of building area		
<u>Affordable Housing Fees</u> (Only applicable to RHASP and DCCSP)	Any residential project providing voluntary workforce housing incentive units pursuant to Subsection (a)(3) of Tustin City Code B9923 must also pay the City a voluntary workforce housing incentive program in-lieu fee calculated by either:	1. Multiplying the voluntary workforce housing incentive program in-lieu fee by one-half (½) the number of base units provided on-site	$\frac{(\text{In-Lieu Fee}) \times (\text{Base Units Provided On-site})}{2}$
			2. Multiplying the voluntary workforce housing incentive program in-lieu fee by one-half (½) the residential project's total square feet of residential area
<i>Effective January 2022 – January 2023 Fee = \$13,801 per unit</i>		For residential projects where an application was received but not deemed complete on or before April 17, 2018, use calculations from 2 above.	

Figure II-1. Impact Fee Zones

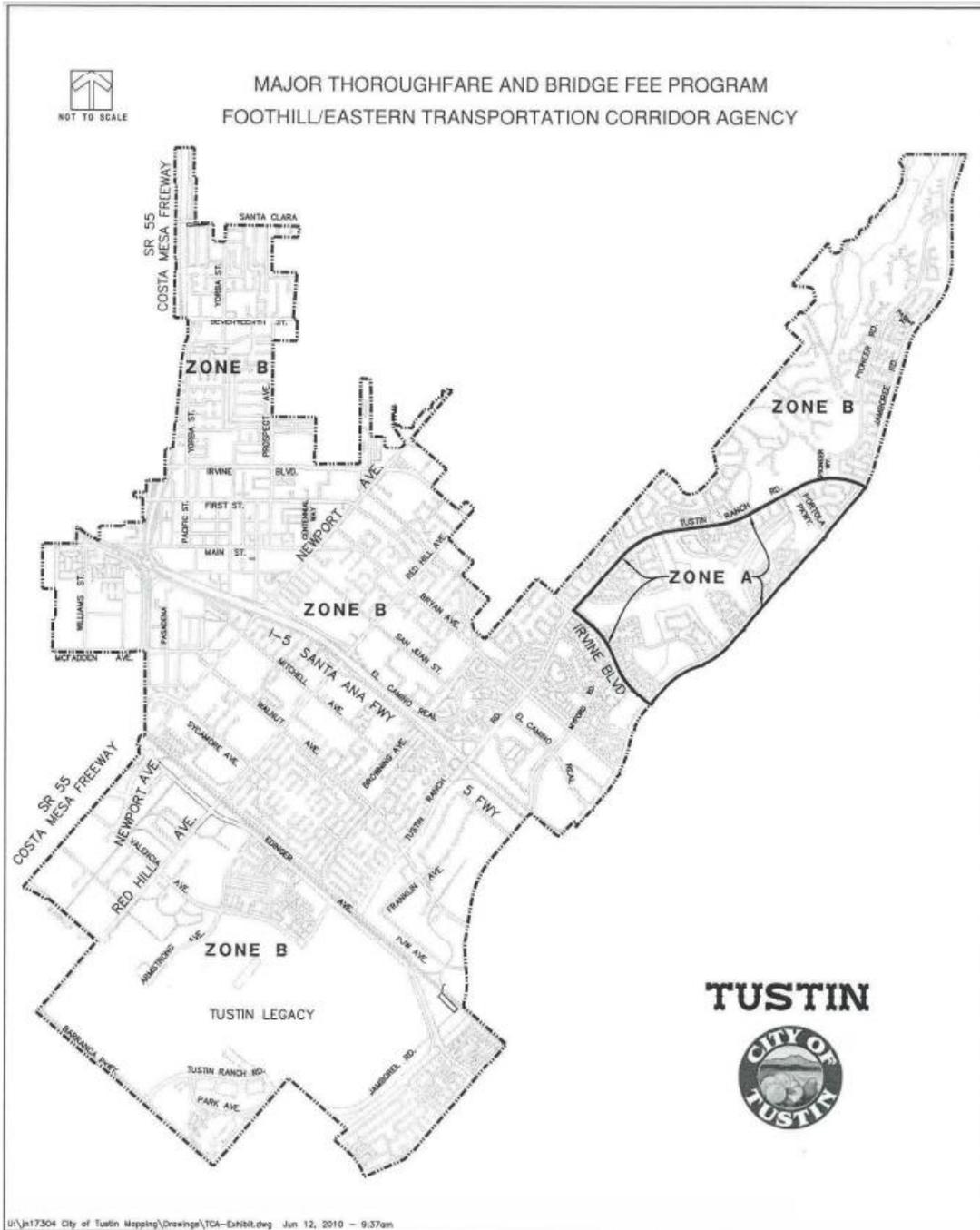


Figure II-2. Planning Fees

NO.	CASE TYPE	FEE	NO.	CASE TYPE	FEE	NO.	CASE TYPE	FEE
Conditional Use Permits and Amendments			Zoning Administrator Review			Signage		
1	Major	\$5,000 Deposit	24	Administrative Adjustment/Minor Amendment	\$500 Deposit	46	Temporary Sign Permit	\$110 Fee
2	Minor	\$2,500 Deposit	General Plan Amendments			47	Master Sign Program	\$500 Deposit
3	ABC License	\$1,000 Deposit	25	Major General Plan Amendment	\$10,000 Deposit	48	Sign Code Exception	\$500 Fee
4	Soil Remediation	\$1,000 Deposit	26	Minor General Plan Amendment	\$5,000 Deposit	Variances and Amendments, Use Determinations, Development Agreements and Appeals		
5	Amendment to Conditions of Approval	\$1,000 Deposit	27	Land Use Map	\$5,000 Deposit	49	Major Variance	\$5,000 Deposit
6	Administrative Amendment	\$500 Deposit	28	Legal Review and Outside Consultants	Actual Costs	50	Minor Variance	\$1,000 Deposit
7	Time Extensions	\$250 Fee	Specific Plan Amendments			51	Amendments to Conditions of Approval	\$1,000 Deposit
8	Code Amendment	\$10,000 Deposit	29	Major Specific Plan Amendment	\$5,000 Deposit	52	Time Extensions	\$250 Fee
Design Reviews and Amendments			30	Minor Specific Plan Amendment	\$2,500 Deposit	53	Zone Change	\$10,000 Deposit
9	Major	\$5,000 Deposit	Subdivisions and Amendments			54	Use Determination	\$500 Deposit
10	Minor New	\$2,500 Deposit	31	Tentative Tract / Parcel Map	\$5,000 Deposit	55	Development Agreements	\$5,000 Deposit
11	Minor Remodel	\$1,000 Deposit	32	Final Tract Map	\$2,500 Deposit	56	Appeals	\$1,000 Deposit
12	Amendment to Conditions of Approval	\$500 Deposit	33	Final Parcel Map	\$2,500 Deposit	Planning Review of Building Plan Check Submittals		
13	Time Extensions	\$250 Fee	34	Lot Line Adjustment	\$2,500 Deposit	57	New Construction	20% Permit Fee
14	Concept Plan Review	\$5,000 Deposit	35	Lot Merger	\$2,500 Deposit	58	Remodel/Tenant Improvements	20% Permit Fee
15	Preliminary Review	\$500 Per Sheet, Max. \$2,000 Deposit	36	Reversion to Acreage	\$500 Deposit	59	Landscape Plan Review	20% Permit Fee
Environmental			37	Certificate of Compliance	\$1,000 Deposit	Other Fees		
16	EIR	\$20,000 Deposit	38	Amendments to Conditions of Approval	\$1,000 Deposit	60	Written Zoning Confirmation/ Non-Conforming Status Letter	\$200 Parcel
17	Supplemental / Addendum EIR	\$10,000 Deposit	39	Time Extension	\$250 Fee	61	Annual Parking Exception Fee	\$70/Parking Exception Space
18	Negative Declaration / Mitigated Negative Declaration	\$2,500 Deposit	40	Master Association Documents, CC&R Review	\$3,000 Deposit	62	Annexation	\$10,000 Deposit
19	Initial Study	\$1,000 Deposit	Temporary Uses			63	News Rack Permit	\$500 Deposit
20	Notice of Completion / Determination / Exemption	Actual Costs	41	Temporary Use Permit	\$250 Fee	64	Planning Service – Hourly Rate	Actual Cost
Document Fees			42	Large Gathering Permit	\$1,000 Deposit	65	Fee Not Listed	Per Director Determination
21	Black and White Copy	\$0.10 Per Page	43	Time Extension	\$120 Fee	<i>City Council Resolution No. 21-54 Adopted July 20, 2021 Effective October 1, 2021</i>		
22	Color Copy	\$0.30 Per Page	44	Film Permit	\$500 Fee			
23	Other Plans and Maps	Actual Cost	45	Reasonable Accommodation	\$500 Fee			

Compliance with the CBC should not significantly add to the cost of construction since the Code is mandated to be enforced statewide and costs should be relatively uniform across the State of California. Any costs associated with Building Code standards are necessary to protect the health safety and welfare of the citizens. Compliance ensures that all new or renovated buildings are structurally sound, have proper exiting and are equipped with necessary fire protection features.

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. Depending on the magnitude and complexity of the development proposal, the time that elapses from application submittal to project approval may vary considerably. Factors that can affect the length of development review on a proposed project include the completeness of the development application and the responsiveness of developers to staff comments and requests for information. Approval times are substantially lengthened for projects that are not exempt from the California Environmental Quality Act (CEQA), require rezoning or general plan amendments, or encounter community opposition. The City recommends that applicants for all permits or reviews request a preapplication meeting with the respective department to confirm City requirements as they apply to the proposed project; review the City's review process, possible project alternatives or revisions; and identify information and materials the City will require with the application, and any necessary technical studies and information relating to the environmental review of the project. City Staff reviews all permit applications for completeness, and discretionary applications must then receive a recommendation through a staff report prior to a review by the appropriate authority. Various applications may also require public noticing and a public hearing.

The following table summarizes types of housing permitted in each zone and type of review required.

**TABLE II-34
HOUSING TYPES AND PERMIT PROCESSING REQUIREMENTS**

Zone	By Right	CUP	Design Review	Notes
RA - Residential Agricultural	Single Family, ADUs, JADUS	Not Required	Administrative (Director Review)	See Program 1.2 which commits to the development of Objective Design Standards
E4 - Residential Estate District	Single-family, ADUs, JADUs	Not Required	Administrative (Director Review)	See Program 1.2 which commits to the development of Objective Design Standards
R1 - Residential-Family District	Single-family, ADUs, JADUs	Not Required	Administrative (Director Review)	See Program 1.2 which commits to the development of Objective Design Standards
PD - Planned Development District	Not Applicable	Apartment Homes, Bungalow Courts, Condominiums, Community apartment projects, Stock cooperatives	Discretionary (Planning Commission)	District was specifically created to authorize garden apartment development opportunities
R2 - Duplex Residential District	*Single-family, ADUs, JADUs; Duplexes or two detached single-family dwellings	**Triplexes (single structure)	*Administrative (Director Review) **Discretionary (Planning Commission)	See Program 1.2 which commits to the development of Objective Design Standards Program 1.5, City will amend Zoning Code to allow triplexes by Right
R3 - Multiple Family Residential District	*Single-family, ADUs, JADUs; Duplexes or two detached single-	**Triplexes (single structure); Boarding houses; Condominiums	Administrative (Director Review)	Zoning district includes objective design and development standards

**TABLE II-34
HOUSING TYPES AND PERMIT PROCESSING REQUIREMENTS**

Zone	By Right	CUP	Design Review	Notes
	family dwellings; Multiple family dwellings, apartment houses.			Program 1.5, City will amend Zoning Code to allow triplexes by Right
MHP - Mobile Home Park District	Not applicable	Mobile home parks;	**Discretionary (Planning Commission)	Zoning district includes objective design and development standards
PD - Planned Development District	Not applicable	Apartment houses Bungalow courts Condominium Community Apartment projects	Administrative (Director Review)	See Program 1.2 which commits to the development of Objective Design Standards Program 1.5, City will amend Zoning Code to allow residential uses by Right
RA - Residential Agricultural District	*Single-family, ADUs, JADUs;	Not Required	*Administrative (Director Review)	See Program 1.2 which commits to the development of Objective Design Standards
E4 - Residential Estate District	*Single-family, ADUs, JADUs;	Not Required	*Administrative (Director Review)	See Program 1.2 which commits to the development of Objective Design Standards
RHASP - Red Hill Avenue Specific Plan	Mixed-Use	Not Required	*Administrative (Director Review) with concurrent Residential Unit Allocation from 500 residential unit bank	Specific Plan includes objective design and development standards. The RHASP Land Use Plan allows for a total of 500 residential units within the Specific Plan area.

**TABLE II-34
HOUSING TYPES AND PERMIT PROCESSING REQUIREMENTS**

Zone	By Right	CUP	Design Review	Notes
Tustin Legacy Specific Plan	detached and attached single-family, multifamily products, and affordable housing, as well as mixed-use	Not Required	Administrative (Director Review)	Zoning district includes objective design and development standards. Site #1. Specific Plan will be amended to allow for additional units per Program 1.1.
DCCSP – Downtown Commercial Core Specific Plan	Mixed-Use, Live-Work	Not Required	*Administrative (Director Review) with concurrent Residential Unit Allocation from 747 residential unit bank	Specific Plan includes objective design and development standards. The DCCSP Land Use Plan allows for a total of 887 residential units (140 units have been constructed) within the Specific Plan area.
Planned Community District – Commercial Specific Plan No. 8	Not Applicable	Not Applicable	Administrative (Director Review)	Site #17 (Enderle Center). Residential overlay zone will be added to residential by right; refer to Program 1.5 See Program 1.2 which commits to the development of Objective Design Standards
Planned Community Commercial Specific Plan	Not Applicable	Not Applicable	Administrative (Director Review)	Site #18 (The Market Place). Residential overlay zone will be added to residential by right; refer to Program 1.5. See Program 1.2 which commits to the development of Objective Design Standards

Source: City of Tustin

Housing Types – By Right

Projects that do not require a Conditional Use Permit and are permitted by -right can obtain building permits directly. The process to obtain residential building permits is outlined in Figure II-3, Residential Building Permit Process.

Figure II-3. Residential Building Permit Process



Approximate application processing time can range from three (3) months, for smaller projects, to 9 months, for larger projects depending on if there is a subdivision included with the application and the level of environmental review.

Length of Time between Application Approval and Building Permit Issuance

New Housing Element law now also requires an examination of the length of time between receiving approval for a housing development and submittal of an application for building permits. The time between application approval and building permit issuance is influenced by a number of factors, none of which are directly impacted by the City. Factors that may impact the timing of building permit issuance include: completion of construction drawings and detailed site and landscape design; securing construction and permanent financing; real estate transaction schedules, and retention of a building contractor and subcontractors.

As a smaller city, Tustin staff have the advantage of working closely with applicants through the review and approval process, thereby helping to expedite the issuance of building and zoning permits. Furthermore, the City’s uses in-house and contracts staff for building plan check which allows for the close monitoring of projects which results in the expeditious review of project. The City has a long-time commitment to complete first plan check for development projects within ten (10) business days.

In Tustin, approved housing projects are constructed in a reasonable time period, given the complexities that developers navigate that are outside of the City’s control. Here are some recent example projects with the timing noted:

In general, smaller, less complex projects are generally issued building permits within one year of project approval, whereas more complicated projects may take up to two years.

**TABLE II-35
PROJECT BUILDING PERMIT TIMEFRAME, TUSTIN, CA**

Project Name	Approval Obtained	Building Permits Obtained	Time Between Approval and Permit Issuance in Months
Brookfield Development - "The Landing" 400 units	December 2019	October 2021	22 Months
Red Hill Avenue Specific Plan Area - "The Hill" 137 units	September 2021	Applicant has not submitted for plan check or obtained permits	Five (5) months since approval; no permits as of March 2022
Downtown Commercial Core Specific Plan Area - "Vintage" 140 units	December 2016	April 2018	16 months

Source: City of Tustin, Community Development Department

Conditional Use Permit Process

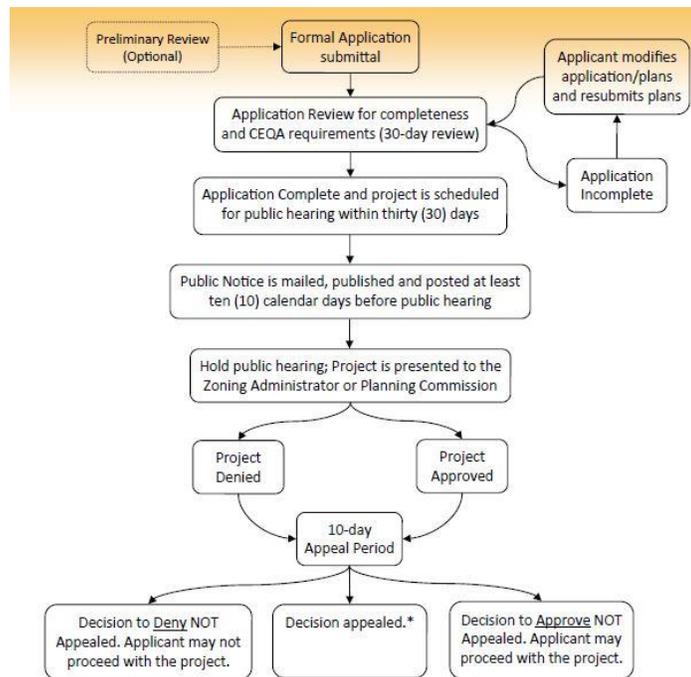
New residential projects not permitted by right require a conditional use permit (CUP) and may be approved if the following determinations are made by the Planning Commission:

- whether or not the establishment, maintenance or operation of the use applied for will, under the circumstances of the particular case, be detrimental to the health, safety, morals, comfort and general welfare of the persons residing or working in the neighborhood of such proposed use, or
- whether it will be injurious or detrimental to property and improvements in the neighborhood or the general welfare of the City.
- If the Planning Commission finds that the aforementioned conditions will not result from the particular use applied for, it shall grant the Conditional Use Permit.

The City will amend the Zoning Code to allow residential uses By Right. The average time to process a CUP is between three (3) and six (6) months. Figure II-4, Conditional Use Permit Process below provides a flowchart demonstrating the typical process to obtain a CUP.

CUP processes are not considered a constraint to the development of units identified to meet the RHNA since housing sites in the Tustin Legacy Specific Plan, Downtown Commercial Core Specific Plan and Red Hill Avenue Specific Plan allow residential development by right and would only be subject to Design Review and a concurrent consideration for a residential unit allocation from the residential unit bank (applicable to Redhill Avenue Specific Plan and Downtown Commercial Core Specific Plan), both of which are subject to administrative level Community Development Director Review. Other housing sites will be rezoned within the one year of the Housing Element cycle to allow housing by right which are described in Programs 1.1 and 1.5.

Figure II-4. - Conditional Use Permit CUP Process and Timelines



Streamlined reviews for Subdivision Maps and Environmental Reviews

All three Specific Plans have adopted and approved EIRs. Developers can rely upon the approved EIR when designing their projects. This allows developers to rely on the certainty of gaining approval of a project which is significant and important for

new projects. For the other identified housing sites, the city will be undertaking a comprehensive EIR analysis during the rezoning process which will streamline development process of the sites, since the environmental review would have been completed prior to development proposals submitted to the City. Following the rezoning, developers would be able to propose developments that comply with objective design standards and the environmental assumptions included in the Final EIR. This process significantly streamline and shorten the amount of time needed to complete development application.

The City of Tustin Subdivision Code requires Planning Commission approval for Tentative Map. Subsequent Final Map can be approved administratively by the Community Development Director. Processing time for these projects may take approximately 6-8 months.

The City concurrently processes entitlement application for a single project in order to save the applicant time and review costs. The number and/or type discretionary applications does not infer that additional time is needed or required to process them. The review of all development is considered and reviewed in a timely manner by City staff.

A thorough review and complete review of proposed development is in the interest of public welfare and safety to ensure development would be compatible with existing and future land uses, so as not to induce environmental or health risk as a result of project operation. Therefore, the discretionary or non-discretionary development approval process would be considered reasonable and beneficial and would not be considered a constraint on housing supply and affordability.

In addition, the Community Development Department serves as the coordinating agency to facilitate reviews with other in-house departments such as Police, Public Works/Engineering, and Parks and Recreation.

Objective Design Standards - Tustin Legacy, Red Hill and Downtown Commercial Core Specific Plans

These Specific Plans contain objective design standards that serve to provide staff, builders, and design professionals, and other users with a concise document which clearly outlines the desired design elements for residential project so that the Design Review expectations are clear and the process runs smoothly, to avoid ambiguity. In addition, per Program 1.2a, the City will create objective design standards for other parts of the city that are outside of these Specific Plan areas.

Priority Processing

The City assigns priority to the plan review and permit issuance for low-income housing projects which eliminates the potential increase in financing costs caused by permit processing a delays

Design Review Process

In accordance with Section 9272 (Design Review) of the Tustin City Code, individual development projects are be subject to a design review process and it is an administrative review that is carried out by the Community Development Director and does not require a public hearing. This entire process is completed within the 30-day review timeframe allotted by the Permit Streamlining Act. As part of the Design Review process, the Community Development Department has the following responsibilities:

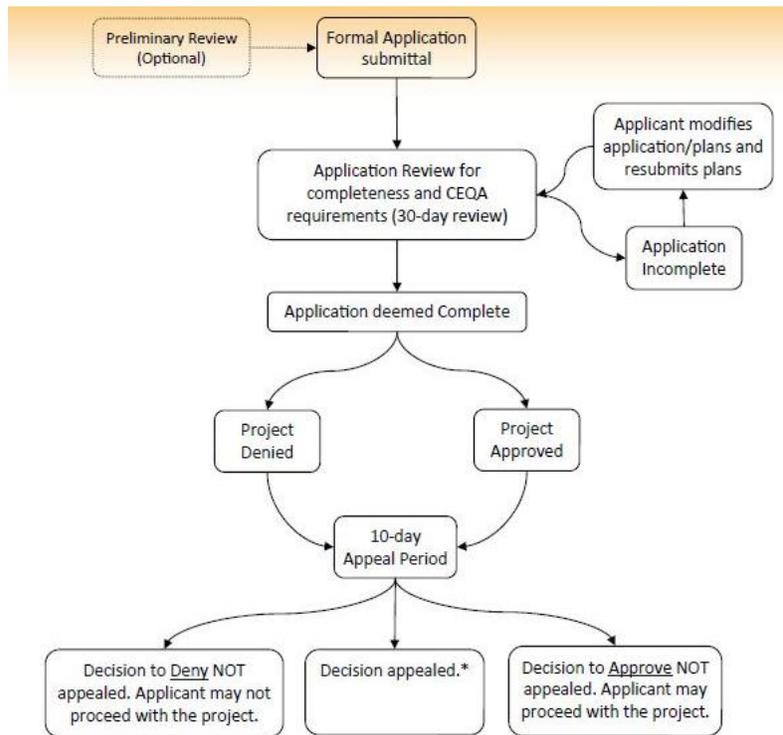
1. To provide for the review of building design, site planning and site development in order to protect the increasing value, standards and importance of land and development in the City due to the urbanization of Orange County.
2. To retain and strengthen the unity and order of the visual community.
3. To ensure that new uses and structures enhance their sites and are harmonious with the highest standards of improvements in the surrounding area and total community.
4. To ensure the necessary linkages are provided between the development project and the Planning Area/Neighborhood in which it is located.
5. The integrity of the Specific Plan and purpose and intent of each Neighborhood is maintained.

The City of Tustin employs a streamlined, interdepartmental development review process known as the Design Review Committee in order to generate high-quality projects in a timely manner. We accomplish this by first encouraging applicants to discuss preliminary project concepts with City staff to identify potential concerns. The intent is to screen for major obstacles prior to submittal to avoid the applicant committing time and resources to construction documents that will need to be extensively modified. The Design Review process is in place for Tustin to ensure that incremental development complements the City's historic character and to ensure that new development enhances the quality of life for the community. However, the process may pose a constraint to development by requiring compliance with subjective design guidance which potentially adds additional review times which results in additional project costs.

As part of Program 1.2, the City will amend the Tustin City Code 9272 (Design Review) to remove subjective design guidance will and adopt objective design standards to facilitate high-quality, streamlined residential development. These new objective design standards would serve to further increase certainty and reduce inefficiencies related to project’s design review and approval.

The following chart depicts the City’s current administrative review process for design review:

Figure II-5. – Streamlined Administrative Review Process



Waived Fees

For projects of significant benefit to the low-income community, certain fees such as Park In-lieu fees, can be waived by the City Council. Other fee deferral could also be provided to affordable housing developers upon City Council approval.

Residential Unit Allocation (Red Hill Avenue and Downtown Commercial Core Specific Plans)

In 2020, City staff developed a streamlined application and implemented a complimentary streamlined review system (i.e., Residential Allocation Reservation or “RAR process”) for projects located in the DCCSP and the RHASP.

The RAR process, which is an integral part of each plan, is a preliminary review of the project prior to formal submittal for entitlements whereby residential units are potentially allocated to a project based on certain findings. An application with project description, parking management plan, scaled and dimensioned site plan and architectural elevations are required for the submittal.

The allocation is not final until the formal entitlement application for the project is submitted, reviewed and approved by the City following required hearings before the Planning Commission and/or City Council.

Additionally, City staff is currently developing citywide ADU design guidelines and updating the Zoning Code to streamline the ability to construct ADUs as an affordable housing option (see Program 1.8 of Section IV).

Another potential 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.

Lot Consolidation

The success of development on the opportunity sites that contain multiple parcels will be dependent upon consolidation of individual parcels into larger development sites. Within the last housing cycle, the City has had success in encouraging the assembly of property to spur development.

Examples of recent projects with lot consolidation include:

- Brookfield Development – 400 units approved and in construction;
- Red Hill Avenue Specific Plan Area – 137 units approved; and
- Downtown Commercial Core Specific Plan Area – 140 units and construction completed.

The City will create a Lot Consolidation Overlay (LCO) Program No. 1.19 (see Section IV). The intent of the LCO is to encourage the consolidation of lots by providing incentives such as:

- Reduce development standards
- Additional density bonus beyond the State’s maximum ratio
- Reduced application fees

- Priorities in the application process

Lot consolidation incentives will be clearly defined in the Overlay to be adopted by the City by 2024. In order to further encourage the consolidation of individual parcels within the opportunity sites, the City will contact the property owners of each of these sites and discuss the City's goals for residential development and available regulatory and financial assistance. For property owners receptive to lot consolidation, the City will aid to facilitate the parcel merger process in a streamlined and timely manner.

Housing opportunity Sites 17 and 18, those that have a single ownership, and/or may require lot consolidation could be facilitated by a lot line adjustment (LLA), a process which is detailed in the Tustin City Code 9322 and the administrative process further detailed in the City existing Subdivision Manual, which provide a step by step process in preparing and filing a Lot Line Adjustment request with the City. A LLA is an administrative review process, and any land taken from one parcel can be added to an adjacent parcel. No public hearing are required for a LLA request. The Administrative Authority for LLA applications is under the Community Development Director.

The application process for a LLA is streamlined and is cost effective. A LLA can be approved if the following criteria are met:

- The project site described in the proposal consists of legal parcels and no greater number of parcels will result from the lot line adjustment.
- Any land taken from one parcel will be added to an adjacent parcel and no additional parcels will result from the lot line adjustment.
- The parcels proposed by the lot line adjustment will comply with all applicable zoning and building regulations and City's General Plan.
- The proposal is consistent with the General Plan.

The rezoning process of sites suitable to meet RHNA will ensure that the proper zoning is in place to allow for housing units at these sites to meet RHNA. Therefore, this LLA process would be a streamlined process to adjust property lines in order create parcels of the adequate size to meet RHNA. The City already has a process in place to streamline LLA and therefore a program is not necessary at this time since a LLA is not a constraint to development but rather a tool.

Cumulative

The cumulative effect of the City's residential development standards does not constrain the expansion of the housing opportunities. Density standards contained with the City's Zoning Ordinance are consistent with densities established in the General Plan.

In addition, the City has adopted a variety of zoning tools that provide development options that promote the development of residential developments. As described in Table II-22 (Summary of Residential Zoning Regulations) along with the various Specific Plans and Planned Community Districts which allow for a variety of residential housing products.

In 2018 the City adopted the Red Hill Avenue Specific Plan (RHASP) and Downtown Commercial Specific Plan (DCCSP), which will facilitate the development of mixed-use housing developments along Red Hill Avenue and in key segments within the City's downtown area. The Specific Plans encompasses two key areas where a significant portion of residential growth is expected to occur during the current Housing Element planning period.

The development standards in the various zones have not been found to constrain housing development as projects have been able to maximize the number of units on site, while taking advantage of the maximum allowable heights. For example, in the DCSSP and RHASP, the reduced setback requirements are typical for higher-density housing development opportunities available in the region that provide minimal light and air for development and do not unreasonably constrain housing opportunities. In the DCCSP, residential developments opportunities were added in areas previously reserved for solely non-residential development. In the DCCSP, residential development are allowed in a vertical format with either, three (3) story, four (4) story, or five (5) stories, with no maximum floor area ratio. Another example is the Red Hill Specific Plan which encompassing approximately 36 acres of land area that has been up zoned to allow higher density residential developments in an area that previously did not allow residential development, with no define floor are ratio. In the Tustin Legacy Specific Plan (TLSP), the zone allows for a variety of housing types, and include medium and high densities allowing 60+ du/acre, with flexible development standards.

Furthermore, a Voluntary Workforce Housing Incentive Ordinance was also adopted during this same timeframe and is applicable to both DCCSP and RHASP areas to encourage development of affordable housing. The Ordinance utilized affordable housing provisions included in the State Density Bonus Law. This would allow developer to be able to comply with both provisions while benefitting from relaxed development standards and obtain concession and/or incentives under State Density Bonus Law.

At the time of this update, the first mixed use project along Red Hill Avenue within the RHASP has been approved for 137 housing units including five (5) percent Very-Low Income affordable units, as allowed by the City Voluntary Housing Ordinance, approved at a density of 40 du/acre. This is the first housing development project to

comply with this Ordinance and includes the provision of 20 percent density bonus housing units. Furthermore, the project took advantage of a concession and incentive request, pursuant to State Density Bonus law for a reduction in open space, reduced parking ratios, and the waiver for park fees for the affordable units provided. The waiver of park fees is a development incentive option available by the City's Subdivision Ordinance and is subject to approval by the City Council which requires that the incentive be associated with the provision of affordable housing development.

More recently, AB 1763 made a number of changes to density bonus requirements for affordable projects. The bill requires a density bonus to be granted for projects that include 100 percent lower income units but allows up to 20 percent of total units in a project that qualifies for a density bonus to be for moderate-income households. Under the revised law, density bonus projects must be allowed four incentives or concessions, and for developments within ½ mile of a major transit stop, a height increase of up to three additional stories or 33 feet. A density bonus of 80 percent is authorized for most projects, with no limitations on density placed on projects within ½ mile of a major transit stop. The bill also allows developers to request the elimination of minimum parking requirements for rental units affordable to lower-income families that are either supportive housing or special needs housing, as defined. AB 2345 signed by the Governor in September 2020 further incentivizes the production of affordable housing. Housing Program 1.3 commits to amending the zoning ordinance to ensure the affordable housing density bonus regulations conform to current state law.

The City has not processed any zone changes since 2018. In 2018, two were processed for the establishment of the RHASP and DCCSP areas. Since adoption of either Specific Plan, the City has not received any requests for projects (within the entire City) below the City's allowable densities. There have not been any zone change applications processed for any housing developments between 2013 and present. Furthermore, the City does not currently allow short-term rental in the City that could directly impact the cost and supply of residential development.

The City monitors closely its development standards and their impact on development. Periodically, the City made amendments to its Zoning Ordinance as part of code streamlining to ensure development standards respond to market trends and Program 1.5 has been included to continue to address necessary code changes to respond to and facilitate housing development and the changing housing market.

HOUSING OPPORTUNITIES

During the past several years, a number of changes to Statutes resulting from new or amended laws have occurred which focus on housing and, particularly housing opportunities and site identifications and associated required assessments. The changes to the law are a result of Chapter 375, Statutes of 2017 (AB 1397), Chapter 958, Statutes of 2018 (AB 686), Chapter 664, Statutes of 2019 (AB 1486), and Chapter 667, Statutes of 2019 (SB 6).

The City has identified the following quantified objectives for the 6th planning cycle (2021-2029).

Income	New Construction	Rehabilitation	Conservation/ Preservation
Very Low-	1,724 ¹		32
Low-	1,046	13	377
Moderate-	1,132	12	9
Above Moderate-	2,880		
Total	6,782	25	418

¹ Pursuant to Government Code Section 65583(a)(1), City's share of extremely-low-income units is 862 (50 percent of the total Very-Low Income new construction objective).

As described previously, the City anticipates preservation of several affordable housing projects that are at-risk of expiring during this planning period. Additionally, under Program 3.10, Housing Rehabilitation to Address Substandard Housing, the City commits to assisting in rehabilitation of five (5) low to moderate income housing units each year beginning in 2024. Appendix B, Housing Sites Inventory Assessment, with associated Attachments provides the focused analysis for the City's new construction to meet their Regional Housing Needs Allocation (RHNA).

The purpose of the Housing Element's site inventory is to identify and analyze specific land (sites) that is available and suitable for residential development in order to determine the City's capacity to accommodate residential development and reconcile that capacity with the City's RHNA. The intent of the required site inventory is to ensure the City determines whether there are sufficient adequate sites to accommodate the RHNA by income category. The site inventory and analysis help to determine whether program actions must be adopted to "make sites available" with appropriate zoning, development standards, and infrastructure capacity to accommodate the new development need. As identified in Appendix B, the City has adequate opportunity sites to develop for anticipated growth and RHNA allocation.

HOUSING ELEMENT GOALS AND POLICIES

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 five 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) promote fair housing opportunities;
- 3) preserve and improve existing extremely low-, low- and moderate-income housing; Preserve and improve the existing supply of low- and moderate-income housing
- 4) conserve and improve the condition of the existing housing; and
- 5) ensure that housing is sensitive to the existing natural and built environment.

HOUSING SUPPLY/HOUSING OPPORTUNITIES

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

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

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

Policy 1.3: REGULATORY INCENTIVES - Support the use of regulatory incentives, such as density bonuses and deferment of impact fees, to offset the

costs of affordable housing while ensuring that potential impacts are addressed.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MAINTENANCE AND CONSERVATION

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

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

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

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

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

ENVIRONMENTAL SENSITIVITY

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 5: Ensure that new housing is sensitive to the existing natural and built environment.

Policy 5.1: SUSTAINABLE DEVELOPMENT - Prioritize sustainable housing developments in proximity to services and employment centers thereby enabling the use of public transit, walking or bicycling and promoting an active lifestyle.

Policy 5.2: ENERGY CONSERVATION - Promote green building practices for more sustainable energy conservation measures in the construction of new housing or rehabilitated units, including

Policy 5.4: FEDERAL AVIATION REGULATIONS - Provide development community with information to ensure that development proposals meet the criteria of the Federal Aviation Regulation (FAR) Part 77 Imaginary Obstruction Surfaces for John Wayne Airport in coordination with review procedures by the Airport Land Use Commission (ALUC).

HOUSING IMPLEMENTATION PROGRAM

The Housing Implementation Program provides for specific actions the City intends to undertake to achieve the goals and policies of the Element. The Housing Implementation Program describes the specific programs that will be implemented during the planning period. Housing programs include those which are currently in operation and can be further enhanced or refined to meet future housing needs as well as new programs to reflect the many changes resulting from the adoption of new housing-related legislation in conjunction with the 6th cycle Housing Element update. A review of the City's past performance on housing element implementation programs is contained in Appendix A of the Housing Element.

The following table (Table IV-1) identifies existing and new housing programs to be implemented during the 2021-2029 planning period. The programs are organized according to the goals described in Section III (Housing Element Goals and Policies) along with a listing of the responsible agenc(ies), funding source, quantified objective and timeframe.

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HOUSING PROGRAMS

The following matrix identifies existing and new housing programs to be implemented during the 2021-2029 planning period. Table IV-1 is divided into five goals and describes each program and associated quantified objective and timeframe. It should be noted that a number of programs fall under multiple goals and policies described in Section III. Those programs are only listed once to avoid duplication.

TABLE IV-1 HOUSING ELEMENT PROGRAMS 2021-2029				
Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
Goal 1: Adequate Housing Supply				
1.1 (New) Residential Development - Available Sites				
<p>(Existing) Tustin Legacy Specific Plan (TLSP) Implementation</p> <p>a. Implement the Specific Plan for the Tustin Legacy area. This program will rezone properties identified in Appendix B, Site Inventory Assessment Table B-2. The Specific Plan amendment will include the following in conjunction with the By-Right Approval of Projects with 20 Percent Affordable Units on “Reuse” Sites in compliance with Government Code Government Code 65583.2(h) and (i).</p> <ul style="list-style-type: none"> Permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a CUP, planned unit development permit, or other discretionary review or approval. Accommodate a minimum of 16 units per site. 	<p>Housing Authority, Economic Development Department, Community Development Department</p>	<p>General Fund</p>	<p>Complete Specific Plan amendment</p> <p>Prioritize the processing of housing related entitlements for TLSP by assigning a designated project manager</p> <p>Process entitlement for TLSP area</p>	<p>By October 2022 or within three (3) years if deadline is extended</p> <p>As requested between 2021 - 2029, Report annually in April</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<ul style="list-style-type: none"> • Require a minimum density of 20 units per acre. • At least 50 percent of the lower-income need must be accommodated on sites designated for residential use only or on sites zoned for mixed uses that accommodate all of the very low and low-income housing need, if those sites: <ul style="list-style-type: none"> ○ Allow 100 percent residential use, and ○ Require residential use occupy 50 percent of the total floor area of a mixed-use project. 				
<p>(Modified) Utilization of Planned Community Districts, Overlay Districts, and Specific Plans (Available Sites)</p> <p>b. Utilize Planned Community Districts, Overlay Districts, and/or Specific Plans to facilitate mixed-use developments to assist in the development of new affordable ownership and rental housing.</p>	<p>Community Development Department, Housing Authority, Economic Development Department</p>	<p>City General Fund; Housing Authority</p>	<p>Support applications for the creation of new mixed-use developments, particularly when the projects include affordable housing, through the following actions:</p> <ul style="list-style-type: none"> • Post available sites and capacity of Specific Plan areas on the City website • Promote City’s density bonus program, Article 9, Chapter 1 of the Zoning Incentives for the development of affordable housing and include on City website. • Continue to provide at least 10 regulatory and technical assistance meetings with affordable 	<p>Post to City website by January 2022</p> <p>Post to City website by July 2022</p> <p>Between 2021 – 2029, Report in April</p> <p>Post procedures on City website by December 2023</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			housing developers and non-profit organizations <ul style="list-style-type: none"> • Develop streamlined procedures for affordable ownership and rental housing development applications 	
<p>(New) Downtown Commercial Core Specific Plan (DCCSP) Implementation</p> <p>c. Implement the Specific Plan for the Downtown Commercial Core area.</p>	Housing Authority Community Development Department Economic Development Department	General Fund	Process entitlements for DCCSP <ul style="list-style-type: none"> • 374 housing units by October 2025 • 373 housing units by October 2029 	As requested 2021 – 2029; Report in April
<p>(New) Red Hill Avenue Specific Plan (RHSP) Implementation</p> <p>d. Continue implementation of the Specific Plan for portions of Red Hill Avenue north and south of the I-5 freeway</p>	Housing Authority, Community Development Department	General Fund	Process entitlements for RHSP; no amendment needed to meet RHNA and prioritize by assigning a designated project manager. <ul style="list-style-type: none"> • 258 housing units by October 2025 • 105 housing units by October 2029 	As requested 2021 – 2029; Report in April

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p>(New) By-Right Approval of Projects with 20 Percent Affordable Units on “Reuse” Sites</p> <p>e. Amend Zoning Code, pursuant to AB 1397 (passed in 2017) to provide by-right approvals of development projects in which the project applicant voluntarily includes 20 percent of the units as housing affordable to lower income households, on sites being used to meet the 6th cycle RHNA that represent “reuse sites” from previous Housing Element cycles. The “reuse” sites are specifically identified in the Appendix B - Sites Inventory.</p>	Community Development Department	General Fund	Amend Zoning Code	By October 2022, or within three (3) years if deadline is extended
<p>(New) Residential Mixed-Use Development - Available Sites</p> <p>f. (New) Process Enderle Center and Tustin Market Place Zoning and General Plan Amendments. The rezoned sites will meet the requirements of Government Code 65583.2.</p>	Community Development Department	General Fund	Add a residential overlay zone and amend General Plan; Include development standards allowing a minimum of 30 du/acre.	By October 2022, or within three (3) years if deadline is extended
<p>(New) By-Right Residential Development to Meet RHNA</p> <p>g. The City will update its Zoning Code to allow by-right residential development pursuant to Government Code 65583.2 provisions. This program applies to areas rezoned for residential development after October 15th, 2021 to achieve the City’s 6th Cycle RHNA objectives.</p> <p>City will update the Zoning Code to include provision of by-right development in areas rezoned to meet the City’s RHNA objectives. The rezoned sites will meet the requirements of Government Code 65583.2, including but not limited to:</p>	Community Development Department	General Fund	Amend Zoning Code	By October 2022, or within three (3) years if deadline is extended

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<ul style="list-style-type: none"> • Minimum density of 20 units per acre, • Minimum site size to permit at least 16 units on site, and • Zoned to allow ownership and rental housing by-right in which at least 20 percent of the units are affordable to lower-income households. 				
<p>(New) Extremely Low Income Households</p> <p>h. Facilitate affordable housing development including housing for extremely low income and very low-income households, and households with special needs (such as persons with disabilities and farmworkers).</p>	<p>Housing Authority, Community Development Department</p>	<p>General Fund Housing Authority Fund CDBG Fund Other State or federal Grants</p>	<p>Expand affordable housing inventory by 50 units over eight years (10 extremely low; 20 very low; 20 low income units).</p> <ul style="list-style-type: none"> • Provide technical assistance to 10 developers regarding City mixed use zoning and density bonus incentives; • Create and distribute an Affordable Housing Guide that explains how to use affordable housing incentives • Adopt an ordinance to allow the provision of fee deferral and/or fee waiver when associated with housing developments to meet RHNA 	<p>By October 2029</p> <p>By October 2025</p> <p>By October 2023</p> <p>By October 2024</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			<ul style="list-style-type: none"> Provide technical assistance and permit fast-tracking for new ADU/SB9 development proposals and a minimum of six projects that include housing affordable to lower income households on an annual basis through 2029. City staff will fast track a minimum of 10 ADU and/or SB 9 developments in high opportunity areas (Census tracts 756.05, 524.19, 756.06, and 756.07) on an annual basis, which means that review times will be reduced by 25% compared to year 2022 review timeframes and for all affordable housing projects by assigning a designated “streamlining staff liaison” to the project. 	By October 2023

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
i. Monitor development proposals within the Tustin Legacy Specific Plan area to ensure 25 percent of the total amount of units proposed are low income, very low income, or a mix of the two to comply with the Surplus Land Act.	Community Development Department Economic Development Department	General Fund	Review project (Design Review) agendas on a bi-weekly basis to monitor for new housing developments to ensure compliance with SLA and affordable housing provisions.	Bi-weekly basis from 2021-2029.
1.2 (New) Objective Design Standards				
Objective Development Standards				
a. Amend Zoning Code to remove subjective design guidance in TCC 9272 (Design Review), and adopt objective design standards to ensure that the City can provide clear guidance on design to streamline the development of high quality residential development; ensuring the provision of adequate private open space, parking, and use of city's private streets standards consistent with State law (SB 35).	Community Development Department	General Fund, Grant Funding if available	Remove subjective design guidance in TCC 9272 (Design Review) and adopt Objective Design Standards which will apply citywide	Amend TCC 9272 (Design Review) to remove subjective design guidance and also develop and adopt new Citywide Objective Design Standards by December 2024
Design Guidance				
b. Provide educational materials and consultations regarding Objective Design Standards (SB 35)	Community Development Department	Grant Funding, General Fund	Educate public via City's website, and counter consultations, approximately 100 consultations total per year.	Post to City' website By December 2024 Minimum of 10 weekly design consultations starting January 2025.
(New) Parking Standards				
c. Develop parking standards to facilitate residential housing production as part of mixed-use developments, adaptive re-use projects and new residential developments.	Community Development Department	General Fund	Develop parking standards that incentivize creative parking strategies such parking credits for transit rich development and allowance of	By October 2024

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			parking structures and parking lifts, by-right and subject to Objective Design Standards.	
1.3 (Modified) Density Bonus Program				
a. Promote use of the State’s Density Bonus Law to facilitate the construction of affordable housing, including extremely low-income housing.	Community Development Department	General Fund	Encourage the use of density bonus incentives by advertising on City’s website and by providing information on available sites and regulatory incentives in conjunction with discussions with development applicants.	Advertise on City website by October 2022 Bi-weekly review of development projects between 2021-2029.
b. Update City Density Bonus Ordinance; ensure it is consistent with State law.	Community Development Department	General Fund	Update ordinance	By December 2022
1.4 (New) Voluntary Workforce Housing & Specific Plan Reassessments				
a. Engage a real estate and economic development consultant to evaluate the City’s current Voluntary Workforce Housing Ordinance in conjunction with the reassessment on the effectiveness of the Downtown Commercial Core Specific Plan (DCCSP) and Red Hill Avenue Specific Plan (RHASP), adopted in 2018, to identify development constraints and adjustments necessary to incentivize housing development	Community Development Department; Housing Authority	General Fund	Conduct analysis and evaluation of the Voluntary Workforce Housing Ordinance and DCCSP and RHASP (Specific Plans) and develop recommendations for policy	By December 2022

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
and subsequently amend the TCC to remove development constraints.			<p>changes that remove development constraints.</p> <p>Amend the TCC Code “Voluntary Workforce Housing” to implement recommendations to remove any identified housing development constraints</p> <p>Conduct an analysis of the Residential Allocation Reservation (RAR) process applicable in the following Specific Plan areas: DCCSP and RHASP and identify any potential barriers to housing developments.</p> <p>Amend DCCSP and RHASP Specific Plans review procedures and/or applicable Specific Plan sections to eliminate governmental constraints that may pose a barrier to housing development, with an emphasis on eliminating redundant processes,</p>	<p>By December 2024</p> <p>By December 2022</p> <p>By December 2025</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			<p>ambiguities and discretionary action(s).</p> <p>Amend DCCSP and RHASP to provide for additional housing units aligned with economic objectives and infrastructure capacities by re-evaluating the housing units allocated to each geographic area in each Specific Plan.</p> <p>Conduct environmental analysis, as needed, to accommodate additional housing units in each Specific Plan area, aligned with economic objectives and infrastructure capacities.</p>	<p>By December 2025</p> <p>By December 2025</p>
1.5 (New) Zoning Code Streamlining Program				
<p>a. Implement zoning code amendments to facilitate application and project review streamlining and compliance with State law to meet housing needs.</p>	<p>Community Development</p>	<p>General Fund</p>	<ul style="list-style-type: none"> Annually review zoning code and identify potential improvements to streamline development and permit Amend zoning code as appropriate 	<p>Annually</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			and adopt within 12-month timeframe <ul style="list-style-type: none"> • Amend Zoning Code to remove the CUP requirement for triplexes in the R2 and R3 zones. • Amend the Zoning Code to remove the Conditional Use Permit (CUP), when currently required, for residential uses City-wide in all zones. 	By October 2023 By October 2023
b. Amend existing commercial and industrial Specific Plans for potential inclusion of additional residential units within the respective areas.	Community Development	General Fund	Conduct analysis and evaluation Amend Specific Plans and Zoning map as appropriate	By December 2025 By December 2029
1.6 (Modified) Mobile Home Programs				
a. Continue to maintain the City's mobile home park zone and process conditional use permit applications as received for manufactured homes.	Community Development Department	General Fund	Annual review and report	Annually
b. Amend the zoning code to outline mobile home park closure procedures and provide reasonable protection for residents in accordance with State Mobile home Park law.	Community Development Department	General Fund	Conduct analysis and evaluation Amend zoning code	By December 2023

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
c. Seek funding and determine financial feasibility for a Mobile Home Assistance Program that provides financial and technical assistance to mobile home parks and their conversion to resident ownership to maintain affordable housing within existing mobile home park(s).	Community Development Department; Housing Authority	HCD Grant Funding	Annually check the HCD website for potential funding sources and apply for eligible programs.	Annually in March of each year.
1.7 (Modified) Accessory Dwelling Units Program				
a. Promote the construction of accessory dwelling units in new and existing residential areas by updating City codes in compliance with State law and focusing on education and awareness.	Community Development	General Fund, SB2 Grant Funding	Update ADU Ordinance in accordance with State Law Update website with ADU permit guidance Process approximately 5 ADU/JADU applications per year.	By January 2022 By June 2022 Process applications within the timeframe prescribed by State Law, as may be amended
b. Create an ADU/SB 9 accelerator program and focus in High Opportunity Areas within the northeast portion of the City where there are predominately single family residences in order to expand housing choices. This program could include a permit fee waiver for affordable housing units, permit fast tracking (refer to Program 1.1h), and technical assistance. This program will also create a one-stop-shop comprehensive resource for homeowners interested in developing an ADU and/or SB9 developments. This program will complement revised Program 1.1(h) Streamlining and Permit Fast Tracking for new ADU/SB9 development proposals.	Community Development; Housing Authority	General Fund, SB2 Grant Funding	Develop and adopt an ADU/SB9 accelerator program. Mail out information pertaining to the new accelerator program for ADUs and SB 9 developments, specifically to high opportunity areas.	By December 2024 By January 2025

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
c. Establish an Accessory Dwelling Unit Legalization and Delay of Enforcement program to allow owners with existing unpermitted ADUs to legalize the structure per Senate Bill 13, Gov. Code, § 65852.2, subd. (n); and Health & Safety Code, § 17980.12).	Community Development Department	General Fund	Establish SB13 Program	By December 2023
d. ADU Monitoring Program and Database	Community Development Department	General Fund	Annual Report	Annually in April
1.8 (New) Partnerships with Non-Profit Organizations				
a. To further facilitate affordable housing, including extremely low-income housing, the City will proactively build relationships with the building and housing community including nonprofits, and establish an array of regulatory and financial tools to assist residential development.	Community Development Department; Housing Authority; Economic Development Department	General Fund	Hold meeting, open house, and/or or video series targeted to building and housing community including nonprofits, to present residential development opportunities in the City and financial tools available. Make information on financial resources and regulatory tools available on the City’s website.	Annually in September By December 2022

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
a. (New) Continue to coordinate and support community-based organizations that support after school programs, self-help training, food-assistance and counseling and access to other resources, especially in low resource areas of the City and communities with higher proportion of special needs populations.	Community Development Department; Housing Authority;	General Fund	Meeting, open house, and/or video series targeted to nonprofits that provide family resources, to present potential partnership opportunities.	Inform providers annually in February beginning in 2023.
1.9 (Modified) Deed Restrictions				
a. Continue to require appropriate deed restrictions where newly approved or extended affordable housing units will be required to record a 55-year deed restriction for rental units and 45 years for ownership units to ensure continued affordability for extremely low-, low-, or moderate-income housing constructed or rehabilitated with the assistance of any public funds, as may be legally required.	Community Development Department; Housing Authority; Economic Development Department	Tax-Exempt Mortgage Revenue Bonds and other various resources	Include conditions of approval at entitlement and require recordation of deed restriction prior to issuance of Certificate of Occupancy for affordable units for applicable housing development projects.	Bi-weekly review of development projects between 2021-2029.
1.10 (Modified) Development and Permit Streamlining				
a. Utilize pre-application conferences and expedited permit processing procedures to streamline development review and permit processing.	Community Development Department	General Fund	Approximately 50 consultations per year	Minimum of four (4) monthly consultations starting January 2024.
b. Track the processing time frames for processing of reviews and permits for low- and moderate-income housing and	Community Development Department	General Fund	Develop development permit tracker	By December 2022

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
where possible, adjust internal procedures to shorten review timeframes.				
c. 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. Use technology and revise internal processes to reduce processing time, which in turn reduces development costs.	Community Development Department	General Fund	Review number of days to process an application, at least bi-annually and implement revised procedures to shorten review times, when possible.	Bi-annual reviews in June and January, starting in January 2023
d. Streamline environmental reviews for major mixed use and residential related projects by tiering environmental reviews.	Community Development Department	General Fund	Develop a list of on-call consultants to assist with fast-tracking environmental reviews Require Program Environmental Impact Reports (EIR) on all major development projects whenever possible.	By December 2023 Annually, project by project basis.
1.11 (New) Inventory of Available Sites and Monitoring No Net Loss:				
a. Maintain a current inventory of residential and mixed-use sites. Monitor development of vacant and nonvacant sites inventory and ensure that adequate sites are available to meet the remaining RHNA by income category.	Community Development Department	General Fund	Annual website updates with residential and mixed-use sites inventory. Provide list (vacant and nonvacant sites) on city website, especially for prospective residential	By December 2023 Update annually by May, starting in January 2023

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			developers, to facilitate the development of housing in the City	
1.12 (Modify) Bonding Programs				
a. Utilize housing revenue bond financing resources and Low-Income Housing Tax Credits on new construction and acquisition/rehabilitation projects that help meet the City's affordable housing needs.	Community Development Department; Housing Authority	State and Municipal Bonds; Private Activity Mortgage Bonds Revenue issued by California Statewide Communities Development Authority and others; California Low-Income Housing Tax Credits; California Debt Limit Allocation Committee (CDLAC)	Complete analysis of available programs annually.	Annually in June between 2021 - 2029
1.13 (New) Adaptive Reuse of Historic Resources to Facilitate Affordable Housing production				
a. Promote current program that allows the adaptive reuse of historic resources for affordable housing and evaluate the use of alternate parking strategies under Program 1.2 (c).	Community Development Department	General Fund	Promote program through City website and historic preservation interest groups. Develop memo to evaluate the use of alternate parking	By December 2023 By December 2023

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			strategies for adaptive historic reuse.	
1.14 Ongoing Review of Housing Element Programs				
a. 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.	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.
1.15 (New) Monitor Changes in Federal and State Housing, Planning, and Zoning Laws				
a. City will continue to monitor federal and state legislation that could impact housing and comment on, support legislation that promotes the equitable provision of affordable housing or oppose legislation that negates that purpose and will respond with appropriate changes to remain compliant with State law.	Community Development Department	City General Fund; Staff time	Prepare annual legislation update.	Report Annually in April
1.16 Consolidated Plan				
a. Continue to prepare regular updates 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 in coordination with Affirmatively Furthering Fair Housing Practices.	Community Development Department	Variety of local, State, and Federal funding; City General Fund Staff time	2020-2025 Consolidated Plan adopted in April 2020; next update 2026 Prepare annual Action Plan	Update by December 2026 Annual Action Plan
1.17 Public Improvement Financing				

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
a. Continue to assess opportunities to utilize public improvement financing techniques for other areas of the City and determine whether or not they are financially feasible. In creating any new community assessment districts, an evaluation should be completed of the developer's activity to advance pay off bonds at the close of escrow.	Community Development Department; Economic Development; Finance Department	Developer funded	Continue to use special assessment district funding at Tustin Legacy and its use in other developing areas.	On-going. As development progresses at Tustin Legacy, the City will evaluate financing mechanism to fund infrastructure improvements.
1.18 Fees, Exactions, and Permit Procedures				
a. The City will waive and modify various fees or exactions normally required where such waiver will reduce the affordability gap associated with providing housing for the elderly and for very-low and low-income households.	Community Development Department	City General Fund	Adoption of a revised policy relative to deferment of impacts fees will be evaluated and considered on an annual basis.	Annually beginning January 2023
1.19 Lot Consolidation Overlay Program				
a. Create a Lot Consolidation Overlay (LCO) Program (see Section IV). The intent of the LCO is to encourage the consolidation of lots by providing incentives	Community Development Department	City General Fund	Adopt Code Amendment to provide Lot Consolidation development incentives such as: <ul style="list-style-type: none"> • Reduction in development standards • Additional density bonus beyond the State's maximum ratio • Reduced application fees 	By October 2024

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			<ul style="list-style-type: none"> Priorities in the application process 	
Goal 2: Fair Housing and Specials Needs				
2.1 (Modified) Emergency, Transitional, and Supportive Housing				
<p>a. The Municipal Code will be amended to include definitions of transitional and supportive housing, consider transitional and supportive housing to be a residential use, and explicitly permit transitional and supportive housing subject only to those zoning regulations that apply to other residential dwellings of the same type in the same zone. Transitional and supportive housing meeting certain criteria will be allowed by-right in zones where residential uses are permitted, including mixed-use and nonresidential zones, per AB 2162 and AB 2988.</p> <p>Additionally, the City will amend the Municipal Code to include definition and provision of Low Barrier Navigation Centers (LBNC) in compliance with AB 101 and AB 139, which require the provision and emergency shelters by-right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. Specifically, AB 139 requires the assessment of shelter needs be based on the most recent Point-in-Time Count and the parking standards for shelters be based on staffing levels.</p>	<p>Various Non-Profit Organizations, Housing Authority, Community Development Department, Economic Development Department</p>	<p>Variety of private funds; CDBG funds</p>	<p>Update City Municipal Code</p>	<p>By October 2023</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
b. Facilitate continued operation of Sheepfold homes and Laurel House in Tustin, which provide housing facilities for battered homeless women and children	Community Development Department	CDBG funds	Continue to provide financial assistance through the allocation of CDBG funding	Annually in July
c. Continue to support countywide efforts to assist approved homeless providers as part of the Tustin Legacy Reuse effort.	County of Orange, Community Development Department, Housing Authority	CDBG funds, HUD SHP funds	<p>Continue to participate on the Association of California Cities-OC Housing and Homeless Committee</p> <p>Allocate CDBG funds to non-profits to provide 150 individuals services such as counseling, education, job-training and other techniques to stop the cycle of homelessness.</p> <p>Retain 262 emergency shelter beds and expand emergency shelter bed inventory by 125 beds.</p> <p>Retain 50 transitional housing units.</p> <ul style="list-style-type: none"> Continue to support 24 units of transitional housing for families (operated by Salvation Army) 	<p>Attend quarterly meetings beginning in February 2022)</p> <p>Annually, between 2021-2029.</p> <p>By December 2024</p> <p>On-going, between 2021-2029; Report annually in April</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			<ul style="list-style-type: none"> • Continue to support 6 units of transitional housing for women and children (operated by Human Options-Dove Housing) • Continue to support 6 units- in long-term 12-24 months transitional housing for families with children (operated by Orange Coast Interfaith Shelter) • 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) 	
<p>d. Provide educational resources for prevention of extremely low-income households from becoming homeless by providing links and program information on City’s website and at the Tustin Library, Senior Center, and Family and Youth Center.</p>	<p>Housing Authority and Community Development Department</p>	<p>HUD Section 8 Program, CDBG</p>	<p>Post information to City website and provide informational materials to Tustin Library, Senior Center, and Family Youth Center</p>	<p>Post by January 2023; Update Annually in April</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
2.2 Economic Integration within Sphere of Influence				
a. Request that the Orange County Planning Commission and the Environmental Management Agency (EMA) notice the City of Tustin of any proposed development activities and encourage and support the County of Orange in its efforts to provide affordable housing opportunities for low, very-low, and extremely low- income families within Tustin’s sphere of influence.	County of Orange, Community Development Department	City General Fund; Staff time	Report number of requests in annual report.	Annually in April
2.3 (Modified) Senior Services				
a. Continue implementation of the City’s comprehensive transportation program, case management, information and referral, and shared housing program.	Parks and Recreation Department	City General Funds	Serve more than 75,000 seniors annually	Report annually in April
2.4 (Modified) Housing for Persons with Disabilities				
a. Continue to work with the Regional Center of Orange County to develop and implement an outreach program (i.e. brochures, pamphlets, informational flyers, etc. that can be shared and posted on the City’s website) that informs families within the City of affordable housing and services available for persons with developmental disabilities.	Community Development Department	General Fund State and Federal programs; City’s General Fund	Implement an updated outreach program with information posted on the City’s website along with social media usage.	Develop outreach program by June 2022 Develop outreach materials by September 2022 Post outreach materials to City website by October 2022

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
b. Develop zoning and development standards that will allow and encourage the construction and expansion of affordable housing including but not limited to single-room occupancy (SRO) housing and permanent and supportive housing (i.e. motel conversion ordinance).	Community Development	General Fund	Revise City's Zoning Code.	By January 2024
c. Remove Reasonable Accommodations request application fee.	Community Development	General Fund	Adopt a revised fee Resolution.	By June 2023

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			basis, starting in 2024 through 2029.	basis starting March 2024.
2.5 (New) Affirmatively Furthering Fair Housing				
<p>(New) Fair Housing Education</p> <p>a. Provide educational materials to promote fair housing laws including but not limited to housing referral services.</p>	<p>Community Development Department; Police Department; Parks and Recreation Department; Community Development;</p>	<p>General Fund, CDBG Funds</p>	<p>Report confirmed incidents of discrimination in the sale or rental of housing; and report on the increase/decrease in the number of complaints/cases of discrimination in the sale or rental of housing</p> <p>Update website and provide educational material related but not limited to: Directory of Senior Citizen’s Services prepared by the Area Agency on Aging Senior Citizen’s Office; Social Service Assistance Booklet prepared by Connection Plus; and Orange County Housing Directory prepared by OCHA and the OCHA Advisory Committee.</p>	<p>Annually by April, starting April 2023.</p> <p>By January 2023</p>
<p>(New) Increase Accessibility of Fair Housing Services / Engage Linguistically Isolated</p> <p>b. The City will provide bilingual communications, including but not limited to interpreters and translation services, in official governmental actions and communications</p>	<p>Community Development Department</p>	<p>General Fund</p>	<p>Translate official City announcements (i.e. community meeting, hearings, etc.) to Spanish and disseminate printed copies of information to renters,</p>	<p>By January 2023</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p>including meeting and hearing notices and presentations. By engaging linguistically isolated populations in the decision-making process, they are better able to advocate for their needs and concerns regarding affordable housing and access to opportunities.</p>			<p>property owners, and via social media, in order to expand knowledge of affordable housing options in High Opportunity Areas.</p> <p>Increase attendance, representation, understanding by linguistically isolated residents, at community meeting, public hearings and City Council meetings.</p> <p>The City will conduct at least one community informational meeting in areas that lack affordable housing opportunities and that exhibit high segregation, on an annual basis until 2029.</p>	
<p>(NEW) DISSEMINATE HOUSING AND ANCILLARY RESOURCE INFORMATION & ENGAGE LIGUISTICALLY ISOLOATED</p> <p>c. Translate the City’s Tustin Housing Authority website and factsheets promoting affordable housing opportunities and ancillary support services, such as transit and child care, into Spanish, and distribute to low resources areas.</p>	<p>Community Development Department</p>	<p>General Fund</p>	<p>Increase the distribution of translated materials to low resources areas located in the southwest of the City by mailing out postcards to each household in select census tracts, containing information related to housing choices,</p>	<p>Annually, starting in 2023 through 2029</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			transit, child care, and education resources.	
<p>(New) Housing Discrimination</p> <p>d. Contract with a non-profit fair housing provider, (i.e. non-profit organization such as Fair Housing Foundation), to provide education to property owners and landlord to prohibit housing discrimination, as well as fair housing testing and investigation to look for evidence of differential treatment and disparate impact.</p>	Community Development Department	General Fund	<p>Contract with fair housing provide annually.</p> <p>Conduct an annual training with the Fair Housing Foundation to provide landlords education on housing discrimination, specifically targeted towards fair housing issues identified in AFFH.</p> <p>Conduct annual fair housing testing and investigation.</p>	<p>Annually, starting July 2022</p> <p>Trainings annually, beginning July 2022</p> <p>Report on Fair housing testing conducted annually, beginning June 2023</p>
2.6 Housing Referral Program				
<p>a. Continue to provide housing referral services to families in need of housing assistance and information by. This program consists of three City departments disseminating information to the public at all times.</p> <ul style="list-style-type: none"> The Police Department refers homeless people to different agencies that provide shelters and food for various segments of the population. The Parks and Recreation Services Department 	Police Department; Parks and Recreation; Department; Community Development Department;	City General Fund, CDBG Funds	<p>7,500 referrals to social agencies</p> <ul style="list-style-type: none"> 937 referrals annually 50 referrals for shared housing by 2029 	Annually between 2021-2029; Report in April

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p>provides housing information and social service information to the senior population.</p> <ul style="list-style-type: none"> The Community Development Department provides housing and social service information to all segments of the population as part of its City Hall operations, which is conducted in person, by phone, and online, including referrals provided by CDBG funded non-profits. 				
2.7 (New) Farmworker Housing				
<p>(New) Farmworker Housing</p> <p>a. The City will update their Zoning Code to comply with provisions of the Health and Safety Code Section 1702.15, which allows employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone, and 1702.16, which requires employee housing, consisting of no more than 12 units or 36 beds, to be permitted in the same manner as other agricultural uses in the same zone.</p>	Community Development Department	General Fund	City will update the Zoning Code to include provision of farmworker housing as appropriate under Health and Safety Code Section 1702.15 and 1702.16.	By October 2022
2.8 (New) Tustin Legacy Specific Plan Improvement Program				
<p>(New) Tustin Legacy Specific Plan Improvement Program:</p> <p>Tustin Legacy (Tract 744.15) is a Master Planned Community that is currently being developed. Although the tract has been identified as low resource, it has been substantially enhanced with new resources within recent years including services and amenities such as elementary school, high school, Junior College, new grocery store, shopping and</p>	Community Development Department	Tustin Legacy (MCAS) Fees, Developer Fees, and General Fund	City will implement projects as identified in the City's Capital Improvement Program, Tustin Legacy Backbone Infrastructure Program, and Tustin Legacy Specific Plan.	By October 2029

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p>dining, medical offices, Acute Rehabilitation Center, Animal Shelter, Sherriff Academy, Transitional and Emergency shelters, Sports Park, and County Facility for abused and neglected women and children. In addition, substantial infrastructures have and will continue to occur such as water, power, sewer, streets, sidewalks, pedestrian walkways, landscaping, water treatment facility. The area comprises 1,600 acres, of which 600 acres remain for future development of a diverse housing stock, community amenities, and resources. By 2029, the City will continue to implement projects that increase assets in the Specific Plan area as proposed by developers and identified in the Tustin Legacy Backbone Infrastructure Program, which includes:</p> <ul style="list-style-type: none"> • The Landing at Tustin Legacy: residential projects with development of open space, park areas, and community amenities • Tustin Legacy Linear Park at Armstrong Avenue and Warner Avenue • Alley Grove Public Promenade and recreational courts • Neighborhood D South Infrastructure Construction - Phase 2 • South Hangar Historic resource renovation and preservation Renovation • Armstrong Avenue Pedestrian Bridge • Warner Avenue Pedestrian Bridge 				

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<ul style="list-style-type: none"> Tustin Legacy Community Dog Park Police substation at Tustin Legacy				
Goal 3: Preserve and Improve Housing Opportunities				
3.1 Condominium Conversions				
a. 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.	Community Development Department	City General Fund	Post requirements on highlighted City webpage and provide consultations to developers approximately 5 per year.	Post by October 2022 Report consultations Annually in April
3.2 (Modified) Home Ownership Assistance				
a. Facilitate the process of homeownership, especially first-time homebuyers, by providing a virtual one stop shop clearinghouse through a non-profit organization (i.e. Affordable Housing Clearinghouse) and explore participation in the Orange County Mortgage Assistance Program (MAP)	Housing Authority; Community Development	State and Federal sources	Provide educational resources on city website and social media. Conduct review and analysis for MAP participation.	Annually, start by December 2024 By October 2023
b. Search and apply for funding opportunities such as HELP, HOME funds, and other State and Federal programs.	Housing Authority	State and Federal sources	Annually check the websites of HUD, State HCD, and Orange County Housing Authority for potential funding sources and apply for eligible programs concurrently during application for SB 2 Permanent	Annually, in April starting in 2023.

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			Local Housing Allocation (PLHA) funds.	
3.3 Housing Authority				
a. Contract with the Orange County Housing Authority (OCHA), where necessary, for the development and operation of federally assisted low- and moderate-income housing programs.	Orange County Housing Authority; Tustin Housing Authority and Community Development	HUD, CDBG	Continue to contract with the OCHA Quarterly Meetings; Report Annually	Annually, as needed in April. Quarterly Meetings
b. Participate in educational campaign for property owners regarding State and Federal laws prohibiting discrimination, in coordination with non-profit fair housing services organization	Housing Authority and Community Development	Federal, State, and Local grant funding	Bi-annual education media campaign; post on City website	Bi-annually and on-going
3.4 (New) Annual City Housing Check-In with Developers				
a. City will coordinate an annual check-in (i.e. survey or meeting) with s developers to promote affordable housing development opportunities within the City.	Community Development, Public Works, Economic Development and Housing Authority	General Fund	Conduct an annual C annual check-in such as a survey or meeting to educate private sector of housing opportunity sites to meet RHNA	Annually by June of each year, starting June 2023
3.5 Rental Assistance				

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p>a. Provide rental assistance, through the County Section 8 program, to extremely low and very low income households.</p>	<p>County of Orange, Housing Authority, Community Development Department</p>	<p>HUD</p>	<p>Through the Orange County Housing Authority, the City will continue to provide Section 8 rental assistance to extremely low to very low-income residents with approximately 425 Tustin residents assisted.</p> <p>Promote availability on city websites</p> <p>Reach out to landlords of low-income apartment complexes to provide education and materials about the Section 8 program.</p>	<p>Report annually in April, during planning period.</p> <p>Annually update in January</p> <p>Biannually in January and June</p>
<p>3.6 Affordable Senior Housing Project and Senior Board and Care Facility</p>				
<p>a. Continue to provide opportunities to provide a range of housing options to address the diverse needs of Tustin's senior population.</p>	<p>Community Development Department</p>	<p>None necessary</p>	<p>Provide at a variety of affordable housing options for seniors located at:</p> <ul style="list-style-type: none"> • 16000 Cambridge Street (Coventry Court - 153 units) 	<p>Annual report in April.</p> <p>Publish locations on City website and verify annually in April</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			<ul style="list-style-type: none"> • 311 Sycamore Avenue (Heritage Place - 54 units) • 275 E. 6th Street (Tustin Gardens - 99 units) • 17432-17442 Mitchell Avenue (Tustin Terrace - 20 units) 	
3.7 (Modified) Preservation of Assisted Housing				
a. Preserve units at-risk of conversion to market-rate housing	Community Development Department, Housing Authority	State and Federal Funds	Establish annual monitoring procedures for rent restricted units provided through City incentives and/or financial assistance. Contact property owners within at least one year of potential affordability expiration to initiate preservation discussions.	Develop monitoring procedures by December 2023 and begin implementing procedures by January 2024.
3.8 (New) Middle Income Housing Opportunities				
a. Complete a cost-benefit analysis of obtaining membership with the CalCHA - through its Essential Middle-Income Rental Housing Program ("Program").	Community Development Department, Housing Authority	General Fund	Review and analyze benefits from potential participation in CalCHA program. Identify rental properties for potential acquisition and	By December 2025 By December 2025

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			conversion to affordable housing.	
3.9 (New) "Qualified Entities"				
a. Publish contact information for organizations that specialize in providing affordable housing and may be able to preserve at-risk subsidized units.	Community Development Department	General Fund	Registration into program. Publish on website.	By December 2022 Publish on City website by December. Annually, by April between 2021-2029
3.10 (Modified) Housing Rehabilitation to Address Substandard Housing				
a. Partner with a non-profit to develop and launch a CDBG funded Housing Rehabilitation Program to facilitate the repair of dilapidated housing to address lack of plumbing, kitchen facilities and repairs to provide relief of overcrowding. Program participants will be provided grants and/or loans to conduct necessary housing updates. The program will focus on improving housing conditions in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15 (areas with high segregation index as defined by Dissimilarity Index values which indicate geographical segregation patterns in census tracts)	Housing Authority; Community Development Department	Available federal, state, and local resources	Conduct review and analysis and develop a program framework for implementation. Facilitate four (4) rehabilitation projects to assist with reducing overcrowding per year and another four (4) projects will assist with general habitability repairs, with a total of eight (8) dwellings assisted annually. Starting in July 2024, the City in partnership with a	By December 2025

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			non-profit, will conduct targeted outreach through annual mailings to the southwest areas of City within low resources areas and populations, about available rehabilitation assistance. All program literature will be provided in English and Spanish. Progress will be evaluated and reported annually in the City’s CDBG Annual Report.	Annually, beginning January 2026.
3.11 (New) Quality Rental Housing Inspection Program				
a. Establish a multi-family quality rental housing inspection program.	Community Development Department	CDBG, Home	Elevate the quality of housing in segregated areas in order to transform the area into a desirable housing location by all socio-economic groups. The City will conduct at least five multi-family quality rental housing inspections in the program’s first year, and will increase the number of annual inspections by 2, each year thereafter until 2029.	By July 2025

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			<p>The program will focus on improving housing conditions in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15 (areas with high segregation index as defined by Dissimilarity Index values which indicate geographical segregation patterns in census tracts).</p> <p>The City will receive at least one monthly referral from the City's Neighborhood Improvement Task Force (NITF) (NITF includes Code Enforcement, Police, Social Service/County, School District representatives, City staff from various Departments) to identify households in need of this tenant protection and anti-displacement focused program; focused on improving the quality of single family and multi-family residential dwellings by providing technical assistance and funds to repairs substandard housing conditions.</p>	

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
3.12 CHILD-CARE RESOURCES				
<p>a. Create a “Financial Assistance for Child Care” webpage with information and links to Children’s Home Society of California (CHS) and the Orange County Department of Education (OCDE). These programs provide funding to low-income families for child care services. The City will work with Tustin Preschool, Kiddie Academy of Tustin, or other local preschool programs within Census tract 755.14 to advertise and promote financial assistance through pamphlets, e-blasts, and other applicable online community forums (such as Facebook and NextDoor).</p>	<p>Economic Development Department/ Community Development Department</p>	<p>General Fund</p>	<p>Single-parent households require special consideration and assistance because of their greater needs for daycare, healthcare, and other facilities. According to HCD, female-headed households with children tend to have lower incomes, thus limiting housing availability for this group. The City will assist in providing free childcare services to relieve general living expenses of female-headed households, specifically in Census tract 755.14. The City will provide services to relieve general living expenses of female-headed households, specifically in Census tract 755.14.</p>	<p>By December 2022</p>
3.13 INCREASE HOUSING SUPPLY FOR LARGE HOUSEHOLDS	<p>Community Development Department</p>	<p>General Fund</p>		

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
<p>b. Amend the zoning code to require all new multi-family projects to provide at least five (5) percent large family units (3+ bedrooms) which will prevent overcrowding and further cost burden, by addressing demand for such units and increasing the large units into the local housing inventory.</p>	Community Development Department	General Fund	<p>Amend the code.</p> <p>Facilitate the creation of four (4) large family units will be generated annually, and 32 total by 2029.</p>	<p>By December 2024</p> <p>Annually, start January 2025 through 2029</p>
Goal 4: SUSTAINABLE HOUSING				
4.1 (Modified) Code Enforcement Program				
<p>a. Encourage property maintenance and enforce building codes to address and prevent substandard housing conditions, removal of graffiti and other deferred maintenance issues on public property.</p>	Community Development Department	City General Fund	<p>Investigate substandard housing on an on-going basis; approximately 25 cases per year.</p> <p>Remove approximately 4,000 cases of graffiti annually.</p> <p>Conduct approximately 100 Water Quality inspections, in conjunction with the Water Quality Control Ordinance and the National Pollutant Discharge Elimination System (NPDES) permit process to protect neighborhoods from pollution.</p>	<p>Report annually in April</p> <p>Report annually in April</p> <p>Report annually in April.</p>

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
b. Encourage proactive maintenance and improvement to existing housing.	Community Development Department	City General Fund	Advertise available home improvement financing programs on an on-going basis. Post and update information on website and at the public service counters.	Report annually in April Report annually in April
4.2 (Modified) Cultural Resources District				
a. Preserve neighborhoods and structures that reflect the City's heritage .in the City's Cultural Resources Overlay District.	Community Development Department	CDBG, City General Fund, State grants	Process approximately 20 Certificate of Appropriateness on an annual basis. Update citywide historic resources survey	Report annually in April By December 2021
4.3 (Modified) Energy Conservation				
a. Partner with utility companies to promote energy conservation and rebate programs (i.e. installation of photovoltaic systems, tank-less water heater, natural gas recharge connection, electric vehicle recharge connection, wind power generator, etc.)	Community Development Department	General Fund; grant funding.	Promote utility company rebates during design review and public counter consultations; approximately 100 total per year.	Report annually in April

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
4.4 (Modified) Sustainable Building				
a. Promote energy efficiency by orienting homes to maximize natural day lighting.	Community Development Department	General Fund	Promote via City’s Design Review process and counter consultations; approximately 100 total per year.	Report annually in April
b. 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.	Community Development Department	General Fund	Educate via City’s website, Design Review process and counter consultations; approximately one (1) total per year.	Report annually in April
c. Require development projects that include structures higher than 200 feet above existing grade to be submitted to Airport Land Use Commission for review. Require projects that exceed a height of 200 feet above existing grade to file Form 7460-1 with the Federal Aviation Administration (FAA).	Community Development Department	General Fund	Educate via City’s website, Design Review process and counter consultations, as applicable; approximately one (1) total per year.	Report annually in April
4.5 (Modified) Water Efficiency				
a. Promote water-efficient landscapes, efficient irrigation, and use of permeable paving materials.	Community Development Department	General Fund	Educate via City’s website, project review process and counter consultations;	Report annually in April

**TABLE IV-1
HOUSING ELEMENT PROGRAMS 2021-2029**

Program	Responsible Agency	Funding Source	Quantified Objective	Timeframe
			approximately 100 total per year.	
b. Develop educational and trainings materials, to promote water efficiency.	Community Development Department	General Fund	Educate via City’s website, Design Review process and counter consultations; approximately 100 total per year.	Report annually in April

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APPENDIX A
REVIEW OF PAST PERFORMANCE

APPENDIX A

REVIEW OF PAST PERFORMANCE

State law establishes an eight-year cycle regulating housing element updates. In compliance with the 5th SCAG RHNA cycle, the Tustin Housing Element was updated in 2013 and was certified by The State's Housing and Community Development Department in compliance with State's Law. The following section evaluates the effectiveness of the goals, policies and programs of the last adopted Housing Element (2013-2021).

Review of Past Housing Element Objectives (2013-2021)

State law (California Government Code Section 65588(a)) requires each jurisdiction to review its housing element as frequently as appropriate and evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal;
- The effectiveness of the housing element in attainment of the community's housing goals and objectives; and
- The progress in implementation of the housing element.

The evaluation provides valuable information on the extent to which programs have been successful in achieving stated objectives and addressing local needs, and to which these programs continue to be relevant to addressing current and future housing needs in Tustin. The evaluation provides the basis for recommended modifications to policies and programs and the establishment of new housing objectives. The following highlights the housing activities and programs from the past Housing Element:

Goal 1: Adequate Housing Supply

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. While unit count was undefined, the program has seen development of over 1,549 units over the 8-year period. Development in the Tustin Legacy Specific Plan area accounted for 1,351 units (Greenwood, Amalfi, Anton Legacy, Levity developments. Of these units, 262 units were affordable.

Two new specific plan areas allowing residential development (generally mixed-use residential), where not previously zoned to allow residential, were created in the City

in 2018; the Downtown Commercial Core Specific Plan (DCCSP) area and the Red Hill Avenue Specific Plan (RHASP) area. Both of these new Specific Plan areas require all future development to participate in the City's Workforce Housing Ordinance (Ordinance No. 1491 adopted in 2018) options contributing to affordable housing mostly through mixed-use. To date, 140 units have been built in the DCCSP area during this planning period.

New construction/Additions and Alterations

1,549 new residential units were issued permits for constructions during the 2013-2021 planning period, above the assigned RHNA of 1,227 units, though partially meeting the City's estimated objective of 2,900 new constructed units for said period. Most estimated new construction (2,295) was anticipated to occur in the Tustin Legacy. While sites were available, the market/development community did not respond to the estimated objective during the planning period with probable effects due to the economy, other factors and the Covid-19 Pandemic occurring within said cycle.

Expectations were exceeded relative to Accessory Dwelling Units (second units). While ten (10) second units (ADU's) were estimated, actually new ADU's accounted for twenty-seven (27) new units are deemed approved/under construction/in the plan check process. This result is assumed attributed to new State laws, economics and generational characteristics and desires of the population.

Additionally, a total of 5,307 residential additions and alterations were processed during this planning period.

Accessory Dwelling Unit (Second Residential Units)

As noted above, expectations were exceeded relative to Accessory Dwelling Units (second units) resulting in almost three times the 10-unit objective referenced. In 2017, the City Council adopted Ordinance No. 1479 related to accessory dwelling units (ADUs), formerly known as second residential units. With such, the City was deemed in compliance with State law. Most activity resulted after this 2017 timeframe.

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 2013-2021, 328 restricted units were established.

Special Needs Housing

The City was effective in addressing housing needs for our special needs population; the disabled (including developmentally disabled), elderly (seniors), homeless, female head of household and large families. Specific results were capturable for the disabled, seniors and homeless categories but less so for the female headed household and large family categories as the metrics were not present.

Disabled: Ongoing efforts have continued during this planning cycle regarding the program objective to ensure accommodations for the disabled. Some of the efforts included update of the City's website Housing Section, participation in an adjacent city's task force relative to housing needs of developmentally disabled, and, meeting with Tustin Legacy affordable housing developers to discuss specific needs for this population. Further, implementation requirements and associated program objectives relative to SB 520 were met and continues. The City also ensured that development of multi-family housing to set aside portion of the units to be accessible in compliance with Chapter 11 of the California Building Code.

Homeless: The City of Tustin is directly assisting the unsheltered homeless population within Tustin through the collaboration between the Tustin Police Department, CityNet, Orange County Health Care Agency (PERT Mental Health Services), Orange County Rescue Mission, and the Tustin-based nonprofit Operation Warm Wishes, to provide resources and services to the transient homeless in Tustin.

In March 2019, the City of Tustin opened a new low-barrier temporary homeless shelter with 57 emergency shelter beds for men, women, and families with children. This facility is operated by Temporary Shelter, Inc., and includes a variety of wrap-around and other supportive services which are administered at the site. This site is being established to ensure that unsheltered homeless individuals with ties to Tustin have the opportunity to be provided with a bed and shelter. The City will continue to develop a strategy that will continue to address homeless needs in the community.

Transitional and Supportive Housing: The City of Tustin and Orange County Rescue Mission executed a ground lease to support the Rescue Mission's construction/rehabilitation of a 5.1 acre site to establish a 192-unit transitional housing project (Village of Hope) at the former MCAS Tustin. This site was created by converting former military barracks equipped with private bathroom and kitchenette. The Village of Hope has also increased their transitional housing capacity to up to 387 units, an increase of 195 units. This transitional housing facility is currently in operation.

The City also conveyed two four-plexus to the Orange County Rescues Mission to provide transitional housing to homeless veterans to serve 26 homeless veterans and their families, the Tustin Veterans Outpost was completed. The conversion of

fourteen (14) units from transitional to permanent supportive housing for low income families also took place and resulted with an amended Homeless Assistance Agreement with Families Forward. The City also entered into an Agreement with Family Promise in partnership with Home Aid Orange County for the construction of a new seven (7) housing unit facility and family resource center (House of Ruth) to provide affordable housing and related support to extremely-low-income families with children who are experiencing homelessness or are at-risk of being homeless. In addition, the City allocates CDBG funds annually to non-profit groups such as Families Forward Transitional Housing Program; Human Options Third Step Transitional Housing Program; and, Mercy House Family Care Center.

Zoning Studies

The City was to undertake zoning studies to include the creation of zoning provisions which would accommodate mixed-uses in portions of the city, particularly in the Old Town Commercial Area and study the relaxation of certain development standards and incentives for projects which include affordable housing units particularly units for extremely low income if directed by the City Council.

In 2018, the Tustin City Council adopted a new specific plan document, the Downtown Commercial Core Specific Plan (DCCSP). This Orange County American Planning Association award winning Plan introduced mixed-use and infused the potential for 887 units into the area. To date, 140 new residential units were constructed (all within the Vintage Development). While this development entailed all market rate units, the developer participated in the in-lieu fee option regarding affordable housing provisions.

Also in 2018, the Red Hill Avenue Specific Plan (RHASP) was adopted by the Tustin City Council. The RHASP introduced mixed-use to the area and similarly identified the potential for 500 new residential units to the area.

Additionally, a Workforce Housing Ordinance was prepared and adopted by the City Council in 2018 which currently affects both the DCCSP and RHASP areas of the City. All future projects in these two areas of the City are required to participate.

In 2020, City staff prepared for both the DCCSP and the RHASP areas streamlined application and review systems.

Currently in process, City staff is working on citywide ADU design guidelines with examples as well as an ADU zoning update. Additionally, staff is working on residential related mixed-use parking strategies for the DCCSP area.

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, two apartment developments that were granted density bonuses by the City in November 2012 were completed. The Amalfi development is a 533-unit complex

with 37 moderate income units. Anton Legacy Apartments is a 100% affordable development with 225 rental units: 88 very low income; 73 low income; and 64 moderate income. A total of 190 density bonus units were realized.

Goal 2: Equal Housing Opportunity

Fair Housing

This objective was to provide housing counseling services to assure equal housing opportunities by assisting approximately 400 residents annually and 3,000 residents by 2021. Between 2013 and 2021, it was estimated by the Fair Housing Foundation that 1,333 Tustin residents requested assistance and were provided with housing counseling services. Additionally, yearly educational outreach activities occurred. The City responds to any general housing and discrimination complaints. The objective was met.

Goal 3: Ownership Housing

The City continues to encourage new housing construction for home-ownership in a mixture of price ranges particularly in the Tustin Legacy area. The City's goal is to provide a job/housing balance within the Community by encouraging and requiring the developer to construct workforce housing units within the City's owned sites at Tustin Legacy.

The City also partnered with Habitat for Humanity in creating two (2) new affordable ownership housing units for families.

Goal 4: Affordable Housing Preservation

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. The 100 at-risk units at Tustin Gardens were preserved throughout the review period.

Goal 5: Neighborhood Conservation

Enforcement of Building and Housing Codes

The objective of this program is to continue to enforce building and housing codes to ensure health and safety, rectify Code violations and thereby improve the overall character of the community. The quantified objective was to investigate 30 substandard housing cases annually and 240 cases by 2021. The City's Code Enforcement Staff estimated that over 2,300 property maintenance and housing code

related inspections were conducted between 2013 and 2020. The City has been successful in getting property owners to abate code violations.

Preservation of Historic Resources

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 2013 and 2021, the Community Development Department issued 163 Certificates of Appropriateness certifying building changes were consistent with design guidelines and appropriate within the District context. Further, the City is in the process of an update to the City's Historical Resources Survey and Report which is to be completed in 2021.

Goal 6: Environmental Sensitivity

Energy Conservation/Rebate Program

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. All new units were required by the City to meet these standards. In addition, since 2013, all properties within the City have the opportunity to benefit from inclusion in the California HERO Program to finance distributed generation renewable energy sources, energy and water efficiency improvements and electric vehicle charging infrastructure. Availability of grants are continuously explored.

Water Efficiency

In response to Assembly Bill 1881, the City in coordination with the League of Cities Orange County Division and the Orange County Water District prepared and adopted the Water Efficiency Landscape Ordinance. The City's website has been updated with information and guidelines to achieve water efficiency.

The City adopted an ordinance addressing synthetic turf landscaping, including material, installation and maintenance, to promote reduced irrigation needs and quality landscaping. In December 2015, the City Council adopted Ordinance 1465 which calls for additional water efficiency and was found to be in conformance with both State law and Governor Brown's Executive Order. The City issued 12 residential permits and 24 permits for landscape rehabilitation, subject to the Water Efficient Landscape Ordinance:

In 2013, the City also participated in the SoCal Water Smart program where rebates were provided for eligible water saving projects.

In 2018, the City partnered with other Orange County Cities to prepare a helpful video guide for the public to use regarding water efficient landscaping. Said video received an Orange County American Planning Association award.

Progress in Meeting 2013-2021 Housing Element Quantified Objectives

The SCAG Regional Housing Needs Assessment (for the 2014-2021 cycle) indicated a new construction need in Tustin by 2021 of 1,227 units, of which 283 units were for very low-income households, 195 for low income, 224 for moderate income and 525 for above moderate income. Table AA-1 summarizes the quantified objectives and compares the City’s progress in meeting these objectives.

**TABLE AA-1
SUMMARY TABLE EFFECTIVENESS OF HOUSING ELEMENT,
2013-2021**

Income Group	New Construction		Preservation	
	Goal	Actual ¹	Goal ²	Actual
Very-Low	283	103	100	100
Low	195	74		
Moderate	224	114		
Above Moderate	525	1,258		
Total	1,227	1,549	100	100

¹Numbers include total, actual number of units with permits issued and completed.

²While the numbers represent units, it does not account for the funding and other support activities provided.

Source: The City of Tustin, Housing Element, 2013 Table HTM-25, 2014-2021 Housing Needs; City of Tustin Annual Reports 2013 – 2020 – Implementation Status - Housing Programs Progress Report – Government Code Section 65583 Tables (Tables C or D depending on the year)

**APPENDIX A -
ATTACHMENTS
REVIEW OF PAST PERFORMANCE**

SUMMARY OF PREVIOUS HOUSING ELEMENT PROGRAMS

To develop appropriate programs to address the housing issues identified in this Housing Element Update, the City of Tustin has reviewed the housing programs adopted as part of its 2013 Housing Element, and evaluated the effectiveness of these programs in delivering housing services.

By reviewing the progress in implementation of the adopted programs, the effectiveness of the last element, and the continued appropriateness of these identified programs, a comprehensive housing program strategy has been developed.

The following section reviews the progress in implementation of the programs, the effectiveness of the 2013 Element to date, and the continued appropriateness of the identified programs. The results of the analysis provided the basis for developing the comprehensive housing program strategy for the future planning period, as well as goals for the planning period in progress.

REVIEW OF PAST PERFORMANCE

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, 2009 and 2013, the City updated its Housing Element and was certified by the State's Housing and Community Development Department in compliance with State's Law.

The time period covered in this analysis is generally 2013 - 2020, and, 2021, where information is available.

REVIEW AND PROGRESS IN IMPLEMENTING THE 2013 GOALS AND OBJECTIVES

Table A-1 summarizes the performance and presents a comparison of the quantified objectives of the previous 2013 Element and the actual achievements since 2013.

The 2012 SCAG Regional Housing Need Assessment (for the 2013-2021 cycle) indicated a new construction need in Tustin by 2021 of 1,227 units, of which 283 units were for very low-income households, 195 for low income, 224 for moderate income and 525 for above moderate income. Table A-1 conveys the actual results for new construction as well as goals and actual results regarding rehabilitation/preservation

and housing assistance, where information was available. Of note, any extremely low-income units are captured in the very-low income category.

**TABLE A-1
SUMMARY TABLE EFFECTIVENESS OF HOUSING ELEMENT, 2013-2021**

Income Group	New Construction		Rehab/Preservation		Housing Assistance	
	Goal	Actual	Goal ¹	Actual	Goal ¹	Actual
Very-Low	283	94	171	253	242	243
Low	195	74	49	132	74	74
Moderate	224	114				
Above Moderate	525	1,240				
Total	1,227	1,522	220	385	316	317

¹ While the numbers represent units, it does not account for the funding and other support activities provided. Data not available for those not presented with numbers.

Source: The City of Tustin, Housing Element, 2013 Table HTM-25, 2014-2021 Housing Needs; Table A-2, Effectiveness of Housing Element Programs; Table H-20, Housing Element Programs 2013-2021; City of Tustin Annual Reports 2013 - 2020 - Implementation Status - Housing Programs Progress Report - Government Code Section 65583 Tables (Tables C or D depending on the year)

Table A-2 provides program by program review of the previous Housing Element (identified in Table H-20 from the 2013 Housing Element), containing a discussion on the effectiveness and continued appropriateness of each program. It includes an identification of units achieved or status thereof, where applicable. Of note, any extremely low-income units are captured in the very-low income category.

Table A-3, Progress Towards Objectives 2013-2021, following Table A-2 provides a summary table identifying focused areas with quantified objectives, associated accomplishments and, where known, the distribution of units by income category. The focused areas include new construction, rehabilitation, preservation, and other focused affordable housing programs. The detail is articulated in Table A-2. Of note, any extremely low-income units are captured in the very-low income category.

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
Goal 1: Adequate Housing Supply						
<p>1.1 Available Sites Continue to utilize Planned Community Districts and Specific Plans to authorize and encourage mixed-use developments. (See Zoning Studies Program).</p> <p>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	<p>Tustin Legacy (previously referred to as MCAS):</p> <p><u>Amalfi:</u> <u>Completed 2015</u></p> <p>37 Moderate 496 Upper Income</p> <p><u>Anton Legacy:</u> <u>Completed 2015</u></p> <p>88 Very Low 73 Low 64 Moderate</p> <p>Other City Areas</p> <p><u>Habitat for Humanity Veteran's Housing</u> [140 S. A Street adjacent to Old Town]; <u>Completed 2018</u></p> <p>1 Low 1 Moderate</p>	<p>Positive</p> <p><u>Tustin Legacy</u></p> <p>The City entered into agreements with several developers at the Tustin Legacy for implementing the affordable housing component of the Specific Plan and secured units for housing, including low income households.</p> <p><u>DCCSP</u></p> <p>Specific Plan approved in 2018 which added into this area of the City the opportunity for 887 residential units to be developed. To date, 140 upper income units have been built with a workforce housing in-</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
					<p>lieu fee provided. All future development will require participation in workforce housing options contributing to affordable housing mostly through mixed use.</p> <p><u>RHASP</u></p> <p>Specific Plan approved in 2018 which added into this area of the City the opportunity for 500 residential units to be developed. All future development will require participation in workforce housing options contributing to affordable housing mostly through mixed use.</p>	
<p>1.2 Mobile Homes</p> <p>Continue to maintain the City's mobile home park zone and</p>	Community Development	City General Fund; processing fees (recoverable)	The City will continue to maintain the existing mobile home park zone.	Between 2013-2021, no applications for mobile homes or	Positive	On-going Continue

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
process conditional use permit applications as received for manufactured homes. Housing Element Policies: 1.1, 1.4	Department, City Council			manufactured homes were received	Existing mobile home parks continue to be maintained.	This program will be included in the 2021-2029 Housing Element and future applications will be processed as received in a timely manner.
1.3 Second Residential Units 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	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.	Between 2013- and spring 2021: 15 ADUs were constructed 4 ADUs are under construction and have not yet received a final 8 ADUs are in the plan check process 2 ADUs were withdrawn	Positive On April 4, 2017, the City Council adopted Ordinance 1479 related to accessory dwelling units (ADUs), formerly known as second residential units, in compliance with new state regulations.	On-going Continue This program will be included in the 2021-2029 Housing Element with exploration of additional programs; future applications will be processed as received in a timely manner.
1.4 Deed Restrictions Require appropriate deed restrictions to ensure continued affordability for low- or moderate-income housing constructed or	Community Development Department, Successor Agency, City Council	Tax-Exempt Mortgage Revenue Bonds	All affordable housing created during the planning period will be required to record deed restriction to ensure continued affordability	2016-2019: 2 affordable condominium units for a 60-year period; Habitat for Humanity of Orange County	Positive	On-going Continue This program will be included in the 2021-

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
rehabilitated with the assistance of any public funds as may be legally required. Housing Element Policies: 1.1			for a minimum of 45 years.	2017: 1 residential structure authorized for continued use by the City requiring that the property owner enter into a housing agreement ensuring that the dwelling remain affordable to low/moderate income for a 55-year period. 2021: Tustin Gardens with potential continuation for 20 more years of 100 deed restricted units Anton in Tustin Legacy 225 55-year deed restricted affordable units (262 total includes 37 density bonus units)		2029 Housing Element. For affordable units, projects will continue to include conditions of approval at entitlement and required recordation of deed restriction prior to issuance of Certificate of Occupancy.
1.5 Pre-application Conferences Continue to utilize procedures for pre-application conferences and	Community Development Department	City General Fund; City processing fees (recoverable)	Continue		Positive Continued to utilize pre-application	On-going Continue This program will be included in the 2021-

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
processing procedures to expedite permit processing. Housing Element Policies: 1.12					processing procedures to expedite processing	2029 Housing Element.
1.6 Permit Processing for Low- and Moderate-Income Housing 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		Positive All affordable housing projects were recipients of such streamlined processing, including three in the Tustin Legacy; Amalfi, Anton projects and Village of Hope veterans housing and homeless facility.	On-going Continue This program will be included in the 2021-2029 Housing Element. Continue to process applications in a timely manner

<p>1.7 Permit Coordination</p> <p>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.</p> <p>Housing Element Policies: 1.12</p>	<p>Community Development</p>	<p>City General Fund; City processing fees (recoverable)</p>	<p>Continue</p>	<p>Between 2013-2020</p> <p>1,562 New residential projects processed</p> <p>2013: 758</p> <p>2014: 46</p> <p>2015: 241</p> <p>2016: 141</p> <p>2017: 17</p> <p>2018: 42</p> <p>2019: 262</p> <p>2020: 55</p> <p>5,307 Residential additions and alterations processed</p> <p>2013: 458</p> <p>2014: 66</p> <p>2015: 571</p> <p>2016: 817</p> <p>2017: 866</p> <p>2018: 825</p> <p>2019: 1,069</p> <p>2020: 635</p>	<p>Positive</p>	<p>On-going.</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>
<p>1.8 Housing for People with Developmental Disabilities</p> <p>Work with the Regional Center of Orange County to implement an outreach program that informs families within the City of</p>	<p>Community Development Department</p>	<p>General Fund</p>	<p>Implement outreach program through City website and social media.</p>		<p>Positive</p> <p>The Housing Section of the City’s website was updated to include affordable rental opportunities</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-</p>

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
affordable housing and services available for persons with developmental disabilities. Housing Element Policies: 1.11, 1.13, 1.15					including a map of all affordable rental opportunities in the City. Staff attended task force relative to housing needs of developmentally disabled. Staff met with affordable housing developers to discuss developmentally disabled housing within Tustin Legacy. Continued ongoing efforts.	2029 Housing Element.
1.9 Housing for the Disabled 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	Community Development Department	State and Federal programs; City's General Fund.	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.		Positive Objectives met and continues.	On-going Continue This program will be included in the 2021-2029 Housing Element.

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
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. Housing Element Policies: 1.11, 1.13, 1.15						

<p>1.10 Transitional Housing</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"> • Promote, assist, and facilitate the development of emergency and transients' shelters through continued support of the County Homeless Assistance Program • Support local agencies that provide homeless services by providing financial assistance of approximately \$5,000-\$10,000 annually. • Consider the adoption of a Single Room Occupancy Ordinance to facilitate the development of SRO units. 	<p>2014: Laurel House transitional housing was transferred to the Orange County Rescue Mission for continued assistance to the homeless, women, and teens.</p> <p>2015: The City conveyed two (2) four-plexes to the Orange County Rescue Mission (OCRM) in order to provide transitional housing to homeless veterans.</p> <p>2016: Tustin Veterans Outpost was completed in June 2016, with the capacity to house 26 homeless veterans and their families.</p> <p>2018, The City Amended the Homeless Assistance Agreement with Families Forward, to allow the conversion of 14 units from transitional to permanent supportive housing for homeless, low income families.</p>	<p>Positive</p> <p>On-going assistance; during the planning period, \$33,000 of CDBG funds were distributed to organizations that provide services to homeless individuals.</p>	<p>Ongoing</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>
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**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
				<p>2020: The City entered into a Disposition and Development Agreement with Family Promise to develop short-term/transitional housing for homeless families with children.</p> <p>In 2018, the City Council authorized the construction of the Tustin Temporary Emergency Shelter ("TTES"), a low-barrier, fifty-seven (57) bed shelter serving the homeless with ties to Tustin. In 2019, the Housing Authority entered into an agreement with Temporary Shelter, Inc., to operate TTES. Construction was completed in 2019.</p>		

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>1.11 Temporary Housing for Homeless</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>	County of Orange, Community Development Department	CDBG funds, HUD SHP funds	<ul style="list-style-type: none"> • Continue to participate on the Orange County City Managers/Planning Directors SB 2 Task Force • Continue to support 192 emergency housing units to single men and women at Tustin Legacy (Orange County Rescue Mission). • The City plans to assist 200 individuals by means of integrating counseling, education, job-training and other techniques to stop the cycle of homelessness. • Continue to support 24 units of transitional housing for families 	<p>At Tustin Legacy:</p> <ul style="list-style-type: none"> ○ Construction of a 192-bed facility at the Village of Hope operated by Orange County Rescue Mission completed and City conveyed the approximate 5-acre property to the OC Rescue Mission at no cost. ○ Expansion plans of the existing above-referenced Village of Hope facility capacity from 192 beds to 387 beds, construction of a new parking lot, and establishment of an ancillary church use. A 0.57-acre parcel was conveyed to the Orange County Rescue Mission in November 2016 to 	<p>Positive</p> <p>The MCAS Tustin Specific Plan (now Tustin Legacy Specific Plan) provided sites and designated land uses to accommodate the identified homeless needs.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
			(operated by Salvation Army) <ul style="list-style-type: none"> • Continue to support 6 units of transitional housing for women and children (operated by Human Options-Dove Housing) • Continue to support 6 units- in long-term 12-24 months- transitional housing for families with children (operated by Orange Coast Interfaith Shelter) • 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, 	construct the parking lot and construction is complete. <ul style="list-style-type: none"> ○ 6 new units at Tustin Field I to Salvation Army provided at no cost. ○ Acquisition contribution of 16 units in Buena Park for the Salvation Army was completed. The City assisted in acquisition and contributed grant funds to acquire the units at no cost to Salvation Army. ○ 14 new units, in coordination with the City of Irvine, obtained by Tustin and conveyed to Irvine Temporary Housing at the 		

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
			formerly Irvine Temporary Housing) • Continue to support the Tustin Family Campus (operated by the County of Orange)	Columbus Grove project in Irvine at no cost to Irvine Temporary Housing; complete. ○ 6 new units at Columbus Grove to Human Options at no cost; complete. ○ 6 new units at Columbus Grove to Orange Coast Interfaith Shelter at no cost; complete. ○ In 2014, the City Council authorized the conveyance of two (2) fourplexes to Orange County Rescue Mission in order to provide transitional housing for homeless		

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
				Veterans; complete. ○ In 2018, the City Council authorized the construction of the Tustin Temporary Emergency Shelter ("TTES"), a low-barrier, fifty-seven (57) bed shelter serving the homeless with ties to Tustin. In 2019, the Housing Authority entered into an agreement with Temporary Shelter, Inc., to operate TTES. In 2019, construction was completed and TTES opened. ○ In addition, CDBG funds were allocated to non-profit organizations		

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
				assisting homeless individuals.		
1.12 Number Unutilized						
1.13 Bonding Programs Utilize housing revenue bond financing resources and Low-Income Housing Tax Credits on new construction and acquisition/rehabilitation projects that help meet the City's affordable housing needs. Housing Element Policies: 1.7, 3.2	Community Development Department; Housing Authority	State and Municipal Bonds; Private Activity Mortgage Bonds Revenue issued by California Statewide Communities Development Authority and others; California Low-Income Housing Tax Credits; variety of other sources	Complete analysis of available programs on as needed basis.		Neutral No tax-exempt bonds were issued between 2013 - 2020	NA On-going Continue This program will be included in the 2021-2029 Housing Element.
1.14 Economic Integration within Sphere of Influence Request that the Orange County Planning Commission and the Environmental Management Agency (EMA) notice the City of Tustin of any proposed development	County of Orange	City General Fund; Staff time	Ongoing request to both agencies.		Positive This is an ongoing effort to ensure coordination between the County and the City within the	On-going Continue This program will be included in the 2021-2029 Housing Element.

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
activities within Tustin’s sphere of influence. Housing Element Policies: 1.1, 1.6					Tustin’s sphere of influence.	
1.15 Senior Housing Continue to preserve existing sites and identify new sites that are suitable for senior housing projects. These sites will be promoted for private development and applications will be made for any available subsidy funds. Housing Element Policies: 1.1, 1.11, 1.13	Successor Agency; Community Development Department	HELP; Low-Income Housing Tax Credits; Private Activity Bonds issued by California Statewide and others	Preservation of 100 at-risk units at Tustin Gardens, and identification of new senior housing sites.	100 units – Tustin Gardens	Positive The City monitors the project and its affordability on an ongoing basis.	On-going Modify This program will be included in the 2021-2029 Housing Element and likely expanded to include CDLAC Tax Exempt Bonds for Rehab /Preservation and PLHA funds (SB2), and Voluntary Workforce Housing Incentive Funds. The City will continue to monitor projects on an on-going basis.
1.16 Senior Services Program Develop a comprehensive transportation program, case	Parks and Recreation Department	City General Funds	Assist 950 elderly annually	From 2013–2020 17,198 of our elderly population utilized the transportation	Positive The City far exceeded the objective by	On-going Continue

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
management, information and referral, and shared housing program. Housing Element Policies: 1.15, 2.3				system services provided through the City. 2013: 1,336 persons assisted 2014: 1,448 persons assisted 2015: 2,271 persons assisted 2016: 1,993 persons assisted 2017: 2,544 persons assisted 2018: 2,678 persons assisted 2019: 2,532 persons assisted 2020: 2,396 persons assisted	assisting an average of 2,150 elderly annually. See also shared housing for the objective results which too were positive.	This program will be included in the 2021-2029 Housing Element.
1.17 Recycling Single-Family Uses in R-3 Zones into Multiple-Family Units Continue to encourage developers to consolidate individual lots into	Community Development Department	City General Fund; Staff time	Eight (8) housing units are anticipated	Undeterminable	Positive Continue support of applications as received.	On-going Continue This program will be included in the 2021-

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
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. Housing Element Policies: 1.2						2029 Housing Element.
1.18 Ongoing Review of Housing Element Programs 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. Housing Element Policies: all policies	Community Development Department	City General Fund; Staff time	Prepare Annual Report to the Planning Commission and the City Council annually.		The City submitted annual reports to HCD on or before the April 1 st deadlines.	On-going Continue This program will be included in the 2021-2029 Housing Element.

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>1.19 Consolidated Plan</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	<p>Prepare Consolidated Plan in 2014</p> <p>Prepare Action Plan annually</p>		<p>Positive</p> <p>The City prepared and the City Council adopted the 2015-2020 Consolidated Plan on April 21, 2015.</p> <p>The City prepared and the City Council adopted, the 2020-2025 Consolidated Plan on April 21, 2020.</p> <p>Action Plans continue to be prepared and adopted annually.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>
<p>1.20 Zoning Studies</p> <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>	Successor Agency and Community Development Department	City General Fund,	Initiate Zoning Studies by 2015 and complete any proposed amendments by 2021.	DCCSP area 140 new units constructed to date (all within the Vintage Development). Of note, this development participated in the in-lieu fee option regarding affordable housing provisions. All units were market rate.	<p>Positive</p> <p>In 2018, the Tustin City Council adopted a new specific plan document, the Downtown Commercial Core Specific Plan (DCCSP). This plan introduced mixed-use and infused the potential for 887 units into the area through a Residential Allocation Reservation</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p> <p>Opportunities will continue to be explored relative to this these and potentially other zoning related</p>

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<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>(RAR) review process. Said plan was an Orange County American Planning Association award winner.</p> <p>In 2018, the Red Hill Avenue Specific Plan (RHASP) was adopted by the Tustin City Council. The RHASP introduced mixed-use to the area and similarly identified the potential for 500 new units in conjunction with the RAR review process.</p> <p>In 2018, the City adopted the Workforce Housing Ordinance which currently affects both the DCCSP & RHASP areas.</p> <p>In 2020, City staff prepared for both the DCCSP and the RHASP areas streamlined</p>	<p>studies.</p>

**TABLE A-2
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2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
					<p>application and review systems.</p> <p>Currently in process, City staff is working on citywide ADU design guidelines with examples as well as an ADU zoning update.</p> <p>Additionally staff is working on residential related mixed-use parking strategies for the DCCSP area.</p>	
<p>1.21 Private Streets</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>	City of Tustin	None necessary	Continue		<p>Positive</p> <p>Private street standards were implemented in most Tustin Legacy area residential developments that occurred during this time period.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>1.22 Building Codes</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 California 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>	City of Tustin, Community Development Department	City General Fund; Staff time	On-going		During this reporting period, the City adopted the 2013, then 2016, and now the 2019 California Building Codes.	On-going Continue This program will be included in the 2021-2029 Housing Element.

<p>1.23 Site Improvements</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>Positive</p> <p>Assessments were issued for a Community Facilities District Annexation Area at Tustin Legacy in 2014 (CFD 14-01) for the Standard Pacific development of 375 single family residential units.</p> <p>Assessments were issued for a new Community Facilities District 2018-1 Improvement Area 1 (CFD 18-01 IA 1) at Tustin Legacy in 2018 for the Lennar Homes of Southern California (formerly CalAtlantic Homes) development of 218 townhomes, flats, and single-family homes and for Brookfield Homes of Southern California, a future development of 400 townhomes, flats, and single-family homes.</p> <p>Additional efforts will continue to be ongoing.</p> <p>As development progresses at Tustin Legacy, the City will</p>	<p>On-going.</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>
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**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
					continue to evaluate financing mechanisms to fund infrastructure improvements.	

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>1.24 Fees, Exactions, and Permit Procedures</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>	Community Development Department,	City General Fund;	Defer development impact fees during economic downturns.		<p>Neutral</p> <p>Adoption of a new policy has been evaluated and considered on an annual basis. No changes to date though continually being monitored and considered.</p> <p>Of note, 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.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>

<p>1.25 Environmental Constraints</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>Effective</p> <p>During the Housing Element Planning Period, amendments to the Tustin Legacy Specific Plan included amendments to the associated Final Program EIS/EIR and Mitigation Monitoring Program. It continues to serve as the program EIR for the implementation of Tustin Legacy.</p> <p>Additionally, with the preparation of the Downtown Commercial Core Specific Plan and Red Hill Avenue Specific Plan, Program EIRs and associated Mitigation Monitoring Programs were prepared and serve as the environmental implementation provisions for both areas providing a large cost savings to future developers.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element.</p>
<p>1.26 Density Bonus Program</p> <p>Promote Density Bonuses to facilitate the construction of affordable housing. Under State</p>	<p>Community Development Department</p>	<p>General Fund,</p>	<p>Process all requests for density bonuses.</p>		<p>Effective</p> <p>In 2015, two apartment developments that were granted density</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-</p>

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>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>bonuses by the City in November 2012 were completed. The Amalfi development is a 533-unit complex with 37 moderate income units. Anton Legacy Apartments is a 100% affordable development with 225 rental units: 88 very low income; 73 low income; and 64 moderate income. A total of 190 density bonus units resulted with these two developments</p>	2029 Housing Element
<p>1.27 MCAS-Tustin Implementation</p> <p>Implementation of the Specific Plan for MCAS-Tustin site</p> <p>Housing Element Policies: 1.1, 1.3, 1.5</p>	Successor Agency	General Fund	Process entitlements for MCAS Tustin	See Program 1.1	Positive Achieved	<p>On-going Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
Goal 2: Equal Housing Opportunity						
<p>2.1 Fair Housing</p> <p>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.</p> <p>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.		<p>Effective</p> <p>Fair Housing Foundation estimated that the number of Tustin residents provided with direct client assistance during this planning period was 1,333.</p> <p>Yearly educational and outreach activities occurred including workshops and open houses to assist Tustin residents.</p> <p>The City responds to any general housing and discrimination complaints.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>
<p>2.2 Shared-Housing</p> <p>Continue to provide coordination and support to a home sharing</p>	TLC, Parks and Recreation Services	CDBG funds	Continue		<p>Effective</p> <p>The City provided coordination and</p>	<p>On-going</p> <p>Continue</p>

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>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.</p> <p>Housing Element Policies: 2.3</p>	<p>Department, and Community Development Department</p>				<p>support through the referenced program and providers. In 2020, the Community SeniorServ (formerly known as Feedback Foundation) changed over to Meals on Wheels Orange County and no longer provides a home sharing program. The City is still partnering with Meals on Wheels Orange County and will provide transportation again for seniors to attend the Senior Center Congregate Meal program when they resume and the facility opens back up. The Covid-19 pandemic had an effect on this program and the ability to service seniors at the facility. See also Senior Services Program.</p>	<p>This program will be included in the 2021-2029 Housing Element</p>

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2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
					For senior housing requests, seniors are referred to the Office on Aging Orange County, which provides resources for senior housing and case management.	

<p>2.3 Housing Referral Program</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"> • The Police Department refers homeless people to different agencies that provide shelters and food for various segments of the population. • The Parks and Recreation Services Department provides housing information and social service information to the senior citizen population. • 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. <p>City departments utilize the</p>	<p>Police Department; Parks and Recreation Department; Community Development;</p>	<p>City General Fund, CDBG Funds</p>	<ul style="list-style-type: none"> • 7,500 referrals to social agencies by 2021 • 50 referrals for shared housing by 2021 		<p>Effective</p> <p>The Economic Development Department and Tustin Housing Authority provides housing and social service information to interested parties.</p> <p>To assist referrals, the Housing Section of the City's website is updated on an ongoing basis to include affordable rental opportunities and senior housing resources.</p> <p>The City does not keep specific counts of referrals. See also other programs that touch on the objective measurements (i.e., shared housing, etc.).</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>
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**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>following documents and also make these documents available to the public:</p> <ul style="list-style-type: none"> • Directory of Senior Citizen’s Services prepared by the Area Agency on Aging Senior Citizen’s Office • Social Service Assistance Booklet prepared by Connection Plus • Orange County Housing Directory prepared by OCHA and the OCHA Advisory Committee. <p>Housing Element Policies: 2.1,2,2,2.3,2.4,2.5</p>						
Ongoing Review of Housing Element Programs	See Program 1.18					
Consolidated Plan	See Program 1.19					
Goal 3: Ownership Housing						

**TABLE A-2
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2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>3.1 Condominium Conversions</p> <p>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.</p> <p>Housing Element Policies: 3.1, 3.2, 3.3</p>	Community Development Department, City Council,	City General Fund,	Impose requirements where applicable.		Effective No units converted	On-going Continue This program will be included in the 2021-2029 Housing Element
<p>3.2 State Home-Ownership Assistance</p> <p>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.</p> <p>Housing Element Policies: 3.1, 3.3</p>	Housing Authority	State and Federal sources	Assist 30 First time homebuyers by 2021		With the dissolution of Redevelopment eliminated low- and moderate-income housing funds, a major funding source, has made it more difficult to fund this program at the local level. The Housing Authority continually explores the use of other funding opportunities.	On-going Modify - The Housing Authority will add the funding opportunities of MCC and continue to look for other opportunities.
Bonding Programs	See Program1.13					

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
Ongoing Review of Housing Element Programs	See Program1.18					
Consolidated Plan	See Program1.19					
Goal 4: Affordable Housing Preservation						
4.1 Housing Authority Contract with the Orange County Housing Authority, where necessary, for the development and operation of federally assisted low- and moderate-income housing programs. Housing Element Policies: 1.3, 1.7, 1.14	Orange County Housing Authority,	HUD, CDBG,	Continue		Effectively continued	On-going Continue This program will be included in the 2021-2029 Housing Element

<p>4.2 Rental Assistance</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>Effective</p> <p>The Orange County Housing Authority issued the following annual voucher counts for Tustin residents:</p> <p>2013: 330 vouchers</p> <p>2014: 342 vouchers</p> <p>2015: 525 vouchers</p> <p>2016: 550 vouchers (includes 55 Veterans Affairs Supportive Housing (VASH vouchers)</p> <p>2017: 566 vouchers (includes 51 VASH vouchers)</p> <p>2018: 561 vouchers (includes 50 VASH vouchers)</p> <p>2019: 579 vouchers (includes 48 VASH vouchers)</p> <p>2020: 572 vouchers (includes 52 VASH vouchers)</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>
<p>4.3 Affordable Senior Housing Project and Senior Board and Care Facility</p> <p>To maintain 74 units of affordable housing for Seniors located at 17432-17442 Mitchell Avenue (20</p>	<p>Community Development Department</p>	<p>None necessary</p>	<p>Maintain 74 units of affordable Senior Housing.</p>		<p>Effective – continually maintained.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>

**TABLE A-2
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2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
units) and 54 units affordable senior apartments at 1311 Sycamore Avenue (Heritage Place). Housing Element Policies: 5.1, 5.2, 5.3, 5.4						
<p>4.4 Preservation of Assisted Housing</p> <p>Tustin has four (4) low-income housing project with a total of 517 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</p>	<p>Community Development Department, Housing Authority</p> <p>Housing Authority working with a non-profit affordable housing developer</p> <p>Community Development Department, Housing Authority</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 100 at-risk units (Tustin Gardens) were maintained.</p> <p>Also, despite the elimination of a major funding source, the Housing Authority was also able to preserve a total of two low- income units and one very low-income unit in foreclosure by purchasing them and selling them to other families.</p>	<p>Effective</p> <p>The City maintains contact with Tustin Gardens and has been monitoring their annual renewal option.</p> <p>Annual Monitoring: The Housing Authority annually mails letters to homeowners requesting documentation verifying continuing compliance with the affordability covenants they entered into with the City when they purchased their affordable unit.</p>	<p>On-going and modify as additional housing projects will fall within this program category over the next planning period</p> <p>This program will be included in the 2021-2029 Housing Element</p>

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
<p>“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>Affordable Units at Risk of Foreclosure: The Successor Agency, now Housing Authority, prepared monthly foreclosure reports to all City operating departments in order to monitor and keep City sensitive to the implications on property conditions and blight as a result of the foreclosure activity associated with periods of economic downturn in the residential and commercial markets,</p> <p>The Housing Authority (created in 2011) was created by the City Council to assist the City in increasing, improving and preserving its supply of affordable housing.</p>	

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
d) Reserve Fund. Continue to monitor other potential funding sources, such as State grants and HUD funds. Housing Element Policies: 4.1, 4.2, 4.3, 4.4					In 2014, as a result of increased foreclosure activity, the City Council approved an Affordable Housing Default Revolving Fund in order to cure homeowner defaults under the City and Agency's Affordable Housing Program. The Fund ensures the City has the opportunity to exercise its option rights to purchase the home prior to the home being sold in a Trustee's Sale and the City losing affordable housing supply. The State of California Department of Finance denied the transfer of redevelopment funds to the Default Revolving Fund and the fund was dissolved. The loss of a funding source made	

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2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
					<p>it more difficult to purchase homes prior to foreclosure, resulting in a reduction in the City's affordable housing supply.</p> <p>The dissolution of Redevelopment eliminated a major funding source available to preserve units at risk of their affordability expiring.</p> <p>Staff has continued to explore other funding options.</p>	
<p>4.5 Temporary Housing Assistance for Extremely Low-Income Households</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</p>	Housing Authority 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		<p>Effective</p> <p>In accordance with AB 987, the Housing Authority maintains a list on the City's website of all affordable ownership units and affordable rental units in the City of Tustin. In addition, links to</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
the percentage of their incomes that are applied to rent (i.e. increase in allocation of Section 8 existing rental certificates, etc.). Housing Element Policies: 1.7, 1.11, 1.15, 1.18			Family and Youth Center		other affordable housing sites and documents are also provided on the website.	
4.6 Housing Rehabilitation Allocate available resources to finance the rehabilitation of residential units in target areas	Housing Authority	Available federal, state, and local resources	Subject to available funding		The Authority was able to effectuate the rehabilitation of two (2) four-plexes by conveying them to the Orange County Rescue Mission for the purpose of providing transitional housing to homeless veterans. The Tustin Veterans Outpost was completed in June 2016 and can serve up to twenty-six (26) veterans at one time.	On-going Continue This program will be included in the 2021-2029 Housing Element
Mobile Homes	See Program 1.2					
Deed Restrictions:	See Program 1.4					
Transitional Housing	See Program 1.10					

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
Ongoing Review of Housing Element Programs	See Program 1.18					
Consolidated Plan	See Program 1.19					
Goal 5: Neighborhood Conservation						
<p>5.1 Enforcement of Building and Housing Codes</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>	Community Development Department	City General Fund	Investigate 30 substandard housing cases annually and 240cases by 2021.		<p>Effective</p> <p>While specific metrics are not kept by the City, the City’s Code Enforcement Staff estimated that over 2,300 property maintenance and housing code related inspections were conducted between 2013 and 2020. The City has been successful in getting property owners to abate code violations.</p> <p>Most tenant calls that are generally received by Code Enforcement are very minor</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>

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Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
Housing Element Policies: 5.3, 5.4					<p>concerns and most tenants are referred to the Fair Housing Foundation for assistance</p> <p>Also, the Fair Housing Foundation, under contract with the City, provided workshops and open houses to assist Tustin residents.</p>	

<p>5.2 Cultural Resources District</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>	<p>Community Development Department</p>	<p>CDBG, City General Fund, State grants</p>	<p>Rate historic structures where applicable and process certificates of appropriateness as received.</p>		<p>Effective</p> <p>Process Certificates of Appropriateness as received.</p> <p>Certificates of Appropriateness issued for improvements to properties located within the Cultural Resources District by year:</p> <p>2013: 13</p> <p>2014: 14</p> <p>2015: 30</p> <p>2016: 25</p> <p>2017: 13</p> <p>2018: 26</p> <p>2019: 32</p> <p>2020: 10</p> <p>The City is in the process of an update to the City's Historical Resources Survey and Report which is to be completed in 2021.</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>
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**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
Ongoing Review of Housing Element Programs	See Program 1.18					
Consolidated Plan	See Program 1.19					
Building Codes	See Program 1.22					
Goal 6: Environmental Sensitivity						
6.1 Energy Conservation Require all new construction to be subject to State energy conservation requirements (Title 24) as a condition for the issuance of a building permit. Housing Element Policies: 6.2	Community Development Department	None necessary	Require all new units within planning period.		Effective In force. See Program 1.7, Permit Coordination, for statistics.	On-going Continue This program will be included in the 2021-2029 Housing Element
6.2 Energy Rebate Program 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	Community Development Department	General Fund, potential Grants	Seek available grants to partner with utility companies to promote energy rebate programs.		Effective Since 2013, all properties within the City may benefit from inclusion in the California HERO Program to finance distributed generation renewable energy	On-going Continue This program will be included in the 2021-2029 Housing Element

**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
water heater, natural gas recharge connection, electric vehicle recharge connection, wind power generator, etc. Housing Element Policies: 6.6					sources, energy and water efficiency improvements and electric vehicle charging infrastructure. Availability of grants explored.	

<p>6.3 Solar Energy and Conservation</p> <p>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.</p> <p>Housing Element Policies: 6.2, 6.3</p>	<p>Community Development Department</p>	<p>None necessary</p>	<p>On-going</p>		<p>Effective</p> <p>CEQA checklist updated to include greenhouse gas emissions.</p> <p>Supported solar panels installation in residential and commercial buildings. During the planning period, the City issued the following number of residential and non-residential solar panel permits:</p> <p>2013: 98/3 2014: 91/0 2015: 186/4 2016: 200/1 2017: 164/2 2018: 120/6 2019: 210/4 2020: 169/9</p> <p>To date, the City Council has approved three (3) PACE vendors. The Property Assessed Clean Energy (PACE) program provides upfront financing to residential, commercial and</p>	<p>On-going</p> <p>Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>
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**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
					industrial property owners for water conservation and energy efficiency improvements.	
6.4 Building Orientation 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		Effective On-going	On-going Continue/Modify This program will be included in the 2021-2029 Housing Element

<p>6.5 Water Efficiency</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>In response to Assembly Bill 1881, the City in coordination with the League of Cities Orange County Division and the Orange County Water District prepared and adopted the Water Efficiency Landscape Ordinance. The City's website also has been updated with information and guidelines to achieve water efficiency. The City adopted an ordinance addressing synthetic turf landscaping, including material, installation and maintenance, to promote reduced irrigation needs and quality landscaping.</p> <p>In December 2015, the City Council adopted Ordinance 1465 which calls for additional water efficiency and was found to be in conformance with both State law and Governor Brown's Executive Order. An annual report summarizing activities between January 1st and December 31st of</p>	<p>On-going Continue</p> <p>This program will be included in the 2021-2029 Housing Element</p>
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					<p>each year since 2016 has been provided to the State Department of Water Resources.</p> <p>The City issued the following annual number of permits for commercial projects, residential and landscape rehabilitation projects, respectively, subject to the Water Efficient Landscape Ordinance:</p> <p>2016: 0/2/0 2017: 0/6/0 2018: 2/4/2 2019: 2/0/3 2020: 2/0/19</p> <p>In 2013, the City also participated in the SoCal Water Smart program where rebates were provided for eligible water saving projects.</p> <p>In 2018, the City partnered with other Orange County Cities to prepare a helpful video guide for the public to use regarding water efficient landscaping. Said video received an</p>	
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**TABLE A-2
EFFECTIVENESS OF HOUSING ELEMENT PROGRAMS
2013-2021**

Program Parameters				Results		
Program	Responsible Agency	Funding Source	Quantified Objective	Units	Effectiveness	Timeframe Continue/Modify/ Delete
					Orange County American Planning Association award.	
6.6 Green Building Streamline processing for approved green building. Housing Element Policies: 6.2, 6.3, 6.5	Community Development Department	General Fund	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.		Effective Ongoing No Green Building Program adopted to date.	On-going Continue This program will be included in the 2021-2029 Housing Element
Ongoing Review of Housing Element Programs	See Program 1.18					
Consolidated Plan	See Program 1.19					

**TABLE A-3
PROGRESS TOWARDS OBJECTIVES 2013-2021
CITY OF TUSTIN**

Unit Type/Description	Quantified Objectives	Accomplishments ¹	Extremely Low	Very Low	Low	Moderate	Upper
NEW CONSTRUCTION (See Table H-17 and Table H-18; 2013 Housing Element for Income Objectives)							
MCAS Tustin Housing Units (Tustin Legacy)							
Neighborhood D	1,048	533				37	496
Neighborhood G	1,247	818		88	73	64	593
Units Approved/Under Construction (2020 Annual Progress Report))	Undefined	12 ADU's (undefined income)					
Preservation	100	100		100			
New Ownership and Rental Housing (all outside of Tustin Legacy)	587	172		6	1	14	151
Second Unit	10 (note 5 units indicated in Table H-20)	15 (Undefined income)					
Recycling of SFD to MFD in R-3 district	8	Undeterminable					
Subtotal	3,000			514	303	348	1,835
RHNA	1,227			283	195	224	525
Difference	1,773			231	108	124	1,310
ACTUAL TOTAL UNITS CONSTRUCTED	RHNA Required 1,227	1,534 (includes 1,522 units + 12 ADU's approved and under construction) Note: Statistics show 1,562 new residential projects completed in planning period		194	74	115	1,240
REHABILITATION							
Single and Multi-Family Rehab	Undefined	Undeterminable					
Single Family	Undefined	Undeterminable					
Multi-Family	Undefined	Undeterminable					
Multi-Family Rental Acquisition/Rehab/Conversion/Resale	Undefined	Undeterminable					

**TABLE A-3
PROGRESS TOWARDS OBJECTIVES 2013-2021
CITY OF TUSTIN**

Unit Type/Description	Quantified Objectives	Accomplishments ¹	Extremely Low	Very Low	Low	Moderate	Upper
Total Rehabilitation	Undefined	Of Note - 5,307 residential additions and alterations realized during the planning period	8				
PRESERVATION							
Tustin Gardens	100	100		100			
Total Preservation	100	100		100			
OTHER FOCUSED AFFORDABLE HOUSING PROGRAMS							
Homeless Assistance & Supportive Services	Variety of Programs - Undefined	A variety of support services provided					
Tustin Legacy New Construction Inclusionary Housing Requirement	452	230					
Other Administrative Support (Housing Authority; Density Bonus'; Affordable Housing Assistance Programs (associated with HOME funds; CDBG), etc.	Variety of Programs - Undefined	A variety of support services provided					
Section 8 Rental Voucher Assistance	1,600 Vouchers	4,268 Vouchers					
Shared Housing Referrals	Undefined	A variety of support services provided					
Total Other Programs	See Above Due to Various Metrics	See Above Due to Various Metrics					

¹ Number of Units unless otherwise noted.

Sources: Tables H-17 & H-18; Housing Element Implementation Program Section; Table HTM-35 (2013 Housing Element)

APPENDIX B
SITES INVENTORY

APPENDIX B

HOUSING SITES INVENTORY ASSESSMENT

The focus of the site inventory assessment is to identify sites that, in total, can achieve Tustin’s assigned 2021 Regional Housing Needs Allocation (RHNA) by income level for the planning period (2021 – 2029). This discussion includes the following topics:

- Housing Units Approved/Entitled/Pending and Permitted
- Suitable Sites Identification and Assessment
- Sites to Accommodate Low and Very Low Income RHNA

Housing Units Approved/Entitled/Pending and Permitted

As conveyed in Table B-1, Summary of RHNA Credits and Remaining Need, there are a total of 556 housing units that are captured from approved/entitled, pending and permitted (projects under construction). A total of 6,226 additional housing units are therefore needed to achieve the total assigned RHNA of 6,782 housing units.

TABLE B-1
SUMMARY OF RHNA CREDITS AND REMAINING NEED
CITY OF TUSTIN
2021 – 2029

Income Group	RHNA	Units Approved	ADUs Permitted	Net RHNA Need
Very Low	862	6	1	855
Extremely Low ¹	862	7	2	853
Low	1,046	0	4	1,042
Moderate	1,132	0	4	1,128
Above Moderate	2,880	531	1	2,348
Total	6,782	544	12[*]/^{**}	6,226

¹ Pursuant to Government Code Section 65583(a)(1), City’s share of extremely-low-income units is 862 (50 percent of the total Very-Low Income new construction objective).

* 12 ADUs currently permitted and under construction.

** Income categories distributed per SCAG Regional Accessory Dwelling Unit Affordability Analysis (2020).

Source: 2021 RHNA, SCAG

There are 544 housing units in three (3) projects with a total of seven (7) extremely-low, six (6) very-low, and 531 above-moderate income housing units that were approved/entitled at the time of the preparation of this Housing Element and are

being included in the RHNA count. In addition, 12 ADUs have been approved and permitted for construction.

Brookfield Development (Part of Site 1B)

This is an entitled 400-unit above-moderate-income development planned in the Tustin Legacy Specific Plan (TLSP) area within Neighborhood D South. The project is currently under construction.

13751 & 13841 Red Hill Avenue (Site 3)

This is a mixed-use project with a total of 137 housing units (six [6] very-low-income and 131 above-moderate-income). The project was approved by City Council on August 17, 2021. Construction drawings have not yet been submitted into plan check to obtain building permits. This site currently contains no residential development and the City does not prescribe specific FARs for the RHASP area, but rather, bases development decisions on RAR and individual project review. The existing improvement-to-land value is estimated to be approximately 0.18 based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized.

House of Ruth - Transitional Housing Units

This entitled project will consist of seven (7) transitional housing units at 1941 El Camino Real, on a 0.38-acre vacant parcel, to serve extremely low income homeless families (2 to 7 persons per unit). It includes two (2) density bonus units. The project also incorporates non-site support services to avoid long-term homelessness. The project is currently in plan check and the project is anticipated to begin construction in 2022.

ADUs/JADUs - Other Housing Category

There are currently twelve (12) accessory dwelling units (ADUs) that are permitted and under construction within the City.

Suitable Sites Identification and Assessment

The City analyzed and assessed a number of sites and areas throughout the community to accommodate the City's remaining RHNA. While many sites were considered, eighteen (18) sites and one housing category (ADUs/JADUs) have been identified for Tustin's qualifying sites to accommodate remaining RHNA.

Attachment B-1, Sites Identification to meet RHNA, provides a detailed listing of the approved/entitled sites and sites to accommodate remaining RHNA. Attachment B-1A, provides a summary of the realistic capacity. Figure B-2, Site Identification to

Meet RHNA, provides a map of the site locations. Additionally, site aeriols and individual site APN maps with summaries are provided for reference, organized by each of the three respective specific plans (Sites 1 - 16 - TLSP, DCCSP, RHASP), two additional sites (Sites 17 and 18), as well as a two "other" categories (Transitional Housing Units and ADUs/JDUs) in Attachment B-2. Attachment B-3, provides a summary of "Buffer" sites that would provide suitability for additional residential development to meet the City's RHNA in the event that identified sites become no longer feasible for development of affordable or market rate housing.

Tustin Legacy Specific Plan (TLSP) Area

The Tustin Legacy Specific Plan (SP-1) area contains two geographic areas, referred to as Neighborhoods in the TLSP, where residential housing sites will be concentrated for this planning period: Neighborhood D and Neighborhood G. The land is vacant and is owned and development is controlled by the City. The zoning for the site is Tustin Legacy Specific Plan area (SP-1) and the General Plan designation is TLSP. According to the existing Specific Plan, a total remaining capacity of 3,325 units exists throughout the Tustin Legacy area.

Sites 1A and 1B are located in Neighborhood D. Neighborhood D has a total of 84.73 acres and is divided into two areas: South (44.86 acres) and North (39.87 acres). Site 2 is located in Neighborhood G which is in the northeastern portion of the TLSP site and includes approximately 50 acres. Sites within Tustin Legacy do not have a density prescribed to the planning area per the TLSP; however, there is a development cap on the number of housing units in each of the planning areas. The following elaborates on the development capacity for each Neighborhood and planning area.

Site 1A - (TLSP) Neighborhood D North

This portion of Neighborhood D does not currently have any residential planned (no residential units allocated). The City is planning a rezone (Specific Plan Amendment) within three years (by 2024) to accommodate a minimum of 555 additional housing units within this area to meet RHNA. The focused vacant land is 39.87 acres. It is currently situated within four parcels. The rezone is included in the City's Programs in Section IV. Neighborhood D North was not identified in either of the past two planning cycles as vacant land available for housing to meet RHNA. The housing units are expected to be constructed during the planning period.

Site 1B - TLSP Neighborhood D South

This area includes a recently entitled 400-unit market-rate development (identified as The Landing by Brookfield Residential) on 25.44 acres within one Tract (Tract 18197) which has seven lots and is currently in construction. The remainder of this area, 19.42

acres, is identified for multifamily type development within the same Tract (Tract 18197) which has three lots. The lots range in size from 5.45 acres to 7.04 acres.

A total of 1,296 housing units are currently allocated in Neighborhood D South to meet RHNA. The City is planning a rezone (Specific Plan Amendment – see Programs in Section IV) by October 2022, unless extended by law, to accommodate a minimum of 100 additional housing units within this area, to bring the total number of housing units to **1,396 housing units** to meet RHNA. Assessor parcel numbers have not yet been established as this area is part of the base closure land conveyance from the Department of Navy to the City of Tustin. Neighborhood D South was identified in the past two planning cycles as vacant land available for housing to meet RHNA. A portion of the area has rental housing that was developed over the past housing cycle (2014-2021). The remaining allocated units, as described above, is expected to be built within this 2021-2029 planning period.

Site 2 - (TLSP) Neighborhood G

Neighborhood G currently has housing within the area built over the past two planning cycles. Fifty acres are currently planned and available for future housing developments. A total of 2,029 housing units are currently allocated in Neighborhood G to meet RHNA. The City is planning a rezone (Specific Plan Amendment) by October 2022, unless extended by law, to accommodate a minimum of 200 additional housing units within this area, to bring the total number of housing units to **2,229 housing units** to meet RHNA. The rezone is included in the City’s Programs in Section IV. There are 13 contiguous parcels designated for residential development with one parcel at 10 acres and the rest at smaller acreages. Neighborhood G was not identified in the past two planning cycles as needed to meet RHNA. The remaining entitled units, as described above, are expected to be built within this 2021-2029 planning period.

Red Hill Avenue Specific Plan (RHASP) Area

The Red Hill Avenue Specific Plan (RHASP), SP-13, was adopted in 2018. The Specific Plan area consists of approximately 52 acres centrally located within the City. It is primarily a commercial and retail corridor that is prime for revitalization. With the Specific Plan, mixed-use residential is now permitted in this area, with a total of 500-unit capacity, consisting of 137 housing units (114 base units and 23 bonus units) approved for construction (Site 3 located at 13751 & 13841 Red Hill Avenue) and **386 housing units** remaining throughout the Specific Plan area. Remaining units in the RHASP include 258 housing units to the north of the freeway and 105 housing units to the south of the freeway. The RHASP provides a unique Residential Allocation Reservation (RAR) which is approved either by the Community Development Director or the Planning Commission/City Council, as applicable. The RAR is the

mechanism with an associated process and timeline that allocates units to a requested development. The units are drawn from a residential allocation bank which assigns units by area and allows for transferability between areas. The maximum density on an individual parcel may exceed 25 dwelling units per acre (the General Plan's high density residential zones maximum density) as long as the total dwelling units allocated to the Specific Planning Area is not exceeded. Therefore, densities above 25 units per acre are achievable in the RHASP area. RHASP was accompanied by a Program Environmental Impact Report, approved and certified by the City Council, which affords future developers significant time and costs savings, yielding building of housing units in a more expedient manner. The Zoning is SP 13, known as the RHASP, and the General Plan designation is RHASP. The maximum allowable building height for residential mixed-use development in the RHASP is four (4) stories (50 feet). Four (4) sites within the RHASP area have been identified to meet RHNA:

Site 4 – (RHASP) 13822 - 13852 Red Hill Avenue (Red Hill Plaza)

This non-vacant site consists of four parcels on 7.08 acres, all under one ownership. The current land use is a shopping center with commercial, retail and restaurants with a construction dating back to 1973 with over fifty percent of the land area developed with surface parking areas. The center has not undergone any major renovations and remains largely outdated. Recent development inquiries for this parcel have been received due to a recent change in ownership structure. Development interest discussions have involved the property owners and interested developers and the City. This site currently contains no residential development and the City does not prescribe specific FARs for the RHASP area, but rather, bases development decisions on RAR and individual project review. With the recently approved mixed-use project across the street from this site, revitalization of the area can be anticipated in the near future. A total of 226 units have been assigned to Site 4. The existing improvement-to-land value is estimated to be approximately 0.30 based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized

Site 5 – (RHASP) 1571 El Camino Real (Denny's Restaurant)

This non-vacant site adjacent to and under the same ownership as Site 4. It is possible that the two sites could merge for one development. The site is 0.90 acre and currently has an outdated restaurant use and the original construction date of building is 1973. The building has not undergone any recent renovations and at least fifty percent of the site is developed with surface parking areas. A total of 32 units have been assigned to Site 5. This site currently contains no residential development and the City does not prescribe specific FARs for the RHASP area, but rather, bases development

decisions on RAR and individual project review. The existing improvement-to-land value is estimated to be approximately 0.54 based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized.

Site 6 – (RHASP) 14081 – 14231 Red Hill Avenue (Stater Bros. Shopping Center)

This non-vacant site consists of six parcels on 5.95 acres under three owners. The holdings are all within the same family, yielding a more favorable redevelopment potential. The current land use is a shopping center with commercial, retail, restaurants and one active service station and the other remains vacant and inactive. The various buildings on the site have construction dates ranging between 1966-1973. The various building in Site 6 have not undergone any recent major renovations and remain largely outdated. A total of 105 units have been assigned to Site 6. This site currently contains no residential development and the City does not prescribe specific FARs for the RHASP area, but rather, bases development decisions on RAR and individual project review. The existing improvement-to-land value for the parcels that are developed is estimated to be approximately 1.10 based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized. However, as previously stated, site improvements are outdated and the site is partially vacant, suggesting redevelopment potential.

Downtown Commercial Core Specific Plan (DCCSP) Area

The Downtown Commercial Core Specific Plan, SP-12, was adopted in 2018 and is centered around the intersection of Main Street and El Camino Real in Old Town Tustin. The DCCSP consists of approximately 220 acres located in the northern and western portion of the City.

This area was not previously zoned to accommodate residential development. With the adoption of a Specific Plan, it is now an option to allow residential (primarily mixed-use residential) in this area. A total of 887 residential units have been allocated through the Specific Plan within six Development Areas. Since Specific Plan adoption, 140 residential units have been developed, and **747 housing units** remain. The DCCSP also provides the unique RAR, which is approved either by the Community Development Director or the Planning Commission/City Council, as applicable.

The maximum density on an individual parcel may exceed 25 dwelling units per acre (the General Plan's High-Density- Residential zones maximum density) as long as the total dwelling units allocated to the Specific Plan area is not exceeded. Therefore, densities above 25 units per acre are achievable in the DCCSP area. This Specific Plan

was accompanied Program Environmental Impact Report approved and certified by the City Council, which affords future developers significant time and costs savings. The Zoning is SP 12 and the General Plan designation is DCCSP. The maximum allowable building height ranges from two to five stories, depending on Development Area and adjacent land uses.

None of the DCCSP sites were identified in either of the past two planning cycles as vacant land available for housing to meet RHNA.

A total of 10 sites are within this DCCSP area:

Site 7 - (DCCSP) Development Area 1

This non-vacant site consisting of two parcels, under separate ownership, is located at 365 W. First Street (Think Physical Therapy) and a vacant portion of a property shared with the existing Villa Viento Apartments (345 W. First St.). Combined, the two parcels are 1.1 acres. The DCCSP's Housing Allocation Bank's 45 units for this Development Area is assumed on this site. This site currently contains no residential development and the City does not prescribe specific FARs for the DCCSP area, but rather, bases development decisions on RAR and individual project review. The existing improvement-to-land value is estimated to be approximately 1.98 based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized. However, site this site is partially undeveloped, with no building improvements and the other portion of the site contains a large parking lot area and considered underutilized, therefore, the site has potential for redevelopment.

Sites 8 and 9 - (DCCSP) Development Area 2

The two (2) sites in Development Area 2 are non-vacant sites.

Site 8 is non-vacant site (Bel Air Motor Hotel located at 140 W. First Street) and is 1.0 acre, on one parcel, under one ownership.

Site 9 includes two parcels: A City-owned property located at 150 E. First Street and the adjacent restaurant building at 105 El Camino Real which is privately owned. The City owned property was once operated as Tustin War Memorial which contains a multi-war memorial with four plaques along the north wall of the building. The Tustin War Memorial building is currently vacant and is permanently closed. At one time, this building was shared with the Tustin War Memorial and The Learning Village Preschool, however, the school closed in 2018 as did the War Memorial and the site has since remained unoccupied. The commercial building at 105 El Camino

Real is an underutilized parcel with building that had not been improved since its construction in 1974 with over fifty percent of the site dedicated to surface parking lot. The two parcels combined are approximately 0.88 acre. This site currently contains no residential development and would achieve full residential buildout of the site (on the remaining parcel avoiding the existing memorial), since the City does not prescribe specific FARs for the DCCSP area, but rather, bases development decisions on RAR and individual project review. The existing improvement-to-land value is estimated to be approximately 0.36 on the developed portion of the site based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized.

The Housing Allocation Bank's 92 units for this Development Area are assumed between these two sites.

Site 10 - (DCCSP) Development Area 3

The non-vacant site 10 (Larwin Square), located at the southwest corner of First Street and Newport Avenue, is approximately 16.47 acres and within one parcel under one owner. It is a multi-building shopping center serving retail, restaurants, commercial and office uses and its construction dates back to 1962. The center has not undergone any major remodels in the past and remains largely outdated. A major building tenant was a grocery store which vacated in the 2015-2016 timeframe and that tenant space has since remained vacant. Mixed-use residential development interest has been expressed by the owner's representatives. The Housing Allocation Bank's 200 units for this Development Area is assumed on this site. Conceivably, the site, due to its large size, could possibly be developed with additional units if a transfer of units from another Development Area was requested and approved. This site currently contains no residential development and the City does not prescribe specific FARs for the DCCSP area, but rather, bases development decisions on RAR and individual project review. The existing improvement-to-land value is estimated to be approximately 0.36 on the developed portion of the site based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized.

Sites 11, 12, 13, and 14 - (DCCSP) Development Area 4

All four sites in this Development Area are available vacant land with no buildings on the sites. As this Development Area is part of the City's original Downtown Core, the sites are small and appropriate for infill residential development. All 150 units for this Development Area, identified in the Housing Allocation Bank, are assumed within these four sites which total approximately four (4) acres.

Site 11 consists of six contiguous small vacant parcels totaling 1.02 acres. These six vacant parcels are held by one owner. The site is located at 225-255 El Camino Real and 250 Prospect Avenue.

Site 12 consists of three contiguous vacant parcels totaling approximately 2.29 acres arranged in an L-shaped configuration. All three parcels are held by one owner. The site is located at the NEC of El Camino Real and Sixth Street (generally at 542 El Camino Real).

Site 13 is a vacant 0.25-acre parcel located at 125 W. Main Street located adjacent to developed land area.

Site 14 is a vacant 0.44-acre parcel located at 420 El Camino Real. The vacant site is L-shaped, wraps around a building and is adjacent to community serving uses which makes it ideal for infill development.

Sites 15 and 16 – DCCSP Development Area 6

Site 15 is vacant and site 16 is non-vacant. All 260 units for this Development Area, identified in the Housing Allocation Bank, are assumed between these two sites.

Site 15 consists of 2.73 acres on three parcels under one owner adjacent to the freeway. At the time of writing of this update document, City staff have been working with an applicant for a residential related project for this site.

Site 16 is referred to as the El Camino Plaza located at 620 El Camino Real at the southwest corner of El Camino Real and Sixth Street. The site is 7.81 acres and all three parcels that comprise this parcel are under one owner. The current land uses include retail, restaurants, commercial, and office. Significant owner and developer interests exists on this site with a recent preliminary residential mixed-use project submitted to the City in 2019 as well as a separate recent inquiry for a mixed-use project containing senior housing. Since then, the property owner and the representative have actively engaged in consultation with the City staff on the project site design and layout responding to the pandemic new opportunities (outdoor dining and open space). This site currently contains no residential development and the City does not prescribe specific FARs for the DCCSP area, but rather, bases development decisions on RAR and individual project review. The existing improvement-to-land value is estimated to be approximately 5.10 on the developed portion of the site based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized. This site's improvement-to-land value is high; however, as described, interest to redevelop the site indicates redevelopment potential.

Enderle Center

The non-vacant site 17 (Enderle Center) consists of approximately 11.6 acres, under the ownership of a single family. Of the site area, 7 acres have been identified suitable for housing development. Currently the site supports a commercial center, with redevelopment, the site is expected to accommodate **413 housing units**. The City has been approached by several developers showing interests in redeveloping the shopping center with mixed-use development. Additional information regarding realistic capacity of the developed site is provided in the following section. This site currently contains no residential development and with a rezone would be allowed up to 413 housing units with no maximum FAR, similar to the DCCSP and RHASP areas. The existing improvement-to-land value is estimated to be approximately 2.5 based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized. This site's improvement-to-land value is high; however, as described, interest to redevelop the site indicates redevelopment potential.

The Market Place

The non-vacant site 18 (The Market Place) consists of approximately 76 acres, under single ownership, the Irvine Company. Of the site area, approximately 18 acres have been identified suitable for housing development. Currently a commercial center, with redevelopment it is expected to accommodate **900 housing units**. Additional information regarding realistic capacity of the developed site is provided in the following section. This site currently contains no residential development and with the rezone a total of 900 units would be allowed and no maximum FAR would be prescribed similar to the DCCSP and RHASP areas. The existing improvement-to-land value is estimated to be approximately 0.82 based on the latest County property tax information for fiscal year 2021-2022. Values less than 1 suggests the site is currently underutilized.

Sites to Accommodate Low and Very Low Income RHNA

The Housing Element Update is required to calculate if lower income RHNA distribution has more than 50 percent on non-vacant sites. The only sites that would contain true non-vacant sites are in the RHASP, DCCSP, Enderle, and Market Place areas. It is estimated that between these areas, a total of 648 of the 1,724 very-low income units, and 404 of the 1,046 low-income units would be developed in these areas. That results in approximately 36 percent of very-low and 39 percent of low income housing units anticipated to be developed within non-vacant areas, which is lower than the stipulated 50 percent. Further, not all the sites in these areas are non-vacant, resulting in an even lower percentage of housing units expected on non-

vacant sites. Table B-2, Sites to Meet RHNA Estimated Income Distribution Reference, above provides more detail.

Table B-2
Sites to Meet RHNA (With Income Distribution)

Site Reference	Vacant or Non-Vacant	Very Low & Low Income Units on Vacant Property	Capacity	Units Very Low Income	Units Low Income	Units Moderate Income	Units Above Moderate Income
TLSP - Neighborhood D North (includes Specific Plan amendment) (Site 1A)	Vacant	296	555	230	66	72	187
TLSP - Neighborhood D - South (includes Specific Plan amendment) (Site 1B) <i>(includes approved entitlements)</i>	Vacant	532	1,396	314	218	244	620
TLSP - Neighborhood G (includes Specific Plan amendment) (Site 2)	Vacant	878	2,229	526	352	383	968
RHASP (Sites 3 - 6)	1 Vacant	6	500	124	79	83	214

	3 Non-Vacant						
<i>Site 3 (Approved Entitlements)</i>	<i>Vacant / Non-Vacant-Approved Housing Project</i>	6	137	6	0	0	131
<i>Site 4</i>	<i>Non-vacant</i>	0	226	67	56	60	43
<i>Site 5</i>	<i>Non-vacant</i>	0	32	8	5	3	16
<i>Site 6</i>	<i>Non-vacant</i>	0	105	43	18	20	24
DCCSP (Sites 7 - 16)	4 Vacant 5 Non-Vacant	39	747	187	117	125	318
<i>Site 7</i>	<i>Non-vacant</i>	0	45	6	3	3	33
<i>Site 8</i>	<i>Non-vacant</i>	0	46	11	6	5	24
<i>Site 9</i>	<i>Non-vacant</i>	0	46	11	6	6	23
<i>Site 10</i>	<i>Non-vacant</i>	0	200	65	47	22	66
<i>Site 11</i>	<i>Vacant</i>	10	40	8	2	10	20
<i>Site 12</i>	<i>Vacant</i>	12	68	10	2	20	36
<i>Site 13</i>	<i>Vacant</i>	0	12	0	0	3	9
<i>Site 14</i>	<i>Vacant</i>	5	30	3	2	10	15
<i>Site 15</i>	<i>Vacant</i>	12	60	9	3	15	33
<i>Site 16</i>	<i>Non-vacant</i>	0	200	64	46	31	59
Site 17 - Enderle Center	Non-vacant	0	413	102	67	69	175
Site 18 - The Market Place	Non-vacant	0	900	225	141	150	384

Projected ADU & JADUs			35	9	6	6	14
Entitled Units (Transitional Homes) - approved entitlements, permits in progress.	Vacant - Approved Housing Project		7	7	0	0	0
RHNA			6,782	1,724	1,046	1,132	2,880
Assigned Distributions Achieved		1,796	6,782	1,724	1,046	1,132	2,880
Assigned Distributions Achieved with 20% Buffer (within TLSP Neighborhood G)			8,138	1,724	1,046	1,132	4,236

Note: Percentage of total Very Low- and Low-Income units on vacant land is 75 percent.

Zoning Appropriate to Accommodate Very Low and Low Income RHNA

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to demonstrate the projected residential development capacity of the sites identified in the housing element can realistically be achieved. The following factors are considered when determining the realistic capacity of a site:

- Land use controls;
- Site improvements;
- Typical densities of existing residential development; and
- Current and planned utilities.

Zoning

Sites 1 through 16, identified to meet RHNA, have appropriate zoning to allow residential development at densities to achieve the estimated capacities and, without inhibitors, such as stringent standards, that inhibit residential development. This is evidenced by existing residential development taking place within the master planned community and in the surrounding cities and described in Table B-4. Sites 17 and 18, Enderle Center and The Market Place, are currently zoned as Planned Community Commercial (PC COM) and Planned Community Mixed-Use (PCMU) - SP 8 (East Tustin Specific Plan), respectively. These zoning designations do not currently support residential development. Both sites would be rezoned under Program 1.1 to allow for high density residential/mixed use development. There are no provisions that would deter accommodating very low- or low-income housing.

Table B-3, Zoning / Size / Lot Consolidation Potential / Available Infrastructure, below, is a snapshot of sites appropriateness regarding these respective factors. Some housing sites are candidates for lot consolidation or splits to increase development potential of the site. The City’s process for lot splits and lot consolidations are outlined in Section II of this Housing Element.

**Table B-3
Zoning / Size / Lot Consolidation Potential / Available Infrastructure**

Site #	Site Reference	Appropriate Zoning	Site Size (Acres)	Lot Consolidation Potential	Available Infrastructure
<i>Tustin Legacy Specific Plan Area</i>					
1	Vacant, Neighborhood D North and South.	Yes*	Varies	Yes	Planned as part of Master Planned

Site #	Site Reference	Appropriate Zoning	Site Size (Acres)	Lot Consolidation Potential	Available Infrastructure
					Community and analyzed in certified EIR
2	Vacant, Neighborhood G	Yes	Varies	Yes	Planned as part of Master Planned Community and analyzed in certified EIR
<i>Red Hill Avenue Specific Plan Area</i>					
3	Vacant, 13751-13842 Red Hill Avenue (Approved project)	Yes	3.37	Approved Project entitled for housing	Yes, analyzed in certified EIR
4	Non-vacant, 13822-13852 Red Hill Avenue	Yes	7.08	Yes	Yes, analyzed in certified EIR
5	Non-vacant, 1571 El Camino Real	Yes	0.90	No - One Parcel/Yes with Adjacent Site 4	Yes, analyzed in certified EIR
6	Non-vacant, 14081-14231 Red Hill Avenue, (<u>Stater Bros. Shopping Center</u>)	Yes	5.95	Yes	Yes, analyzed in certified EIR
<i>Downtown Commercial Core Specific Plan Area</i>					
7	Non-vacant and vacant; Non-vacant at 365 W. First St.	Yes	1.1	Yes	Yes, analyzed in certified EIR

Site #	Site Reference	Appropriate Zoning	Site Size (Acres)	Lot Consolidation Potential	Available Infrastructure
	(Think Physical Therapy) & Vacant Lot Frontage of Villa Viento Apartments				
8	Non-vacant, Bel Air Motor Hotel at 140 W. First Street	Yes	1.0	No - One Parcel	Yes, analyzed in certified EIR
9	Non-vacant, Tustin War Memorial at 150 E. First & Wienerschnitzel Street at 105 El Camino Real	Yes	0.88	Yes	Yes, analyzed in certified EIR
10	Non-vacant, Larwin Square at SWC First Street & Newport Avenue	Yes	16.47	Yes, Though Same Ownership	Yes, analyzed in certified EIR
11	Vacant lots, Farmer's Market Related Properties at 225-255 El Camino Real & 250 Prospect Avenue	Yes	1.02	Yes, Though Same Ownership	Yes, analyzed in certified EIR
12	Vacant lots, NEC of El Camino Real & Sixth Street at generally 542 El Camino Real	Yes	2.29	Yes, Though Same Ownership	Yes, analyzed in certified EIR

Site #	Site Reference	Appropriate Zoning	Site Size (Acres)	Lot Consolidation Potential	Available Infrastructure
13	Vacant Lot, 125 W. Main Street (adjacent to Arvida Book Store, previously Mrs. B's)	Yes	0.25	No - One Parcel	Yes, analyzed in certified EIR
14	Vacant Lot, 420 El Camino Real	Yes	0.44	No - One Parcel	Yes, analyzed in certified EIR
15	Vacant Lot Adjacent to I-5 Freeway & East of Jack in the Box Restaurant at 14042 Newport & El Camino Real	Yes	2.73	Yes - 3 of 4 Parcels Under Same Ownership	Yes, analyzed in certified EIR
16	Non-vacant, El Camino Plaza at SWC of El Camino Real & 6 th Street, (generally at 620 El Camino Real, 634 El Camino Real, No Listed Address)	Yes	7.81	Yes, Though Under Same Ownership	Yes, analyzed in certified EIR
<i>Other Sites</i>					
17	Non-vacant, Enderle Center	Requires Rezoning	11.62 (7 acres suitable for development)	Yes, same ownership	Yes, site located near major arterials streets existing infrastructure and there is adequate

Site #	Site Reference	Appropriate Zoning	Site Size (Acres)	Lot Consolidation Potential	Available Infrastructure
					capacity for development.
18	Non-vacant, The Market Place (East Tustin Specific Plan)	Requires Rezoning	76.937 (18 acres suitable for development)	No	Yes, site located near major arterials streets existing infrastructure and there is adequate capacity for development.

* Site 1A, 1B (TLSP Neighborhood D - South) and Site 2 (TLSP Neighborhood G) has appropriate zoning, but a rezone (Specific Plan Amendment) to accommodate residential development is proposed to occur within three years.

As Tustin is in a metropolitan county, HCD allows the use of a defined default density of 30 dwelling units per acre. Sites 1 through 16 are within Specific Plan areas which do not have any density limits and, the General Plan for these areas also do not have density limits. Rather, these Specific Plans offer developers flexibility for innovative design by imposing limits on overall unit counts within the Specific Plan area, without specific density restrictions for individual sites. Sites 17 and 18 would be rezoned to include a residential overlay that would allow for high density residential/mixed use development.

As such, zoning would be considered appropriate to consider the RHNA for lower income households where the zone allows for a range of 24 - 35 units or more per acre which would be the case within identified housing sites. Therefore, these sites have appropriate density to accommodate lower income units.

Development Trends/Realistic Capacity

Recent development trends in the City were used to aid in determining the realistic capacity of housing sites identified for future residential development in meeting the City's RHNA allocation. Recent development projects that include residential uses are included in Table B-4

TABLE B-4 Realistic Capacity Development Trends				
Project (Year)/ Description	Zone	Units	Area (ac.)	Density (du/ac.)
The Bowery (2020)/mixed-use	Specific Development (SD) - Santa Ana	1,150	14.6	79
Broadstone Arden (2020)/apartments	Specific Development (SD) - Santa Ana	1,221	18.8	65
Anton Legacy (2015)/apartments	TLSP Tustin	225	7	32
13751 & 13841 Red Hill Avenue (2021)/mixed-use	RHASP Tustin	137	3.4	41
Brookfield/single and multi-family residential	TLSP Tustin	400	25.4	14-29
Tustin Legacy: Multi-Family mixed-use Development (In- process)	TLSP Tustin	1,208	19	60-65
City of Irvine ¹	Median Density of High Density Residential Developments	-	-	70
City of Santa Ana ²	MEMU Overlay Zone Recent Developments	-	-	45 - 90
Sources: ¹ City of Irvine Second Draft 2021-2029 Cycle Housing Element Update, November 19, 2021 ² City of Santa Ana General Plan Housing Element 2021-2029, October 21, 2021.				

Higher-density residential development is now common in recent developments within one to two miles of the Specific Plan areas (see Table B-4). The following capacity assumptions were made based on recently proposed and approved development in Tustin and the surrounding area. The minimum densities exclude areas that may be used for infrastructure, ingress/egress, parking, commercial components when part of a mixed-use development (Refer to Attachment B-1A for net area calculations):

- **The TLSP area is anticipated to provide capacity of**
 - **555 units over approximately 40 acres in Neighborhood D North (40 du/ac minimum);**
 - **1,396 units over approximately 45 acres in Neighborhood D South (45 du/ac minimum); and**

- **2,229 units over approximately 50 acres in Neighborhood G (50 du/ac minimum).**

Recent developments proposed and approved in the TLSP area show that densities have been between 32 and 62 dwelling units per acre. Further, CBRE Inc. was retained to market the Tustin Legacy Multifamily Mixed-Use Development Site, identified as a 19.4-acre site with 1,208-unit capacity (approximately 62.2 dwelling units per acre).¹ **As mentioned previously, sites within TLSP do not have a density prescribed; rather, there is a unit development cap in each of the planning areas. The prescribed capacity would be within the proposed development cap, except for Neighborhood D North where residential was not previously planned. However, the TLSP would be amended to add 555 units to the TLSP Neighborhood D North.** Development conditions would be comparable to the other TLSP area. Therefore, it would be reasonable to assume the TLSP area to be developed at comparable density (including the proposed 40-50 du/ac. densities) based on existing and proposed development trends in the TLSP area and vicinity.

Mixed-use development is permitted and encouraged in Specific Plan areas. However, this is not anticipated to reduce residential development capacity for several reasons:

- In addition to the permitted number of residential units, a substantial amount of non-residential development (in excess of 9.5 million square feet in the TLSP alone) is planned for and accommodated. The TLSP has adequate sites to accommodate non-residential uses and there is no expectation that the demand for nonresidential uses will both utilize the available capacity and displace potential residential development.
- Development standards allow building heights up to 150 feet, minimizing the impact of such restrictions on density. Lot coverage and floor area ratio restrictions are not imposed in the TLSP.

The TLSP, adopted in 2003 and amended regularly since, includes plans for water, wastewater, electrical, and other utility services. The availability and capacity of utility services were evaluated in technical studies prepared and updated regularly in support of an environmental impact report (EIR) (State Clearinghouse No. 1994071005) prepared in compliance with CEQA. The EIR determined the utility plan identified in the Specific Plan would be adequate

¹ CBRE, Inc., 2021. *Tustin Legacy Multifamily Mixed Use Development Opportunity*.

for the proposed residential and nonresidential development and would not put the citywide system over capacity.

The presence of sites over 10 acres does not limit the ability to provide housing for lower-income households. Within the TLSP, the Anton Legacy project is an example of a large site (7 acres) that was developed with significant affordable housing units. The project was constructed as a 225-unit 100 percent affordable housing project, including 88 very-low-income and 73 low-income units. Similar and larger affordable projects have been developed in the adjacent city of Irvine. No lower-income units are proposed on sites less than one-half acre in size except where lot consolidation is considered feasible due adjacency of parcels and the presence of a single landowner or landowning family.

The TLSP encompasses the former Marine Corps Air Station Tustin, which closed in 1999. Since that time, hazardous waste remediation has been occurring across the site by the BRAC (Base Realignment and Closure) Cleanup Team (BCT). A small portion within the southern part of Neighborhood D North is continuing to undergo remediation; however, proposed housing sites are outside of the remediation area. Therefore, the presence of continued remediation activities on the Tustin Legacy site will not impair the site's ability to support the number of anticipated residential units. Currently, over 85 percent of the Specific Plan area has been conveyed to the City of Tustin and other agencies for redevelopment. The majority of the areas not yet conveyed to the City are planned for development as part of a regional park and community college campus.

- **The RHASP area is anticipated to provide capacity of**
 - **395 units over approximately 10 acres north of I-5 (40 du/ac) and**
 - **105 units over approximately 6 acres south of I-5 (18 du/ac).**

A recent development in the RHASP was proposed and approved in 2021 at a density of approximately 41 dwelling units per acre. The project site is approximately 3.4 acres in size and was a result of lot consolidation of two parcels. Other developments in the surrounding area support similar densities as well on similar size lots. Additionally, the RHASP uses a RAR to allocate units to a requested development. The units are drawn from a residential allocation bank which assigns units by area and allows for transferability between areas. **The proposed number of units within the RHASP would be within the remaining allotted capacity of the planning**

area. Therefore, it would be reasonable to assume 18 to 40 dwelling units per acre based on existing and proposed development trends in the RHASP area and vicinity.

- **The DCCSP area is anticipated to provide capacity of**
 - **45 units over approximately 1 acre in DA1 (41 du/ac minimum);**
 - **92 units over approximately 2 acres in DA2 (48 du/ac minimum);**
 - **200 units over approximately 17 acres in DA3 (12 du/ac minimum);**
 - **150 units over approximately 4 acres in DA4 (38 du/ac minimum);**
and
 - **260 units over approximately 11 acres in DA6 (27 du/ac minimum).**
 - **140 units entitled and constructed over 6.8 acres in DA6 (20.6 du/ac minimum).**

A total of 887 residential units have been allocated through the DCCSP within six Development Areas. The DCCSP is subject to voluntary inclusionary housing provisions (City's Voluntary Workforce Housing Incentive Program) that requires a developer of a residential project of twenty (20) or more units to provide affordable units on-site whenever a developer is requesting a residential bank allocation using the City's administrative residential allocation reservation process. For projects under 20 units, the developer may elect to pay an in-lieu fee or provide the units off-site. It is assumed that developments proposed in the DCCSP area would be over 20 units per acre. The DCCSP was recently adopted in 2018, and development patterns have not yet been established for the area. Similar to other specific plan area, the DCCSP operates on a RAR. The average of four Tustin projects identified in Table B-4 equals approximately 38 du/ac. Therefore, it would be reasonable to anticipate a similar development density for DCCSP housing sites. Densities proposed under DA1 and DA2 include 41 and 48 du/ac. As shown in Table B-4, recent mixed-use projects in the City range between 16 to 62 du/ac. Therefore, the City's is taking a conservative approach in anticipating development to take place at 41 and 48 dwelling units per acre based on existing and proposed development trends in the DCCSP area and vicinity.

- **Enderle Center and Tustin Market Place**

The following provides further analysis of the two additional sites added to the sites inventory after receiving public input, requesting a reduction in the number of units in the TLSP area and requesting identification of sites in other parts of the City.

General

The City included two sites located in commercial zones as suitable housing sites for rezoning to allow mixed-use development, which would introduce the opportunity to allow higher density housing in either horizontal or vertical mixed-use developments. The City incorporated these sites in recognition of several factors. First, in response to real estate market changes which places a new demand for commercial development to adapt to changes in retail land uses in particular with the increasing popularity of e-commerce. Second, to plan for lower-income, multi-family residential development to be located throughout the City, particularly in proximity to resources such as parks, schools, public amenities and services, and employment centers. Finally, the inclusion of these two non-residential commercial center as suitable sites for residential development aligns with community input received during the public outreach process, requesting that the City identify additional adequate sites outside of the TLSP area. Ultimately, the redistribution of units these two sites will further facilitate the equitable dispersion of housing units of various income levels throughout the City.

The City identified: (1) The Enderle Center and (2) The Market Place in Tustin as adequate for housing development which will provide housing capacity with planned zoning and land use changes. These two sites have capacity for 413 housing units and 900 housing units, respectively, with a combined total capacity of 1,313 housing units. Each identified site is adjacent to developed land and based on documentation outlined within this element, each site has sufficient infrastructure and is accessible to support housing development. In selecting both of these sites, the anticipated development density is conservative and based on development trends in nearby communities (refer to Table B-4). Furthermore, the anticipated development does not rely on the demolition of any existing building but rather focuses on areas used for surface parking; and Program 1.2 provides that parking may be replaced with parking structures, as needed, to provide required parking. Finally, as part of the program, the city will develop parking standards that incentivize creative parking strategies such parking credits for transit rich development and allowance of parking structures and parking lifts, by right and subject to

Objective Design Standards (refer to Program 1.2). Environmental constraints are factored into the Sites Inventory; however, these two sites are not impacted by any environmental constraints. Redevelopment of the sites would be taking place on already developed land which contains asphalt parking lots.

Retail – Changes in Consumer Preference

The COVID-19 Pandemic accelerated the evolution of the retail commercial real estate market away from the large traditional brick-and-mortar footprints. According to a Retail Market Report produced by CoStar (a leading commercial real estate analytics database) in February 2021, more retail square footage was vacated than occupied (i.e., the net absorption) in Orange County in 2020. More specifically, 858,000 more square feet of retail space was vacated vs. occupied and rent growth declined by 2.1 percent in 2020. This market data clearly indicates a lack of demand for retail space in the County and that there is an oversupply of space given demand. CoStar also shows that vacancy rates in the County have increased from a five-year low of about 3.5 percent in the middle of 2018 to over 4.5 percent in the middle of 2020. CoStar forecasts that vacancy rates will increase to over 5.0 percent by 2024. These market changes support the City’s decision to include new non-residential sites for re-zoning during the planning period, to allow for higher-density housing in either vertical or horizontal mixed-use development.

Housing Capacity Evaluation

For the purposes of assessing realistic density for sites where current zoning does not allow for residential development for these two sites, the City reviewed and analyzed recent development in the City and nearby cities. Table B-4 summarizes recently approved or housing development projects in construction which demonstrates the viability for future housing developments at these two sites.

Furthermore, the City has first-hand knowledge and experience that mixed-use developments continue to be viable opportunities for housing development. In late 2021, the City released a Multi-family mixed use offering seeking interest in the delivery of 1,208 residential units (906 market rate, 302 lower income) on 19 acres of city owned property which would develop at approximately 60-65 dwelling units per acre. The multifamily mixed use offering was advertised to all entities identified in subdivision (a) of Section 54222 of the Government Code and were invited to participate in the

competitive bid process (over 430 entities). The City received a high level of interest and received responses from numerous developers that met the terms of the offering, and the City is still finalizing our selection. The City utilized the surplus land exemption granted in Government Code section 54221 (f) (1) (F) (ii) of the SLA for a mixed-use development that is more than one acre in area, that includes not less than 300 housing units, and that restricts at least 25 percent of the residential units to lower-income households, as defined in Health and Safety Code Section 50079.5 as affordable housing pursuant to Section 102(a). While the process and required level of affordability under the SLA exemption creates many challenges for developers, the City is encouraged as many high-quality developers demonstrated that they are still interested, and submitted proposals to develop a high density multifamily mixed use project.

Site 17 - (Enderle Center)

The Enderle Center is anticipated to provide capacity of 413 units over approximately 7 acres (59 du/ac). During the preparation of the Housing Element Update, the City was in contact with the property owner representative. The property owner expressed their support of the re-zoning. Furthermore, the City has been approached by several developers showing interests in redeveloping the shopping center with mixed-use development. This demonstrate the viability of the site to be redeveloped within the planning period, if not, sooner towards the beginning of the new planning period.

TABLE B-5 Enderle Center	
Existing Zone:	Planning Community Commercial
Proposed Zone:	Allow mixed-use development with minimum 30/du acre (Refer to Program 1.1)
Total Area:	11.62
Area Suitable for residential development:	seven (7) acres (60 percent of the site)
Proposed Housing Capacity:	413 units
Proposed Density:	59 du/ac
During Planning Period:	Rezone properties to allow mixed-use, allowing residential development.

The Enderle Center is located within the northern edge of Tustin, southwest of 17th Street and Enderle Center Drive. The Enderle Center is directly north

of residential development and has existing infrastructure that would be available to serve mixed-use development. Anticipated density is planned to be 59 dwelling units per acre. This density was determined by identifying the area as having capacity for 413 residential units based on an estimated seven (7)-acre site available for redevelopment. As shown in Table B-4, recent mixed-use projects in the City range between 16 to 65 du/ac. Therefore, the City's is taking a conservative approach in anticipating development to take place at 59 dwelling units per acre based on existing and proposed development trends in the region.

The site does not currently support residential land use; however, the site has been identified as underutilized by the City based on other surrounding development trends and compatible for mixed-use development. Approximately seven (7) acres consist of underutilized buildings and expansive surface-level parking lots and are suitable for redevelopment to accommodate housing development. Program 1.1 would add an overlay zone to allow for residential development as part of a mixed-use development at up to 59 dwelling units per acre.

Parking displaced as a result of redevelopment would be accommodated by vertical parking structures located within proposed development structures. With Program 1.2, parking structures would be permitted by right, making it easier to build parking structures to make up the loss for surface parking.

Site 18 - The Market Place

The Market Place Center is anticipated to provide capacity of 900 units over approximately 18 acres (50 du/ac).

The Tustin Market Place is located north of Jamboree Road and El Comino Real near the intersection of I-5 and SR-261. The Market Place is a commercial shopping center which is under one ownership, The Irvine Company. The large site size and single ownership make this site advantageous for development, as consolidation would not be necessary. This retail center originally developed in the 1990s with big-box spaces and large parking fields that lacks the walkable, place-making attributes of today's successful retail centers. The existing layout of this retail center, which is adjacent to the 5 Freeway and close to employment, makes these properties underdeveloped.

TABLE B-5 The Market Place	
Existing Zone:	PCMU - SP 8 (East Tustin Specific Plan)
Proposed Zone:	Allow mixed-use development with minimum 30/du acre (Refer to Program 1.1)
Total Area:	76.93 acres
Area Suitable for residential development:	18 acres (24 percent of the site)
Proposed Housing Capacity:	900 units
Proposed Density:	50 du/ac
During Planning Period:	Rezone properties to allow mixed-use, allowing residential development.

The Tustin Market Place is directly south of residential development and has existing infrastructure that would be available to serve mixed-use development. The Irvine Market Place, a comparable development southeast of Bryan Avenue and Jamboree Road, is anticipated to support multi-family housing as well. The City of Irvine has identified a density of 50 dwelling units per acre for portion of sites located in the City of Irvine.

The site does not currently support residential land use; however, the site has been identified as underutilized by the City based on other surrounding development trends and compatible for mixed-use development. As shown in Table B-4, recent mixed-use projects in the City range between 16 to 65 du/ac. Therefore, the City's is taking a conservative approach in anticipating development to take place at 50 dwelling units per acre based on existing and proposed development trends in the region.

Zoning for this site would be amended to allow multi-family residential/mixed use development and modified development standards appropriate for facilitating affordable housing. Program 1.1 would add an overlay zone to allow for residential development as part of a mixed-use development with a minimum density of 30 dwelling units per acre.

Approximately 18 of the 76.93 acres consist of expansive surface-level parking lots that are mostly not occupied and are suitable for redevelopment at greater density. The anticipated development over 18 acres would take place on underutilized asphalt parking lot areas. Parking displaced as a result of redevelopment would be accommodated by vertical parking structures located within proposed development structures. With Program 1.2, parking structures would be permitted by right, making it easier to build parking

structures to make up the loss for surface parking. In addition, Program 1.1 would add an overlay zone to allow for residential development as part of a mixed-use development with a minimum density of 30 dwelling units per acre.

ATTACHMENTS
ASSOCIATED WITH APPENDIX B
SITE INVENTORY ASSESSMENT

Attachment B-1
Sites Identification to Meet RHNA*

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
<i>Tustin Legacy Specific Plan Area</i>									
1 1A	Neighborhood D PA 8, 13 & 14 North [requires rezone]	Vacant	Yes (both) / Yes	39.873 0.002 2.466 1.235 36.170	430-381-38 430-381-41 430-381-91 430-381-95	City of Tustin	SP 1	TLSP	555
1B	Neighborhood D - South Brookfield Development - (Approved/Permitted) and also requires rezone to add a minimum of 200 additional units Multifamily			44.861 25.437 5.289 2.778 2.639 2.572 4.012 3.984 4.163 19.424 7.039 6.934 5.451	Tract 18197 Lot 2 Lot 5 Lot 6 Lot 7 Lot 8 Lot 9 Lot 10 Tract 18197 Lot 11 Lot 12 Lot 13				1,396

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
2	Neighborhood G PA 15	Vacant	Yes (both) / No	50.321 3.573 0.665 1.559 1.349 46.748 10.010 4.946 9.086 3.396 0.107 0.139 5.000 3.316 7.212 3.536	430-381-27 430-381-28 430-381-29 430-391-03 430-391-27 430-391-28 430-391-56 430-391-59 430-391-60 430-391-61 430-391-62 430-391-63 430-391-64	City of Tustin	SP 1	TLSP	2,229
Red Hill Avenue Specific Plan Area <i>Planning Area – North of I-5</i>									395 units
3	13751-13841 Red Hill Avenue (Approved Entitlements)	Non-Vacant	Yes Opportunity site (5 th only) / Not for RHNA	3.37 0.46	500-141-09	WASL Investors V, LLC, a Delaware Limited Liability Company	SP 13	RHASP	137

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
				2.91	500-141-10 (Vacant)	WASL Investors V, c/o Irvine Asset Group, LLC			
4	13822-13852 Red Hill Avenue (Red Hill Plaza) 13822 Red Hill Avenue No address listed 13852 Red Hill Avenue	Non-Vacant	No / No	7.08	500-022-12 500-022-09 500-022-04	RHP8 LLC RHP1 LLC RHP1 LLC	SP 13	RHASP	226
5	1571 El Camino Real (Denny's Restaurant)	Non-Vacant	No / No	0.90	500-022-02	RHP2 LLC	SP 13	RHASP	32
Red Hill Avenue Specific Plan Area									
<i>Planning Area – South of I-5</i>									105 units
6	14081-14231 Red Hill Avenue (Stater Bros. Shopping Center) 14081 Red Hill Avenue 14131 Red Hill Avenue 14171 Red Hill Avenue 14171 Red Hill Avenue	Non-Vacant	No / No	5.95	432-041-04 432-041-17 432-041-19 432-041-20	Huber G. Wilson Huber G. Wilson/Old Town Inc. Huber G. Wilson	SP 13	RHASP	

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
	14213 Red Hill Avenue			1.50	432-041-21	Huber G. Wilson/Armand Pedicini			
	14231 Red Hill Avenue			0.33	432-041-14	Huber G. Wilson/Armand Pedicini			
						Huber G. Wilson/Maria Pedicini			
<i>Downtown Commercial Core Specific Plan Area</i>									
<i>Development Area 1</i>									45 units
7	365 W. First St. (Think Physical Therapy) & Vacant Frontage of Villa Viento Apartments	Non-Vacant	No / No	1.1			SP 12	DCCSP	
	365 W. First Street			0.6	401-523-30	365 West First Street LLC			
	Vacant Frontage of Villa Viento Apartments			0.5	401-523-15 (portion)	Tustin-First Investment Co			
<i>Development Area 2</i>									92 units
8	Bel Air Motor Hotel at 140 W. First Street	Non-Vacant	No / No	1.0	401-571-14	GLM Ventures LLC	SP 12 DA-2	DCCSP	

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
9	Tustin War Memorial at 150 E. First Street & Wienerschnitzel at 105 El Camino Real	Non-Vacant	No / No	0.88			SP 12 DA-2	DCCSP	
	150 E. First Street (Tustin War Mem)			0.43	401-583-01	City of Tustin			
	105 El Camino Real (Restaurant)			0.45	401-583-15	Holmes John M the Holmes Family Trust			
<i>Development Area 3</i>									200 units
10	Larwin Square at SWC First Street & Newport Avenue	Non-Vacant	No / No	16.47			SP 12 DA-3	DCCSP	
	630 E. First Street			12.20	401-601-01	Larwin Square SC Weinberg LLC			
	13341 Newport Avenue			0.81	401-601-04	PK II Larwin Sq .SC			
	13421 Newport Avenue Tustin			0.32	401-601-05	PK II Larwin Sq. SC			
	13451 Newport Avenue			0.38	401-601-06	PK II Lawrin Sq. SC			
	13471 Newport Avenue			0.39	401-601-07	PK II Larwin			
	550 E First St			1.00	401-601-08	Haggen Property South LLC			

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
	275 Centennial Way			0.46	401-601-09	PK II Larwin Square			
	662 E First Street			0.91	401-601-10	PK II Larwin Square			
<i>Development Area 4</i>									150 units
11	Farmer's Market Related Properties at 225-255 El Camino Real & 250 Prospect Avenue 250 Prospect Avenue No Address Listed 255 El Camino Real 245 El Camino Real 235 El Camino Real 225 El Camino Real	Vacant	Yes (both) / No	1.02 0.17 0.17 0.17 0.17 0.17 0.17	 401-584-04 401-584-05 401-584-06 401-584-07 401-584-08 401-584-09	 Mary M. Prescott Mary M. Prescott Mary M. Prescott Mary M. Prescott Mary M. Prescott Mary M. Prescott	SP 12 DA-4	DCCSP	
12	NEC of El Camino Real & Sixth Street at generally 542 El Camino Real 520 El Camino Real Address unavailable 135 W. 6 th Street	Vacant	Yes (both) / No	2.29 0.50 1.1 0.69	 401-623-14 401-623-15 401-623-16	 Prescott Mary M. Exemption Trust Prescott Mary M. Exemption Trust Prescott Mary M. Exemption Trust	SP 12 DA-4	DCCSP	
13	125 W. Main Street (adjacent to Arvida Book Store, previously Mrs. B's)	Vacant	No / No	0.25	401-573-13	Pacific Maintenance & Repair Inc.	SP 12 DA-4	DCCSP	

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
14	420 El Camino Real	Vacant	No/No	0.44	401-622-18	Radon Davor	SP 12 DA-4	DCCSP	
Development Area 6									260 units
15	Vacant Lot Adjacent to I-5 Freeway & east of Jack in the Box Restaurant at 14042 Newport & El Camino Real No address listed 14042 Newport Avenue No address listed No address listed	Vacant	Yes (5 th cycle) / No	2.73 0.77 0.675 0.378 0.906	432-074-02 432-074-07 432-074-08 432-074-09	All parcels owned by Tustin Capital, LLC & Kim Michael	SP 12 DA-6	DCCSP	
16	El Camino Plaza at SWC of El Camino Real & 6 th Street 620 El Camino Real 634 El Camino Real No Listed Address	Non-Vacant	No / No	7.81 3.5 4.2 0.11	401-631-01 401-631-15 401-631-13	ECP Investors LLC ECP Investors LLC ECP Investors LLC	SP 12 DA-6	DCCSP	
Other Areas of City									
17	Enderle Center, near 17 th St, Enderle Center Dr., Yorba St. and Vandenburg	Non-Vacant	No / No	11.62 (7.0 ac. Suitable for development)	401-251-04 401-251-06 401-252-05 401-252-06 401-252-08 401-252-09 401-252-10 401-253-04 410-253-03	Bruce A. Enderle, Scott W. Enderle, Wallace Enderle Trust, Wallace Owens Enderle Trust 2	PC COM	PCCB	413

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
18	The Market Place, near Interstate-5 and Jamboree Rd, near the City of Irvine.	Non-Vacant	No / No	76.93 (18 ac. suitable for development)	500-291-25 500-312-10	Tustin Market Place I LLC	SP 8 PC COM	PCCB	900
19	House of Ruth Transitional Housing Units at 1941 El Camino Real	Vacant (Entitled, Plan check and permits currently underway)	Yes (both) / No	0.38	500-071-12	City of Tustin	R4	HDR	7
Other	ADUs & JDUs	Non-Vacant	No / No	NA	NA	NA	Varies	Varies	35
TOTAL ESTIMATED UNIT CAPACITY									6,782

Note: Unit capacity incorporates anticipated TLSP rezone (Neighborhood D – North)

**Attachment B-1A
Sites Identification to Meet RHNA - Realistic Capacity Estimates**

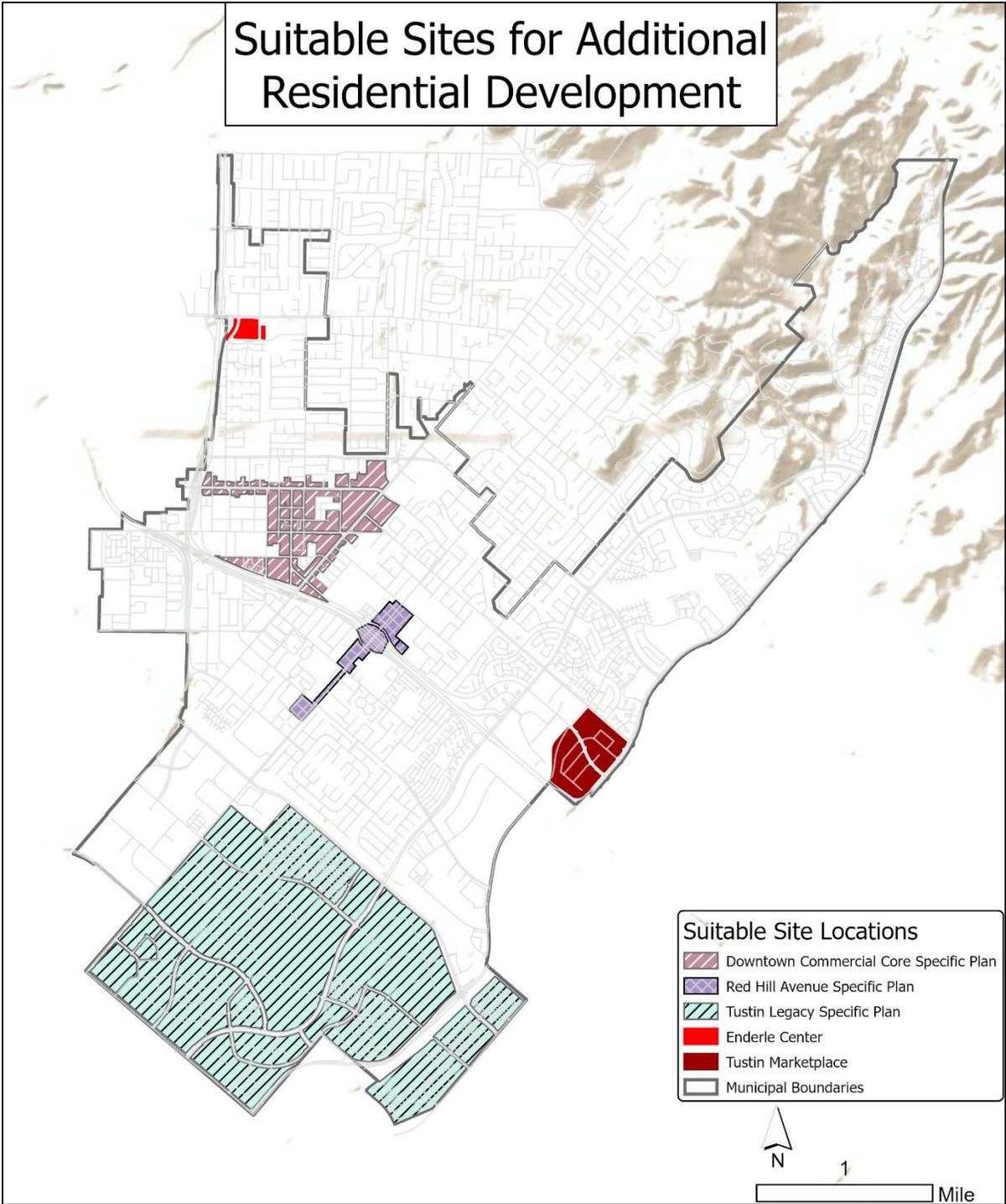
	Site	Density (Gross Land Area)			REALISTIC CAPACITY Density (Net Land Area)*		
		# of Units	# of Acres	Density	# of Units	# of Acres	Density
TLSP Nbrhd "D" North	1A	555	40	14	555	14	40
TLSP Nbrhd "D" South	1B	1,396	45	31	1,396	31	45
TLSP Nbrhd "G"	2	2,229	50	41	2,229	45	45
RHASP - North	3,4,5	395	11.35	35	395	10	40
RHASP - South	6	105	6	18	105	6	18
DCCSP DA1	7	45	1	45	45	1	45
DCCSP DA2	8,9	92	2	46	92	2	46
DCCSP DA3	10	200	17	12	200	17	12
DCCSP DA4	11,12,13,14	150	4	38	150	3.5	43
DCCSP DA6	15,16	260	10.54	25	260	9.5	27
Enderle Center	17	413	11.62	36	413	7	59
The Market Place	18	900	76.93	12	900	18	50

Notes:

* Excludes areas that may be used for infrastructure, easements, ingress/egress, parking, commercial components when part of mixed-use developments, etc.

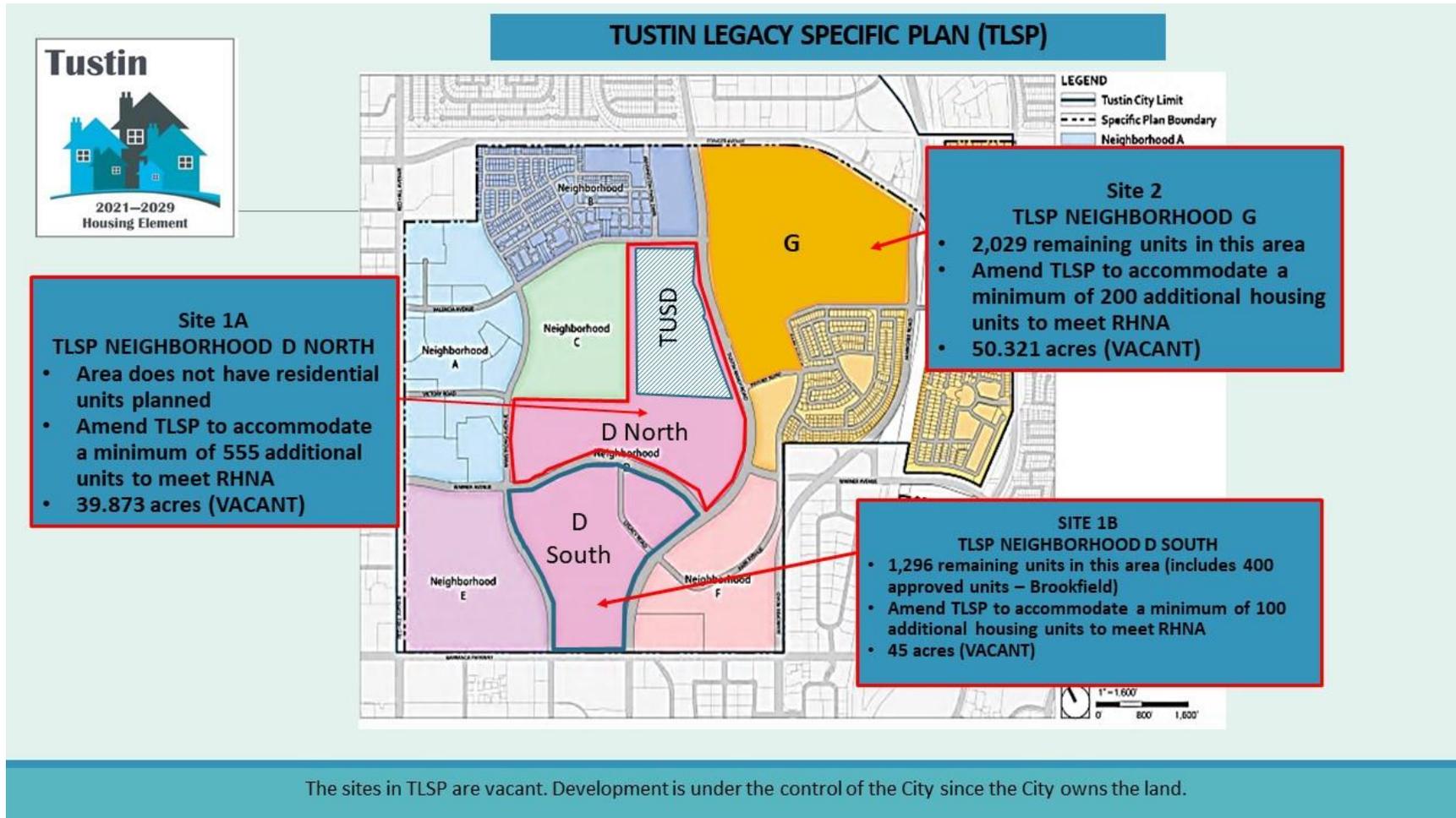
Note: Acreages have been rounded to the nearest whole number.

Suitable Sites for Additional Residential Development



Attachment B-2

Tustin Legacy Specific Plan
Site Aerials / Individual Site APN Maps

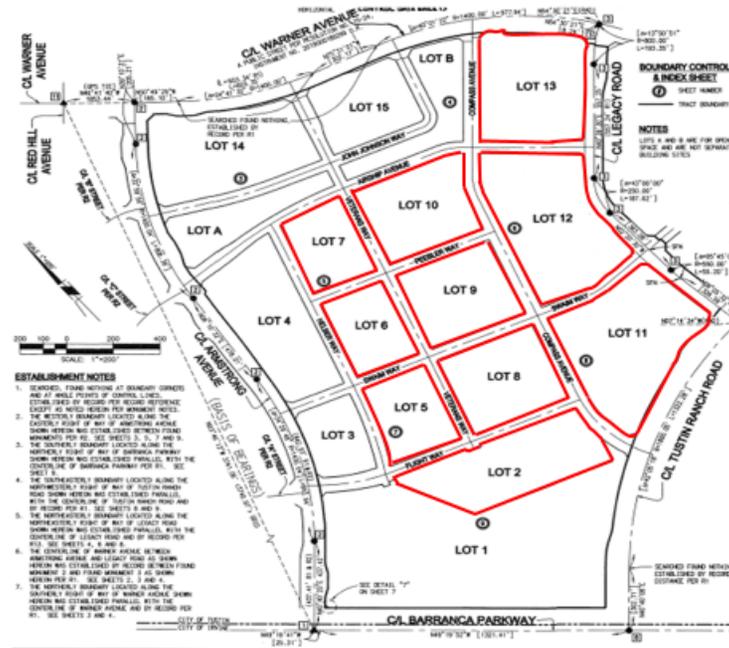


Site 1B NEIGHBORHOOD D SOUTH

- 45 Acres 1396 Units
- Zoning: SP 1 General Plan: TLSP
 - Includes Brookfield Development (400 units)
 - 1,208 Future Units – Multiple Family

Address	APN	Acre	Total Acreage
1B South Brookfield Tract 18197	Lot 2	5.289	44.86
	Lot 5	2.778	
	Lot 6	2.639	
	Lot 7	2.572	
	Lot 8	4.012	
	Lot 9	3.984	
	Lot 10	4.163	
	Lot 11	7.039	
	Lot 12	6.934	
Lot 13	5.451		

Source: Orange County Assessor Map

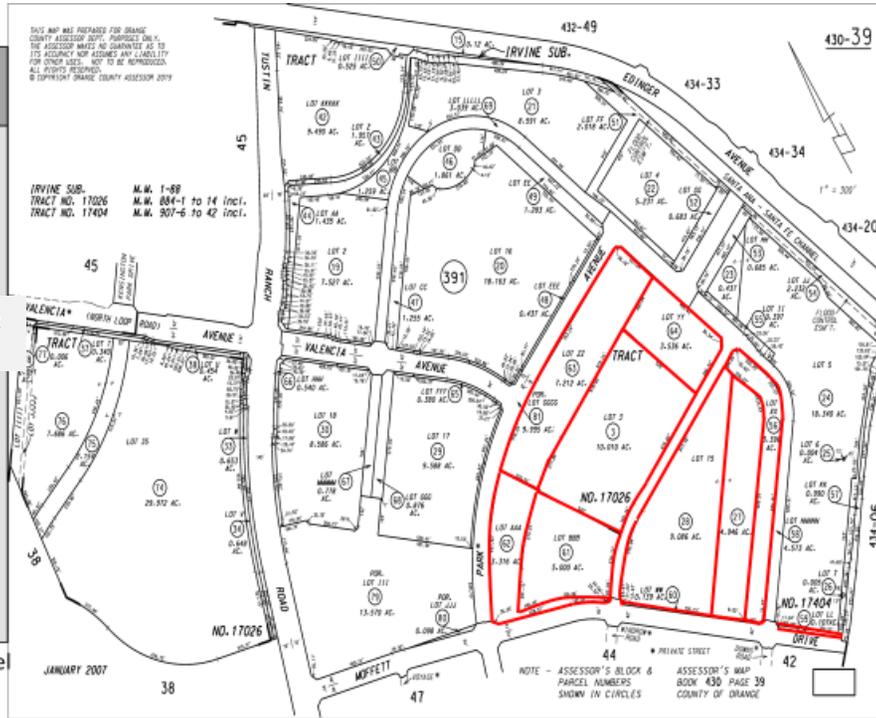


Continued

NEIGHBORHOOD G

Address	APN	Acre	Total Acreage
Neighborhood G	430-391-03	10.01	46.748
	430-391-27	4.946	
	430-391-28	9.086	
	430-391-56	3.396	
	430-391-59	0.107	
	430-391-60	0.139	
	430-391-61	5	
	430-391-62	3.316	
	430-391-63	7.212	
	430-391-64	3.536	

Source: Orange County Assessor Parcel Map



Attachment B-2

Red Hill Avenue Specific Plan
Site Aerials / Individual Site APN Maps



**RED HILL AVENUE
SPECIFIC PLAN
AREA**

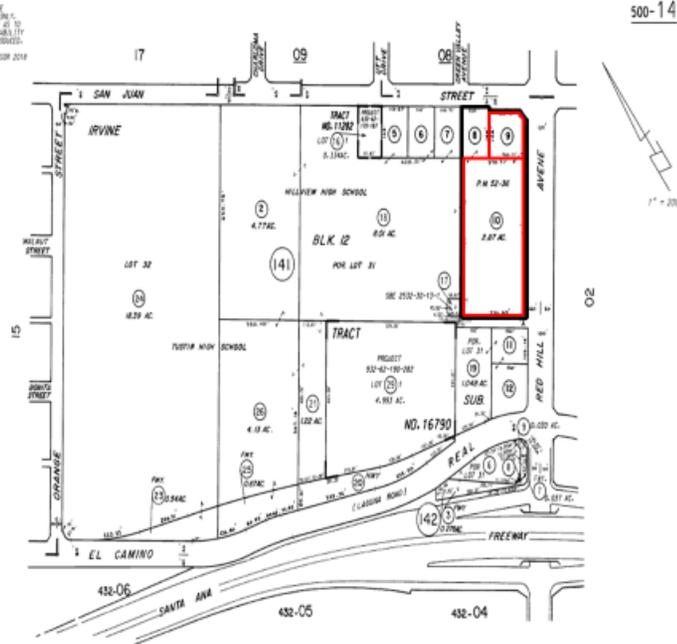


SITE 3: 13751 - 13841 RED HILL AVENUE
(2 Parcels) Pending Project
3.37 Acres Zoning: SP 13
General Plan: RHASP

Address	APN	Acre	Total Acreage
13751 Red Hill Avenue	500-141-09	0.46	3.37
13841 Red Hill Avenue	500-141-10	2.91	

Source: RealQuest

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MARCH 1983

IRVINE SUB.
 TRACT NO. 71282
 TRACT NO. 16790

M.M. 1-88
 M.M. 508-19-20
 M.M. 891-05 to 08 Inc.

NOTE - ASSESSOR'S BLOCK & PARCEL NUMBERS SHOWN IN CIRCLES

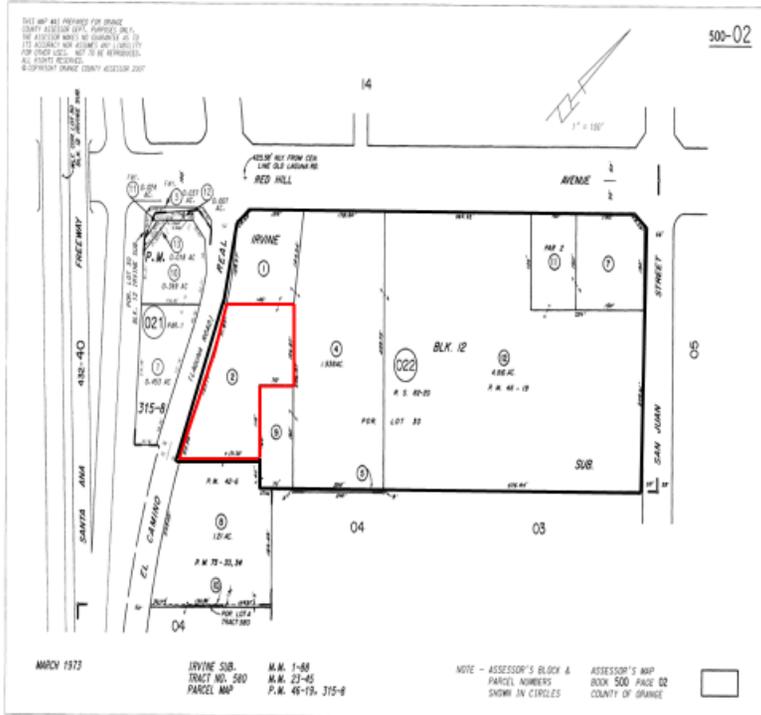
ASSESSOR'S MAP BOOK 400 PAGE 14 COUNTY OF ORANGE



SITE 5: 1571 EL CAMINO REAL
Denny's Restaurant
0.90 Acres Zoning: SP 13 General Plan:
RHASP

Address	APN	Acre	Total Acreage
1571 El Camino Real	500-022-02	0.9	0.9

Source: RealQuest



SITE 6 : 14081 – 14231 RED HILL AVENUE

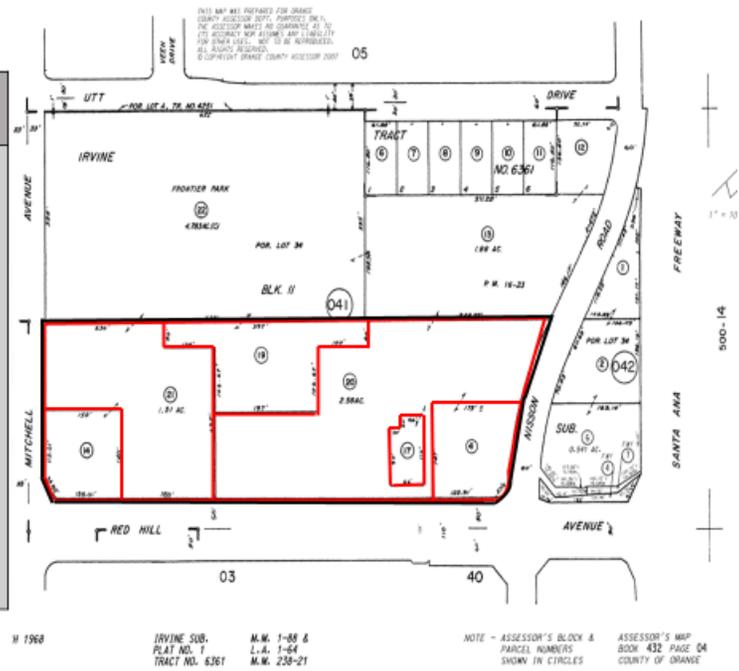
Stater Brothers Shopping Center

5.95 Acres Zoning: SP 13 General Plan: RHASP

Addresses	APN	ACRES	Total Acreage
14081 Red Hill Avenue	432-041-04	0.53	5.95
14231 Red Hill Avenue	432-041-14	0.33	
14131 Red Hill Avenue	432-041-17	0.16	
14171 Red Hill Avenue	432-041-19	0.83	
14171 Red Hill Avenue	432-041-20	2.60	
14213 Red Hill Avenue	432-041-21	1.50	

Sources:

- RealQuest Map
- OCPW Maps



Attachment B-2

Downtown Commercial Core Specific Plan
Site Aerials / Individual Site APN Maps



Sites 8 & 9 - 92 units

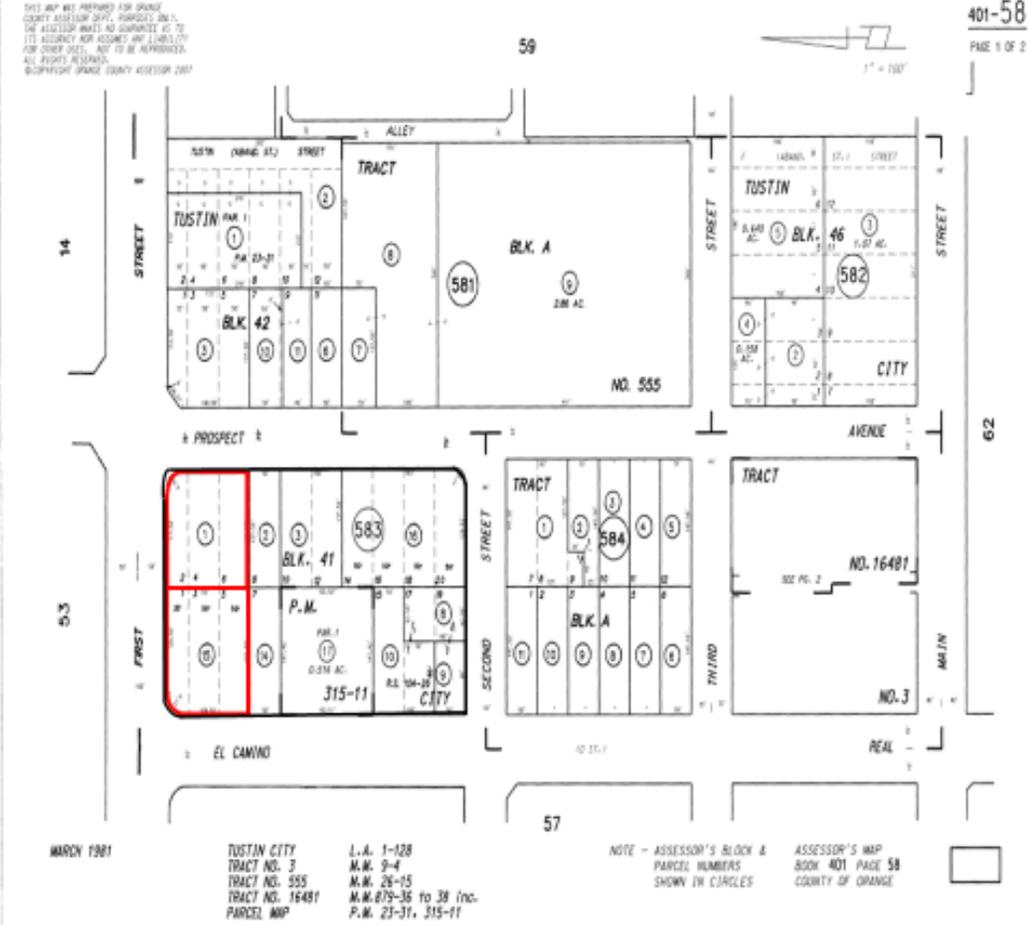
**DOWNTOWN
COMMERCIAL CORE
SPECIFIC PLAN AREA**

SITE 9: 150 E. FIRST STREET & 105 EL CAMINO REAL

Tustin War Memorial and Wienerschnitzel
 0.88 Acres Zoning: SP 12 General Plan: DCCSP

Address	APN	Acre	Total Acreage
150 E. First Street	401-583-01	0.43	0.88
105 El Camino Real	401-583-15	0.45	

Source: RealQuest





**DOWNTOWN
COMMERCIAL
CORE
SPECIFIC
PLAN AREA**

**SITE 10
LARWIN SQUARE
SWC OF NEWPORT AVE & FIRST STREET – 200 units
16.47 Acres**



SITE 10: LARWIN SQUARE

16.47 acres

Zoning: SP 12

General Plan: DCCSP

Address	APN	Acre	Total Acreage
630 E 1ST ST	401-601-01	12.20	16.47
13341 NEWPORT AVE	401-601-04	0.81	
13421 NEWPORT AVE	401-601-05	0.32	
13451 NEWPORT AVE	401-601-06	0.38	
13471 Newport Ave	401-601-07	0.39	
550 E 1ST ST	401-601-08	1.00	
275 CENTENNIAL WAY	401-601-09	0.46	
662 E 1ST ST	401-601-10	0.91	

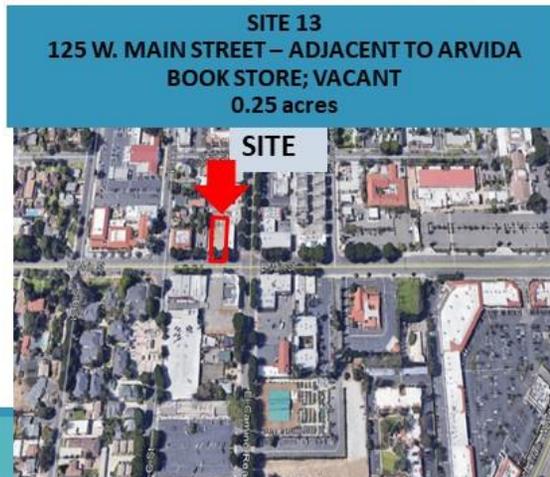
Source: RealQuest





**DOWNTOWN
COMMERCIAL
CORE
SPECIFIC
PLAN AREA**

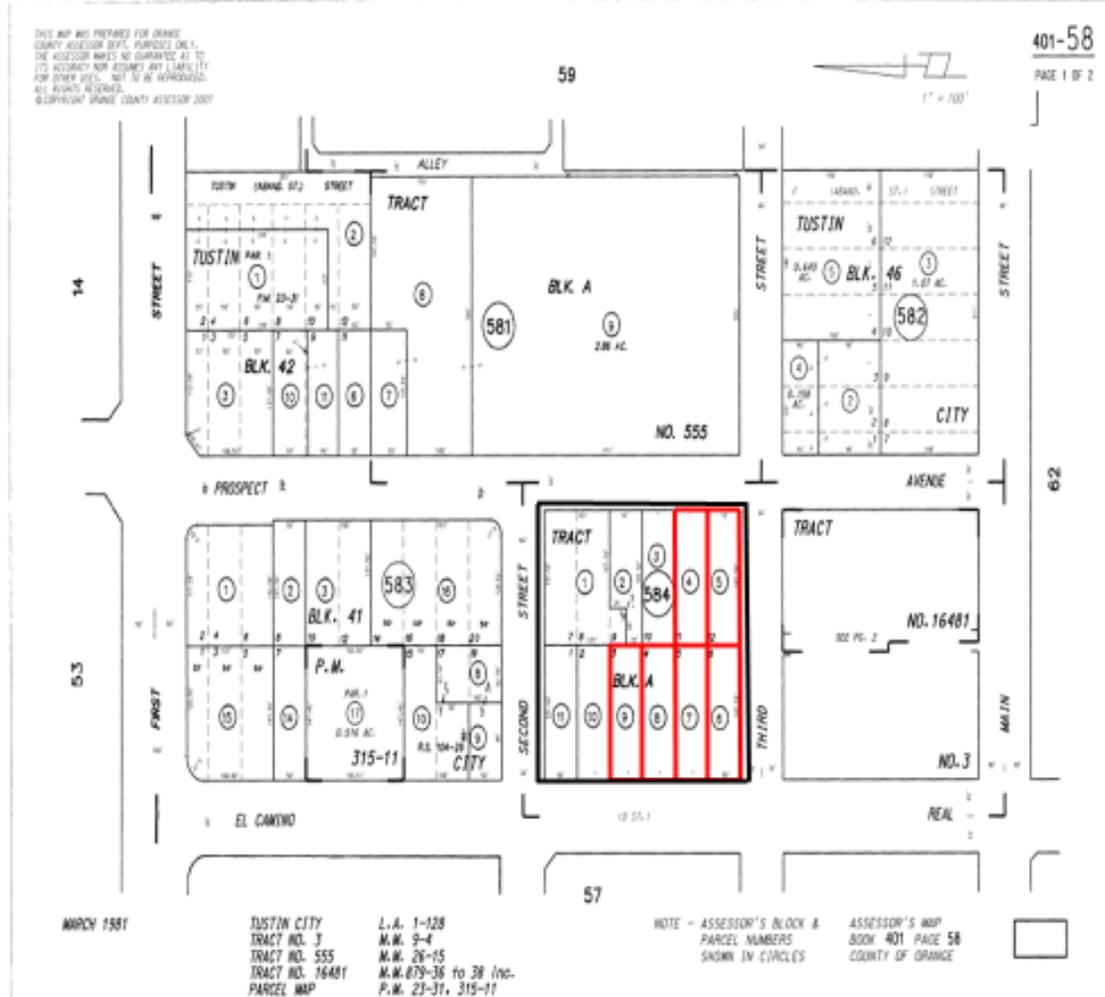
**Sites:
11, 12, 13, 14 –
150 units**



**SITE 11: 225 – 255 EL CAMINO REAL
& 250 PROSPECT AVE.
Farmer's Market Temporary Use
1.02 Acres Zoning: SP 12 General
Plan: DCCSP**

Address	APN	Acres	Total Acreage
250 Prospect Avenue	401-584-04	0.17	1.02
No address listed	401-584-05	0.17	
255 El Camino Real	401-584-06	0.17	
245 El Camino Real	401-584-07	0.17	
235 El Camino Real	401-584-08	0.17	
225 El Camino Real	401-584-09	0.17	

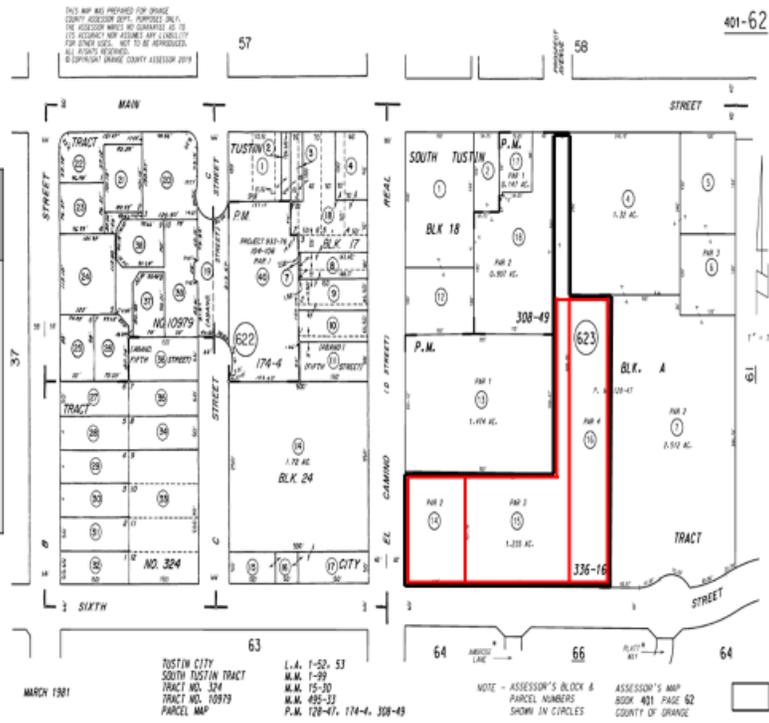
Source: RealQuest and Orange County Public Works



**SITE 12: NEC of EL CAMINO
REAL & SIXTH STREET
542 EL CAMINO REAL**
2.29 Acres Zoning: SP 12 General
Plan: DCCSP

Address	APN	Acre	Total Acreage
520 El Camino Real	401-623-14	0.50	2.29
No Listed Address	401-623-15	1.1	
135 W 6th	401-623-16	0.69	

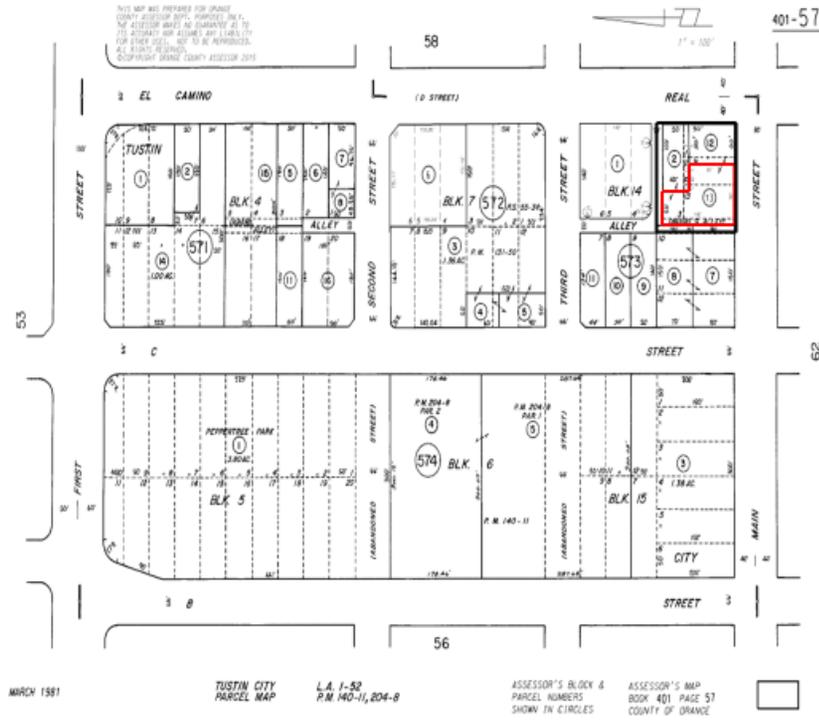
Source: RealQuest



SITE 13: 125 W. MAIN STREET – ADJACENT TO ARVIDA BOOK STORE
0.25 Acres Zoning: SP 12
General Plan: DCCSP

Address	APN	Acre	Total Acreage
125 W. Main St	401-573-13	0.25	0.25

Source: RealQuest





SITE 16
EL CAMINO PLAZA
SWC OF SIXTH STREET & EL CAMINO REAL
7.81 Acres

SITE 15
14042 NEWPORT AVE. & EL CAMINO REAL
VACANT; 2.73 Acres



**DOWNTOWN
 COMMERCIAL
 CORE
 SPECIFIC PLAN
 AREA**

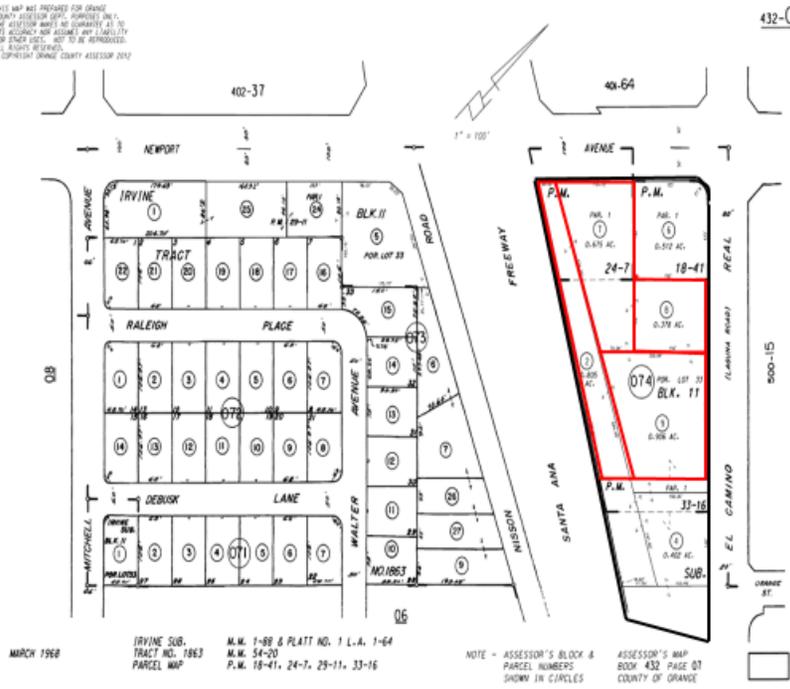
**Sites 15 & 16 –
 260 housing
 units**

SITE 15: 14042 NEWPORT AVE. & EL CAMINO REAL
2.73 Acres Zoning: SP 12 General Plan: DCCSP

Address	APN	Acre	Total Acreage
14042 Newport Avenue	432-074-02	0.77	2.73
14042 Newport Avenue	432-074-07	0.675	
14042 Newport Avenue	432-074-08	0.378	
14042 Newport Avenue	432-074-09	0.906	

Source: RealQuest and Orange County Public Works

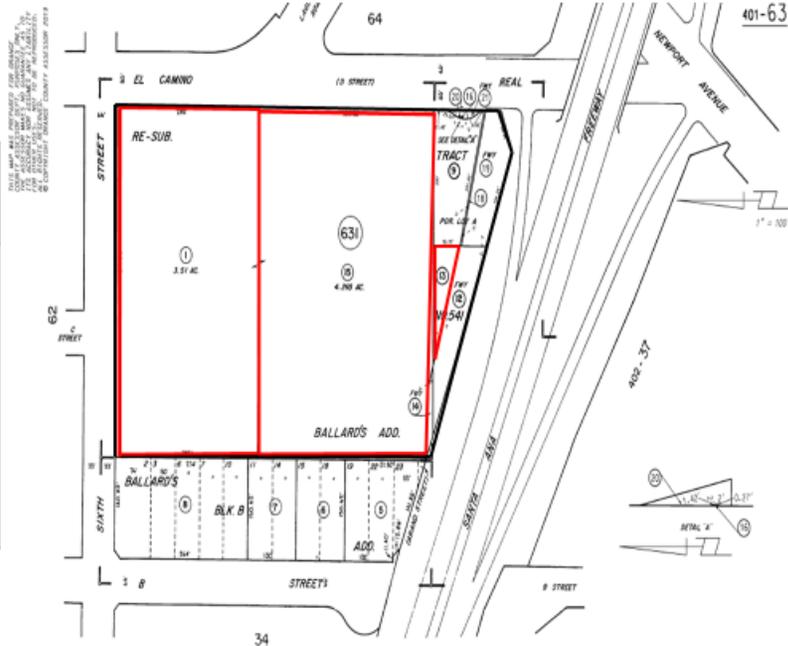
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SITE 16: EL CAMINO PLAZA

7.81 Acres Zoning: SP 12 General Plan: DCCSP

Address	APN	Acre	Total Acreage
620 El Camino Real	401-631-01	3.5	7.81
634 El Camino Real	401-631-15	4.2	
No Listed Address	401-631-13	0.11	



Source: RealQuest and City of Tustin GIS Database

MARCH 1981

BALLARD'S ADD. L.A. 2-142
 RE-SUB. BALLARD'S ADD. M.M. 1-89
 TRACT NO. 541 M.M. 26-14

NOTE - ASSESSOR'S BLOCK & PARCEL NUMBERS SHOWN IN CIRCLES

ASSESSOR'S MAP BOOK 401 PAGE 63 COUNTY OF ORANGE





Enderle Center

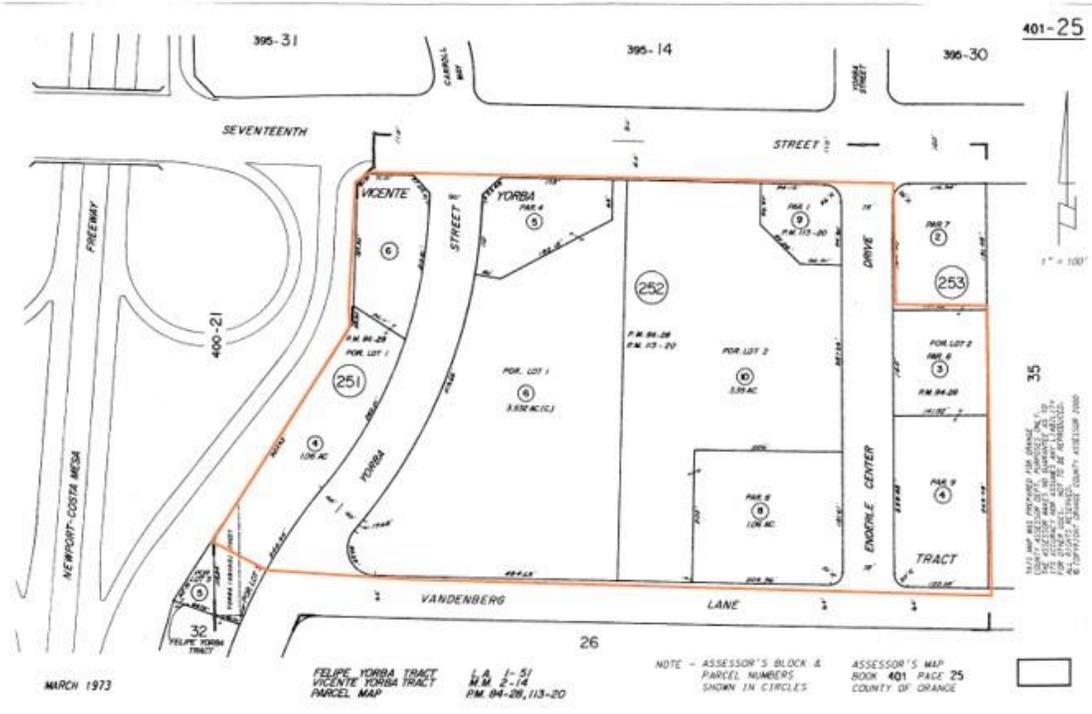
SITE #17: ENDERLE CENTER

11.62 acres Zoning: PCC

General Plan: PCCB

Address	APN	Acres
14081 Yorba St	401-251-04	1.05
17240 17th St	401-251-06	0.54
17280 17th St	401-252-05	0.52
17300 17th St	401-252-06	3.53
-	401-252-08	1.05
17480 17th St	401-252-09	0.3
17440 17th St	401-252-10	3.32
14032 Enderle Center Dr	401-253-03	0.5
-	401-253-04	0.81
Total Site Acreage		11.62
Total Acreage Suitable for Residential Development		7

Partially or wholly suitable for residential development





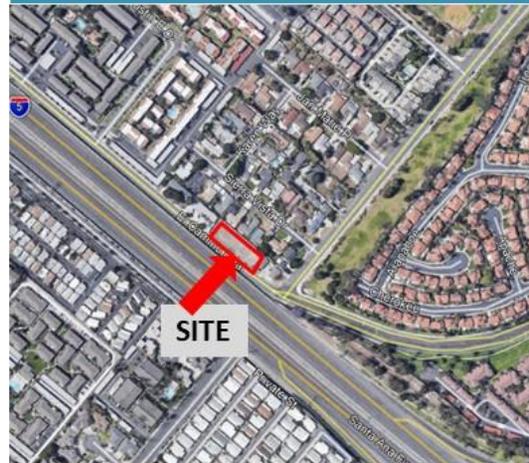
SITE 18
THE MARKETPLACE – 900 housing units
Total: 76.937 Acres
(Acreage suitable for redevelopment 18 acres)

An aerial photograph of a residential and commercial area in Tustin, California. A red outline highlights a specific area labeled "SITE 18". A red arrow points from a white box with the word "SITE" to the red-outlined area. The map shows various streets, including Chambers Rd, Franklin Ave, Menelle Dr, Tustin Ranch Rd, Auto Center Dr, and San Joaquin Rd. Major roads like the Santa Ana Freeway (SR 5) and SR 261 are also visible. The area is densely packed with buildings and parking lots.



Transitional Housing

1941 EL CAMINO REAL – ENTITLED
House of Ruth
(7 Transitional Home Units)
0.38 Acres



ADUs/JADUs – 35 housing units



Citywide: ADUs/JADUs



Attachment B-3

Buffer

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
<i>Tustin Legacy Specific Plan Area</i>									
1 1A	Neighborhood D PA 8, 13 & 14 North [requires rezone]	Vacant	Yes (both) / Yes	39.873 0.002 2.466 1.235 36.170	430-381-38 430-381-41 430-381-91 430-381-95	City of Tustin	SP 1	TLSP	714
2	Neighborhood G PA 15 [requires rezone]	Vacant	Yes (both) / No	50.321 3.573 0.665 1.559 1.349 46.748 10.010	430-381-27 430-381-28 430-381-29 430-391-03	City of Tustin	SP 1	TLSP	642

Attachment B-3

Buffer

Site #	Site Reference	Vacant or Non-Vacant	Identified in Previous 4 th &/Or 5 th Cycles / Was Counted Towards RHNA	Site Size (Acres)	APNs	Ownership	Zoning	General Plan	Capacity
<i>Tustin Legacy Specific Plan Area</i>									
				4.946	430-391-27				
				9.086	430-391-28				
				3.396	430-391-56				
				0.107	430-391-59				
				0.139	430-391-60				
				5.000	430-391-61				
				3.316	430-391-62				
				7.212	430-391-63				
				3.536	430-391-64				
TOTAL ESTIMATED UNIT CAPACITY									1,356

Attachment B-4

HCD Required Site Inventory Form

To Be Submitted Following Housing Element Adoption - As Allowed

APPENDIX C
AFFORDABLE HOUSING RESOURCES

APPENDIX C

AFFORDABLE HOUSING RESOURCES

The City has compiled a list of funding sources for a wide variety of major housing assistance programs available from federal and state agencies and private lending institutions that can assist in meeting the City's housing needs. More specific information including details regarding eligible projects and activities and funding availability can be found in this section of the housing element update. The following is a summary of this information along with updates to reflect new state and federal programs.

- **Senate Bill (SB) 2 Grants**

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the state's housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which established a \$75 recording fee on real estate documents to increase the supply of affordable homes in California. Due to the various number of real estate transactions that may take place within the county, the annual revenues will also fluctuate.

The first year of SB 2 funds were available as planning grants to local jurisdictions. On May 20, 2020, HCD approved \$310,000 of funding to the City. Through five projects, the City participates in goals of the Planning Grants Program including, accelerated housing production, streamlined approvals, expedited processing, promotion of development, objective design and development standards, promotion of ADU development, preservation and rehabilitation, as well as assisting in this state mandated Housing Element Updated.

The Local Early Action Planning (LEAP) grants was another source of funding intended to aid local jurisdictions in the preparation and adoption of planning documents and process improvements that accelerate housing production and facilitation compliance to implement the sixth cycle of the RHNA. On December 28, 2020, the City was awarded \$300,000 in LEAP funding for two projects; facilitating compliance in implementing the sixth cycle of the RHNA and funding assistance with preparation of the 6th Cycle Housing Element

Update and, secondly, an implementation tool associated with the Housing Element Update.

For the second year and onward, 70% of SB 2 funding under the Permanent Local Housing Allocation (PLHA) component of SB 2 will be allocated to local governments for purposes of affordable housing. The City does intend to participate in the PLHA grants to the degree possible.

- **Partnerships**

In March 2019, the City of Tustin in partnership with Temporary Shelter, Inc (TSI) opened the Tustin Temporary Emergency Shelter, a 57-bed, low barrier emergency shelter. 100% of Tustin's Permanent Local Housing Allocation (PLHA) will partially fund TSI's operation of the shelter. The City will use other funding sources to fully fund the shelter's operation. In establishing the Tustin Temporary Emergency Shelter, the City Council declared a shelter emergency. Under the urgency of a declared shelter emergency and a Federal court order to open a shelter within 120 days, the City asked two (2) nonprofits with experience operating shelters to submit proposals. One nonprofit declined and the City chose Temporary Shelter Inc, a secular affiliate of the Orange County Rescue Mission, to operate the shelter.

The Tustin Temporary Emergency Shelter is a safe, clean and dignified low barrier emergency shelter. The shelter is built on a human scale not an industrial scale, with semiprivate living spaces, integrated health care, 24-Hour/seven-day-a-week intake & orientation, and 24-Hour Access to Orange County Behavioral Health staff. The shelter serves as a first-step opportunity with a focus on moving guests forward towards self-sufficiency and healing by providing strategic pathways and interventions that lead to ending their homelessness. PLHA funding (SB 2) will only be allocated to homeless services and, as such, serving the homeless meets the requirement to prioritize investments that increase the supply of housing for households with incomes at or below 60% AMI. 100% of PHLA funds between 2019-2023 will be allocated towards operation of the emergency shelter.

SB 2/PHLA funding will continue to assist persons within the City who are experiencing or are at-risk of homelessness, including, but not limited to, providing rapid rehousing, rental assistance, supportive/case management services that allow people to obtain and retain housing, operating and capital

costs for navigation centers and emergency shelters, and the new construction, rehabilitation, and preservation of permanent and transitional housing.

- **Preservation At-Risk Housing Rental Units/CDLAC**

The City shall register as a Qualified Preservation Entity with HCD to ensure that the City will receive notices from all owners intending to opt out of their Section 8 contracts. The City has a total of 414 at-risk units that could be converted to market rate during this planning period. The City will consult with the property owners and continue the affordability levels of the at-risk units through establishment of a program that utilizes California Debt Limit Allocation Committee (CDLAC) Tax Exempt Bonds to finance affordable housing developments for low-income Californians.

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

The City has identified funding options such as grants and other funds to extend the life of existing, older housing in the community which may be more affordable to those currently residing in the units. The City will identify and allocate available resources to finance the rehabilitation of residential units in target areas to assist seniors, disabled and lower-income households to ensure safety and habitability of housing units and the quality of residential neighborhoods. The City will also explore a partnership with a non-profit organization, such as Habitat for Humanity of Orange County, to administer the program.

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

The City's First-Time Homebuyer Program will be re-established which will provide down payment and second mortgage assistance to low- and moderate-income buyers to assist them to purchase an existing home in the City. 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 \$59,400 in 2021-22 Community Development Block Grant (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 150 homeless individuals, per year over the projection period.

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.

- **Tustin Legacy New Construction**

During the next planning period, it is anticipated that additional market-rate residential units will be constructed in both Neighborhood D South and Neighborhood G and that additional affordable residential units will be constructed within Neighborhood D North through an amendment to the Tustin Legacy Specific Plan for this specific area. There are currently no inclusionary housing requirements contained within the Tustin Legacy Specific Plan area.

- **Administrative Support**

The City and the Tustin Housing Authority will provide administrative support to implement its affordable housing activities. Additional staffing may be needed to provide a level of administrative support anticipated for the next planning period. Staff will evaluate this in conjunction with a review of streamlining measures and other methods of facilitating the approval of housing projects within the City.

During the 2014-2021 housing element update, the City initiated the development of additional very low, low- and moderate-income housing in the Tustin Legacy Specific Plan area (formally MCAS Tustin) and these efforts were furthered with the adoption of two (2) specific plans; the Red Hill Avenue Specific Plan and Downtown Coe Commercial Specific Plan. through the incentives offered through the State's housing bonus density law. City Staff will look at expanding this to other areas of the City.

The City is not an entitlement jurisdiction for HOME funds but may apply to the State for HOME funds.

The City is an entitlement jurisdiction for CDBG funds. For FY 2020-2021, the City of Tustin was allocated \$847,890 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-19, the City will utilize State and Federal resources to leverage local resources as these funding sources match the City's programmatic objectives. This table is a summary of affordable housing resources.

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APPENDIX D

AFFIRMATIVELY FURTHERING FAIR HOUSING

APPENDIX D

AFFIRMATIVELY FURTHERING FAIR HOUSING

Executive Summary

Existing federal law requires departments and agencies to administer programs relating to housing in a way that affirmatively furthers fair housing. These obligations extend to state and local governments that receive funds or contract with the federal government. For example, a local government receiving Community Development Block Grant (CDBG) dollars directly from the federal government is obligated to affirmatively further fair housing; under federal law this included completing an assessment of fair housing to inform the consolidated plan. As of January 1, 2019, AB 686 extends the obligation to affirmatively further fair housing to all public agencies in the State of California. AB 686 makes changes to Housing Element Law to ensure the long-standing duty to affirmatively further fair housing is part of the housing element of the general plan. Every jurisdiction is responsible for self-identifying internal constraints to furthering fair housing, as well as developing goals and programs that will be implemented to remove identified barriers and improve access to resources and opportunities.

This discussion incorporates planning and analysis, which is collectively referred to as an assessment of fair housing (AFH), generally includes:

- A summary of fair housing issues in the City of Tustin and an assessment of the jurisdiction’s fair housing enforcement and outreach capacity; and
- An analysis and summary of fair housing issues and identification of trends and patterns within the City of Tustin in comparison to surrounding cities and the larger Orange County region, including the topics of:
 - Integration and segregation;
 - Racially or ethnically concentrated areas of poverty;
 - Disparities in access to opportunity, including for persons with disabilities; and
 - Disproportionate housing needs (such as overpayment, overcrowding, housing conditions disproportionately affecting protected classes), and displacement risk.

This analysis utilized available federal, state, and local data and knowledge to identify trends and patterns in fair housing issues and identification of trends and patterns within the City of Tustin. Orange County’s Analysis of Impediments to Fair Housing Choice (AI) was prepared in May 2020 and contains a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA) within Orange County. The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the County’s obligation to affirmatively furthering fair housing. The AI was prepared in consultation with Orange County jurisdictions, including the City of Tustin, and with input from a wide range of stakeholders through a community participation process. Barriers to fair

housing choice specific to the City of Tustin that were identified in the County AI and the commitments of the City to address identified barriers were incorporated into this AFH regarding. Supplemental data analysis was conducted to further understand potential fair housing issues within the context of AFH topics at the city-level.

The following table provides a summary of the results regarding each topic required to be analyzed as part of this AFH assessment.

AFH Topic Area	Summary
Fair Housing Enforcement and Outreach Capacity	<p>The Fair Housing Foundation provides fair housing services for Tustin, along with various other cities in Orange and Los Angeles Counties. During the 2018-2019 Fiscal Year, the Fair Housing Foundation successfully assisted the City with combatting housing discrimination through managing twelve allegation cases and one discrimination case for Tustin residents. Monthly fair housing workshops that cover a variety of topics continue to be held for both residents and landlords. Cases are handled as presented in a timely fashion.</p>
Integration and Segregation	<ul style="list-style-type: none"> • There were no areas of high segregation and poverty identified within the city. Highest resource areas are within the northern portion of the city and the lowest resource areas are to the south. • Minority populations are concentrated predominately within the central portion of the city. • Dissimilarity index scores identified high segregation between Black/White and Hispanic/White populations. Similarly, isolation index scores indicated high isolation of White and Hispanic populations. • City population has relatively low percentages of persons with disability. • Tustin has a slightly higher proportion of families with children (52.64 percent) than Orange County (47.84 percent). • The lowest percentages of low or moderate income (LMI) population are within the northern portion of the city and the highest percentages of LMI populations are to the south.
Racially and Ethnically Concentrated Areas	<p>Tustin does not include racially/ethnically-concentrated areas of poverty (RECAPs); however, the southern portion of the city, near Irvine and Santa Ana, are higher in percentages of population considered poverty status. The City of Tustin has a lower median income than Orange County, but overall percentage of the White population is almost identical. Both</p>

	<p>income and White populations tend to be concentrated within the northern portion of the city.</p>
<p>Access to Opportunities</p>	<ul style="list-style-type: none"> • According to State opportunity maps, highest resource areas were identified within census tracts 0524.19, 0756.06, and 0756.07. Seven census tracts were considered “low resource”. High resource census tracts were identified predominately within the northern portion of the city, while the low resource census tracts were predominately within the southern portion of the city. • According to opportunity map scores, Non-Hispanic Whites and Asians have much higher access than do Blacks and Hispanics. • Low resource areas and populations tended to have low education and environment scores.
<p>Disproportionate Housing Needs</p>	<ul style="list-style-type: none"> • A higher percent of non-White households experienced housing problems than White households in Tustin. • Non-White households that experienced the greatest proportion of housing problems include Hispanic (71.19 percent), Black (62.40 percent), and Native American (50.00 percent). • The same trend occurred for the county population. • A higher proportion of households are considered overcrowded in southern Tustin, which overlaps with census tracts that contain greater proportions of minority population and low-income households. • According to the 2020 AI, displacement of residents due to economic pressures may be a significant contributing factor to fair housing issues in Orange County and, in particular, in parts of Orange County that have historically had concentrations of low-income Hispanic and Vietnamese residents.
<p>Other Contributions</p>	<ul style="list-style-type: none"> • According to 2015-2019 American Community Survey (ACS) data, 50.3 percent of households are owner-occupied, compared to 49.7 percent of renter-occupied. Both city and county trends from 2010 to 2019 show that rentals are becoming increasingly more popular. • Within Orange County, Black loan-applicants were the only racial or ethnic category whose majority of applications (less than 50 percent) did not result in an originated loan for the purposes of refinancing and home improvement.

<p>Sites Inventory</p>	<ul style="list-style-type: none"> • Housing units in the sites inventory are concentrated in the southwestern half of the city in tracts considered lower resource (tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). Several sites are located within tract 755.07, which is identified as a moderate resource area. • Despite the lack of new affordable housing units being introduced in northeastern, more affluent areas of the City, online survey results indicated that 65% of respondents chose the Tustin Legacy Specific Plan (TLSP) Area as an area that is most appropriate to develop more housing. • The City’s strategy to preserve affordable housing in addition to developing other housing options within identified sites will encourage a diverse housing market that will attract people from all races and income levels in these areas. • Goals identified within Section D.5 below would be implemented citywide and support in furthering fair housing within identified housing sites. • Tustin Legacy (Tract 744.15) is a Master Planned Community that is currently being developed. Although the tract has been identified as low resource, it has been substantially enhanced with new resources within recent years. Improvements include schools, parks, community resources, employment centers, transportation, and a variety of housing. With recent improvements, the TLSP surpasses other areas in the City for livability and well-rounded services for households with various income levels.
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As identified in Section D.3, the following concerns have been identified regarding fair housing issues:

- Disparity in access to opportunity between the northeast (higher resources), where there are predominate populations of White residents, and southwest (lower resources) of the city, where there are predominate populations of Hispanic residents;
- High segregation for Hispanic/White and Black/White populations (as defined by Dissimilarity Index values which indicate geographical segregation patterns)
- Disproportionate housing problems for the city’s Hispanic and Black residents (problems include 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened);
- Concentrated female-headed households and LMI population within Census tract 755.14;

- Lack of affordable housing opportunities for Hispanic residents; and
- Disproportionate housing problems faced by large family households.

Factors that may contribute to these concerns include the following:

- Lack of supply of affordable housing in high opportunity areas;
- Inequal access to affordable housing for persons with protected characteristics;
- Concentrated access to opportunity within high resource areas; and
- Lack of education and enforcement, specifically to educate property owners/landlords about State law prohibiting discrimination.

The City and County established goals to address fair housing concerns (Section D.5.1) which were included in the 2020 County AI. Several goals are cross-jurisdictional goals; Orange County and all participating jurisdictions have a role to play in implementing those goals. In addition, the City of Tustin committed to individual goals and actions, which respond to city-specific challenges. Additionally, the City General Plan includes several goals that support in furthering fair housing. If implemented, the goals and strategies identified will serve as an effective basis for affirmatively furthering fair housing by reducing patterns of segregation, mitigating displacement, addressing disproportionate housing needs, and increasing access to opportunity for members of protected classes. Additionally, goals and actions were included as programs in the Housing Element (Section IV) to address constraints that are not currently being adequately addressed within the City.

Overview of AB 686

In 2018, the California State Legislature passed AB 686 to expand upon the fair housing requirements and protections outlined in the Fair Employment and Housing Act (FEHA). The law:

- requires all state and local public agencies to facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns of segregation to foster more inclusive communities; and
- creates new requirements that apply to all housing elements due for revision on or after January 1, 2021.

The passage of AB 686 protects the requirement to affirmatively further fair housing within California state law, regardless of future federal actions. It also preserves the strong policy in the U.S. Department of Housing and Community Development’s (HUD) Affirmatively Furthering Fair Housing (AFFH) Rule as published in the Federal Register in 2015.

As of January 1, 2019, AB 686 proactively applies the obligation to affirmatively further fair housing to all public agencies in California. Public agencies must now examine existing and future policies, plans, programs, rules, practices, and related activities and make proactive changes to promote more inclusive communities.

AB 686 also creates new requirements for all housing elements revised on or after January 1, 2021. These requirements ensure that the obligation to affirmatively further fair housing is a part of a jurisdiction's planning process and guiding documents for community development.

Assessment of Fair Housing Issues

A fair housing issue is a condition in a geographic area of analysis that restricts fair housing choice or access to opportunity and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty and affluence, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.

This assessment of fair housing considers the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs. Data and determinations below include findings from Orange County's 2020 Analysis of Impediments to Fair Housing Choice (2020 AI). The 2020 AI includes a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups throughout Orange County protected from discrimination by the federal Fair Housing Act (FHA). The 2020 AI also outlines fair housing priorities and goals and meaningful strategies that can be implemented at the county and city level to achieve progress towards affirmatively furthering fair housing.

The California Department of Housing and Community Development (HCD) has developed a statewide AFFH Data Viewer, which assembles various data sources and provides options for addressing each of the components within the full scope of the assessment of fair housing. The AFFH Data Viewer was utilized to address the data components of new requirements to affirmatively furthering fair housing in combination with other data such as local or regionally available data. Other data sources used in this assessment include the 2010 U.S. Census, American Community Survey (ACS) 5-Year Estimates, and other sources as referenced below. Patterns were compared from the 2019 ACS 5-Year and the 2010 ACS 5-Year Census data to identify trends within the jurisdiction.

Census tracts included the city of Tustin study area for this analysis include the following:

- 524.19 (overlaps North Tustin)
- 525.02
- 525.24
- 744.07 (overlaps Santa Ana)
- 744.08
- 755.04 (overlaps Santa Ana)
- 755.05
- 755.06 (overlaps Santa Ana)
- 755.07
- 755.12
- 755.13
- 755.14
- 755.15 (overlaps a small portion of Santa Ana and a large portion of Irvine)
- 756.06 (overlaps North Tustin)
- 756.07
- 757.01 (overlaps North Tustin)

Several census tracts overlap the city boundary but were excluded from the study area since a substantial majority of the census tract falls within a neighboring jurisdiction as seen in Figure 1. Census tracts excluded from the study area include the following:

- 754.03
- 756.03
- 757.02
- 744.06
- 756.05

Fair Housing Enforcement and Outreach Capacity

The Fair Housing Foundation provides fair housing services for Tustin, along with various other cities in Orange and Los Angeles Counties. The Foundation provides landlord-tenant counseling and mediation, rental housing counseling, and community outreach and education. In addition, the Foundation screens fair housing complaints, investigates through testing, engages in conciliation or mediation efforts, and refer complaints to the appropriate administrative agencies where appropriate.

During the 2015-19 reporting period the County of Orange Urban County Jurisdiction took the following actions (on its own or in cooperation with regional partners and the Fair Housing Council of Orange County (FHCOC)) to overcome impediments to fair housing choice identified in the 2020 AI:

- Fair Housing Community Education – During 2015-19, the FHCOC regionally conducted or participated in 467 education and/or outreach activities. Regionally, over 9,550 people were served by these activities. Through its various regional outreach efforts FHCOC distributed over 82,130 pieces of literature on fair housing, its services and other housing-related topics. Additionally, throughout Orange County FHCOC held 32 training sessions for rental property owners/managers. FHCOC presented 16 fair housing seminars, 70 general fair housing workshops.
- Fair Housing Enforcement – On a regional basis, FHCOC staff received 363 allegations of housing discrimination and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC also conducted 362 systemic onsite tests, either paired or ‘sandwich’, 51 tests occurring in the jurisdiction and 215 other testing activities.
- Housing Dispute Evaluation & Resolution – On a regional basis, activities provided by FHCOC included assisting 7,664 unduplicated households addressing 24,766 issues, disputes and/or inquires.

According to the AFFH Data Viewer database, the United States Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity (FHEO) inquiries for the city totaled 33 cases between 2013 and 2021, including 3 disability-, 10 race-, 1 familial status-, and 19 unclassified-related accounts. Of the 33 inquiries, 18 resulted in failure to respond, 2 resulted in no valid basis, 7 resulted in no valid issue, and 5 resulted in other disposition.

During the 2018-2019 Fiscal Year, the Fair Housing Foundation assisted the City with combatting housing discrimination through managing twelve allegation cases and one discrimination case for Tustin residents, providing services to those individuals throughout the case management process. They also provided ample fair housing education and outreach to further prevent discrimination, assisting 127 Tustin landlords/tenants who were provided with either landlord/tenant counseling, mediation, UD assistance, and/or referral services during the last fiscal year. Overall, the Fair Housing Foundation's outreach efforts assisted 672 residents during the 2018-2019 Fiscal Year.

Fair Housing Foundation provides a comprehensive, extensive and viable education and outreach program. The purpose of the program is to educate tenants, landlords, owners, real estate agents and property management companies on fair housing laws; to promote media and consumer interest; and to secure grass roots involvement within communities which includes:

- Fair Housing Workshops
- Certificate Management Training
- Walk-In Clinics
- Rental Housing Counseling Workshops
- Community presentations, staff training, and workshops
- Community events, booths, networking, etc.

The following Fair Housing Foundation (now virtual) educational workshops are offered free of charge for Tustin residents every month:

- Fair Housing Workshops
- Rental Counseling Workshops
- Fair Housing Workshops in Spanish
- Fair Housing and the Housing Industry During COVID-19 Virtual Workshops (Landlord-focused)
- Rental Counseling During COVID-19 Virtual Workshops

The City advertises these workshops on their website's Fair Housing Services webpage.

In addition, the City regularly updates its municipal and zoning codes in accordance with State and federal laws and requirements regarding fair housing. With each housing element cycle, local nonprofits, agencies, advocacy groups, and other fair housing stakeholders are invited to take part in the development and review of the City's housing element (see Section D.2.6).

Integration and Segregation

Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.

Race and Ethnicity

The ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. A full breakdown of city demographic data is provided in Table 2. In February 2017, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened a group of independent organizations and research centers that would become the California Fair Housing Task Force (“Task Force”). TCAC and HCD charged the Task Force with creating an opportunity map to identify areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families – particularly long-term outcomes for children. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table 1 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, Census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- Poverty: Tracts with at least 30 percent of population under federal poverty line
- Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Figures 2 and 3 illustrate city and county opportunity ratings by Census tract. Figure 4 identifies concentrations of minority population by Census block group.

Table 1: Domains and List of Indicators for Opportunity Maps

Domain Indicator	Indicator
Economic	Poverty
	Adult education
	Employment
	Job proximity
	Median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency
	Reading proficiency
	High school graduation rates
	Student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020

Table 2: Race and Ethnicity

	(Tustin, CA CDBG) Jurisdiction			(Los Angeles - Long Beach - Anaheim, CA) Region		
Race/Ethnicity	Count	Percent	Count	Percent	Count	Percent
White, Non-Hispanic	24,289	30.36%	4,056,820	31.62%		
Black, Non-Hispanic	1,926	2.41%	859,086	6.70%		
Hispanic	32,982	41.22%	5,700,860	44.44%		
Asian/Pacific Island, Non-Hispanic	17,542	21.93%	1,888,969	14.72%		
Native American, Non-Hispanic	418	0.52%	25,102	0.20%		
Two+ Races, Non-Hispanic	1,949	2.62%	267,038	2.08%		
Other, Non-Hispanic	169	0.23%	30,960	0.24%		
#1 country of origin	Mexico	11,270	14.09%	Mexico	1,735,902	14.34%
#2 country of origin	Vietnam	2,115	2.64%	Philippines	288,529	2.38%
#3 country of origin	India	2,048	2.56%	El Salvador	279,381	2.31%
#4 country of origin	Philippines	1,677	2.10%	Vietnam	234,251	1.93%
#5 country of origin	Korea	1,446	1.81%	Korea	224,370	1.85%

#6 country of origin	China excl. Hong Kong & Taiwan	1,250	1.56%	Guatemala	188,854	1.56%
#7 country of origin	Taiwan	1,040	1.30%	China excl. Hong Kong & Taiwan	174,424	1.44%
#8 country of origin	Iran	507	0.63%	Iran	133,596	1.10%
#9 country of origin	Guatemala	405	0.51%	Taiwan	87,643	0.72%
#10 country of origin	Canada	339	0.42%	India	79,608	0.66%
#1 LEP Language	Spanish	10,333	14.60%	Spanish	2,033,088	16.79%
#2 LEP Language	Vietnamese	1,665	2.35%	Chinese	239,576	1.98%
#3 LEP Language	Korean	844	1.19%	Korean	156,343	1.29%
#4 LEP Language	Chinese	816	1.15%	Vietnamese	147,472	1.22%
#5 LEP Language	Tagalog	400	0.57%	Armenian	87,201	0.72%
#6 LEP Language	Other Indic Language	285	0.40%	Tagalog	86,691	0.72%
#7 LEP Language	Hindi	218	0.31%	Persian	41,051	0.34%
#8 LEP Language	Persian	216	0.31%	Japanese	32,457	0.27%
#9 LEP Language	Other Asian Language	183	0.26%	Russian	28,358	0.23%
#10 LEP Language	Arabic	165	0.23%	Arabic	23,275	0.19%

Hearing difficulty		1,749	2.19%		303,390	2.52%
Vision difficulty		1,216	1.52%		227,927	1.90%
Cognitive difficulty		2,308	2.89%		445,175	3.70%
Ambulatory difficulty		2,894	3.63%		641,347	5.34%
Self-care difficulty		1,162	1.46%		312,961	2.60%
Independent living difficulty		2,353	2.95%		496,105	4.13%
Total		6,477	8.1%		158,784	5%
		(Tustin, CA CDBG) Jurisdiction			(Los Angeles - Long Beach - Anaheim, CA) Region	
Male		36,263	48.83%		6,328,434	49.33%
Female		37,995	51.17%		6,500,403	50.67%
Under 18		19,341	26.05%		3,138,867	24.47%
18-64		48,704	65.59%		8,274,594	64.50%
65+		6,213	8.37%		1,415,376	11.03%
Families with children		9,226	52.64%		1,388,564	47.84%

Note: LEP stands for Limited English Proficiency

Source: County of Orange, Analysis of Impediments, 2020

Figure 1: Census Tracts in the City of Tustin

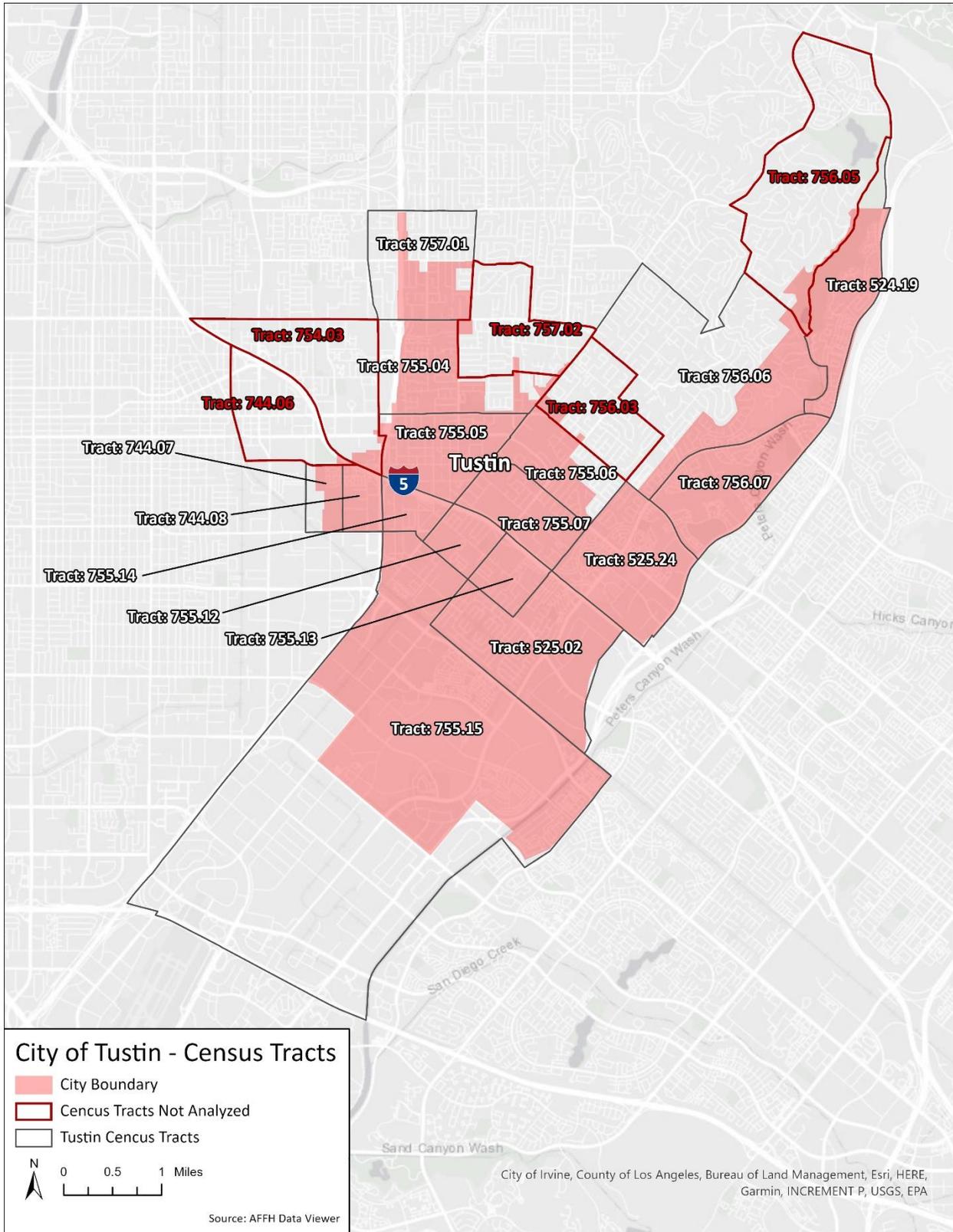


Figure 2: 2020 TCAC/HCD Opportunity Areas (Tustin)

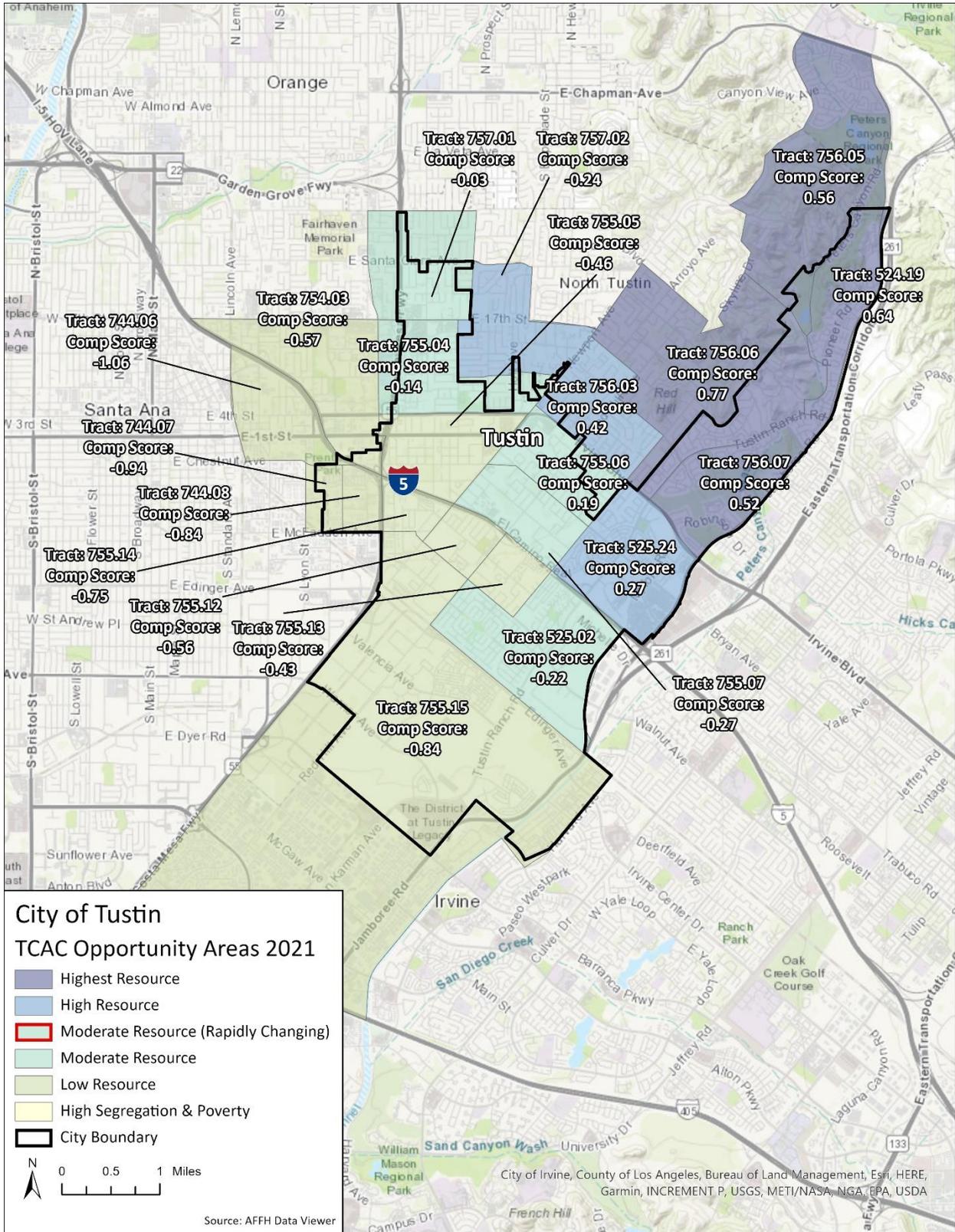


Figure 3: 2021 HCD/TCAC Opportunity Areas (County)

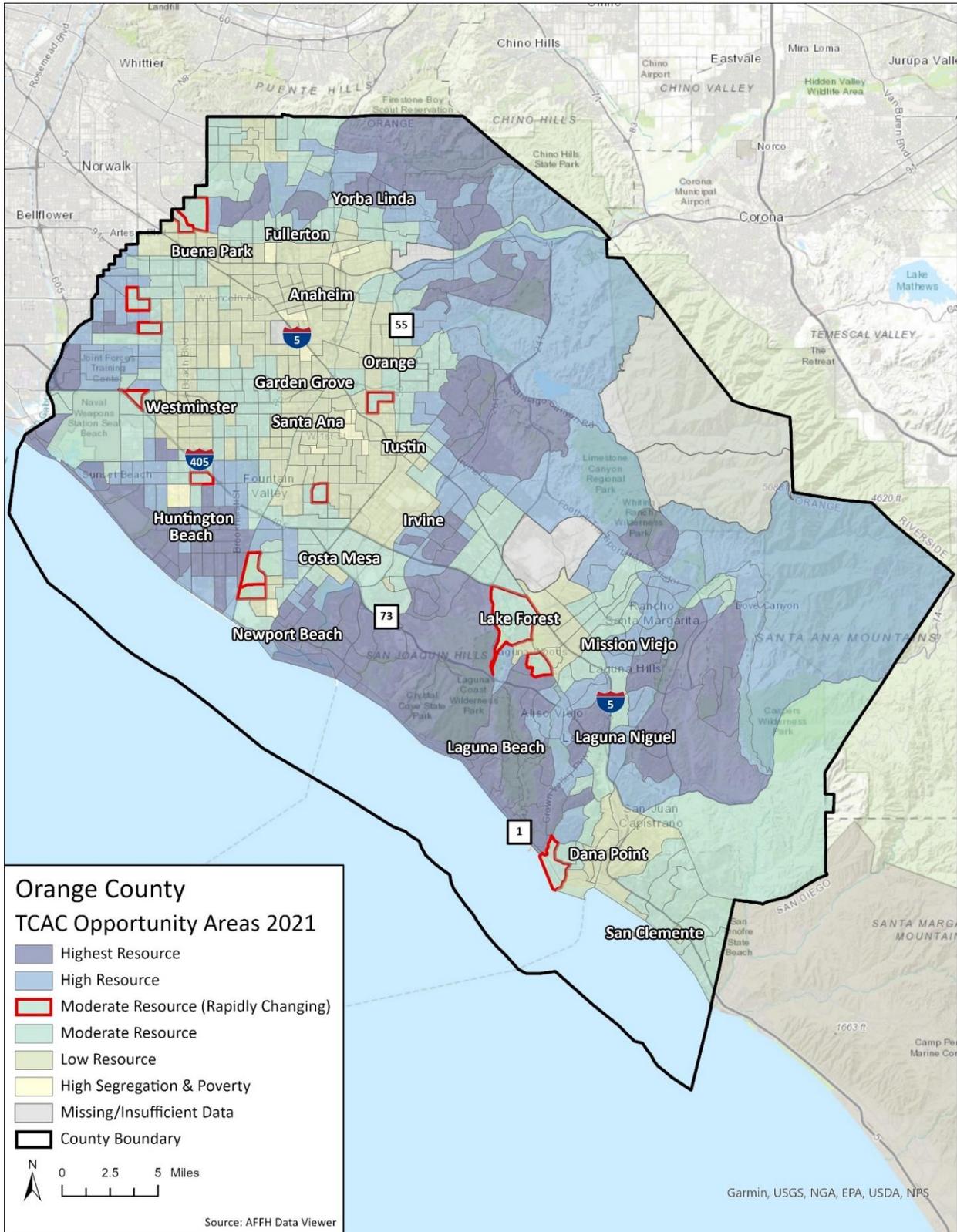
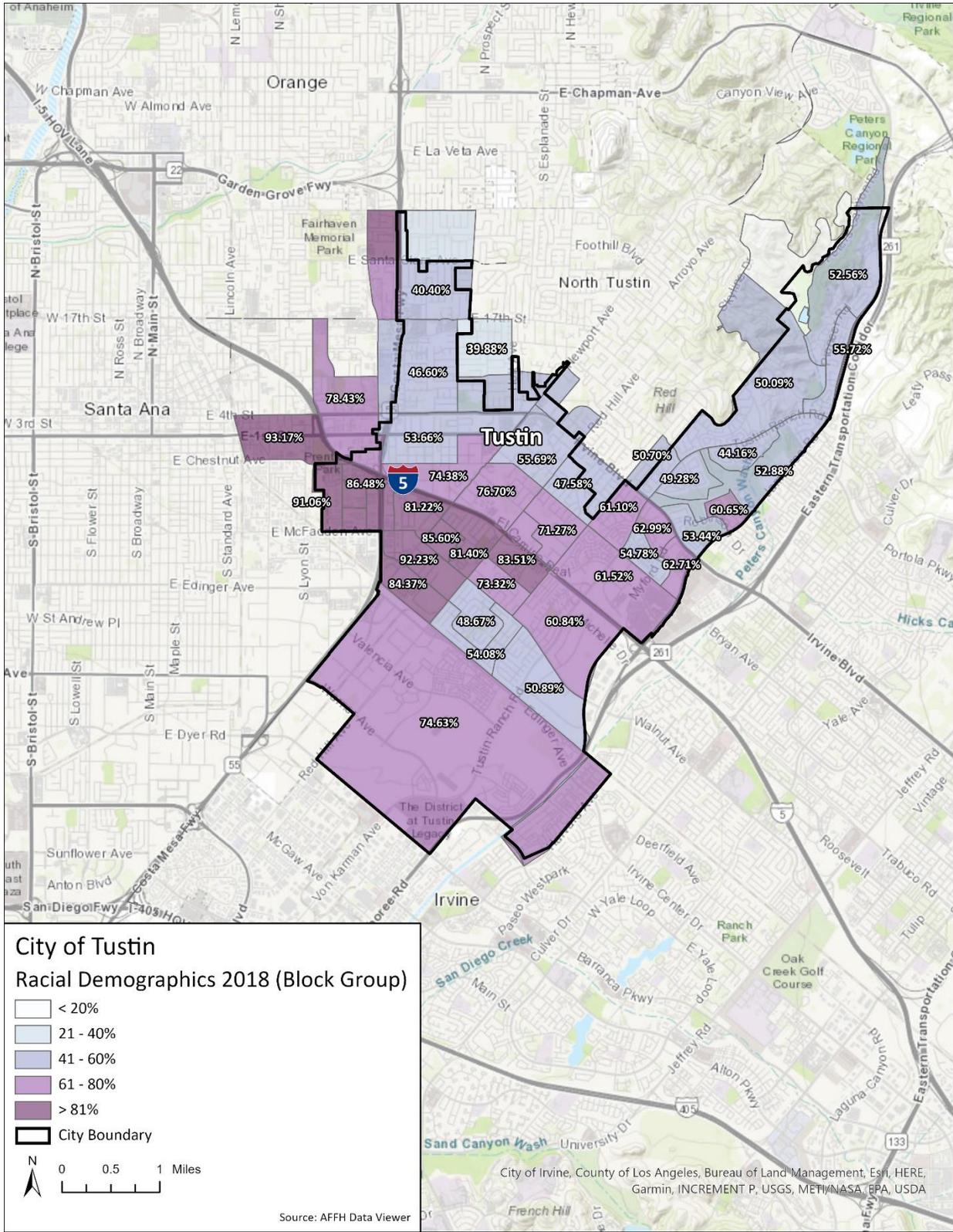


Figure 4: Areas of Minority Concentration in Tustin



Two quantitative metrics can be used to analyze the relative extent of racial and ethnic segregation in entitlement jurisdictions for federal housing programs. These are known as the dissimilarity index and the isolation index. The dissimilarity index is a primary quantitative metric used for identifying patterns of geographic segregation. The isolation index, another quantitative metric for identifying patterns of geographic segregation, compares a group’s share of the overall population to the average share within a given sub-area (such as census tract). Table 3 provides thresholds for dissimilarity quantitative analysis. Values for the Isolation Index range from 0 to 100. A larger value means that the average group member lives in a census tract with a higher percentage of people from another group. Table 4 indicates dissimilarity index scores, and Table 5 indicates isolation index scores.

Table 3: Dissimilarity Index Thresholds

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-40	Low
	41-54	Medium
	55-100	High

Table 4: Dissimilarity Index Scores

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	2020
Tustin				
Non-White/White	26.33	36.73	32.93	48.19
Black/White	42.49	35.11	29.03	66.02
Hispanic/White	31.14	48.19	42.55	57.43
Asian or Pacific Islander/White	19.20	17.74	19.76	28.73
Orange County				
Non-White/White	30.38	34.71	33.58	44.71
Black/White	32.60	33.63	32.27	46.98
Hispanic/White	36.13	41.08	38.18	52.82
Asian or Pacific Islander/White	32.58	34.31	34.82	43.19

Source: County of Orange, Analysis of Impediments, 2020

Table 5: Tustin Isolation Index Scores

Isolation Index	1980	1990	2000	2010	2020	2020 (Orange County)
White/White	83.7	66.3	54.3	43.2	52.44	55.16
Black/Black	6.1	9.9	3.6	2.7	4.84	3.32
Hispanic/Hispanic	10.2	27	51.3	51.9	56.10	52.81
Asian/Asian	4.4	12.1	19.6	26.7	19.86	31.84

Source: County of Orange, Analysis of Impediments, 2020

As shown in Figure 2, the city’s highest resource areas are to the northeast and the low resource areas are to the south and southwest. The city did not include any areas categorized as high segregation and poverty (as defined by TCAC Opportunity scores). The city’s resource trend is consistent with the county’s overall trend. The county’s highest resources were generally located along the coast and within the hillside areas, while low resource areas were clustered near the center of the county along Interstate 5 (I-5) (see Figure 3). Areas that were indicated as rapidly changing were located along the perimeter between low resource and high resource areas, particularly on the southern coastal side. The City of Tustin is not classified as a rapidly changing area. This pattern indicates a rapidly expanding trend of high resources from the coast, inward towards central Orange County located near I-5.

Overall, Orange County experiences moderate levels of segregation, with significant variances in some individual jurisdictions. The Non-White/White value is 44.71, Black/White 46.98, Hispanic/White 52.82, and Asian or Pacific Islander/White 43.19. These values have all increased sharply since 2010, though values had remained consistent from 2000 and 2010. Jurisdictional values tend to indicate low levels of segregation in comparison to the county as a whole, but this is due to the spatial distribution of populations across different jurisdictions rather than within different jurisdictions.

Tustin experiences a range in levels of segregation between different racial groups. The Asian or Pacific Islander/White Dissimilarity Index current value was 28.73, indicating a low level of segregation. Non-White/White Dissimilarity Index value was 48.19, indicating a medium level of segregation. Black/White and Hispanic/White Dissimilarity Index values were 66.02 and 57.43, respectively, indicating a high level of segregation (as defined by Dissimilarity Index values). All races experienced an increase in segregation from 2010 to present. Black residents faced an especially large increase in segregation from 2010 to present and is one of the highest Dissimilarity Index values amongst all jurisdictions within Orange County. Overall, Tustin’s current Dissimilarity Index values were higher than most other jurisdictions within the county.

Isolation values for different populations vary widely across the county and individual jurisdictions. Values for White residents are generally higher than for other residents, likely due to the larger number of White residents overall. In Orange County, White residents have a current Isolation Index value of 55.16, Black residents 3.32, Hispanic residents 52.81, and Asian residents 31.84. Values for the county are higher than values in Tustin for White and Asian residents, again likely due to higher segregation across jurisdictions rather than within them. County Isolation Index values have generally decreased for White residents over time, increased for Hispanic and Asian residents, and remained low for Black residents.

City Isolation Index values were slightly higher for Black (4.84) and Hispanic (56.10) residents. City data from 1980 to today shows that, similar to the county trend, Isolation Index values have generally decreased for White residents over time, increased for Hispanic and Asian residents, and remained low for Black residents. The group with the highest level of isolation as of 2000 is the Hispanic population. Before 2000, the White population historically experienced the greatest level of isolation.

Persons with Disabilities

As shown in Table 2, the city population has relatively low percentages of persons with disability. The city's percentages for hearing, vision, cognitive, ambulatory, self-care, and independent living difficulties were all lower than the county's. Figures 5 and 6 illustrate the population percentage with disability within the county and city. The county includes several clusters of population with disability, including areas near Westminster, Fullerton, Huntington Beach, Lake Forest/Mission Viejo, and Laguna Beach/Dana Point. In the City of Tustin, there are only a handful of census tracts containing 20 percent or greater populations with a disability. As indicated by Table 2, Tustin's population also tends to be slightly younger than the greater Orange County population.

Data provided in Table 6 shows to what extent people with different disabilities are able to access and live in the different categories of publicly supported housing within the city. As shown in Table 2, the city's population of persons with disability is 6,477, or 8.1 percent of the population. The City of Tustin includes two types of publicly supported housing, Project-Based Section 8 Housing and Housing Choice Vouchers (HCV). The proportion of people with disabilities that qualify for Section 8 Housing and HCV, exceeds the overall population concentration of people with disabilities.

According to FHCO statistics, 3 of 33 total inquires within the city of Tustin filed between 2013 and 2021 were disability-related. Tustin allows for reasonable accommodations in the land use and zoning process for developers of housing for persons with disabilities.

Table 6: Disability by Publicly Supported Housing Program Category, Tustin

	People with a Disability	
	Count	Percent
Public Housing	n/a	n/a
Project-Based Section 8	11	10.68
Other Multifamily	n/a	n/a
HCV Program	108	19.82

Source: County of Orange, Analysis of Impediments, 2020

Familial Status

In order for families to have protected choice they need to access housing options without discrimination. In a 2016 housing discrimination study, researchers found that compared to households without children, households with children were shown slightly fewer units and were commonly told about units that were slightly larger, and as a result, slightly more expensive to rent (California Department of Housing and Community Development, 2021). This differential treatment is considered discrimination and a type of steering, which occurs on a racial basis as well.

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. According to the HCD AB686/ AFFH data tool maps (see Figure 7), all Census tracts in the city identified persons 18 years and over in households living alone as making up less than 20 percent of the overall population across all census tracts. Percentage of persons 18 years and over in households living with a spouse ranged across the city. As shown in Figure 8, percentages of persons 18 years and over in households living with a spouse increased from the southwest to the northeast. Census tracts in south and southwest portion of the city (tracts: 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15) contained approximately 20 to 40 percent persons 18 years and over in households living with a spouse, while northeast census tracts identified 60 to 80 percent of persons 18 years and over in households living with a spouse.

As shown in Figure 9, majority of children in the city are living in married couple households. Throughout Tustin, almost all census tracts indicated 60 percent or greater of children living in married couple households. Conversely, one census tract, 755.14, appears as an outlier with 40 to 60 percent of children living in female-headed households (see Figure 10). Additionally, 75 to 100 percent of households in this census tract were identified as low to moderate income in Figure 11. Overall, the city of Tustin has a slightly higher proportion of families with children (52.64 percent) than the larger region (47.84 percent) (see Table 2).

Figure 5: Percent Population with Disabilities in Orange County

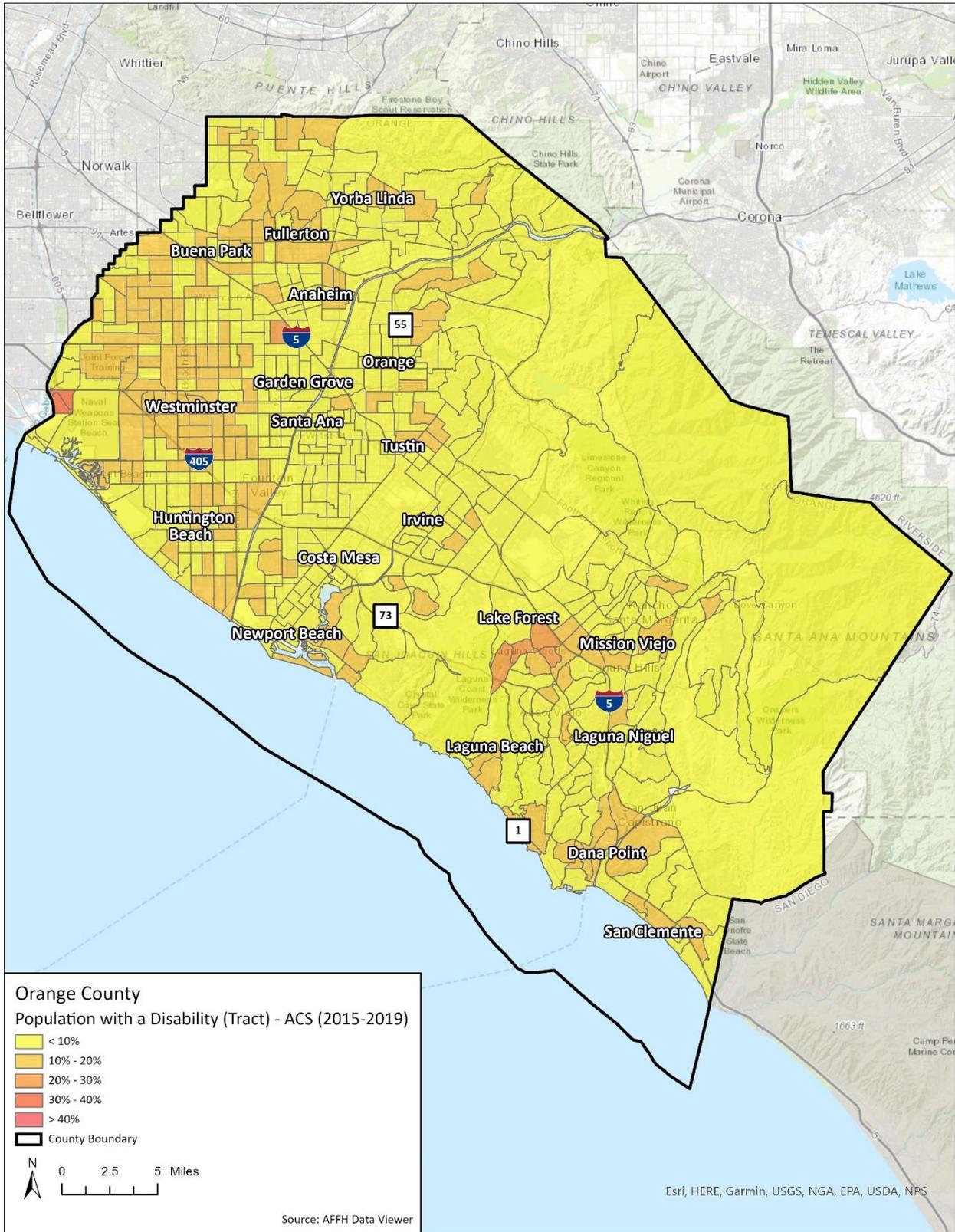


Figure 6: Percent Population with Disabilities in Tustin

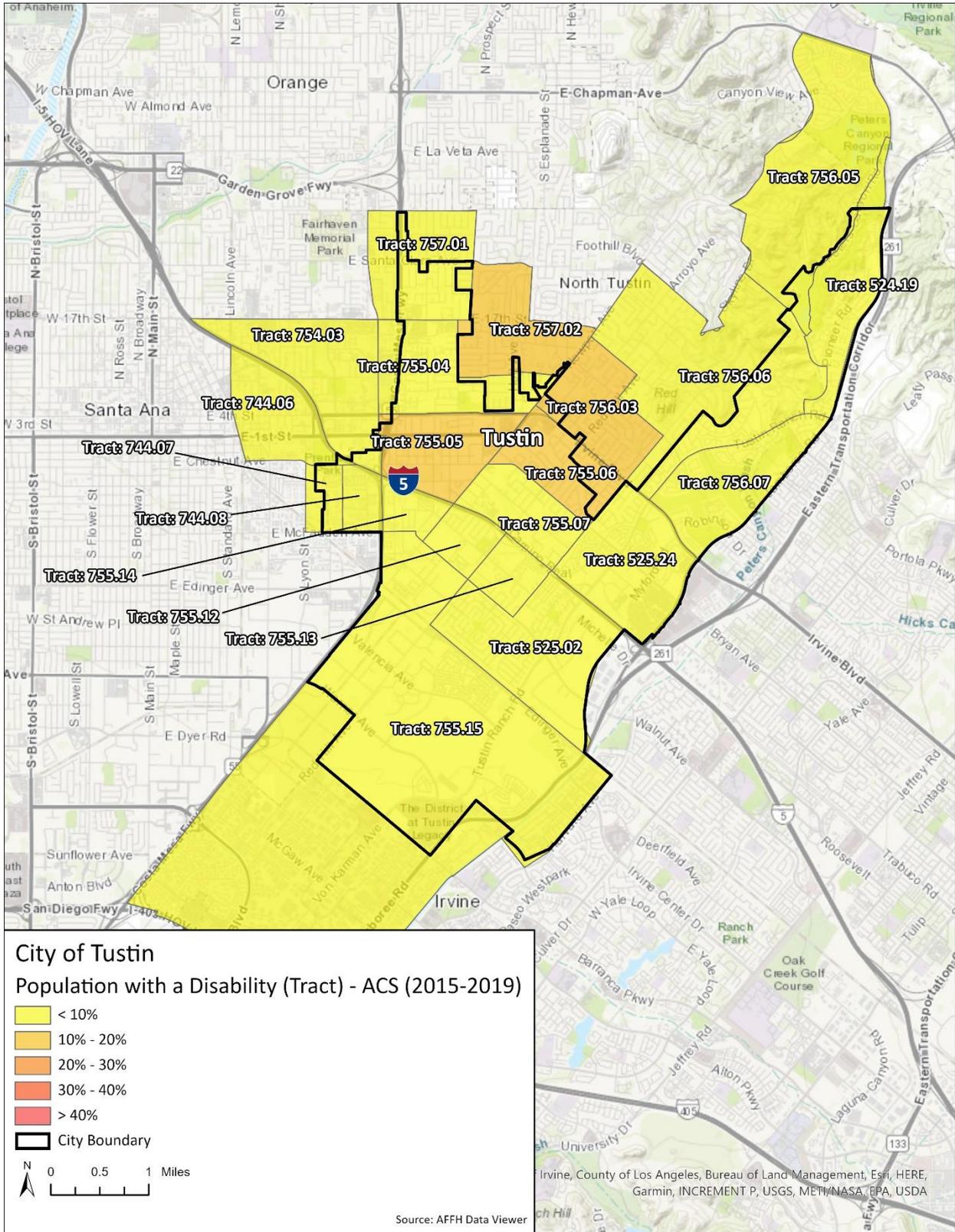


Figure 7: Percent Population of Adults Living Alone - Tustin

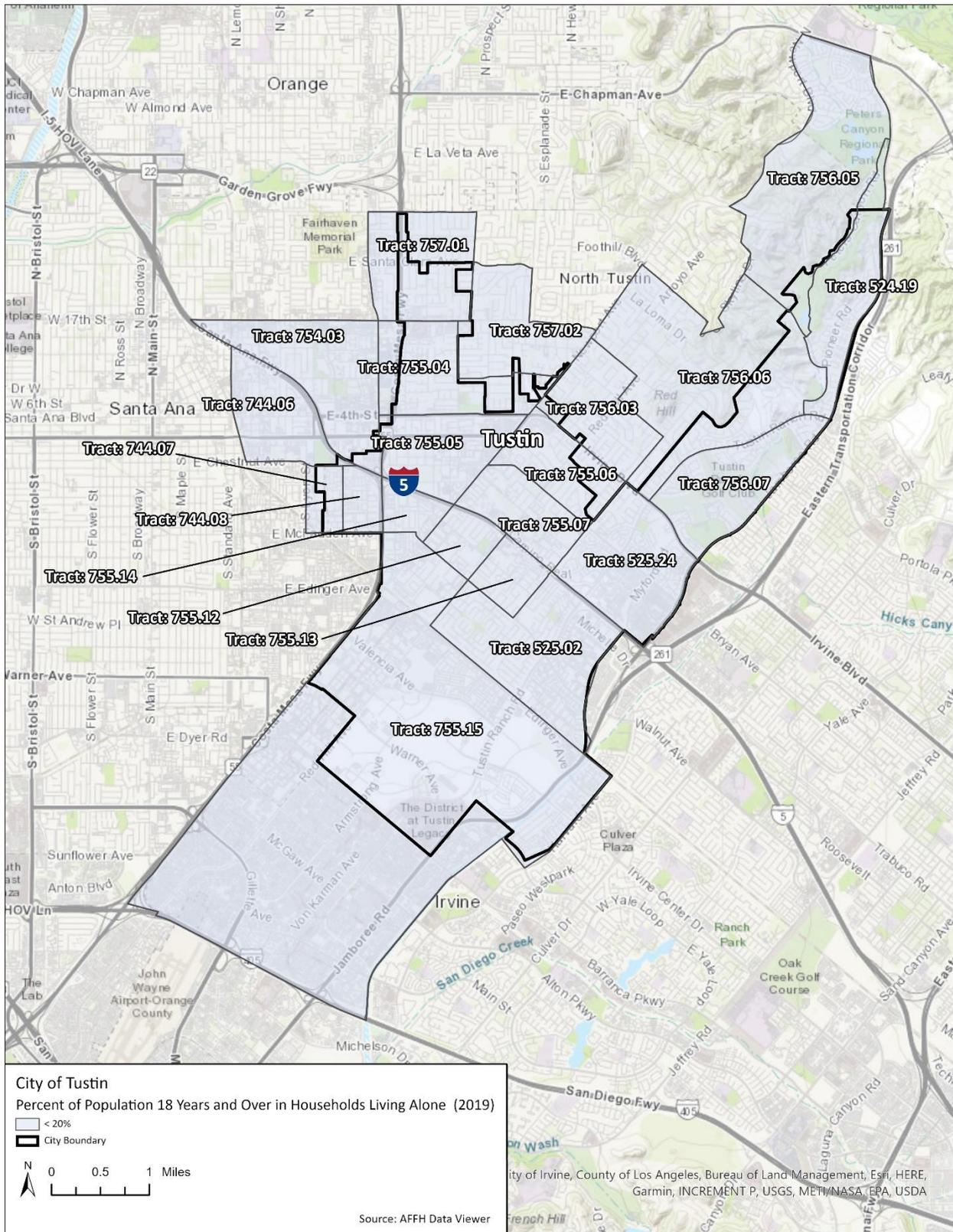


Figure 8: Percent Population of Adults Living with their Spouse - Tustin

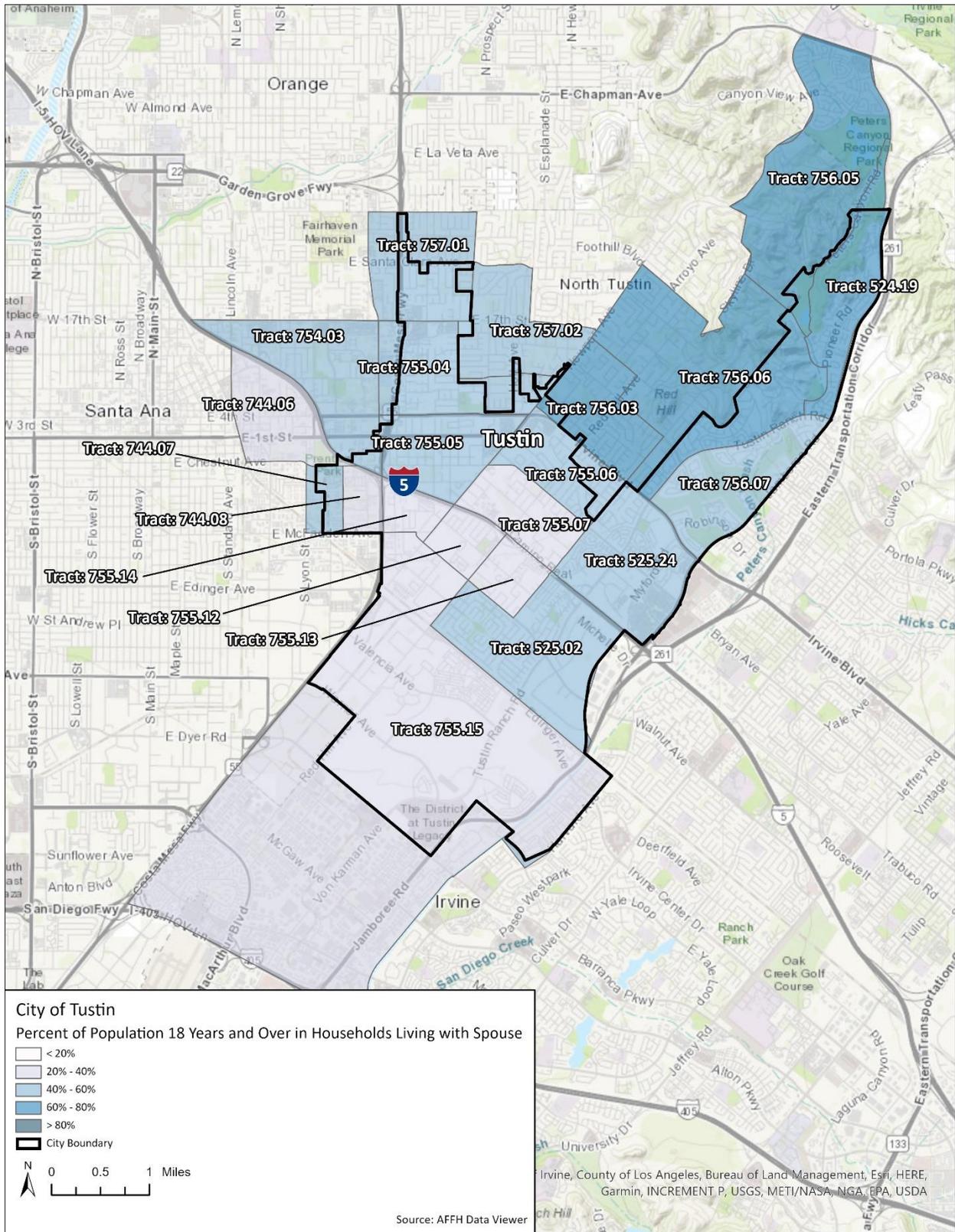


Figure 9: Percent of Children in Married Couple Households - Tustin

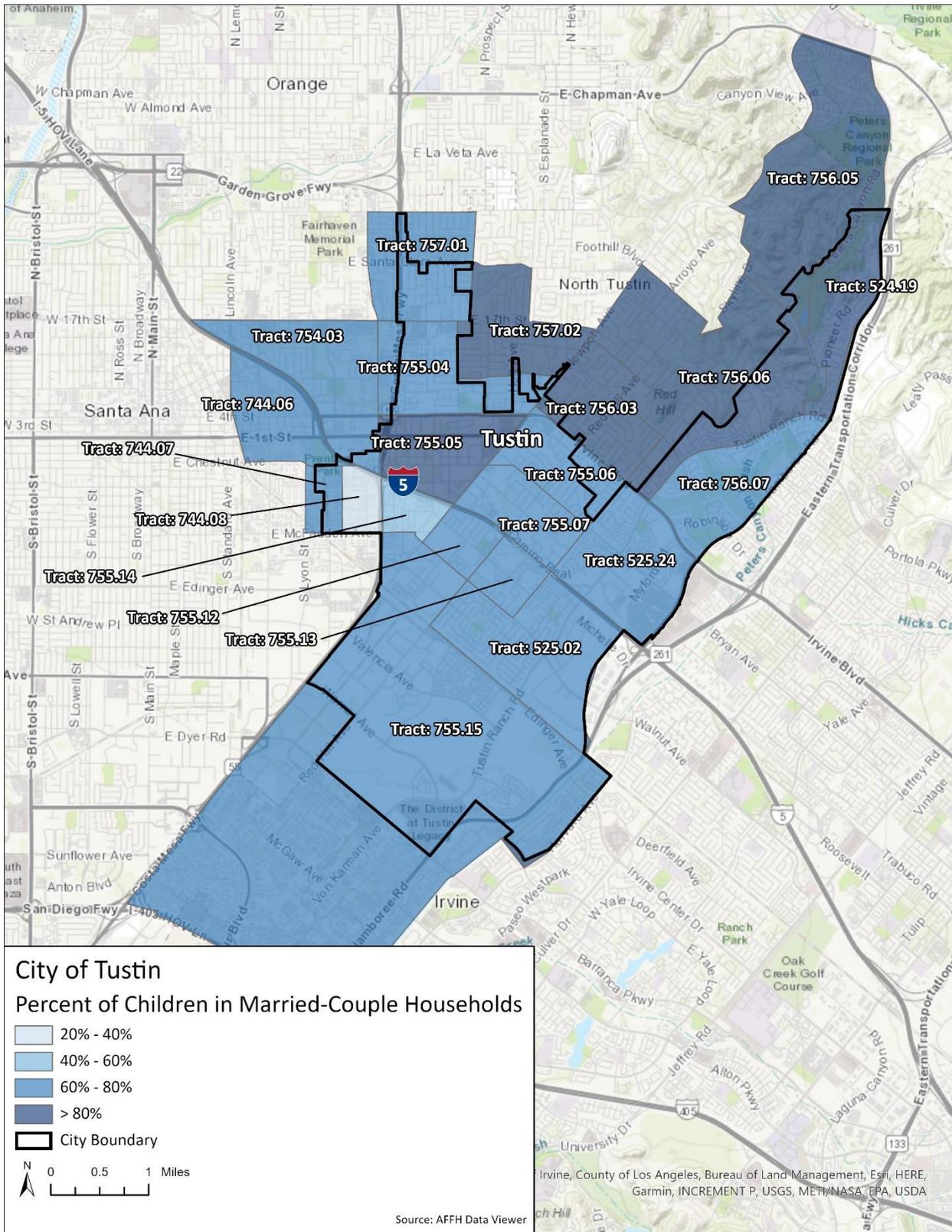
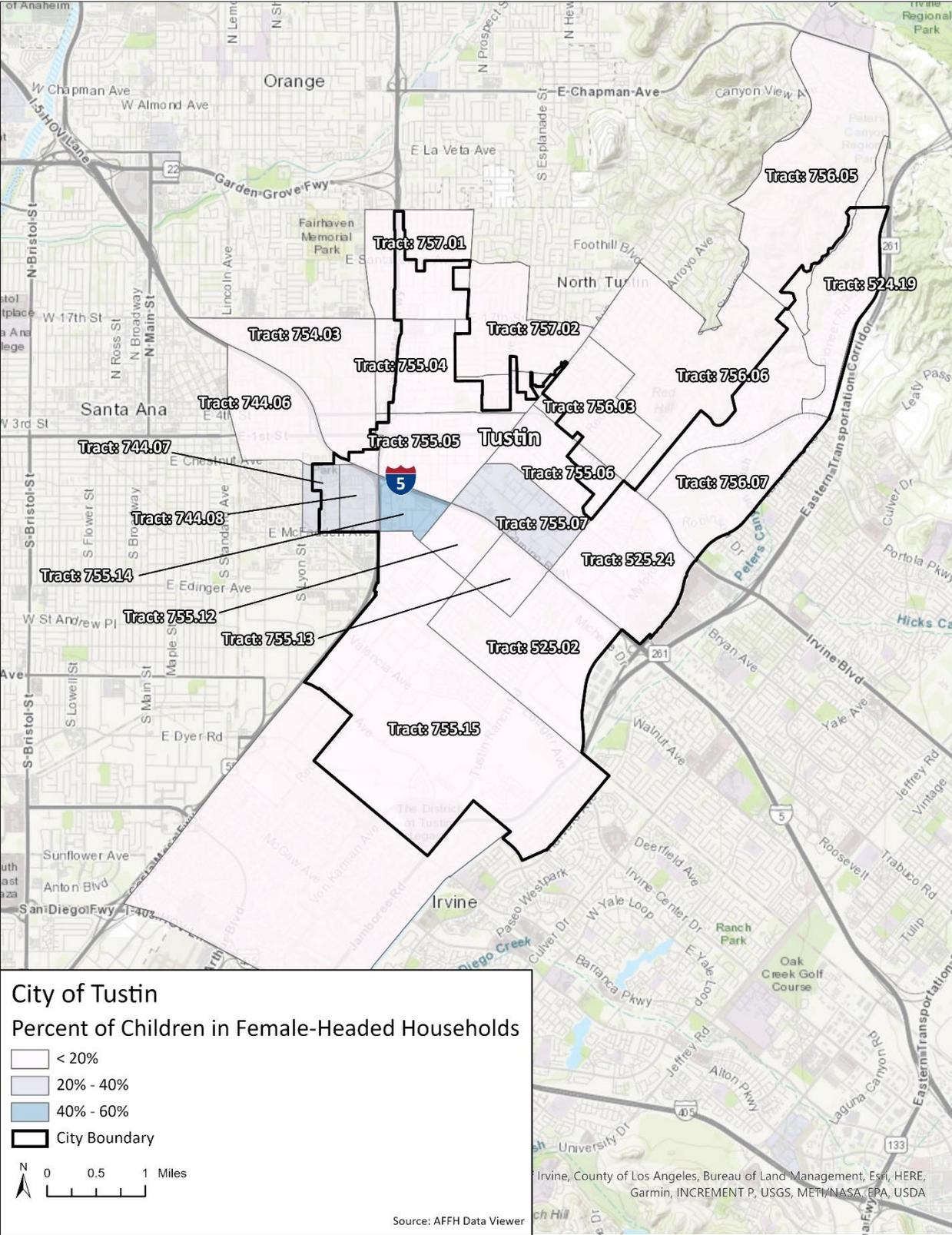


Figure 10: Percent of Children in Single Female-Headed Households - Tustin



Income Level

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. Figure 11 and Figure 12 show the Lower and Moderate Income (LMI) areas in the city and county by census tract, respectively. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). Similar to trends of high and low resource shown in Figure 1, the city's lowest percentages of LMI population are to the northeast and the highest percentages of LMI populations are to the southwest (tracts: 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). LMI populations within the county also followed trends of high and low resource shown in Figure 2. Density of LMI populations tend to increase within inland areas, specifically cities located adjacent to or intersected by the I-5 Santa Ana freeway, State Route 55 freeway, or the 261 Toll Road. The highest percentages of LMI population are located near Fullerton and Santa Ana. Smaller LMI populations are located near Lake Forest, Laguna Niguel, and Dana Point. Within the county, the coastal and hillside communities tend to have lower percentages of LMI populations.

Racially and Ethnically Concentrated Areas

Racially/Ethnically Concentrated Areas of Poverty

In an effort to identify racially/ethnically-concentrated areas of poverty (RECAPs), HUD has identified Census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. Orange County includes two RECAP area clusters scattered throughout the jurisdiction as shown in Figure 13. RECAP areas include southern Irvine (University of California, Irvine campus) and three small census tracts surrounding Santa Ana. Areas that include high percentages of persons who are considered poverty status are dispersed throughout the northcentral Orange County. The southern portion of Orange County does not include RECAP areas and has low percentages of persons considered poverty status. As shown in Figure 14, the city of Tustin does not include RECAP areas; however, the southern portion of the city, near Irvine and Santa Ana where RECAP areas were identified, are higher in percentages of population considered poverty status.

Racially Concentrated Areas of Affluence

In response to the RECAPs utilized by HUD in its 2015 AFFH rule, scholars at the University of Minnesota Humphrey School of Public Affairs have created the Racially Concentrated Areas of Affluence (RCAAs) metric to more fully tell the story of segregation in the United States. Based on their research, RCAAs are defined as Census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016). While this is a useful measure nationwide, HCD has adjusted the RCAA methodology to better reflect California's relative diversity.

Figure 11: Low and Moderate Income (LMI) areas in Orange County

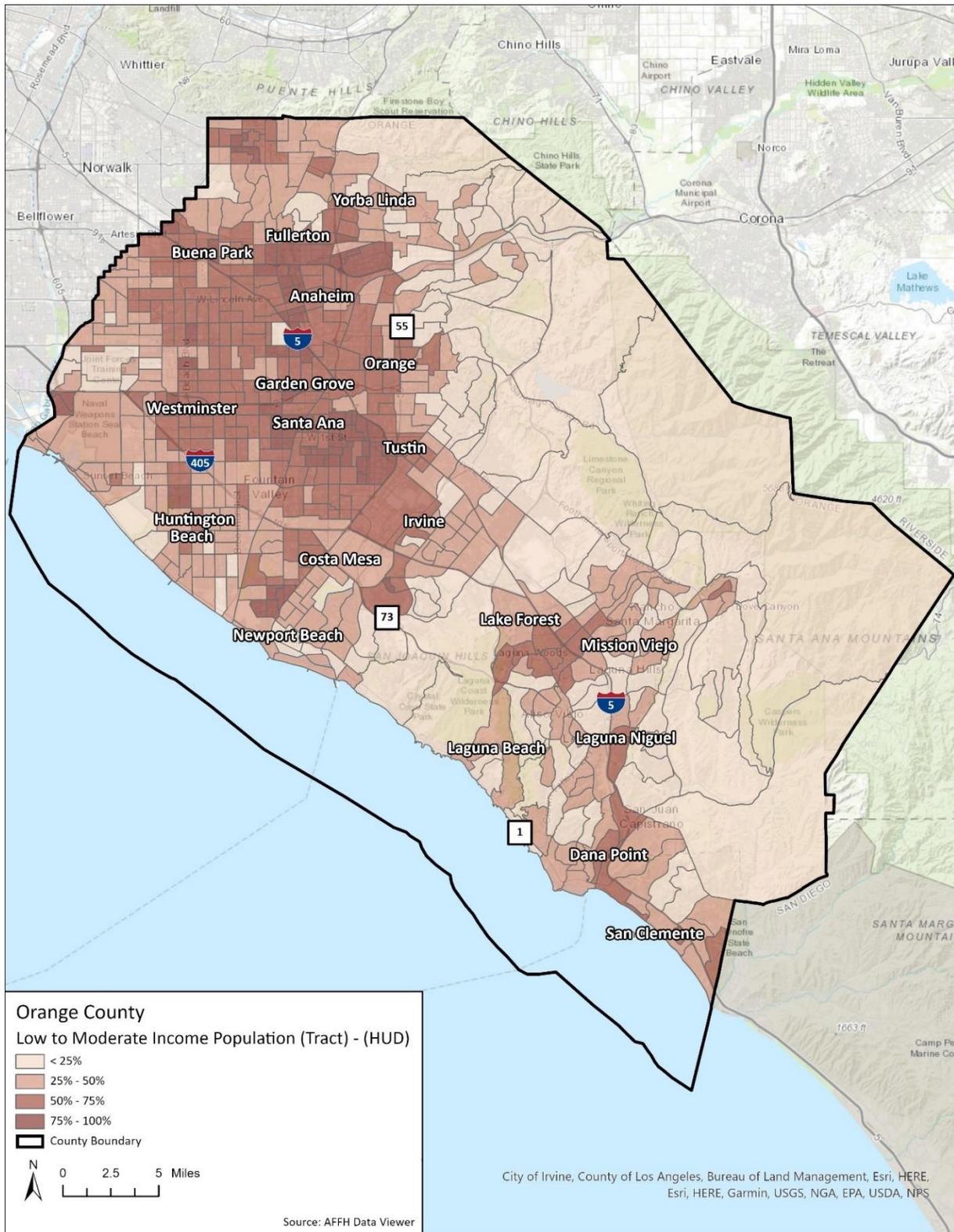


Figure 12: Low and Moderate Income (LMI) areas in Tustin

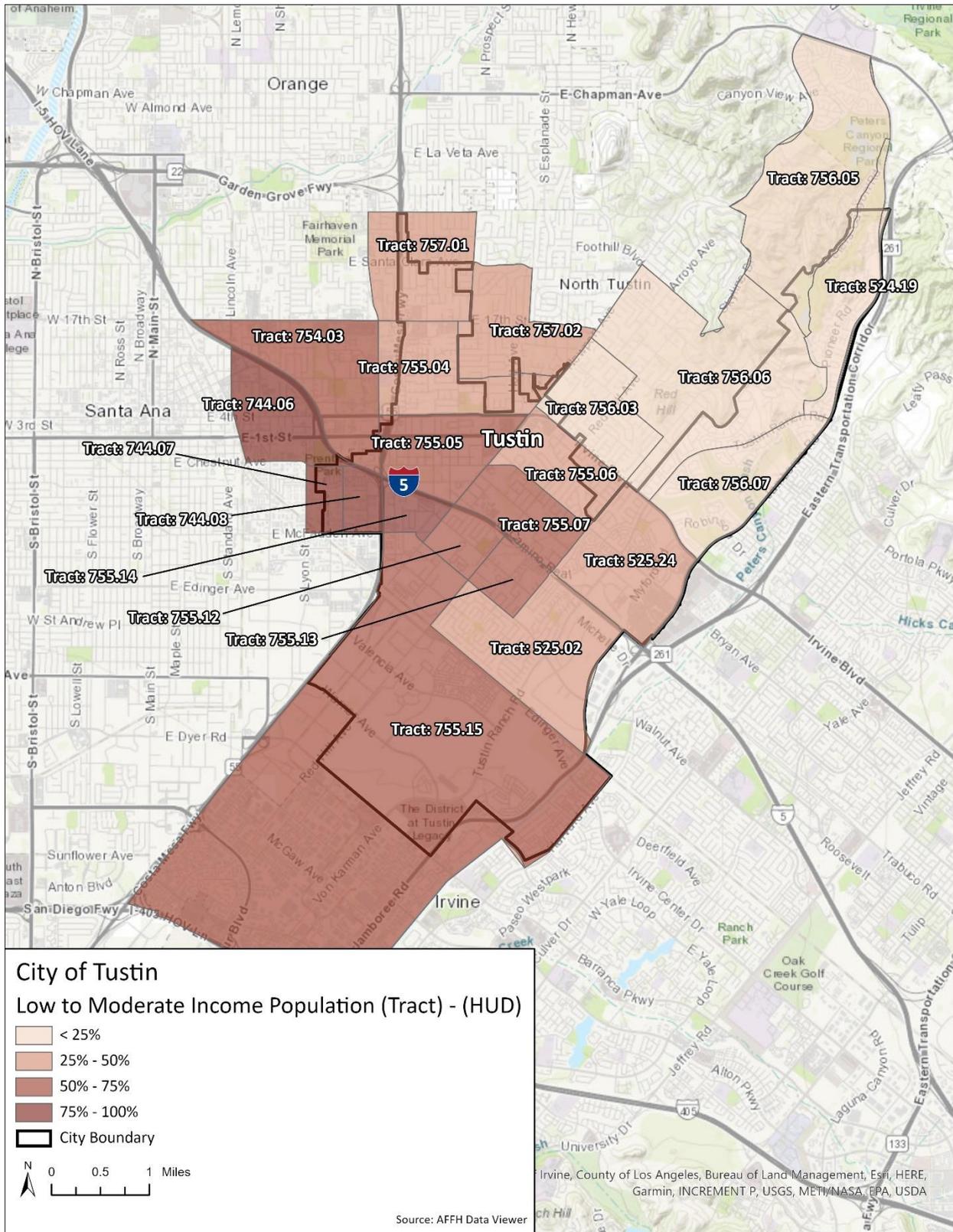


Figure 13: Racially Concentrated Areas of Poverty (RECAPs) in Orange County

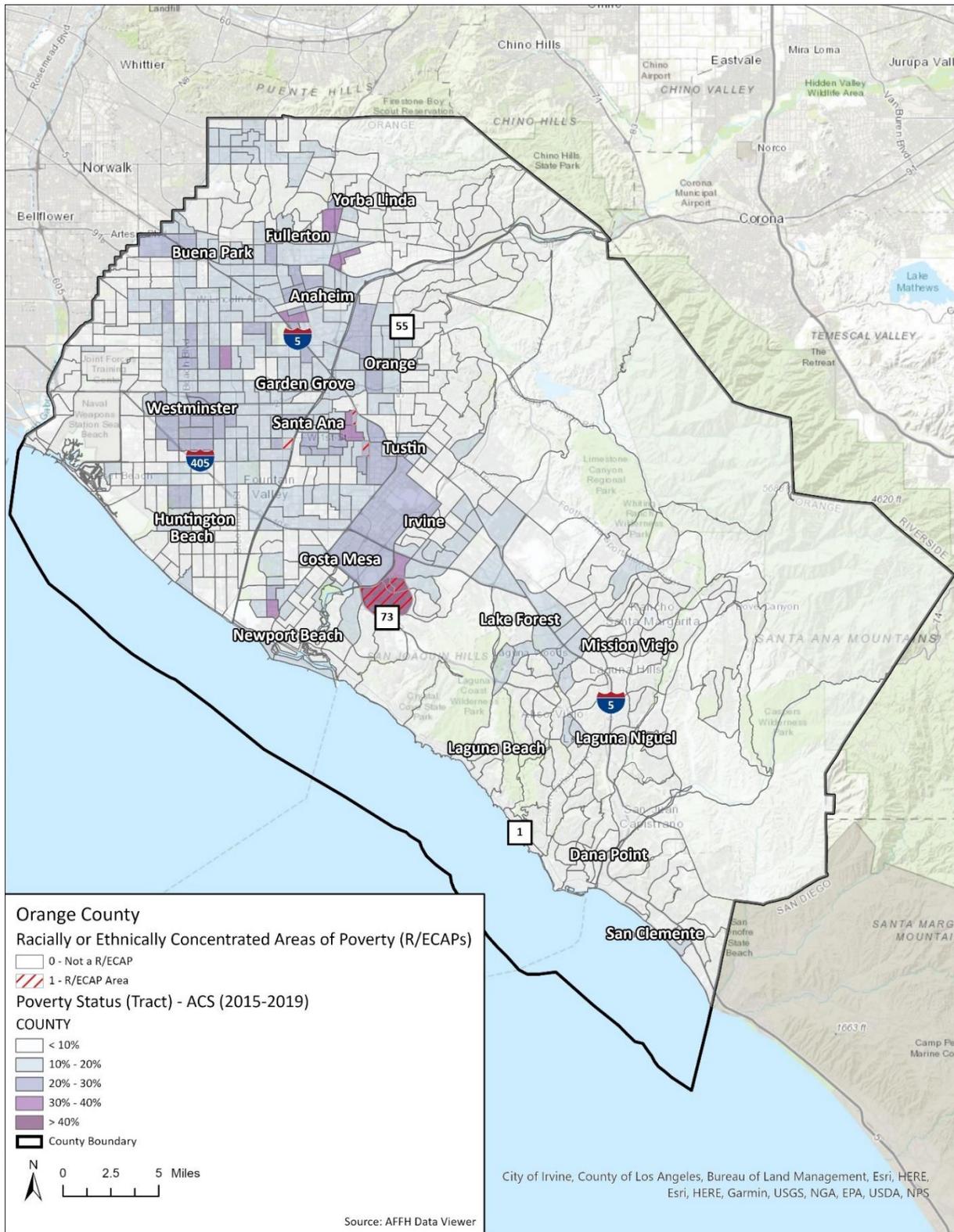
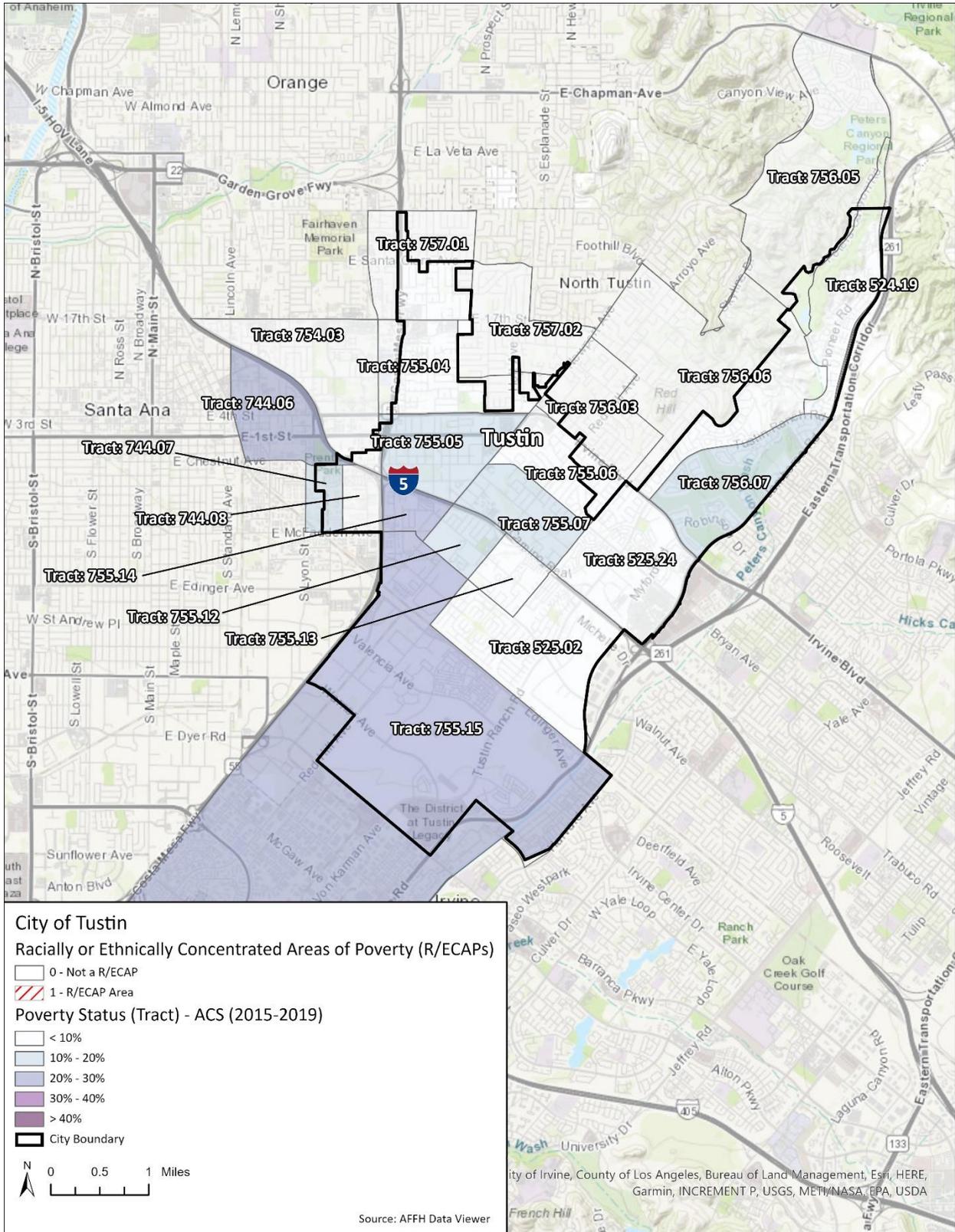


Figure 14: Racially Concentrated Areas of Poverty (RECAPs) in Tustin



RCAAs have not been studied extensively nor has a standard definition been published by HCD or HUD, this fair housing assessment uses the percent White population and median household income as proxies to identify potential areas of affluence. Table 7 shows percentage of White (alone) population and median income by jurisdiction for the city of Tustin, Orange County, and several surrounding jurisdictions. The percentage of White population in Tustin (59.01 percent) is comparable to the county’s (59.25 percent). The city and county median household incomes are also similar with annual incomes of 84,697 and 90,234 dollars, respectively. Santa Ana (28.87 percent) and Irvine (47.80 percent) both have lower percentages of White population, while the city of Orange has a very high percentage (74.03 percent).

Generally, the rank of jurisdictions from low to high percentage of White population is also consistent when ranked from low to high income, except for one outlier. The city of Irvine had the highest reported median household income (\$105,126) and has a predominately non-White population. According to the 2020 AI, Tustin isolation index for White population was 52.44, which is moderate compared to other jurisdictions within Orange County and is lower than the county’s calculated overall value (55.16).

Table 7: White Household Income and Percent Population (2019)

	Tustin	Orange (city)	Santa Ana	Irvine	Orange County
Median Household Income	84,697	91,793	66,145	105,126	90,234
All Households	93,304	95,827	70,084	111,574	95,934
White alone ¹	101,658	95,702	79,000	113,779	100,723
White Population	59.01%	74.03%	28.87%	47.80%	59.25%

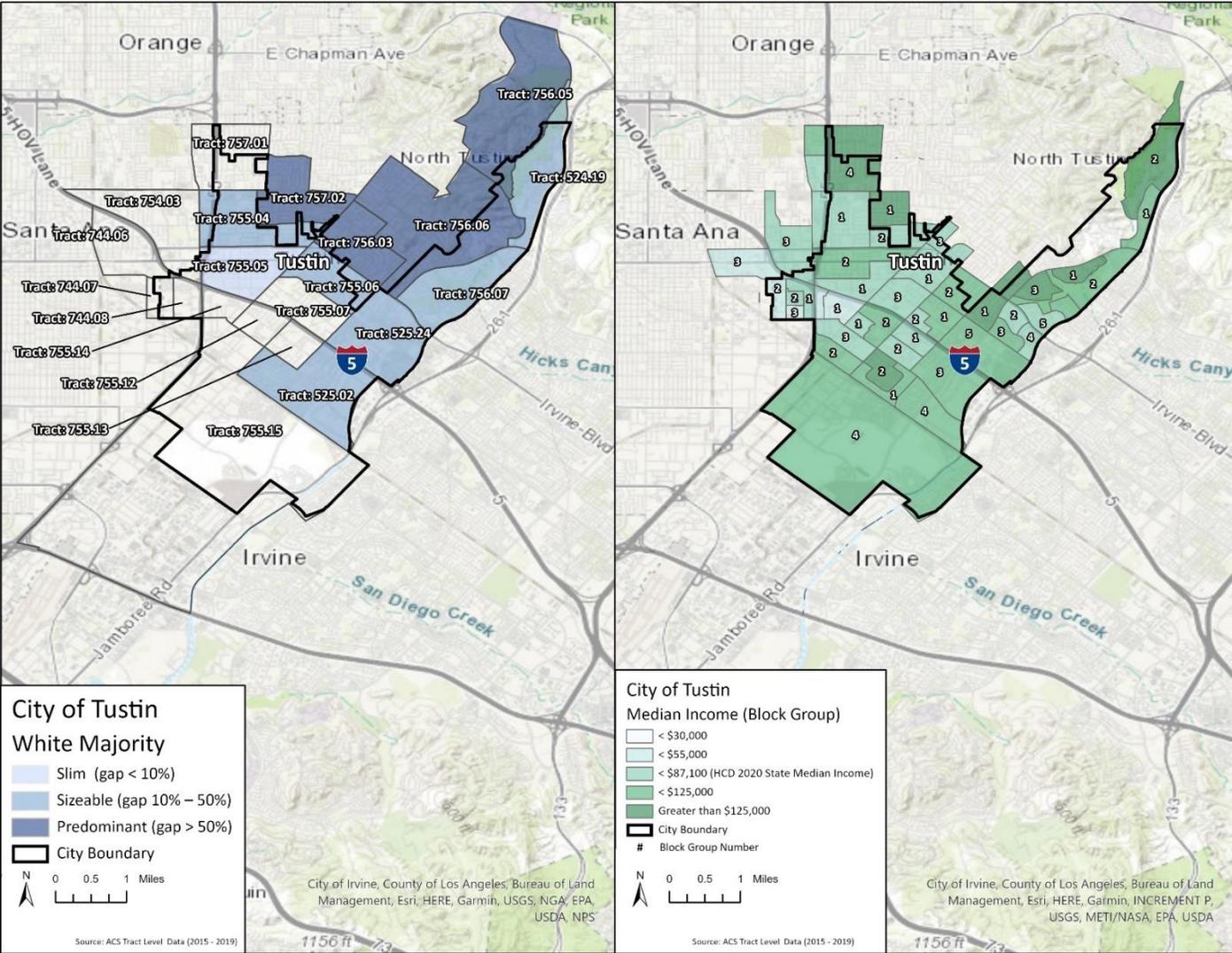
Notes:

1.White Alone refers to people who reported White and did not report any other race category.

Source: 2015-2019 American Community Survey 5-Year Estimates

The City of Tustin has a lower median income than Orange County, but overall percentage of the White population is almost identical. As shown in Figure 15, both income and White populations tend to be concentrated within the northern portion of the city. Although census tracts of high income and predominately White populations do not exactly overlap, there appears to be an area of lower income and non-White majority near census tract 755.14.

Figure 15: White Population and Median Income Distribution



Access to Opportunities

Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to ‘high resource’ neighborhoods. The following section describes locational differences and disparities experienced by different groups in accessing key features of opportunity: educational quality, economic factors, transportation, and environmental health.

TCAC/HCD Opportunity Maps

The 2021 TCAC/HCD Opportunity Maps are made from composite index scores of three different divisions (economic, environmental, and education) to categorize tracts as low, moderate, or high resource (Table 1 shows the full list of indicators). Categorization is based on percentile rankings for Census tracts within Orange County. Higher composite scores correlate to higher resources.

Three opportunity indices (economic, educational, and environmental) use data assembled by the California Fair Housing Task Force on behalf of the Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) for the 2020 TCAC/HCD Opportunity Map. The Economic Opportunity Index is a composite of four indicators depicting elements of neighborhood socio-economic character. The Environmental Opportunity Index reflects indicators from the exposures and environmental effects subcomponents of the “pollution burden” domain of CalEnviroScreen 3.0. The Educational Opportunity Index is a composite of four educational indicators capturing information on student proficiency, graduation rates, and student poverty. All indices range from 0 to 100, reflecting percentiles scaled to census tracts in Orange County, and with higher values indicating higher levels of opportunity.

The two transportation indicators (transit trips and low transportation cost) analyzed below employ data from version 3.0 of the Location Affordability Index (LAI) 9. The transit trips index measures how often low-income families in a neighborhood use public transportation. The index ranges from 0 to 100, with higher values indicating a higher likelihood that residents in a neighborhood utilize public transit. The low transportation cost index measures cost of transportation and proximity to public transportation by neighborhood. It too varies from 0 to 100, and higher scores point to lower transportation costs in that neighborhood.

At the County level, high and highest resource areas are located along the coast in cities such as Huntington Beach, Newport Beach, and Laguna Beach (see Figure 3). Whereas a greater concentration of low resource areas are concentrated in north-central Orange County in cities like Anaheim, Santa Ana, and Orange. Locally, northern and central Census tracts (407.03 and 408.12) scored lower, indicating lower resources than other tracts within the City, although overall scores still indicated “High Resource.” Table 2 shows the scores by domain. Tables 8 and 9 provide index scores by race and tract

Table 8 : Opportunity Map Scores - City

Tustin	Economic Opportunity Index	Environmental Opportunity Index	Educational Opportunity Index	Low Transportation Cost Index	Transit Index
Tustin total Population					
White, Non-Hispanic	77.38	55.53	57.98	37.04	41.62
Black, Non-Hispanic	49.56	33.87	33.27	54.51	60.02
Hispanic	42.96	28.64	27.42	56.88	63.88
Asian or Pacific Islander, Non-Hispanic	67.05	46.94	49.79	44.90	48.62
Native American, Non-Hispanic	63.12	43.93	47.46	43.06	49.65
Tustin population below federal poverty line					
White, Non-Hispanic	57.39	42.89	38.78	47.97	52.79
Black, Non-Hispanic	36.90	22.50	25.10	55.19	64.45
Hispanic	32.15	17.72	18.62	65.68	74.10
Asian or Pacific Islander, Non-Hispanic	42.37	30.60	25.82	55.88	61.08
Native American, Non-Hispanic	26.20	13.70	14.20	65.00	66.80
Orange County total population					

White, Non-Hispanic	59.36	53.88	58.61	33.84	27.43
Black, Non-Hispanic	45.85	45.21	45.63	39.68	36.21
Hispanic	31.86	41.02	30.86	41.80	41.28
Asian or Pacific Islander, Non-Hispanic	49.36	46.78	52.50	37.48	36.11
Native American, Non-Hispanic	46.39	48.79	45.07	37.47	33.02
Orange County population below federal poverty line					
White, Non-Hispanic	51.70	51.01	52.13	39.18	32.26
Black, Non-Hispanic	36.25	40.42	37.29	40.77	35.60
Hispanic	22.65	39.02	23.81	45.65	46.55
Asian or Pacific Islander, Non-Hispanic	38.94	46.38	48.32	41.97	39.51
Native American, Non-Hispanic	35.89	38.62	40.92	40.15	40.17

Source: County of Orange, Analysis of Impediments, 2020

Table 9: Opportunity Map Scores - Census Tracts

Census tract	Economic Domain Scores	Environmental Domain Scores	Education Domain Score	Composite Index Score	Final Category
0524.19	0.962	0.574	0.863	0.638	Highest Resource
0525.02	0.896	0.166	0.199	-0.217	Moderate Resource
0525.24	0.912	0.376	0.541	0.272	High Resource
0744.07	0.12	0.024	0.055	-0.94	Low Resource
0744.08	0.179	0.047	0.054	-0.839	Low Resource
0755.04	0.702	0.199	0.35	-0.136	Moderate Resource
0755.05	0.622	0.22	0.068	-0.462	Low Resource
0755.06	0.614	0.619	0.529	0.189	Moderate Resource
0755.07	0.626	0.27	0.208	-0.269	Moderate Resource
0755.12	0.27	0.218	0.106	-0.575	Low Resource
0755.13	0.386	0.185	0.199	-0.426	Low Resource
0755.14	0.187	0.092	0.078	-0.753	Low Resource
0755.15	0.452	0.005	0.236	-0.839	Low Resource
0756.06	0.986	0.534	0.927	0.766	Highest Resource

0756.07	0.948	0.709	0.683	0.517	Highest Resource
0757.01	0.776	0.156	0.43	-0.028	Moderate Resource

Source: California Fair Housing Task Force, TCAC/HCD Opportunity Maps, 2021 Statewide Summary Table, December 2020

Education

Countywide, there are disparities across racial/ethnic groups in access to educational opportunities as measured by the index. Across all tracts in Orange County, non-Hispanic Whites exhibit the highest exposure to educational opportunity (index score of about 59) and non-Hispanic Asians second highest (53). Hispanics have the lowest access to these opportunities (31), with non-Hispanic Blacks in between (46) as seen in Table 8.

Several jurisdictions score highly (index values at or above 60) on educational opportunity across all racial categories. These cities include Aliso Viejo, Huntington Beach, Irvine, Laguna Niguel, La Palma, Mission Viejo, and Rancho Santa Margarita.

Other jurisdictions obtain low scores on the index. San Juan Capistrano has low educational opportunity, scoring below 10 on the index for all races/ethnicities. San Clemente, Anaheim, and Santa Ana fare similarly poorly, although non-Hispanic Whites score higher (39) than other race/ethnic groups in these cities. Buena Park, Costa Mesa, Garden Grove, Orange, La Habra and Westminster are other cities that struggle with educational opportunity, all with scores in the 30s to 40s on the composite education index.

Finally, a few cities have educational opportunity patterns that mirror those of Orange County overall. Non-Hispanic Whites in Fountain Valley have high exposure to educational opportunity (scores of about 60), whereas Hispanics in the city do not (30). In both Fullerton and Tustin, Non-Hispanic Whites and Asians have much higher access than do Blacks and Hispanics.

The location of proficient schools and school assignment policies may be significant contributing factors to fair housing issues in Orange County. The schools with the highest proficiency in Orange County are generally located in coastal areas and hillside areas rather than in the center of the county, though Irvine is an exception. This distribution of proficient schools maps on to patterns of residential racial and ethnic segregation, with disproportionately White population in areas with high performing schools and relatively low Hispanic population in those areas. Public education in Orange County is highly fragmented with 27 school districts serving the county’s students. District boundaries frequently map onto municipal boundaries, which in turn correlate to patterns of segregation. Inter-district transfers are only available for extremely limited circumstances. This Analysis did not reveal school assignment policies that contribute to segregation within individual school districts.

According to the 2015-2019 American Community Survey 5-Year Estimate, Tustin has a high percentage of Title I schools (52.6 percent) compared to the County overall (2.22 percent) as seen

in Table 10. Title I schools are intended to help meet the educational needs of students by using federal, state, and local funds to support effective, evidence-based educational strategies that close the achievement gap and enable the students to meet the state’s challenging academic standards. Schools in which children from low-income families make up at least 40 percent of enrollment are eligible to use Title I funds to operate schoolwide programs that serve all children in the school in order to raise the achievement of the lowest-achieving students. In the City of Tustin, Title I schools are concentrated in tracts 525.02, 744.07, and 755.04, which also consist of a population with higher percentages of lower to moderate income households and a greater total Non-White population when compared to the rest of the city. The City of Tustin has a lack of policies and practices that promote access to more proficient schools for protected groups as these groups experience this disparity both at the local and county level.

Employment

The Economic Opportunity Index is a composite of four indicators depicting elements of neighborhood socio-economic character. In Orange County, there are significant disparities in access to economic opportunity as Non-Hispanic White residents have the greatest access to economic opportunity. As seen in Table 8, Asian and Pacific Islander residents (49), Native Americans (46), and Black Residents (46) have lower index scores in the high to mid-40s, while Hispanics have the lowest access to economic opportunity of all racial and ethnic groups in Orange County. Tustin’s scores similarly reflect this trend as the City has very high scores for non-Hispanic White residents (77) as well as Asian residents (67), but Black and Hispanic residents have significantly lower scores (in the 40s). Despite this trend, job proximity is not a factor that is heavily weighted in these scores as the City has an overall high percentage (66.4 percent) of employment opportunities being located within 29 miles. Compared to the County’s job proximity average of 57.6 percent as seen in Table 10, residents from the City of Tustin are generally in closer proximity to jobs when compared to the rest of the County.

Transportation

The two transportation indicators (transit trips and low transportation cost) analyzed data from version 3.0 of the Location Affordability Indexed (LAI). The transit trips index measures how often low-income families in a neighborhood use public transportation. The index ranges from 0 to 100, with higher values indicating a higher likelihood that residents in a neighborhood utilize public transportation. The transportation cost index measures cost of transportation and proximity to public transportation by neighborhood. It too varies from 0 to 100, and higher scores point to lower transportation costs in that neighborhood.

When analyzing Orange County as a whole, non-Hispanic Whites have the lowest score (34), while Asian and Pacific Islanders as well as Native Americans have a score of 38 as referenced in Table 8. Black residents have a score of 39 while Hispanics have the highest score of 42. There are no significant disparities between racial/ethnic groups in the low transportation cost index in most jurisdictions in Orange County. However, in Tustin and Rancho Santa Margarita, White and Asian residents have significantly lower scores on the low transportation cost index compared to Black and Hispanic residents. In specific, Hispanics in Tustin have the highest

transit index score (64) followed closely by Blacks (60), while Asian and White residents have significantly lower scores (49 and 42) respectively. This trend is similar to the overall County scores as Hispanics have the highest transit index score, while non-Hispanic Whites have a significantly lower score than other racial and ethnic groups.

Environmental

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). This tool uses Census tracts as the unit of analysis where high-scoring Census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, considering their socioeconomic characteristics and underlying health status.

Pollution Burden scores for each Census tract are derived from the average percentiles of the seven Exposures Indicators (ozone and PM2.5 concentrations, diesel PM emissions, drinking water contaminants, pesticide use, toxic releases from facilities, and traffic density) and the five Environmental Effects indicators (cleanup sites, impaired water bodies, groundwater threats, hazardous waste facilities and generators, and solid waste sites and facilities). Indicators from the Environmental Effects component were given half the weight of the indicators from the Exposures component. The calculated average pollution burden score (average of the indicators) was divided by 10 and rounded to one decimal place for a Pollution Burden (0.1 -10).

Population Characteristics scores for each Census tract are derived from the average percentiles for the three Sensitive Populations indicators (asthma, cardiovascular disease, and low birth weight,) and the five Socioeconomic Factors indicators (educational attainment, housing burdened low-income households, linguistic isolation, poverty, and unemployment). The calculated average percentile is divided by 10 for a Population Characteristic score ranging from 0.1 -10. After the components are scored within Pollution Burden and Population Characteristics, the scores are multiplied to calculate the overall CalEnviroScreen Score ranging from 1-100%. CalEnviroScreen reports scores as percentiles to compare tracts across the county.

The City of Tustin had an average overall percentile of 43.49 percent as seen in Table 10. Protected groups in the City of Tustin suffer from less access to environmentally healthy neighborhoods as these populations are concentrated in tracts that have the highest scores in the City. Tracts with percentiles over 61 percent are concentrated in the southwest (tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15), while tracts scoring lower than 43 percent make up the northeastern half of the City, as seen in Figure 16. The tracts with scores over 61 percent also experience other disparities such as a high percentage of low to moderate income households, overcrowding, higher poverty rates, and a higher concentration of protected groups like Hispanics. Census tract 755.15 is one of the highest scoring tracts in the City with a score of 71.48 percent. This tract scored high due to high exposures to toxic releases, traffic, and contaminated drinking water. Figure 16 and Table 10 show that while Tustin had a relatively low score, overall Orange County had a similar average score of 50.01 percent.

Table 10: Access to Opportunity Indicators by Race/Ethnicity (1 of 2)

Opportunity Indicators	Census Tracts								City of Tustin	County of Orange
	524.19	525.02	525.24	744.07	744.08	755.04	755.05	755.06		
Poverty Rate										
Population Below Federal Poverty Level	2.6%	7.4%	4.3%	17.8%	6.7%	5.6%	11.0%	4.8%	31.9%	40.6%
White alone	46.4%	47.9%	35.4%	11.4%	10.3%	54.7%	44.9%	46.9%	2.4%	1.6%
Black or African American alone	0.4%	1.0%	5.2%	1.1%	3.4%	0.4%	3.0%	2.3%	0.1%	0.2%
American Indian and Alaska Native alone	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.3%	0.0%	22.2%	20.3%
Asian alone	35.1%	17.9%	32.4%	3.8%	3.6%	9.7%	7.3%	15.9%	0.1%	0.3%
Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.4%	0.0%	40.0%	34.1%
Hispanic or Latino (of any race)	11.1%	28.0%	23.5%	82.8%	79.9%	30.5%	39.9%	32.4%	31.9%	40.6%

School Proficiency										
Total Title 1 Schools	-	1	-	1	-	2	-	-	10	135
Total Schools	-	1	-	1	-	2	-	-	19	607
Percent of Schools	-	100	-	100	-	100	-	-	52.6	22.2
Unemployment Rate (2019)	4.2%	1.7%	3.8%	4.3%	3.3%	1.8%	1.4%	2.4%	2.80%	3.00%
Job Proximity										
< 29 mins.	55.6%	73.9%	77.6%	73.3%	57.1%	71.4%	66.6%	70.9%	66.4%	57.6%
30 – 59 mins.	35.8%	21.3%	16.2%	22.1%	37.6%	24.3%	24.9%	21.0%	26.9%	32.6%
60 mins. or more	8.6%	4.8%	6.2%	4.7%	5.2%	4.2%	8.5%	8.1%	6.8%	9.7%
Transit Metrics										
All Transit Performance Score	0.0	6.2	3.8	5.3	4.6	6.0	7.3	5.9	4.8	4.2
Transit Trips Per Week within ½ Mile	0	706	248	704	546	1,530	1,615	1,115	138	528

Transit Routes within ½ Mile	0	8	3	7	5	8	9	7	1	4
Jobs Accessible in 30-Min Trip	0	304,241	145,104	257,864	218,602	311,834	333,019	244,043	17,685	172,595
Commuters Who Use Transit (percent)	0.00	1.00	0.43	2.74	3.52	0.00	2.28	0.55	1.11	2.28
CalEnviroScreen										
CES 3.0 Score	16.66	22.75	19.35	32.39	32.75	27.08	21.69	20.99	23.00	27.93
CES 3.0 Percentile	29.47	44.61	36.69	63.78	64.42	54.05	42.45	40.76	43.49	50.01
Pollution Burden Score	5.03	7.24	5.45	7.21	6.06	6.22	5.72	4.44	5.54	5.18
Population Characteristics Score	3.31	3.14	3.55	4.49	5.40	4.36	3.79	4.73	4.06	5.17

Table 10: Access to Opportunity Indicators by Race/Ethnicity (2 of 2)

Opportunity Indicators	Census Tracts								City of Tustin	County of Orange
	755.07	755.12	755.13	755.14	755.15	756.06	756.07	757.01		
Poverty Rate										
Population Below Federal Poverty Level	15.5%	14.0%	9.1%	27.6%	23.3%	5.4%	10.2%	5.3%	11.4%	10.90%
White alone	30.3%	15.7%	17.1%	11.3%	27.3%	66.6%	47.1%	40.3%	31.9%	40.6%
Black or African American alone	3.4%	9.0%	1.5%	2.3%	1.6%	0.0%	0.1%	1.0%	2.4%	1.6%
American Indian and Alaska Native alone	0.0%	0.0%	0.4%	0.0%	0.0%	0.0%	0.0%	1.4%	0.1%	0.2%
Asian alone	15.1%	16.2%	19.2%	11.2%	39.4%	18.5%	36.2%	8.4%	22.2%	20.3%
Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.0%	0.1%	0.3%

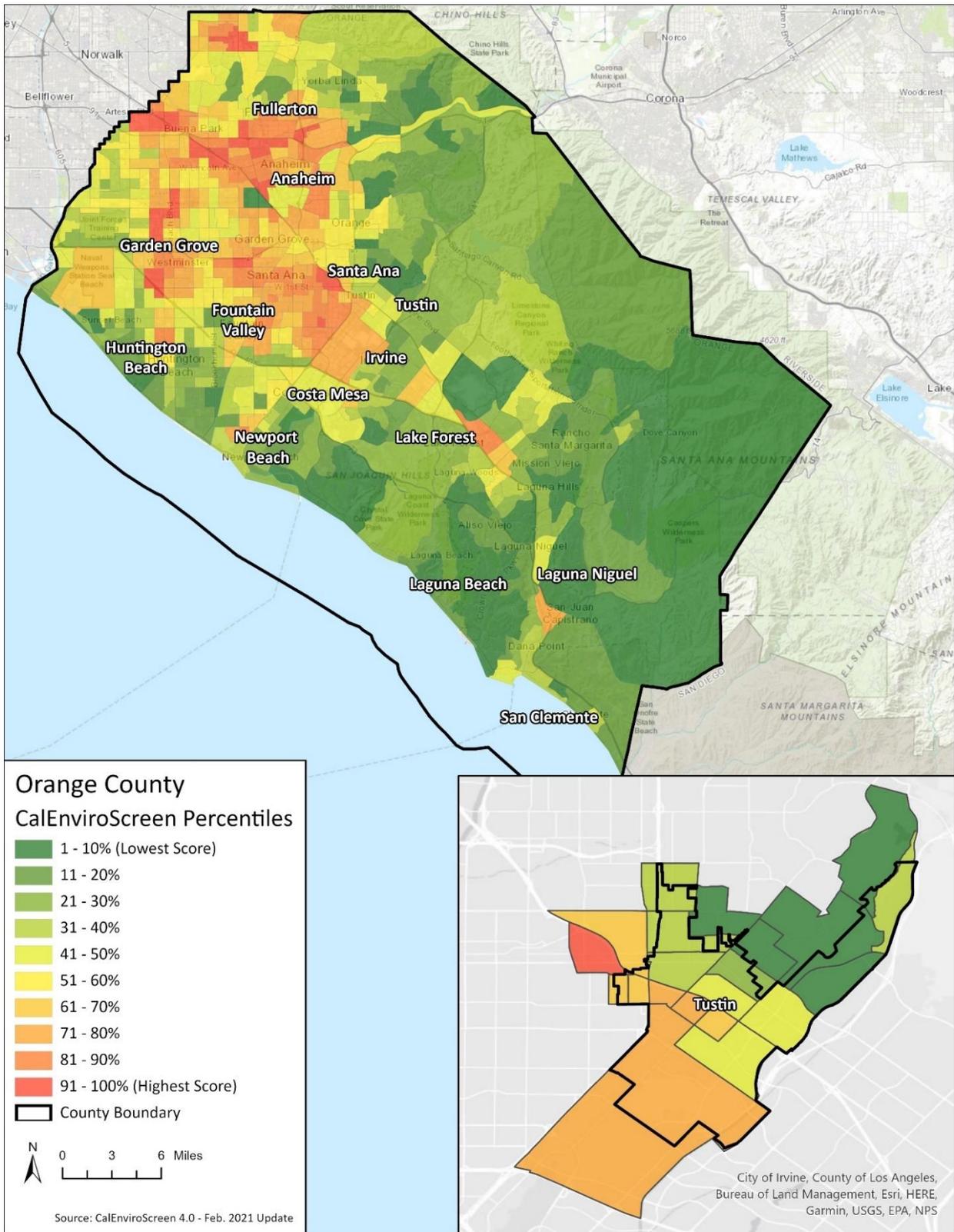
Hispanic or Latino (of any race)	48.0%	55.8%	56.9%	74.2%	28.4%	13.4%	13.5%	46.1%	40.0%	34.1%
School Proficiency										
Total Title 1 Schools	2	1	-	-	3	-	-	-	10	135
Total Schools	5	1	-	-	4	3	1	-	19	607
Percent of Schools	40	100	-	-	75	0	0	-	52.6	22.2
Unemployment Rate (2019)	4.1%	4.3%	5.6%	4.4%	1.3%	1.1%	2.3%	2.0%	2.80%	3.00%
Job Proximity										
< 29 mins.	76.2%	71.7%	71.1%	70.6%	60.0%	68.2%	56.2%	56.5%	66.4%	57.6%
30 – 59 mins.	15.0%	23.1%	27.4%	22.2%	28.7%	24.5%	37.1%	33.4%	26.9%	32.6%
60 mins. or more	8.8%	5.2%	1.4%	7.2%	11.3%	7.3%	6.8%	10.1%	6.8%	9.7%
Transit Metrics										
All Transit Performance Score	5.7	5.9	5.1	5.4	6.4	1.2	1.3	3.7	4.8	4.2

Transit Trips Per Week within ½ Mile	953	440	391	447	1,162	116	53	651	138	528
Transit Routes within ½ Mile	6	4	3	6	13	2	2	6	1	4
Jobs Accessible in 30-Min Trip	287,408	291,211	270,358	238,339	498,552	53,469	25,551	253,231	17,685	172,595
Commuters Who Use Transit (%)	1.90	8.45	0.00	8.66	1.94	0.52	1.95	2.32	1.11	2.28
CalEnviroScreen										
CES 3.0 Score	22.63	28.04	27.06	34.00	36.62	5.58	8.30	21.77	23.00	27.93
CES 3.0 Percentile	44.39	55.97	54.02	66.72	71.09	3.92	9.22	42.57	43.49	50.01
Pollution Burden Score	4.98	5.31	5.27	5.22	8.91	4.47	4.22	5.90	5.54	5.18
Population Characteristics Score	4.55	5.28	5.14	6.51	4.11	1.25	1.97	3.69	4.06	5.17

Sources: 2015-2019 American Community Survey 5-Year Estimates; AllTransit Metrics, 2021; CalEnviroScreen 3.0, 2021; 2019-2020 California Department of Education (CDE) Every Student Succeeds Act (ESSA) Comprehensive Support and Improvement (CSI) data file

Notes: City and County CalEnviroScreen Scores represent the average of all Census tracts included within the jurisdiction.

Figure 16: CalEnviroScreen 3.0 Percentile Scores



Countywide, there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollutions. Across all tracts in Orange County, non-Hispanic Whites exhibit the highest access to environmentally healthy neighborhoods (index score of about 54). All other racial/ethnic groups obtain lower index scores in the 40s: Hispanics score lowest at 41, followed by non-Hispanic Blacks (45), non-Hispanic Asian/Pacific Islander (47), and non-Hispanic Native American (48). As seen in Figure 16, higher percentiles are concentrated in northcentral Orange County, with neighboring cities like Santa Ana and Orange having generally higher scores compared to Tustin. As a result, the tracts to the southwest that abut Santa Ana experience higher percentages (tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). Extensive use of motorized transportation modes and large particulate generating uses in these tracts contribute to poor air quality. New regulations must be implemented to fulfill Air Quality Management Plan requirements. These regulations must be managed to increase the public health, safety, and welfare in order to lower the scores of these tracts and to increase access to environmentally healthy neighborhoods for protected classes.

Disproportionate Housing Needs

Disproportionate Housing Needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing problems are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.

As shown in Table 11, a higher percent of non-White households experienced housing problems than White households in Tustin. Non-White households that experienced the greatest proportion of housing problems include Hispanic (71.19 percent), Black (62.40 percent), and Native American (50.00 percent). The same trend occurred for the county population.

Of the family types, family households that included five or more people experienced the greatest burden of housing problems, with a substantial percentage of 75.23 of the city demographic. Of the county population, large families also had the highest percentage of housing problems; however, the gap in percentages amongst the various family types was less pronounced.

Table 11: Any Housing Problem by Tenure and Race, Tustin

Demographics of Households with Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	4,465	10,495	42.54%
Black, Non-Hispanic	380	609	62.40%
Hispanic	5,485	7,705	71.19%
Asian or Pacific Islander, Non-Hispanic	2,644	6,089	43.42%
Native American, Non-Hispanic	60	120	50.00%
Total	13,034	25,018	52.10%
Household Type and Size			
Family households, <5 people	6,690	14,315	46.73%
Family households, 5+ people	2,840	3,775	75.23%
Non-family households	3,825	7,465	51.24%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	2,085	10,495	19.87%
Black, Non-Hispanic	205	609	33.66%
Hispanic	3,915	7,705	50.81%
Asian or Pacific Islander, Non-Hispanic	1,519	6,089	24.95%
Native American, Non-Hispanic	10	120	8.33%
Total	7,734	25,018	30.91%

Source: County of Orange, Analysis of Impediments, 2020

Table 12: Any Housing Problem by Tenure and Race, County

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs	Jurisdiction		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	206,658	540,773	38.22%
Black, Non-Hispanic	8,074	16,719	48.29%
Hispanic	152,740	241,841	63.16%
Asian or Pacific Islander, Non-Hispanic	84,193	186,038	45.26%
Native American, Non-Hispanic	1063	2,179	48.78%
Total	452,728	987,550	45.84%
Household Type and Size			
Family households, <5 people	228,740	576,690	39.66%
Family households, 5+ people	95,050	145,028	65.54%
Non-family households	138,270	273,662	50.53%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	104,324	540,773	19.29%
Black, Non-Hispanic	4,816	16,719	28.81%
Hispanic	107,752	241,841	44.55%
Asian or Pacific Islander, Non-Hispanic	50,205	186,038	26.99%
Native American, Non-Hispanic	544	2,179	24.97%
Total	267,641	987,550	27.10%

Source: County of Orange, Analysis of Impediments, 2020

Cost Burden

Cost burden is the fraction of a household's total gross income spent on housing costs. There are two levels of cost burden: (1) "Cost Burden" refers to the number of households for which housing cost burden is greater than 30 percent of their income; and (2) "Severe Cost Burden" refers to the number of households paying 50 percent or more of their income for housing. This analysis must address the burdens on both owners and renters (tenure).

According to HUD CHAS Databook using data from 2013-2017 ACS, the race and ethnicities that experience the greatest severe cost burden in Tustin are Other and Hispanic, as shown in Table 11. The race and ethnicities that experience the greatest severe cost burden in Orange County are Hispanics and Blacks. Compared to the county, Tustin had similar cost burden percentages across most races.

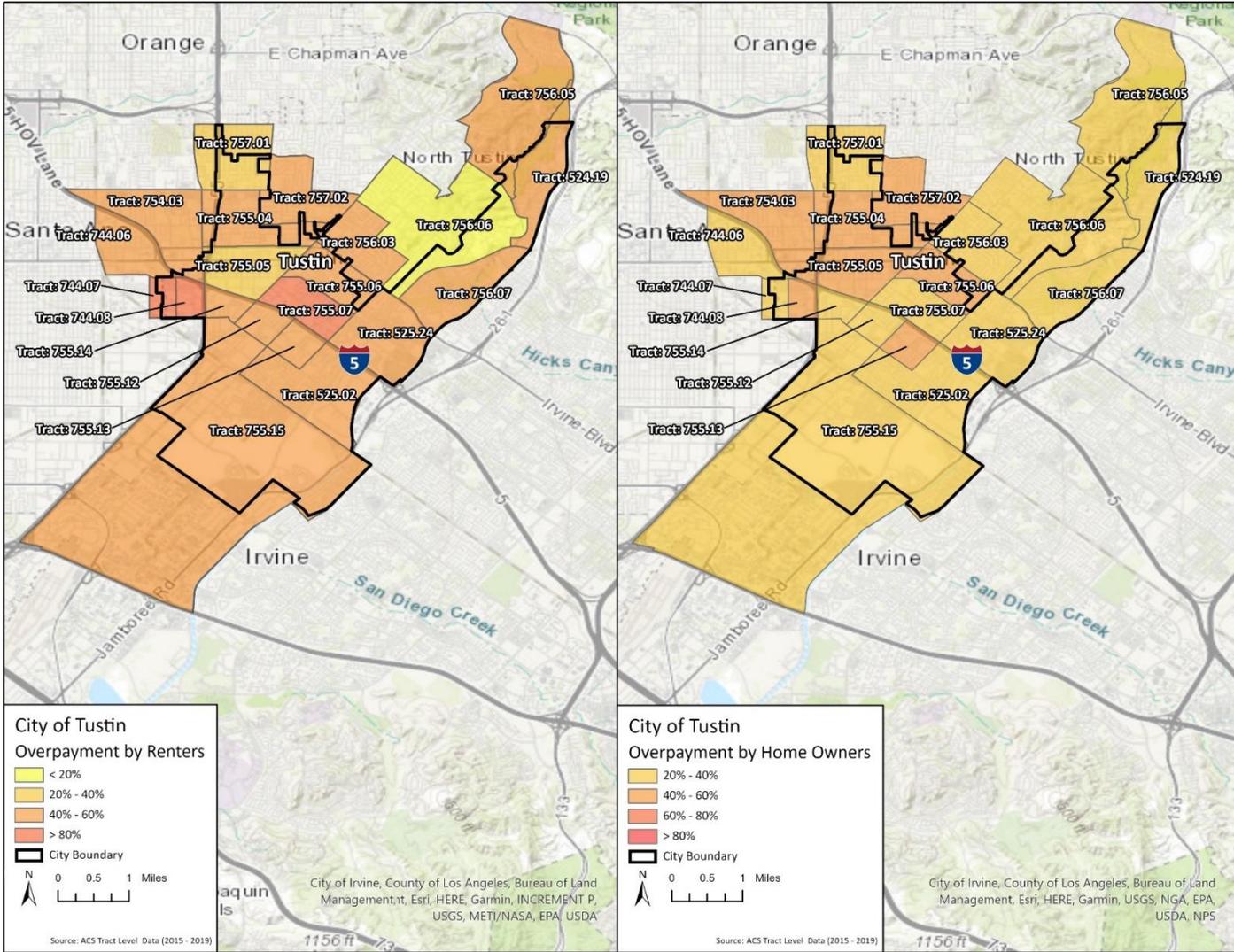
As shown in Tables 11 and 12, non-family households experienced the greatest percentage of severe cost burden within Tustin and Orange County. The percentage of more than five people households was higher than non-family households. A non-family household consists of a householder living alone (a one-person household) or where the householder shares the home exclusively with people to whom he/she is not related. As identified above, the 2020 A.I. compared County of Orange households by household type for 2000, 2010, and 2016. The analysis found the number of family households married without children, other families, and non-families are generally increasing, while families married with children are generally decreasing. This could indicate that there is a lack of housing affordable for non-families and single persons that do not rely on two incomes for living expenses.

Affordability could be a barrier to housing for persons with disabilities or special needs populations who rely on Supplemental Security Income as their primary source of income, which ranges from \$954 to \$1,776 per month, depending on their qualifications. Households may experience cost burden when SSI incomes are not adequate to pay for rent and not increasing at rates comparable to rent increases. Majority of renters within City's census tracts had over 40 percent cost burdened households, while majority of homeowners within census tracts had less than 40 percent cost burden (see Figure 17). Due to lack of rental options available in the City, renters could experience lack of affordable options.

Overcrowding

Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms. This analysis of Tustin addresses the overcrowding on both owners and renters.

Figure 17: Distribution of Cost Burdened/Overpayment Households



According to the 2020 AI, overcrowding in Orange County is very high, at 9.51% overall, expanding to 15.97% for renters. The relative majority of Housing Choice Vouchers is also limited to 0-1-bedroom units (43.97%). 5,561 households or 26.20% of Housing Choice Voucher occupants are also households with children, the highest of any category of publicly supported housing (followed by Project-Based Section 8, with 9.62%). Furthermore, according to the 2018 five-year ACS estimates, the majority of tracts in the City have a low percentage of households that are living in overcrowded conditions, with tracts bordering Santa Ana towards the southwest having higher percentages (tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). Regionally, census tracts with overcrowded households are concentrated in the northcentral Orange County, particularly in the City of Anaheim and Santa Ana. As a result, within Tustin, all tracts besides the few bordering Santa Ana, have a low percentage of overcrowding ranging between 1 and 8 percent. The tract with the highest percentage of overcrowded living conditions is tract 444.08 (22.68 percent) which is located in the westernmost part of the city and borders Santa Ana (see Figure 18). These southwestern tracts also experience a concentration of minorities, a larger percentage of lower to moderate income households, and other housing problems. The higher average of overcrowded living condition in south and southwestern Tustin suggests that there are could be disparities in the proportion of members of protected classes and housing problems, as populations of minorities and lower income levels experience overcrowding in these parts of the city.

Substandard Housing

Housing age is frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. A small percentage of units are at risk of improvement due to age as only 31.3 percent of housing is older than 50 years old in all tracts of the city (Table 13). As shown in Table 14, 13,034 units, or 52.10 percent of total housing units within the city, were identified as having one or more housing problems (which includes cost burden).

Approximately 22.1 percent of households experience one or more of the four severe housing problems. Compared to the county's population, where 45.84 percent of the population has one or more housing problems and 27.1 percent of the population has a severe housing problem, the city of Tustin population experiences slightly more housing problems than the county population; however, the problems experienced are less severe.

There are four housing problems in the CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. A household is said to have a housing problem if they have any 1 or more of these 4 problems.

Figure 18: Distribution of Overcrowded Households

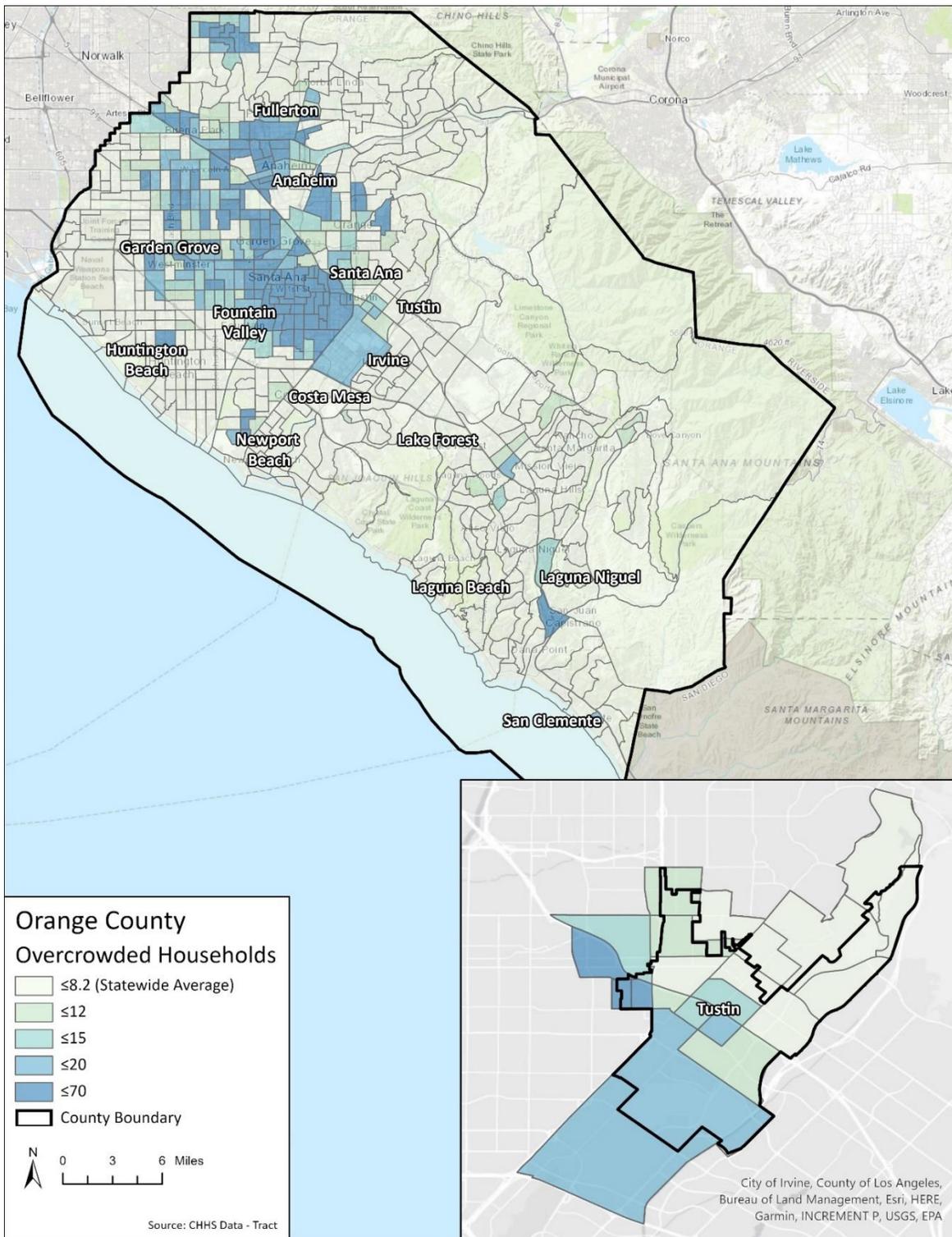


Table 13: Age Housing Built

Year Built	Number of Units	Percent of Units
Built 2014 or later	1,086	4.0
Built 2010 to 2013	387	1.4
Built 2000 to 2009	2,802	10.3
Built 1990 to 1999	5,994	22.1
Built 1980 to 1989	2,952	10.9
Built 1970 to 1979	5,462	20.1
Built 1960 to 1969	6,735	24.8
Built 1950 to 1959	1,222	4.5
Built 1940 to 1949	154	0.6
Built 1939 or earlier	386	1.4
Total	27,180	

Source: 2015-2019 American Community Survey 5-Year Estimates

As shown in Table 11, the race/ethnicity that experiences the highest percentage of housing problems is Hispanic (71.19 percent). The race/ethnicity that experiences the second highest percentage of housing problems is Black (62.30 percent). Similarly, the Hispanic population had the greatest percentage of severe housing problems (50.81 percent). The percentage of Hispanic households that experience severe housing problems was substantially greater than all other races and ethnicities. Native American households had the smallest percentage of households that experiences severe housing problems (7.69 percent). These results may be skewed due to the low number of households identified as Native American, Non-Hispanic.

According to the 2020 AI, deteriorated and abandoned properties are not a significant contributing factor to fair housing issues in Orange County. Although there was a surge in deteriorated and abandoned properties in the wake of the foreclosure crisis, particularly in heavily Hispanic areas and with significant harmful consequences for communities, that issue has gradually abated over the ensuring years. Table 14 identifies the number and overall percent of vacant housing units categorized as “Other Vacant” in the American Community Survey within Tustin and nearby jurisdictions. Irvine and Tustin contained the lowest number and second lowest percentage of vacancy relative to other nearby cities.

Table 14: Vacant Properties

City	Count	Percent of Total Properties
Tustin	162	13.8%
Orange	548	33.7%
Irvine	628	11.4%
Santa Ana	599	30.3%

Source: County of Orange, Analysis of Impediments, 2020

Homelessness

Persons who are classified as homeless include individuals or families who lack or are perceived to lack a fixed, regular, and adequate nighttime residence, or who have a primary nighttime residence in a shelter, on the street, in a vehicle, or in an enclosure or structure that is not authorized or fit for human habitation. People experiencing homelessness are vulnerable to violence and criminalization due to their unhoused status.

Orange County’s 2019 Sheltered Point In Time Count took place the night of Tuesday, January 22, 2019. Emergency Shelters and Transitional Housing Programs collected client-level demographic information from individuals and families staying the night in each program. The 2019 Unsheltered Count process took place over two days, Wednesday, January 23 and Thursday, January 24, to ensure the 800 square mile County jurisdiction was canvassed effectively. Within Orange County 3,961 unsheltered homeless persons and 2,899 sheltered homeless persons counted. During the same point-in-time count, 95 unsheltered homeless persons and 264 sheltered homeless persons were counted, for a total of 359 homeless persons identified in Tustin.

According to the 2020 AI, displacement of residents due to economic pressures may be a significant contributing factor to fair housing issues in Orange County and, in particular, in parts of Orange County that have historically had concentrations of low-income Hispanic and Vietnamese residents. The Urban Displacement Project at the University of California Berkeley identified census tracts in Orange County that experienced gentrification over various time periods from 1990 to present. Several areas that have undergone gentrification at some point since 1990 were identified in Anaheim, Costa Mesa, Dana Point, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, Irvine, Orange, San Clemente, and Villa Park. The city of Tustin was not identified as an area of gentrification. Though the Urban Displacement Project does not map the risk of future gentrification in displacement in Southern California as it does in the Bay Area, the areas most vulnerable to gentrification and displacement in Orange County – going forward – are disadvantaged areas located near areas that have already gentrified and disadvantaged areas located near major transit assets as well as anchor institutions like universities and hospitals. Because the southern and coastal portions of Orange County have relatively few disadvantaged areas, displacement risk is therefore concentrated in inland

portions of central and northern Orange County. These areas also tend to have higher Hispanic and Asian population concentrations than the county, illustrating the fair housing implications of displacement.

Two key factors in predicting displacement for an area are the loss of low-income households and increases in rent. Median household income of residents in the city of Tustin experienced approximately \$15,000 increase from 2010 to 2019, as shown in Table 15. Residents throughout the county experienced a very similar increase within the same timeframe. The mean income for both city and county also increased similar amounts (approximately \$20,000). Conversely, the percentage of households that earn \$15,000 or less simultaneously increased from 2010 to 2019 and percentages of households earning more than \$15,000 annual decreased. Although low-income households are generally increasing, this phenomenon suggests polarizing income, where low-income households in the city are losing income and high earning households are earning greater income.

Table 15: Household Income

Income	City (2010)	City (2019)	County (2010)	County (2019)
Total	71,680	104,524	984,503	1,044,280
Less than \$10,000	6.6%	8.5%	3.9%	4.1%
\$10,000 to \$14,999	2.5%	3.8%	3.2%	2.6%
\$15,000 to \$24,999	2.6%	1.3%	3.3%	2.2%
\$25,000 to \$34,999	2.2%	1.8%	3.7%	2.7%
\$35,000 to \$49,999	2.1%	1.9%	3.8%	2.5%
\$50,000 to \$74,999	2.5%	1.9%	3.7%	2.9%
\$75,000 to \$99,999	2.6%	2.2%	3.6%	2.7%
\$100,000 to \$149,999	2.7%	1.5%	4.1%	2.8%
\$150,000 to \$199,999	2.1%	1.5%	3.6%	2.8%

\$200,000 or more	5.4%	4.3%	7.2%	5.8%
Median income (dollars)	90,939	105,126	74,344	90,234
Mean income (dollars)	113,185	135,877	99,719	122,488

Source: 2015-2019 American Community Survey 5-Year Estimates; 2006-2010 American Community Survey 5-Year Estimates

As previously discussed above and shown in Figure 17, renters experience the greatest level of cost burden in the city of Tustin. Throughout most of Tustin, 40 percent or greater of renters experience overpayment (cost burden), whereas the majority of homeowners do not experience cost burden (less than 40 percent). High percent of cost burden for renters is an indicator of displacement risk, in combination with polarizing income trends.

The city of Tustin supports a number of publicly supported housing projects with low-income units. Table 16 includes a breakdown of publicly supported housing residents by race along with the corresponding census tract percentage of population by race. Table 16 shows that the percentage of White residents and Black residents within the housing projects was greater than their proportion of population identified for their corresponding census tract (the census tract that the housing project was located in) population within four of the six City housing projects. Although Hispanic residents made up a large majority of population residing within the housing projects, their percent of population within the project was lower than the corresponding census percentage in almost every instance. Tustin Gardens had an abnormally high percent of Asian population residing within the housing (59.0 percent) compared to the overall Asian population percentage of the census tract (9.2 percent). Overall, the proportion of White and Black residents living in publicly supported housing indicates these populations may be overserved representative of their total percent of the population, while Hispanic residents may be underserved.

Although there are no established areas where unsheltered homeless persons congregate in the City, there are several homeless services facilities in the City. 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. The shelter services a large area including many portions of Orange and San Bernardino Counties. Sheepfold shelter provides shelter (45 beds), food, clothing, job training, and job-referral services primarily to battered women and children. Guests are admitted on a first-come, first-served basis. Additionally, the City supports a temporary housing shelter in the TLSP area, Tustin Temporary Emergency Shelter (TTES), operated by Temporary Shelter Inc. TTES provides 77 beds low-barrier emergency shelter, integrated healthcare, and 24-hour access of OC Behavioral Health staff.

Table 16: Publicly Supported Housing (Tustin)

Project Name	Type	Low Income Units	Total Units	Race by Housing Sites (percent)				Census Tract	Race by Census Tract			
				Property White	Property Black	Property Hispanic	Property Asian		Tract White	Tract Black	Tract Hispanic	Tract Asian
Tustin Gardens	Section 8	100	100	29.0	-	12.1	59.0	755.05	41.5	2.8	38.8	9.2
Anton Legacy Apartments	LIHTC	161	225	37.9	7.8	33.1	16.9	755.15	27.4	1.1	36	31.7
Coventry Court	LIHTC	97	240	40.5	5.1	8.6	26.9	755.07	31.1	3.8	45	16.7
Hampton Square Apartments	LIHTC	212	350	12.2	1.5	78.1	1.0	744.07	10.8	1.3	84.1	2.0
Heritage Place at Tustin	LIHTC	53	54	38.8	3.0	13.4	25.4	755.15	27.4	1.1	36.0	31.7
Westchester Park	LIHTC	149	150	13.1	3.4	75.4	7.2	755.13	14.4	3.6	57.9	20.5

Source: County of Orange, Analysis of Impediments, 2020

Additional homeless assistance programs have been provided at the TLSP site. A Homeless Assistance Plan has been established for TLSP (formally 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 TLSP:

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

In TLSP, four homeless service providers, including the Salvation Army, Orange Coast Interfaith Shelter, Families Forward, and Human Options, currently operate 48 family units. The Orange County Rescue Mission operates a 262-unit transitional/emergency shelter (Village of Hope). The Orange County Social Services Agency operates a 90-bed facility for abused and neglected children and their families. During the 2021-2029 planning period, the Orange County Rescue Mission will be expanding their facility to include an additional 125 units.

Numerous other agencies provide shelter and other services to the homeless in the nearby cities of Santa Ana, Irvine, and Orange. Table 17 is a list of organizations in Tustin that provide homeless services. For further information, Section II of this Element includes a full discussion of homelessness accommodation within the city.

Table 17. Emergency Shelter/Transitional Housing Facilities

Facility	Services Provided
Village of Hope	Operates a food service program, dental services, and 262 bed emergency shelter at the Village of Hope, operated by the Orange County Rescue Mission.
Sheepfold	Provides shelter, food, clothing, job training, and job-referral services to women with children.
Laurel House	Temporary housing for teenagers in crisis. The facility also provides food, informal counseling, and access to medical care and clothing.
Tustin Family Campus	90 beds intermediate care shelter for abused children and their parents operated by the Orange County Social Services Agency.
St. Cecilia’s	Distributes food supply to needy populations.
Red Hill Lutheran	Operates emergency food program where a person can receive food supply.
Tustin Presbyterian	Collects food supplies and distributes the food to various organizations involved in providing homeless services.
Aldersgate	Refers interested persons to Ecumenical Services Alliance in Santa Ana.

Salvation Army	Six (6) transitional units at Tustin Field I operated by Salvation Army.
Salvation Army	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.
Families Forward	Fourteen (14) transitional units at Columbus Grove operated by Families Forward, formerly Irvine Temporary Housing in Irvine.
Families Forward – Rapid Re-Housing Program	Provides rapid-rehousing services including individualized support and accountability to homeless parents working to locate housing, improve financial stability, and create a sustainable future for their children.
Human Options	Six (6) transitional units at Columbus Grove operated by Human Options
Orange Coast Interfaith Shelter	Six (6) transitional units at Columbus Grove operated by Orange Coast Interfaith Shelter.
Tustin Family and Youth Center	Distributes food supplies to needy populations.
Goodwill of Orange County	Provides emergency funding grants to address immediate and critical needs of veterans and their families, focusing on veterans on the verge of homelessness.
Mercy House	Offers low-thresholds emergency shelter services with case management services.
Veterans outpost	Operated by the Rescue Mission, the Veterans Outpost offers transitional housing for up to 71 people, along with veteran-specific services.
Tustin Temporary Emergency Shelter	Operated by Temporary Shelter Inc., TTES provides 77 beds low-barrier emergency shelter, integrated healthcare, and 24-hour access of OC Behavioral Health staff

Other Data

Tenure

Tustin’s population includes a balance of renters and homeowners. According to 2015-2019 ACS data, 50.3 percent of households are owner-occupied, compared to 49.7 percent of renter-occupied (see Table 18). Households in the county are predominately owner-occupied (57.4 percent). Both city and county trends from 2010 to 2019 show that rentals are becoming increasingly more popular. The city experienced growth, numerically, in both owner- and renter-occupied housing from 2010 to 2019; however, the growth in the renter-occupied housing outgrew the homeowner population, causing a shift in majority to renter-occupied housing. County households were predominately owner-occupied in 2010, but there was a much larger difference between owner- and renter-occupied housing.

Table 18: Housing by Tenure

Tenure	City of Tustin		Orange County	
	Estimate	Percentage	Estimate	Percentage
2010				
Owner-occupied	13,109	52.8	599,032	60.8
Renter-occupied	11,730	47.2	385,471	39.2
Total	24,839		984,503	
2019				
Owner-occupied	12,759	49.7	595,272	57.4
Renter-occupied	12,938	50.3	442,220	42.6
Total	25,697		1,037,492	

Source: 2015-2019 American Community Survey 5-Year Estimates; 2006-2010 American Community Survey 5-Year Estimates

Mortgage Lending

Initially in mortgage lending, buyers must locate a lender who will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide sensitive information including their gender, ethnicity, income level, age, and familial status. This information is required to be gathered by the Community Reinvestment Act and the Home Mortgage Disclosure Act; however, it does not guarantee that individual loan officers or underwriters will not misuse the information.

A report on mortgage lending discrimination by the Urban Land Institute describes four basic stages in which discrimination can occur:

- Advertising/outreach stage. Lenders may not have branches in certain locations, not advertise to certain segments of the population, or violate advertising rules with respect to fair housing.
- Pre-application stage. Lenders may not provide applicants of different racial and ethnic backgrounds the same types of information as other preferred groups or may urge some to seek another lender.
- Lending stage. Lenders may treat equally qualified individuals in a different manner, giving different loan terms, preferred rates, or denying a loan based on a factor not related to ability to pay and risk.
- Loan administration. Lenders may treat minorities in harsher terms, such as initiating foreclosure proceedings if any payment is late, or by making loans at terms that encourage defaults.

Table 19 and Table 20 include percentages of applications that resulted in originated loans and denial by loan purpose within Orange County from 2014 to 2017. Table 21 shows loan application actions by race in the city of Tustin for 2019 as provided by the Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Dataset. Table 22 further identifies loan denial percentages by race in Tustin for 2019. Comparing the

proportion each race makes up of the applicant pool to the percentage denied can provide indication as to whether mortgage lending discrimination is occurring.

According to Table 19, White applicants had the highest approval rate across all loan purposes. Further, White applicants had the lowest denial rate across all loan purposes. Black applicants were the only racial or ethnic category whose majority of applications did not result in an originated loan (less than 50 percent) for the purposes of refinancing and home improvement. Black applicants also had the highest loan denial rate for the purposes of refinancing and home improvement and the second highest for home purchase.

Table 19: Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Orange County, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Purchase	Refinancing	Home Improvement
White, Not Hispanic	66.56%	59.12%	61.96%
Black, Not Hispanic	61.93%	49.62%	49.49%
Asian, Not Hispanic	63.95%	55.35%	51.26%
Hispanic/Latino	59.54%	50.57%	51.60%

Source: County of Orange, Analysis of Impediments, 2020

Table 20: Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Orange County, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Purchase	Refinancing	Home Improvement
White, Not Hispanic	9.09	16.30	17.60
Black, Not Hispanic	12.03	22.04	31.74
Asian, Not Hispanic	9.75	16.65	23.21
Hispanic/Latino	12.38	20.75	28.12

Source: County of Orange, Analysis of Impediments, 2020

Table 21: Tustin Loan Application Actions by Race (2019)

Race and Ethnicity	Loan originated	App. approved but not accepted	App. Denied	App. withdrawn by applicant	File closed for incompleteness	Purchased loan	Preapproval request approved but not accepted	Grand Total
White	1,255	51	268	276	95	113	1	2,059
Black or African American	17	1	7	4	2	2		33
Asian	625	24	113	154	49	63	2	1,030
American Indian or Alaska Native	11		3	3	2	2		21
Native Hawaiian or Other Pacific Islander	5			1	1			7
2 or more minority races	2			1		1		4
Race Not Available	431	27	102	120	54	306		1,040
Other	127	1	20	16	6	3	0	173
Hispanic or Latino	256	18	74	67	43	18		476

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Dataset, 2019

Notes: Other includes Free Form Text and Joint applicants

Table 22: Tustin Loan Applications and Denial by Race

Race and Ethnicity	Population	Population (proportion of total population)	Applicant Pool (proportion of total applicants)	Denial (proportion of total denials)
White alone	46,823	59.0	47.1	52.2
Black or African American alone	1,508	1.9	0.8	1.4
American Indian and Alaska Native alone	588	0.7	23.6	22.0
Asian alone	16,861	21.2	0.5	0.6
Native Hawaiian and Other Pacific Islander alone	0	-	0.2	19.9
Hispanic or Latino	31,902	40.2	10.9	14.4
Total Population	79,346	-	-	-

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA) Dataset, 2019; 2015-2019 American Community Survey 5-Year Estimates

Note: The sum of percentages for a given category may not equal 100 percent due to overlap between Hispanic and other races identified. Additionally, not all applicants identified their racial/ethnic backgrounds, or multiple categories were selected.

The majority of loan applications within the city of Tustin originated from White applicants (59.0 percent) in 2019. However, the proportion of White applicants was lower than the proportion of the city population that identified as White. The second largest proportion of total applicants originated from American Indian and Alaska Native applicants, and the third largest proportion originated from Hispanic or Latino applicants. The proportion of American Indian and Alaska Native applicants was substantially greater (23.6 percent) than the proportion of the city population that identified as American Indian and Alaska Native applicants (0.7 percent). Denial percentages by race were mostly consistent and similar to applicant percentages by race. One outlier was a relatively large denial percentage identified for Native Hawaiian and Other Pacific Islander alone applicants. Approximately 19.9 percent of Native Hawaiian and Other Pacific Islander alone applicants experienced denial, while they only accounted for 0.2 percent of the applicant pool.

Outreach

The preparation, adoption, and implementation of a housing element requires a diligent effort to include all economic segments of the community. AB 686 reinforces and builds on this requirement. Under AB 686 and changes to Housing Element Law, the housing element must also include a summary of fair housing outreach and capacity.

Public participation is summarized in Appendix E of the Housing Element. Several stakeholder groups were invited to participate in the planning process, including Fair Housing Council of Orange County, Fair Housing Foundation and Family Promise of Orange County. A total of two (2) public workshops were held prior to the initial the housing element submittal in June 2021 to HCD; the first was held on November 11, 2020 with the Planning Commission and the second workshop was held on May 11, 2021 and was a joint workshop with the Planning Commission and City Council. Outreach efforts made and public participation opportunities provided included the following:

- Housing Element Webpage update
- Social media posts (Facebook, Twitter and NextDoor)
- Workshop information featured on City's "spotlight" webpage and email blast sent to City news subscriber list
- Workshop featured in City and Department website calendars
- Public notification posted City's e-notice board (under CC and CPC), at the Tustin Library, and Senior Center
- Workshop information posted Tustin News - April 29 (Full Color / Main Page), reaches approximately 7,000 residents
- Workshop information posted Irvine Weekly - May 7 (Full Color), reaches approximately 8,200 residents with anticipated readership of 33,000
- Direct mail postcards (Housing Element Update Workshop included with Strategic Plan Workshop Postcard)
 - Mailed to 29,885 Tustin residents and 3,457 Tustin businesses
- Direct mail postcards focused on Housing Element Update to Interested Parties List
- Email blasts with Housing Element Workshop Postcards and Meeting Information - April 21, May 3 and May 10; and
- Housing Element Update Workshop held via Zoom at 5 p.m.

Additional public meetings were held on August 17, 2021, September 7th and 30th, 2021 and October 5, 2021. At the August 17, 2021 meeting, City Council solicited public input and reviewed and approved the inclusion of additional housing sites, the Tustin Market Place and the Enderle Center that could potentially be developed with residential units. The redistribution of units throughout the City is intended to further facilitate the equitable dispersion of housing units of various income levels. Specifically, the revision reallocates units previously allocated to Tustin Legacy, by redistributing those units to the Tustin Market Place and the Enderle Center. In addition, during this meeting the units were further distributed within Tustin Legacy to additional neighborhoods to ensure that units are dispersed throughout the City. On September 7, 2021, City Council solicited public input, and reviewed and approved revisions that further

facilitate the equitable dispersion of housing units of various income levels throughout the City. Specifically, the revision redistributed 582 units (517 Preservation of At-risk units and 65 ADUs) to the Tustin Market Place and the Enderle Center, as noted above, to further distribute units throughout the City. On September 30, 2021, the Airport Land Use Commission held a public hearing and the Board determined that the Housing Element is consistent with the Airport-Environs Land Use Plan for John Wayne Airport (AELUP for JWA).

Due to the Covid Pandemic, public gatherings and meetings were not permitted and therefore all public workshops were online and made available to attend via livestream or by telephone. Remote accommodations provided opportunities to those with geographic barriers to participation.

The public workshops and public hearings were held outside of work hours, during the evening, to facilitate participation. Drafts of the housing element have continuously been made available to the public for review and comment. Comments will be reviewed, considered and incorporated, as appropriate, into the document before incorporated into the document and before submission to the Department of HCD for review.

Local Data and Knowledge

Based on data from Nextdoor, a free social media platform for neighbors within the same geographical area to share information and communicate information, including neighborhood updates, polls, events, ask for recommendations, as well as list items for sale. Residents on Nextdoor identified over 60 distinct neighborhoods within Tustin. Some common characteristics that Nextdoor users identified as favorable about their community were “quiet”, “family friendly”, “safe”, “walkability”, “clean”, and several commercial factors such as “restaurants”, “shopping”, and “food”.

During the first virtual public workshop held on November 10, 2020, City staff provided a briefing to the Planning Commission regarding the pending housing element update that would be needed and the anticipated process and timing. The public was able to provide questions and comments relative to housing in Tustin either before or after the meeting. Five (5) written public comments were provided via email prior to the virtual meeting and included the need for more affordable housing for low-income residents, housing equity with the community, need for additional supportive housing and the shortage of available below-market housing.

During the virtual public workshop held on May 11, 2021, the public was able to provide questions and comments regarding the housing element process, as well as general information to consider while developing the analysis and policies for the housing element. Leading up to this meeting, an online housing element survey was conducted to learn and understand the housing concerns within the City. Of the 192 individuals that responded to the online survey, 52 percent of respondents live in Tustin and 26 percent both live and work in Tustin. The survey also revealed that 67 percent of attendees believe affordability is the most urgent issue for city housing. Additionally, 65 percent of respondents believe the best way to help people who are experiencing homelessness is to better connect people to assistance and services. Approximately

65 percent of respondents also chose the TLSP area as most appropriate to add more housing units.

Comments were not provided regarding impediments to fair housing on the basis of race or ethnicity during public outreach; however, indicators suggest that the Tustin Hispanic population may experience inequality resource access compared to the city's White population. As shown in Figure 19, the northeastern portion of the city that experiences high resources (see Figure 1) and greater incomes, contains a sizable gap of predominately White residents. The southwestern portion of the city that experiences low resources and lower incomes, contains a sizable gap of predominately Hispanic residents in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15.

Other Contributions

Other contributions that affect the accumulation of wealth and access to resources include historically disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

The City of Tustin invests in its infrastructure through its Capital Improvement Program (CIP), a seven-year program that identifies future projects and cost estimates that allow City staff to properly plan for future capital improvements throughout the City. Major capital improvement projects completed during fiscal year 2017-2018 include:

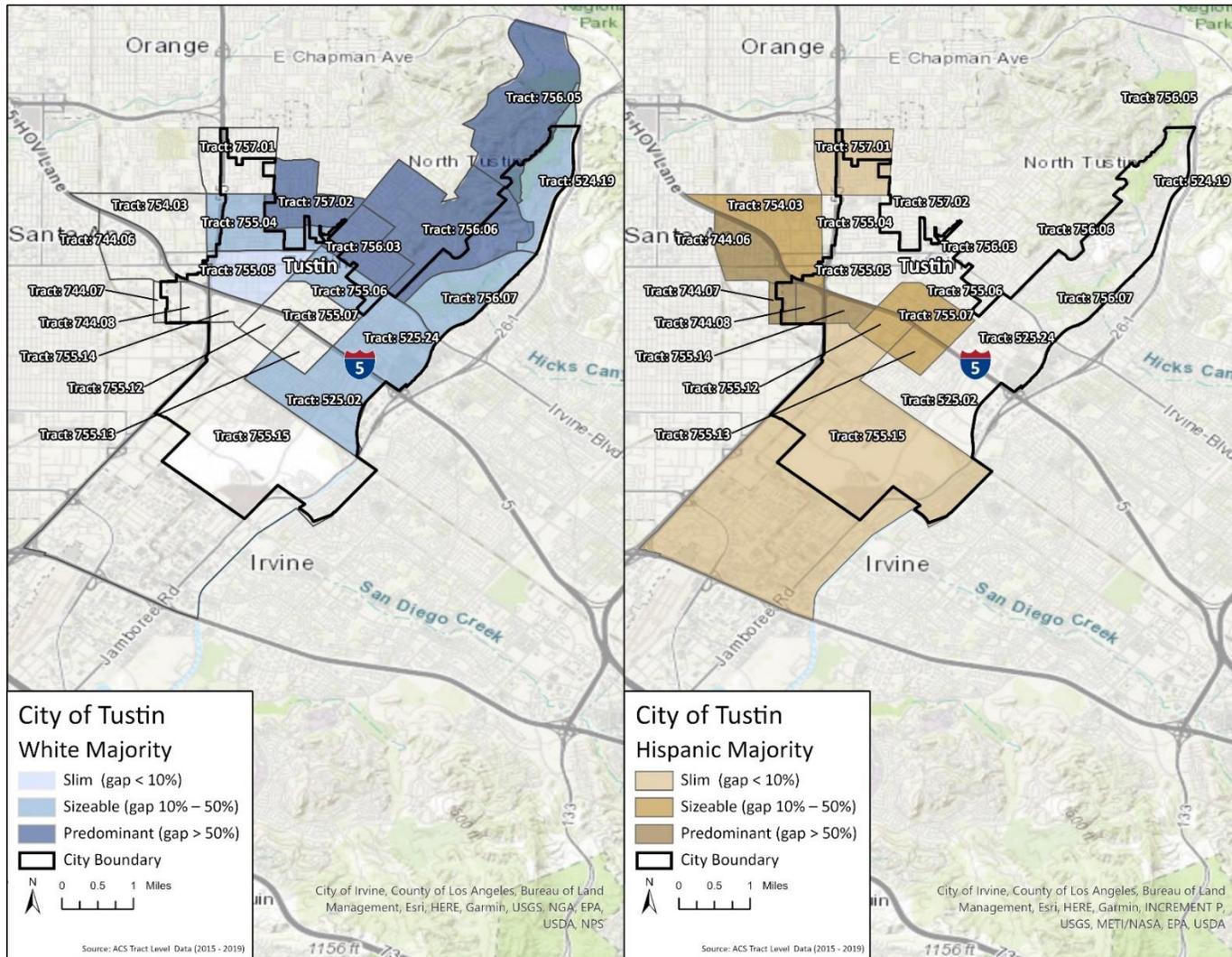
- Annual Major Building Maintenance (Accessibility Improvements, Replace HVAC Units, Repair Tile Roofs)
- Eastbound El Camino Real at Jamboree Road Improvement Project
- Transit Circulator Feasibility Study
- 17th Street Treatment Plan Membrane Replacement

As reported in the City's Annual Comprehensive Financial Report 2017-2018, the City's capital projects for the 2018-2019 fiscal year were budgeted at \$99.4 million. Budgeted projects include 15 Tustin Legacy Facility improvements, seven public facility improvements, two water projects, four transportation facility improvements, two traffic control facility improvements, three park facility improvements, and one flood control facility improvement.

The Capital Projects Funds are used to account for financial resources to be used for the acquisition or construction of major capital facilities. Using various funding sources (revenues generated from ratepayers and user fees, grants, and bonds), the City acquires, repairs, or replaces the major assets needed to deliver its services (water, sewer, streets, trails, streetlights, traffic signals and storm drains) to the City's residents and businesses. The City of Tustin received an annual allocation of \$816,755 from HUD under the Community Development Block Grant (CDBG) program for the Program Year 2021-22.

Currently, the City is in the process of completing the design and construction of various capital improvement projects approved and budgeted by City Council for fiscal year 2021-2022. The City lists its current projects and provides project status on the City website.

Figure 19: Distribution of Predominantly White and Predominantly Hispanic Population



Note: The population of some areas in the United States is dominated heavily by one racial or ethnic group. These areas stand out on this map. The strength of the color indicates the extent to which one group is dominant over the next most populous.

Additionally, various City housing projects are currently under covenants per AB 987. Table II-16 in Section II of this Housing Element includes 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.

Tustin Gardens is a 223(a) (7)/221(D) (4) project with a Section 8 contract for 99 units and is extended on an annual basis. Their current contract is due to expire on July 31, 2022; however, the City has also recently received correspondence indicating that the existing contract has been extended for a new 20-year period which would mean the contract would expire on July 31, 2041. There are also Westchester Park (149 all low-income units), Flanders Pointe (32 very-low income, 16 low income; plus 9 moderate income – totaling 57) and Chatham Village (212, all low-income units) all of which could also be converted towards the end of the planning period.

Various restrictions and incentives affect the likelihood that at-risk units will convert to other uses. Depending on the circumstances, different options may be used to preserve or replace the units. Preservation options typically include: (1) transfer of units to non-profit ownership; (2) provision of rental assistance to tenants using other funding sources; and (3) purchase of affordability covenants.

The City currently enacts Program 3.7, which allows the City to ensure tenants are properly noticed regarding at-risk units and to work with potential purchasers or property owners to provide technical assistance, where feasible, to public and nonprofit agencies interested in purchasing and/or managing units at risk. Additionally, the City has included Program 3.9, which commits the City to registering through HCD so it is aware of any units at-risk of conversion. Program 3.1 requires developers 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 whenever a project proposes to convert affordable apartments and condominiums.

Summary of Fair Housing Issues

As discussed in the previous sections of this analysis, the following conclusions were determined regarding potential fair housing concerns and indicators of certain disadvantaged populations:

- The highest resource areas (environment, education, income, minority concentrations, etc.) are in the northeastern portion of the city and the lowest resource areas are in the southwest (tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). The city's high and low resource areas are consistent with the county's overall trend, where the highest resource areas are located along the coastal and hillside areas, while low resource areas were clustered near I-5 in northcentral Orange County. Areas of low resource within the city were also identified as having higher percentages of LMI population.
- Black residents faced an especially large increase in segregation from 2010 to present and has one of the highest Dissimilarity Index values amongst all jurisdictions within Orange County.
- Census tract 755.14 had a larger percentage (40 to 60 percent) of children living in female-headed households than all other census tracts within the city (see Figure 10). Additionally, a particularly large percentage (75 to 100 percent) of households in this census tract were also identified as LMI in Figure 11.
- Overall, the proportion of White and Black residents living in publicly supported housing indicates these populations may be overserved representative of their total percent of the population, while Hispanic residents may be underserved and in need of additional affordable housing opportunities.
- Hispanic and Black households experience a disproportionately high percent of housing problems when compared to all other races/ethnicities within the city.
- Further, the northeastern portion of the city that experiences high resources and greater incomes, contains a sizable gap of predominately White residents. The southwestern portion of the city that experiences low resources and lower incomes, contains a sizable gap of predominately Hispanic residents in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15.
- Large families experience a disproportionate percentage of housing problems compared to other family types within the city.

Sites Inventory

The Tustin Land Use Element and Zoning Code provide residential development opportunities to accommodate the City's 2021-2029 Regional Housing Needs Allocation (RHNA). Tustin's Regional Housing Allocation for the 2021-2029 planning period is a total of 6,782 housing units, including 1,724 units for very-low-income households, 1,046 units for low-income households, 1,132 units for moderate-income households, and 2,880 units for above moderate-income households.

Figures 20 and 21 detail the designations of vacant and non-vacant land identified to meet the RHNA in the City of Tustin. The sites inventory includes land that is currently zoned as specific plan, medium- and high-density residential, and land that can potentially be designated as high-density residential in the future. Realistic capacity of sites has been 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 City Council, maximum zoning and general plan densities, and eligible incentives to developers for provisions of affordable housing (see Appendix B).

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 new construction, preservation, rehabilitation, and other housing program objectives. As shown in Figure 20, sites to accommodate the City's RHNA allocation are spread throughout various areas of Tustin, with a majority of the units being allocated in tracts 755.05, 755.07, 755.12, 755.13 and 755.15 (TLSP). The impacts on patterns of socioeconomic and racial concentrations are further discussed below:

- **Improved Conditions:** A variety of suitable sites to meet the City's RHNA allocation have been identified in the 2021-2029 Housing Element Update. These sites consist of remaining units in three specific plans, two underutilized sites with potential for mixed use, ADUs/JADUs, and transitional housing. Spatial analysis of the data available on the Affirmatively Furthering Fair Housing Data Viewer showed that the tracts with low to moderate income households, concentrated minorities, and housing problems were located in the south and southwestern tracts of the City (744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). As seen in Figure 20, a majority of identified sites are located within these tracts that experience socioeconomic or racial disparities in the City of Tustin. Although the TLSP area has been identified as low resource, it has been substantially enhanced with new resources within recent years. Improvements include schools, parks, grocery stores and retail services, medical offices, childcare centers, County's Tustin Family campus including transitional homes for abused and neglected children and family, Head Start pre-school, social services, community resources, employment centers, transportation, and a variety of housing. With recent improvements, the TLSP surpasses other areas in the City for livability and well-rounded services for households with various income levels. RHASP and DCCSP are also part of specific plans adopted in 2018 that are anticipated to facilitate development and implementation of new high resource areas. Although the most up-to-date data sources were utilized, recent updates to the specific plan areas may not yet be fully captured and reflected within ratings and data sources utilized to prepare this analysis. The selected sites combined with the City's Comprehensive Housing Affordability Strategy, would be able to accommodate residential development of all income levels to further fair housing in the City of Tustin.
- **Exacerbated Conditions:** Factors used in calculating realistic capacity included the size of site parcels, the location and site layout, the potential for lot consolidations where

appropriate, the number of owners, the already available and/or additional infrastructure improvements needed were among the many protocols in assessing the realistic capacity of the identified sites (see Appendix B). In that the City's General Plan densities are not caps for these three Specific Plan areas, allowed increased densities was also a positive merit towards realistic capacity. Site improvement requirements may only be prevalent in the TLSP area in that it is vacant land though with significant base infrastructure already prevalent. The identified sites can accommodate a variety of income levels since these parcels are intended to build all types of housing as prescribed by their respective specific plans. The City's current site inventory and approach to accommodate future growth through comprehensive plans is an effective strategy to meet the City's 2021-2029 RHNA allocation.

Integration and Segregation: Race and Income

Census tracts with the highest concentration of minority races, in this case, a Hispanic majority, are located west of I-5 and border Santa Ana (tracts 744.07, 744.08, and 755.15). Similarly, low- and moderate-income populations are concentrated to the southwest in tracts 755.15, 755.13, and 755.12. The site inventory identified most sites within these tracts and are zoned as part of a specific plan or have been identified as at-risk units that are intended to be preserved. The City's strategy to preserve affordable housing in addition to developing other housing options in these areas will encourage a diverse housing market that will attract people from all races and income levels in these areas. Additionally, goals identified within Section D.5 below would be implemented citywide and support in furthering fair housing within identified housing sites.

Listed in Table 24 below, the sites identified for RHNA contain variety of income levels. Of the census tracts that RHNA sites are allocated to, three include populations that have less than 50 percent of population that fall within the low to moderate income category, and five include populations that have greater than 50 percent. The majority of RHNA sites are allocated to the TLSP area, which has 60.14 percent population within the low to moderate income category. However, as previously stated, the TLSP area is rapidly developing and changing in accordance with the City's plans for the area. Although the tract has been identified as predominately low to moderate income, it has been substantially enhanced with new resources within recent years. Improvements include schools, parks, community resources, employment centers, transportation, and a variety of housing, which are likely to increase potential for higher wage earning. With recent improvements, the TLSP area surpasses other areas in the City for livability and well-rounded services for households with various income levels. Therefore, the selected RHNA sites would result in improved conditions.

The racial makeup of the census block groups where selected RHNA sites are located include predominately non-White populations (less than 50 percent White). Only one site, Enderle Center, included population with less than 50 percent non-White population. The City's housing strategy is to implement a variety of evenly distributed housing types and affordability levels within each of the housing sites. By doing so, the selected sites would improve diversity and would not concentrate affordable housing within areas of minority populations. In addition to a variety of housing opportunity, new resources and amenities, such as those implemented in

the TLSP area, would be improvements to these areas and provide a benefit to the community. Therefore, selected RHNA sites would result in improved conditions.

Figure 20: Location of Sites to Meet RHNA

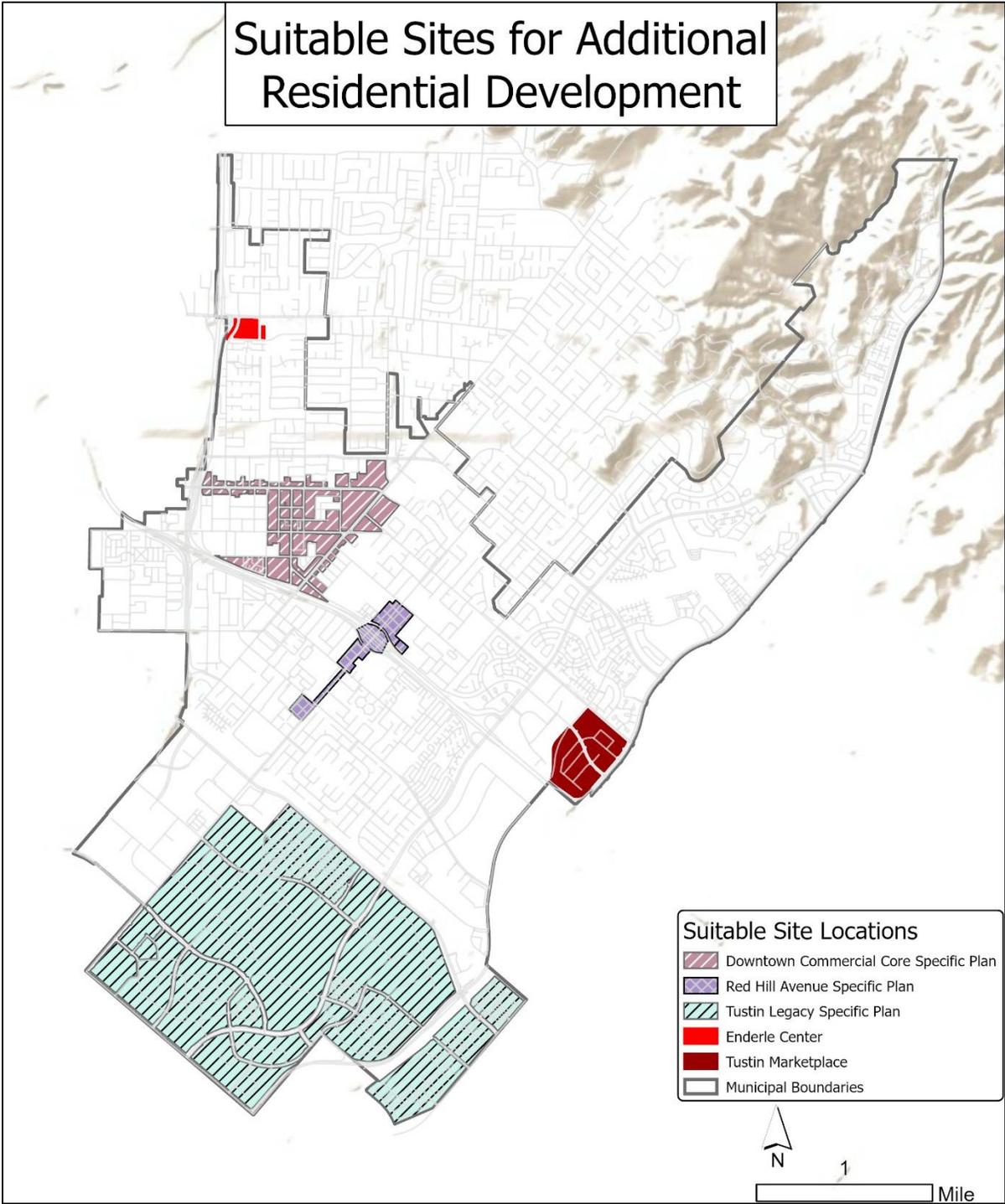


Figure 21: Focused Locations of Sites to Meet RHNA



Figure 22: Location of Sites in Opportunity Zones

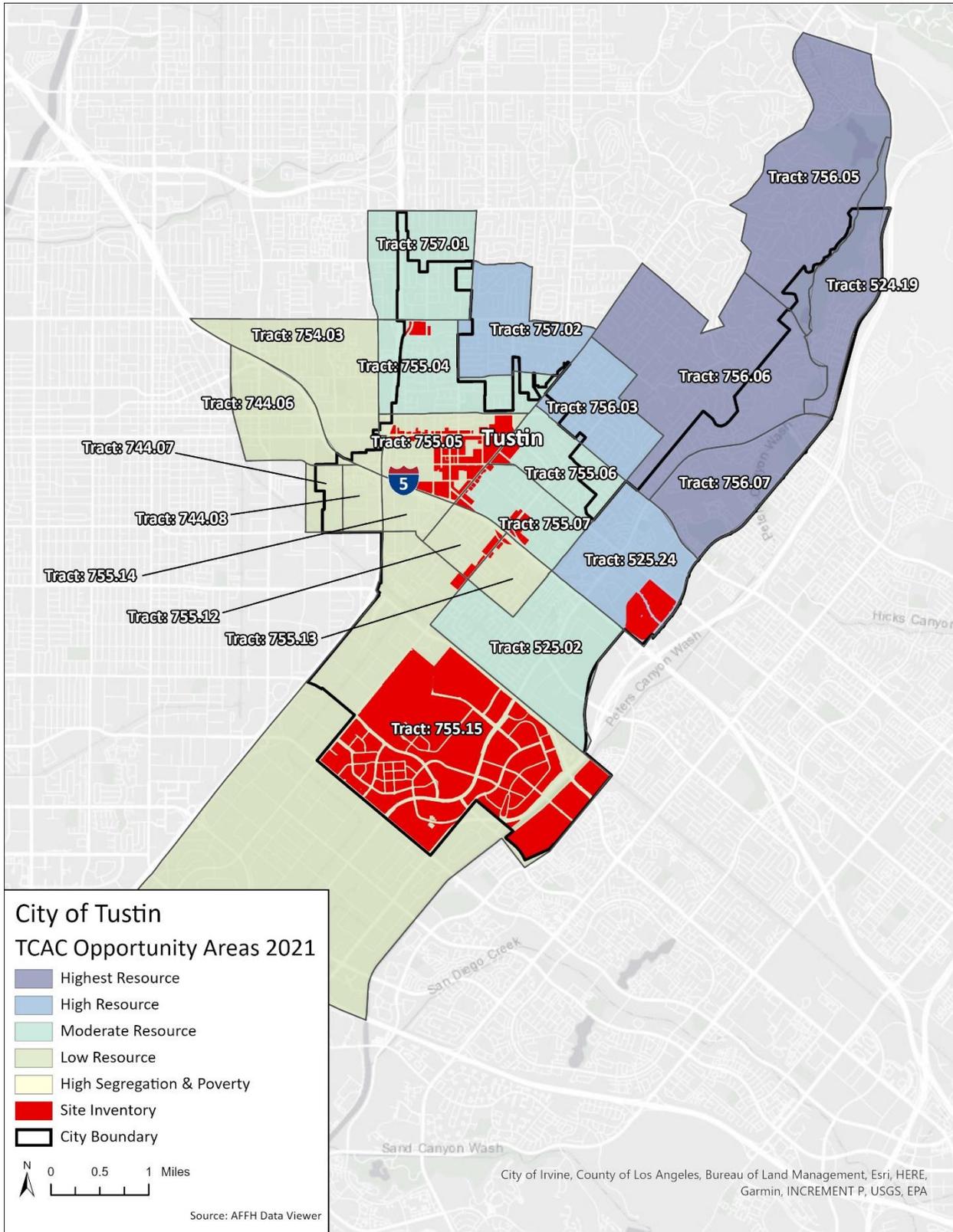


Table 23. Sites Demographics

Area	Non-White Population (Percent)	Low to Moderate Income (Percent)
525.24 (Tustin Market Place)	-	33.59
Block Group 1	61.10	-
Block Group 2	62.99	-
Block Group 3	54.78	-
Block Group 4	62.71	-
Block Group 5	61.52	-
755.04 (Enderle Center)	-	37.43
Block Group 1	46.60	-
Block Group 2	44.58	-
755.05 (DCCSP)	-	61.37
Block Group 1	74.38	-
Block Group 2	53.66	-
755.06 (DCCSP)	-	34.00
Block Group 1	55.69	-
Block Group 2	47.58	-
755.07 (DCCSP/RHASP)	-	61.99
Block Group 1	71.27	-
Block Group 2	79.55	-
Block Group 3	76.70	-
755.12 (RHASP)	-	72.46
Block Group 1	85.60	-
Block Group 2	81.40	-

755.13 (RHSP)	-	64.70
Block Group 1	83.51	-
Block Group 2	73.32	-
755.15 (TLSP)	-	60.14
Block Group 1	60.86	-
Block Group 2	84.37	-
Block Group 3	92.23	-
Block Group 4	74.63	-

Source: AFFH Data Viewer

Racially/Ethnically Concentrated Areas of Poverty and Affluence

While no racially/ethnically concentrated areas of poverty (per HUD’s definition) were found in Tustin, some tracts with a high concentration of minorities and LMI populations were found in the southwestern parts of the city (tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). In contrast, census tract 755.05 can be considered a concentrated area of affluence as it has a majority White population and a higher range in median income compared to its adjacent tracts. The Downtown Commercial Core Specific Plan (DCCSP) , Enderle Center, and The Market Place a few sites in this tract that would support affordable housing in more affluent areas. Despite the lack of new affordable housing units being introduced in northeastern and more affluent areas in the City, online survey results indicated that 65 percent of respondents chose the TLSP Area as an area that is most appropriate to develop more housing. Additionally, goals identified within Section D.5 below would be implemented citywide and support in furthering fair housing within identified housing sites.

As identified in Table 25 below, the sites selected for RHNA allocation include a range of percent of population considered poverty status. The sites include relatively low percentages of population considered poverty status, overall. The City’s housing strategy is to implement a variety of evenly distributed housing types and affordability levels within each of the housing sites. By doing so, the selected sites would improve diversity and would not concentrate affordable housing within areas of high poverty. Therefore, selected RHNA sites would result in improved conditions.

Table 24. Percent Poverty

Area	Percent
525.24 (Tustin Market Place)	19.10
755.04 (Enderle Center)	4.90
755.05 (DCCSP)	6.70
755.06 (DCCSP)	5.40
755.07 (DCCSP/RHASP)	16.70
755.12 (RHASP)	14.30
755.13 (RHASP)	8.80
755.15 (TLSP)	12.00

Source: AFFH Data Viewer

Access to Opportunity

Tustin consists of 21 tracts, with an even distribution of opportunity areas. The City’s south and southwestern tracts are of low resource, while the northeastern half of the City is considered high and highest resource. Housing units in the sites inventory are concentrated in the southwestern half of the city in tracts considered lower resource (tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15). Housing units allocated to this area are predominately within tract 755.15 (TLSP). Other areas that were identified as low resource and contain housing sites are part of the DCCSP and RHASP areas (tracts 755.05, 755.12, and 755.13). The City’s site inventory, which would include a variety of housing affordability, being located primarily in low resource areas can potentially improve the quality of life for residents in these areas and support the mobility of these tracts in attaining higher resources as seen in Figure 22.

Negative TCAC Opportunity index scores generally indicate that the census tract has lower resource indicator scores than the region. Majority of the sites that RHNA have been allocated to tracts that contain negative index scores. The TLSP area includes majority of the City’s RHNA allocation. However, as previously stated, the TLSP area is rapidly developing and changing in accordance with the City’s plans for the area. Tustin Legacy (Tract 744.15) is a Master Planned Community that is currently being developed. Although the area comprises 1,600 acres, there are 600 acres remaining for potential future development with a diverse housing stock, community amenities, and resources. In recent years, the Tustin Legacy area has been enhanced with new resources to serve current and future residents, which will improve opportunities for the area. Based upon the resources listed below, the Tustin Legacy area surpasses other areas in the City for livability and well-rounded services for households with various income levels. These resources include, but not limited to:

- Education
 - Heritage Elementary School
 - Legacy Magnet Academy (Grades 6-12)
 - Advance Technology and Education Park (ATEP) community college by South Orange County Community College District
- Parks
 - A total of 91 acres of public and private parks have been completed or are under construction, including Veterans Sports Park, Tustin Legacy Linear Park, Victory Park and another 79 acres of potential parkland are remaining.
- Community Resources
 - Orange County Social Services facility for Abused and Neglected Children and their parents as well as emancipated youth (includes many women headed households and their children)
 - Head Start preschool
 - Rancho Santiago sheriffs training facility
 - Orange County Animal Shelter
 - Fire Station
 - Army Reserve Center
 - Village of Hope transitional homes for individuals and families with children
- Employment
 - Flight at Tustin Legacy office complex
 - Hoag medical center and Health South acute care facility
 - Stater Bros. grocery store and other retail and neighborhood services at the Village at Tustin Legacy
 - The District at Tustin Legacy shopping center that offers a variety of retail, restaurants, entertainment, groceries and other neighborhood services such as banks, gyms, dance/art studios, barbers and salon services, etc.
- Transportation
 - Metrolink transit facility
- Diverse Housing Stock - Residential developments at various income levels including:
 - Columbus Square (1,075 residential units consisting of single-family homes, duplexes and multi-family homes)
 - Columbus Grove (465 detached homes)
 - Field I (376 attached units)
 - Field II (189 detached units)
 - Amalfi Apartments (533 apartment units)
 - Greenwood (375 detached single-family units)
 - Anton Legacy (225 affordable housing units)
 - Levity (218 attached units)
 - The Landing (400 attached and detached homes - under construction)

Surrounding tracts in TLSP are anticipated follow similar development patterns. Improvements include schools, parks, community resources, employment centers, transportation, and a variety of housing, which will increase opportunity within the area. Therefore, selected RHNA sites would result in improved conditions.

Areas identified as low resource that include housing sites and are part of the DCCSP and RHASP areas (tracts 755.05, 755.12, and 755.13) are similar to TLSP such that the areas have been included as part of a City’s specific plan and are identified for future improvements. These areas are mostly vacant and surrounded by existing development, opposed to TLSP, which is largely undeveloped. Specific plans were developed for these areas to expedite the (re)development of the sites and implement the City’s vision for these areas as high-resource, successful, mixed-use areas.

Table 25. TCAC Opportunity Areas

Area	Index Score
525.24 (Tustin Market Place)	0.27
755.04 (Enderle Center)	-0.14
755.05 (DCCSP)	-0.46
755.06 (DCCSP)	0.19
755.07 (DCCSP/RHASP)	-0.27
755.12 (RHASP)	-0.58
755.13 (RHSP)	-0.43
755.15 (TLSP)	-0.84

Source: AFFH Data Viewer

Disproportionate Housing Needs

A few trends are immediately clear in housing needs in Orange County. The housing problems include houses that have 1 of 4 housing problems by race/ ethnicity and family type. Overall, across the County, Black and Hispanic residents are more likely to face all of these housing problems, at varying rates across different jurisdictions.

Housing problems occur more frequently in more populated areas of the County, including Anaheim and Santa Ana in particular. There are some more obvious discrepancies in rates of housing problems across different demographic groups. Black residents in Aliso Viejo experience housing problems at a rate of 61.84% , in Orange (city) at 68.87%, in Tustin at 62.40%, and in Buena Park at 54.49%. Hispanic residents experience rates of housing problems that are high overall, but significantly higher in central and southern Orange County. Asian residents generally experience average or lower rates of housing problems, with exceptions in Garden Grove and Santa Ana, where they experience housing problems at rates of 55.94% and 54.62% respectively.

All identified sites to meet RHNA have appropriate zoning to allow residential development, at densities to achieve the estimated capacities and, without inhibitors, such as stringent standards, that don't align appropriately for residential development. There are no provisions that would deter accommodating very low- or low-income housing in the City to aid in lowering the percent of disproportionate housing needs experienced by protected classes.

Identification and Prioritization of Contributing Factors

As identified in Section D.3, the following concerns have been identified regarding fair housing issues:

- Disparity in access to opportunity between the northeast (higher resources), where there are predominate populations of White residents, and southwest (lower resources) of the city, where there are predominate populations of Hispanic residents;
- High segregation for Hispanic/White and Black/White populations (as defined by Dissimilarity Index values which indicate geographical segregation patterns)
- Disproportionate housing problems for the city's Hispanic and Black residents (problems include 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened)
- Concentrated female-headed households and LMI population within Census tract 755.14;
- Lack of affordable housing opportunities for Hispanic residents; and
- Disproportionate housing problems faced by large family households.

Factors that may contribute to these concerns include the following:

- Lack of supply of affordable housing in high opportunity areas;
- Inequal access to affordable housing for persons with protected characteristics;
- Concentrated access to opportunity within high resource areas; and
- Lack of education and enforcement, specifically to educate property owners/landlords about State law prohibiting discrimination.

Goals for Affirmatively Furthering Fair Housing

In response to the identified factors above, the City and County established goals to address fair housing concerns, which were included in the County AI. The first six overarching goals below, multiple of which have several strategies listed for implementation, are cross-jurisdictional goals. Orange County and the participating jurisdictions all have a role to play in implementing those goals. Following those goals, individual goals for Tustin are outlined, which respond to local circumstances.

- 1) Goal 1: Increase the supply of affordable housing in high opportunity areas.
 - a) Explore the creation of a new countywide sources of affordable housing.
 - b) Using best practices from other jurisdictions, explore policies and programs that increase the supply affordable housing, such as linkage fees, housing bonds, inclusionary

- housing, public land set-aside, community land trusts, transit-oriented development, and expedited permitting and review.
- c) Explore providing low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 80% of the Area Median Income to develop accessory dwelling units with affordability restriction on their property.
 - d) Review existing zoning policies and explore zoning changes to facilitate the development of affordable housing.
 - e) Align zoning codes to conform to recent California affordable housing legislation.
- 2) Goal 2: Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, seniors, and people with disabilities.
 - a) Explore piloting a Right to Counsel Program to ensure legal representation for tenants in landlord-tenant proceedings, including those involving the application of new laws like AB 1482.
 - 3) Goal 3: Increase community integration for persons with disabilities
 - a) Conduct targeted outreach and provide tenant application assistance and support to persons with disabilities, including individuals transitioning from institutional settings and individuals who are at risk of institutionalization. As part of that assistance, maintain a database of housing that is accessible to persons with disabilities.
 - b) Consider adopting the accessibility standards adopted by the City of Los Angeles, which require 15 percent of all new units in city-supported Low-Income Housing Tax Credit (LIHTC) projects to be ADA-accessible with at least 4 percent of total units to be accessible for persons with hearing and/or vision disabilities.
 - 4) Goal 4: Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.
 - a) Reduce barriers to accessing rental housing by exploring eliminating application fees for voucher holders and encouraging landlords to follow HUD’s guidance on the use of criminal backgrounds in screening tenants.
 - b) Consider incorporating a fair housing equity analysis into the review of significant rezoning proposals and specific plans.
 - 5) Goal 5: Expand access to opportunity for protected classes.
 - a) Explore the voluntary adoption of Small Area Fair Market Rents or exception payment standards in order to increase access to higher opportunity areas for Housing Choice Voucher holders.
 - b) Continue implementing a mobility counseling program that informs Housing Choice Voucher holders about their residential options in higher opportunity areas and provides holistic supports to voucher holders seeking to move to higher opportunity areas.
 - c) Study and make recommendations to improve and expand Orange County’s public transportation to ensure that members of protected classes can access jobs in employment centers in Anaheim, Santa Ana, and Irvine.
 - d) Increase support for fair housing enforcement, education, and outreach.

As identified in the 2020 AI, the following goals were established for the City of Tustin in effort to address factors outlined above:

- 1) In collaboration with the Orange County Housing Authority (OCHA):
 - a) Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.
 - b) Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual Public Housing Authority (PHA) plan certifications.
 - c) In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.
- 2) Through the Fair Housing Foundation:
 - a) Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.
 - b) Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.
 - c) Provide general fair housing counseling and referrals services to address tenant-landlord issues and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.
 - d) Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.
 - e) Include testing/audits within the scope of work with fair housing provider.
- 3) Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.
- 4) Utilize funding through State programs (SB2) to support affordable housing and/or homeless prevention services.
- 5) Update zoning ordinance to comply with current State law.

As part of this Housing Element, the City has established several programs that address the constraints of this AFH analysis, as well as support the goals that were previously established during development of the County AI. The City's General Plan Housing Element (2021-2029) includes several goals that will support in furthering fair housing within the city.

- 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.
- 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.
- Goal 3: Increase the percentage of ownership housing to ensure a reasonable balance of rental and owner-occupied housing within the City.
- Goal 4: Preserve the existing supply of affordable housing in the City.

To facilitate these goals, several programs will be implemented over the planning period to ensure the City's goals are met. Several of the City's programs were modified in response to create measurable actions that will be monitored to progress is made towards AFH constraints identified as part of this analysis. The following table provides the programs that will be implemented over the planning period to address.

Supporting programs would facilitate development of new affordable housing opportunities, provide housing and/or housing services for persons with protected characteristics, protect existing low-income housing from conversion to market rate housing, promote high-quality housing/housing rehabilitation throughout the City, and promote and educate the public/landlords on fair housing practices. Through these actions, the City will be able to take meaningful action towards creating affordable housing opportunities in high resource areas, provide access to affordable housing for persons with protected characteristics, distribute access to opportunity outside of high resource areas, and provide education and enforcement to implement State law prohibiting discrimination.

AFFH Fair Housing Issue	Contributing Factor	Strategies to Address AFFH Issue	Supporting Programs
Housing Mobility	<ol style="list-style-type: none"> Lack of affordable housing opportunities for Hispanic residents High segregation for Hispanic/White and Black/White populations (as defined by Dissimilarity Index values which indicate geographical segregation patterns) 	<p>Housing Mobility Strategies consist of <u>removing barriers to housing in areas of opportunity</u> and strategically enhancing access.</p> <p>Opportunity areas are rated “high” or “low” resource based on education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).</p>	<p>PUBLIC OUTREACH - ENGAGE LIGUISTICALLY ISOLATED</p> <p>Revised Program 2.5 (b): By 2023, translate official City announcements (i.e. community meeting, hearings, etc.) to Spanish and disseminate printed copies of information to renters, property owners, and via social media, in order to expand knowledge of affordable housing options in High Opportunity Areas.</p> <p><i>Community Development Department</i></p> <p>Action Outcomes:</p> <p>The City’s goal is to increase attendance, representation, understanding by linguistically isolated residents, at community meeting, public hearings and City Council meetings. By engaging Hispanic populations in the decision-making process, they are better able to advocate for their needs and concerns regarding affordable housing and access to opportunities. The City will conduct at least one community informational meeting in areas that lack affordable housing opportunities and that exhibit high segregation, on an annual basis.</p> <p>QUALITY RENTAL HOUSING INSPECTION PROGRAM</p> <p>New Program 3.11: By 2025 through 2029, establish a multi-family quality rental housing inspection program.</p> <p><i>Community Development Department</i></p> <p>Action Outcomes:</p> <p>City’s goal is to elevate the quality of housing in segregated areas in order to transform the area into a desirable housing location by all socio-economic groups and to protect existing tenants from displacement and to provide occupants the opportunity to live in suitable housing conditions that are not characterized with substandard conditions such as lack of plumbing or overcrowding.</p> <p>The program will focus on improving housing conditions in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15 (<u>areas with high segregation index as defined by Dissimilarity Index values which indicate geographical segregation patterns in census tracts</u>).</p> <p>The City will receive at least one monthly referral from the City’s Neighborhood Improvement Task Force (NITF) (NITF includes Code Enforcement, Police, Social Service/County, School District representatives, City staff from various Departments) to identify households in need of this tenant protection and anti-displacement focused program; focused on improving the quality of single family and multi-family residential dwellings by providing technical assistance and funds to repairs substandard housing conditions.</p> <p>The City will conduct at least five multi-family quality rental housing inspections in the program’s first year, and will increase the number of annual inspections by 2, each year thereafter, until 2029.</p>
New Housing Choices and Affordability in Areas of Opportunity	<ol style="list-style-type: none"> Disparity in access to opportunity between the northeast (higher resources), where there are predominate populations of White residents, and southwest (lower resources) of the city, where there are predominate populations of Hispanic residents Lack of affordable housing opportunities for Hispanic residents 	<p>New Housing Choices and Affordability in Areas of Opportunity means <u>promoting housing supply, choices and affordability in areas of high opportunity</u> and outside of areas of concentrated poverty.</p>	<p>ADU/SB 9 ACCELERATOR PROGRAM</p> <p>Revised Program 1.7b: The City will create an ADU/SB 9 accelerator program and focus in High Opportunity Areas within the northeast portion of the City where there are predominately single-family residences in order to expand housing choices. This program could include a permit fee waiver for affordable housing units, permit fast tracking (refer to Program 1.1h), and technical assistance. This program will complement revised Program 1.1(h) Streamlining and Permit Fast Tracking for new ADU/SB9 development proposals.</p> <p><i>Community Development Department</i></p> <p>Action Outcome:</p> <p>By 2025, the City will adopt a program and mail out information pertaining to the new accelerator program for ADUs and SB 9 developments, specifically to high opportunity areas.</p> <p>STREAMLINING AND PERMIT FAST TRACKING</p>

AFFH Fair Housing Issue	Contributing Factor	Strategies to Address AFFH Issue	Supporting Programs
			<p>Revised Program 1.1 (h): By 2023, provide technical assistance and permit fast-tracking for new ADU/SB9 development proposals and a minimum of six projects that include housing affordable to lower income households on an annual basis through 2029.</p> <p><i>Community Development Department</i></p> <p>Action Outcome:</p> <p>City staff will fast track a minimum of 10 ADU and/or SB 9 developments in high opportunity areas (Census tracts 756.05, 524.19, 756.06, and 756.07) on an annual basis, which means that review times will be reduced by 25% compared to year 2022 review timeframes and for all affordable housing projects by assigning a designated “streamlining staff liaison” to the project.</p> <p>PUBLIC OUTREACH - DISSEMINATE HOUSING AND ANCILLARY RESOURCE INFORMATION & ENGAGE LIGUISTICALLY ISOLOATED</p> <p>New Program 2.5 (c): Annually, starting in 2023 through 2029, translate the City’s Tustin Housing Authority website and factsheets promoting affordable housing opportunities and ancillary support services, such as transit and child care, into Spanish, and distribute to low resources areas.</p> <p><i>Community Development Department</i></p> <p>Action Outcomes: Increase the distribution of translated materials to low resources areas located in the southwest of the City by mailing out postcards to each household in select census tracts, containing information related to housing choices, transit, child care, and education resources.</p>
<p>Place-Based Strategies to Encourage Community Revitalization</p>	<ol style="list-style-type: none"> 1. Disparity in access to opportunity between the northeast (higher resources), where there are predominate populations of White residents, and southwest (lower resources) of the city, where there are predominate populations of Hispanic residents 2. Disproportionate housing problems for the city’s Hispanic and Black residents (problems include 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened) 3. Disproportionate housing problems faced by large family households 	<p>Place-based Strategies to Encourage Community Conservation and Revitalization Involves approaches that are focused on <u>conserving and improving assets in areas of lower opportunity</u> and concentrated poverty such as targeted investment in neighborhood revitalization, preserving or rehabilitating existing affordable housing, improving infrastructure, schools, employment, parks, transportation and other community amenities.</p>	<p>HOUSING REHABILITATION TO IMPROVE HOUSING CONDITIONS, INCLUDING OVERCROWDING</p> <p>New/Revised Program 3.10: By July 2024, the City will partner with a non-profit to develop and launch a CDBG funded Housing Rehabilitation Program to facilitate the repair of dilapidated housing to address lack of plumbing, kitchen facilities and repairs to provide relief of overcrowding. Program participants will be provided grants and/or loans to conduct necessary housing updates.</p> <p>The City’s goal is to protect existing tenants from displacement and to provide occupants the opportunity to live in suitable housing conditions that are not characterized with substandard conditions such as lack of plumbing or overcrowding. The program will focus on improving housing conditions in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15 <u>(areas with high segregation index as defined by Dissimilarity Index values which indicate geographical segregation patterns in census tracts).</u></p> <p>Action Outcomes:</p> <p>The program will facilitate four (4) rehabilitation projects to assist with reducing overcrowding per year and another four (4) projects will assist with general habitability repairs, with a total of eight (8) dwellings assisted annually. Starting in July 2024, the City in partnership with a non-profit, will conduct targeted outreach through annual mailings to the southwest areas of City within low resources areas and populations, about available rehabilitation assistance. All program literature will be provided in English and Spanish. Progress will be evaluated and reported annually in the City’s CDBG Annual Report.</p> <p><i>Community Development Department</i></p> <p>INCREASE HOUSING SUPPLY FOR LARGE HOUSEHOLDS</p> <p>New Program 3.13: By January 2024, the City will amend the zoning code to require all new multi-family projects to provide at least five (5) percent large family units (3+ bedrooms) which will prevent overcrowding and further cost burden, by addressing demand for such units and increasing the large units into the local housing inventory.</p> <p><i>Community Development Department</i></p> <p>Action Outcomes: Four (4) large family units will be generated annually, and 32 total by 2029.</p>

AFFH Fair Housing Issue	Contributing Factor	Strategies to Address AFFH Issue	Supporting Programs
			<p>QUALITY RENTAL HOUSING INSPECTION PROGRAM</p> <p>New Program 3.11: By 2025, Establish a multi-family quality rental housing inspection program.</p> <p><i>Community Development Department</i></p> <p>Action Outcomes:</p> <p>City’s goal is to elevate the quality of housing in segregated areas in order to transform the area into a desirable housing location by all socio-economic groups and to protect existing tenants from displacement and to provide occupants the opportunity to live in suitable housing conditions that are not characterized with substandard conditions such as lack of plumbing or overcrowding.</p> <p>The program will focus on improving housing conditions in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15 (areas with high segregation index as defined by Dissimilarity Index values which indicate geographical segregation patterns in census tracts).</p> <p>The City will receive at least one monthly referral from the City’s Neighborhood Improvement Task Force (NITF) (NITF includes Code Enforcement, Police, Social Service/County, School District representatives, City staff from various Departments) to identify households in need of this tenant protection and anti-displacement focused program; focused on improving the quality of single family and multi-family residential dwellings by providing technical assistance and funds to repairs substandard housing conditions.</p> <p>The City will conduct at least five multi-family quality rental housing inspections in the program’s first year and will increase the number of annual inspections by 2, each year thereafter until 2029.</p> <p>TUSTIN LEGACY SPECIFIC PLAN IMPROVEMENT PROGRAM:</p> <p>New Program 2.8: Tustin Legacy (Tract 744.15) is a Master Planned Community that is currently being developed. Although the tract has been identified as low resource, it has been substantially enhanced with new resources within recent years. The area comprises 1,500 acres, of which 800 acres remain for future development of a diverse housing stock, community amenities, and resources. By 2029, the City will continue to implement projects that increase assets in the Specific Plan area as proposed by developers and identified in the Tustin Legacy Backbone Infrastructure Program, which includes:</p> <ul style="list-style-type: none"> • Brookfield at Tustin Legacy and Levity: residential projects with development of open space, park areas, and community amenities • Tustin Legacy Linear Park Between Armstrong Avenue and Warner Avenue • Alley Grove Community Plaza • Neighborhood D South Infrastructure Construction - Phase 2 • Tustin Ranch Road Pedestrian Bridge • South Hangar Renovation - Phase 1 (for future reuse of site) • Armstrong Avenue Pedestrian Bridge • Warner Avenue Pedestrian Bridge <p><i>Community Development Department</i></p> <p>Action Outcomes:</p> <p>The City will facilitate development of infrastructure, housing, and community amenities within the TLSP area. Improvements will provide increased access to safe and decent housing, transportation, recreation, and a healthy environment. By 2029, the City anticipates the Tustin Legacy (Tract 744.15) to be identified as a “high resource” area according to TCAC/HCD Opportunity Map criteria.</p>
<p>Protecting Existing Residents from Displacement</p>	<p>1. Disproportionate housing problems for the city’s Hispanic and Black residents (problems include 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is</p>	<p>Protecting Existing Residents from Displacement comprises strategies that <u>protect residents in areas of lower or moderate opportunity and concentrated poverty</u> and preserve housing choices and affordability.</p>	<p>QUALITY RENTAL HOUSING INSPECTION PROGRAM</p> <p>New Program 3.11: By 2025, Establish a multi-family quality rental housing inspection program.</p> <p><i>Community Development Department</i></p>

AFFH Fair Housing Issue	Contributing Factor	Strategies to Address AFFH Issue	Supporting Programs
	<p>overcrowded; and 4) household is cost burdened) – Specifically, Hispanic households were identified as having substantial overcrowding</p> <p>2. Concentrated female-headed households and LMI population within Census tract 755.14</p>		<p>Action Outcomes:</p> <p>City’s goal is to elevate the quality of housing in segregated areas in order to transform the area into a desirable housing location by all socio-economic groups and to protect existing tenants from displacement and to provide occupants the opportunity to live in suitable housing conditions that are not characterized with substandard conditions such as lack of plumbing or overcrowding.</p> <p>The program will focus on improving housing conditions in tracts 744.06, 744.07, 744.08, 755.12, 755.13, 755.14, 755.15 <u>(areas with high segregation index as defined by Dissimilarity Index values which indicate geographical segregation patterns in census tracts).</u></p> <p>The City will receive at least one monthly referral from the City’s Neighborhood Improvement Task Force (NITF) (NITF includes Code Enforcement, Police, Social Service/County, School District representatives, City staff from various Departments) to identify households in need of this tenant protection and anti-displacement focused program; focused on improving the quality of single family and multi-family residential dwellings by providing technical assistance and funds to repairs substandard housing conditions.</p> <p>The City will conduct at least five multi-family quality rental housing inspections in the program’s first year, and will increase the number of annual inspections by 2, each year thereafter until 2029. CHILD-CARE RESOURCES</p> <p>New Program 3.12: By December 2022, the City will create a “Financial Assistance for Child Care” webpage with information and links to Children’s Home Society of California (CHS) and the Orange County Department of Education (OCDE). These programs provide funding to low-income families for child care services. The City will work with Tustin Preschool, Kiddie Academy of Tustin, or other local preschool programs within Census tract 755.14 to advertise and promote financial assistance through pamphlets, e-blasts, and other applicable online community forums (such as Facebook and NextDoor).</p> <p><i>Economic Development Department/Community Development Department</i></p> <p>Action Outcome: Single-parent households require special consideration and assistance because of their greater needs for daycare, healthcare, and other facilities. According to HCD, female-headed households with children tend to have lower incomes, thus limiting housing availability for this group. The City will assist in providing free childcare services to relieve general living expenses of female-headed households, specifically in Census tract 755.14. The City will provide services to relieve general living expenses of female-headed households, specifically in Census tract 755.14.</p>

APPENDIX E
PUBLIC PARTICIPATION

APPENDIX E

PUBLIC PARTICIPATION (COMMUNITY ENGAGEMENT)



City of Tustin
2021 – 2029 Housing Element Update
Community Engagement Plan



Contents

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Purpose

This **COMMUNITY ENGAGEMENT PLAN** is for the City of Tustin’s 6th Cycle Housing Element (2021 -2029). This Plan describes strategies for engaging with residents and stakeholders through an online survey, education and awareness campaigns, and public meetings. Due to COVID-19 restrictions on in-person meetings, this outreach plan focused on alternatives such as virtual meetings, targeted email blasts, mailings to stakeholders, unpaid and paid social media postings, posters at community facilities, distribution of flyers, dedicated project website, and newspaper advertisements.



Background

The City of Tustin is preparing the **2021 – 2029 HOUSING ELEMENT UPDATE** to evaluate current and future housing conditions, and identify housing sites and programs to meet the community’s needs. While updating the housing element is a State requirement, it is also an opportunity to assess its accomplishments and progress toward meeting housing goals put forth in the previous Housing Element in 2013. The 2021-2029 Housing Element will outline the goals, policies and programs needed to promote the development and preservation of safe, accessible, and diverse housing in the City.

Goals and Objectives

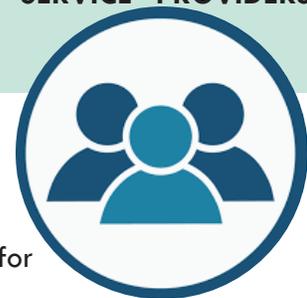
The **GOAL** of the **COMMUNITY ENGAGEMENT PLAN** for the 2021 – 2029 Housing Element Update is to guide the City’s community and stakeholder engagement efforts and to provide information about the importance in participating in the Housing Element Update. The **OBJECTIVES** of the Community Engagement Plan include:

- ▶ Building public awareness of the Housing Element Update, its requirements, and the City’s vision and goals to adequately plan to meet housing needs to all of its residents;
- ▶ Educating the Tustin community on the requirements of the Housing Element Update, and progress since the previous Housing Element;
- ▶ Engaging community members and key stakeholder groups to provide input on potential policies and programs that will align with Tustin resident’s housing needs;
- ▶ Facilitating discussions with community members and decision makers to identify how and where additional housing could be located within the City; and,
- ▶ Providing a concise document to the Tustin City Council and Planning Commission for adoption, with input and updates from public outreach and engagement activities during the Housing Element Update.



Targeted Stakeholders

To meet the **OBJECTIVES** of the City of Tustin’s **COMMUNITY ENGAGEMENT PLAN**, the City requested feedback from a diverse set of stakeholders within the community who represent multiple interests and experiences related to housing. This section of the Community Engagement Plan includes the various organizations and agencies that were included in the City’s outreach efforts. A database was maintained and updated with stakeholder contact information throughout the outreach process. The various stakeholders include, but are not limited to: **RESIDENTS, APARTMENT OWNERS, SERVICE PROVIDERS, ORGANIZATIONS, and AGENCIES.**



Affordable Housing Advocates

Organizations and agencies that advocate for safe and affordable housing opportunities for residents of all ages and abilities within the City of Tustin. This includes but is not limited to:

- Kennedy Commission
- University of Irvine
- Tustin Planning Partnership
- Habitat for Humanity
- Jamboree Housing Corp.
- OC Community Housing Corp.
- Linc Housing

Apartment/HOA Managers and Owners

The TEAM (Tustin Effective Apartment Managers) group, which is a problem-solving community organization comprised of apartment managers, apartment owners, police, school officials, and service providers, and additionally outreached to 99 Home Owner Association property management groups throughout the Tustin area.

Community Service Groups

Community-based organizations that provide services to historically under-represented community members as well as youth and seniors. This includes but is not limited to:

- St. Joseph Hospital
- Alzheimer’s of OC
- Community Health Initiative of OC
- Lestonnac Free Clinic
- Meals on Wheels OC
- Neighborworks OC
- Tustin Community Foundation
- Tustin Public Schools Foundation

Disability Advocates

Organizations and agencies that advocate or provide assistance to people with disabilities who rely on safe and accessible housing opportunities. This includes but is not limited to:

- Assistance League of Tustin
- Dayle McIntosh Center
- Learning Disabilities Assoc. of Southern CA
- The Blind Children’s Learning Center
- Regional Center of OC

Economic Development

Organizations that represent or advocate for business and employers in Tustin. This includes but is not limited to:

- Tustin Chamber of Commerce
- Tustin Economic Development Division
- BIA Orange County Chapter
- Orange County Business Council

Environmental Advocates

Commissions, agencies, or organizations that advocate for sustainable land use and environmental protection in the Tustin or Orange County area. This includes but is not limited to:

- Southern California Gas
- Southern California Edison
- Southern California Air Quality Management
- OC Fire Authority
- Regional Water Quality Control Board
- OC Environmental Health
- Airport Land Use Commission
- East Orange County Water District

Low-Income Communities

Organizations or agencies that represent low-income communities in Tustin. This includes but is not limited to:

- Boys & Girls Clubs of Tustin
- MOMS OC
- Veterans Legal Institute
- Orange County Finance Trust
- Big Brothers and Big Sisters of OC
- OC Food Access Coalition
- YMCA of OC
- Goodwill of OC
- Patriots & Paws
- Community Action Partnership of OC
- Legal Aid Society of OC
- Second Harvest Food Bank of OC
- Public Law Center

People Experiencing Homelessness

Organizations, groups, or agencies that provide services to people experiencing homelessness in Tustin. This includes but is not limited to:

- Housing and Homeless Prevention Unit
- Human Options
- The Eli Home
- Orange County Housing Finance Trust
- City Net
- Olive Crest
- American Family Housing
- Families Forward
- OC Gateway to Housing
- OC Social Services Tustin Family Campus
- Family Promise of OC
- Second Chance OC
- OC Rescue Mission

Real Estate Affiliated

Businesses or agencies that are affiliated with real estate transactions in Tustin. This includes but is not limited to:

- Affordable Housing Clearinghouse
- Consumer Credit Counseling
- Orange County Realtors Association of Professionals

Residential Developers

Residential or property developers that develop housing sites in Tustin, including affordable housing developers. This includes but is not limited to:

- Intracorp Homes
- City Ventures
- Greystar
- Curt Pringle & Assoc.
- Century Housing
- Civic Center Barrio Housing Corp.
- William Lyon Homes, Inc.
- HomeAid Orange County
- Lennar Corp.
- Taylor Morrison
- Brookfield Residential Southern CA
- Shea Homes

Senior Housing and Advocates

Agencies or organizations that provide senior housing in Tustin, and agencies that advocate for safe, affordable, and accessible housing options for senior residents living in Tustin. This includes but is not limited to:

- Council on Aging OC
- OC Office on Aging
- Tustin Housing Authority
- Senior Rental Properties in Tustin
- Community Action Partnership of Orange County
- Orange County Health Care Agency
- County of Orange Senior Services

Religious Institutions

Faith-based organizations who provide supportive services to residents living in Tustin. This includes but is not limited to:

- St. Paul's Episcopal Church
- Grace Harbor Church & School
- The Salvation Army
- Orange County Rescue Mission

Underrepresented Groups

Cultural organizations or groups who advocate for the traditionally underrepresented groups in the Tustin area. The City has reached out to these organizations to encourage feedback. This includes but is not limited to:

- AIDS Services Foundation
- Fair Housing Foundation
- Fair Housing Council of OC
- Tustin Unified School District

Outreach & Engagement Strategies

The chart below provides a summary of the scheduled activities, community outreach and engagement strategies that the City implemented to obtain input and build awareness throughout the Housing Element Update. Each strategy encourages participation, facilitates meaningful dialogue with the community, and builds awareness of the challenges and opportunities of implementing housing strategies that meet the State’s requirements.

Schedule of Activities



Online Community Survey

An online community survey was made available from January 21, 2021 through February 28, 2021, in English and Spanish, to help city staff better understand the communities housing needs and priorities. In total, there were 193 survey respondents, with a majority of the respondents being Tustin residents. **The online survey re-opened for another 30 days from June 30, 2021 through July 30, 2021.**

Planning Commission and Council Meetings and Workshops

A total of four community/public meetings are planned with the Planning Commission and City Council as part of the Housing Element preparation process. These virtual workshops and in-person hearings, serve as a method for community members to provide input on the progress of the Housing Element update as well as a venue to inform the Council and Commission on the state requirements, discuss housing needs, and to provide a progress update.



- ▶ **November 10, 2020 – Planning Commission Workshop (Via Zoom)** - City staff provided an overview of the housing element preparation process, including plans for community outreach.
- ▶ **May 11, 2021- City Council and Planning Commission Workshop (via Zoom)** - City staff presented its findings from the community outreach and engagement activities, and solicited input on future housing needs. Key topics covered at the meetings included:
 - Survey results
 - Reviewed existing housing policies
 - Potential new housing programs
 - Opportunity sites for meeting housing requirements
 - Project timeline

Public Review Period

The City is available to the public for a 30-day public review period, from June 30, 2021 through July 30, 2021. During this time, stakeholders and the general public are provided with the opportunity to review and comment on the Draft Housing Element document before it is finalized. The document has also been transmitted to the Department of Housing and Community Development (HCD) on June 30, 2021 for a 60-day review period. The HCD review period concludes on August 30, 2021.

Planning Commission and Council Adoption Public Hearings

After the final Draft Housing Element is developed, and reviewed by HCD, the City will hold public hearings with the Planning Commission and City Council before submitting the final draft to HCD for certification.

- ▶ Tentative – Planning Commission Hearing on September 14, 2021
- ▶ Tentative – City Council Hearing on October 5, 2021

Education & Awareness Strategies

The City is using many strategies to build education and awareness of the Housing Element Update, and increase participation among community members. The following strategies were implemented to ensure public awareness and to solicit feedback from residents and stakeholders.

- **CITY WEBSITE SPOTLIGHT FEATURE** - Outreach and project information was posted as a spotlight feature on the City's website and sent to the web's subscriber list in English and in Spanish
- **POSTED FLYERS** - Notifications in English and in Spanish were posted on the City's e-notice board, Library, Senior Center, Tustin Family Youth Center (TFYC), and Boys & Girls Club. Additional bundles of flyers were distributed at the Senior Center (200 flyers), TFYC (200 flyers), and Boys & Girls Club (100 flyers). Additional flyer distribution was offered to individual apartment locations part of the TEAM (Tustin Effective Apartment Managers) group
- **CITY CALENDAR** - Meeting information was posted on the City's Calendar
- **TUSTIN CHAMBER** - Tustin Chamber of Commerce advertised meeting dates on their website. Flyer graphics shared were in English and in Spanish.
- **EMAIL BLASTS** - Multiple email notifications were sent to 268 stakeholders and interested parties. The City Manager's Office utilized their Community Outreach ListServ to e-mail notifications to over 10,000 subscribers. Graphics included and attached to email blasts were in English and in Spanish.
- **POSTCARD MAILINGS** - Postcards containing workshop and public participation information in English and in Spanish were mailed to 396 interested parties including residents, businesses, property managers, housing advocacy groups, non-profits, religious institutions and others. Information regarding workshop participation was included within the City of Tustin's Strategic Plan postcards which were distributed to 29,885 Tustin residents and 3,457 Tustin businesses.

- **SOCIAL MEDIA POSTS - UNPAID AND PAID** - Social media posts were made containing information on public participation opportunities regarding the Housing Element Update survey, and multiple workshops/meetings, on all of the City's social media platforms
- **PRESS RELEASE** - A press release was distributed in English and Spanish, inviting the public to review the Draft Housing Element Update (97 subscribers)
- **VIDEO OUTREACH** - Mayor Clark's Corner video advertised review of the Draft HEU. Video was posted on all Social Media outlets including YouTube
- The Tustin Chamber of Commerce shared workshop/meeting information on each of their social media platforms

Notification Methods



Social Media Posts



- **WEBSITE** - City developed a dedicated Housing Element Update webpage, hosted on the City's website
- Website includes a project overview, schedule of activities, and information on how the public can get involved
- Website updated regularly with timeline, meeting updates and survey information

- **NEWSPAPER ADVERTISEMENTS** - To build widespread awareness of the Housing Element Update, the City has made publications in local and regional news resources in both printed and digital formats
- Tustin News - distributed to over 7,000 Tustin residents
- Irvine Weekly - distributed to over 8,200 Tustin residents, including a digital distribution, reaching over 33,000 individuals
- **PAID SOCIAL MEDIA ADS** - Paid advertisements on the City's social media platforms which enabled notification to a larger population than traditional postings

Project Webpage



Earned Media



Appendix B
Index of Interested Parties

Index of Interested Parties
Housing Element Survey Respondents

Name

Margarita Nunez	Tustin, CA 92780
Maria Chavez	Tustin, CA 92780
AnneMarie Olmedo	Tustin, CA 92780
Yvonne Su	Tustin, CA 92780
Denise Federoff	Tustin, CA 92780
Jan Lynn	Tustin, CA 92780
Elaine A Scott	Tustin, CA 92782
Pam Neil	Tustin, CA 92780
Nadia Sanchez	
Brandon Martinez	Tustin, CA 92782
David Mello	Tustin, CA 92780
Kristen Nesselrod	Tustin, CA 92780
May	
Jonathan W Abelove	Tustin, CA 92782
Megan Lopez	Tustin, CA 92782
Khang Lu	Tustin, CA 92782
Sarah Van Zanten	Tustin, CA 92780
Neal Wilbert	Tustin, CA 92780
Jimmy Nguyen	Tustin, CA 92780
Adam Foster	Tustin, CA 92780
Bill Netro	Tustin, CA 92782
Jim Palmer	Tustin, CA 92780
Maneet Sidhu	Tustin, CA 92782
Desiree	
Robyn Nixon	Tustin, CA 92780
Fernanda	Orange, CA 92869
Daisy Cruz	
Sheena Innocente	Tustin, CA 92780
Quan Slim Cui	Diamond Bar, CA 91765
Alexis Mondares	Santa Ana, CA 92701
Collette Morse	Tustin, CA 92780
Scott Spitzer	Tustin, CA 92780
The Rev. Laura Siriani	Tustin, CA 92780

Annie Strenk	North Tustin
Jaime Murillo	Tustin, CA 92780
Bill Hammerle	Tustin, CA 92780
Toby Moore	Tustin, CA 92780
E LeVin	
Beverley Laumann	Tustin, CA 92780
Kimberly Adams	Tustin, CA 92780
Joel Lessard-Clouston	
Rose	Tustin, CA 92782
Tiffany Kuykendall	Tustin, CA 92782
Eric Higuchi	Tustin, CA 92782
Valerie Hart	Tustin, CA 92782
Adriana	Tustin, CA 92782
Janel Bommaiah	Tustin, CA 92782
Kim Ha	Tustin, CA 92782
Amy Kenny	Tustin, CA 92782
Carrie Murray	
Meredith Rowland	Tustin, CA 92780
Leslie Cox	Tustin, CA 92780
Kimberly Albarian	Tustin, CA 92780
Sanjeev Ganatra	Tustin, CA 92780
Lana Clay-Monaghan	
Karin Marquez	Tustin, CA 92780
Dominic Mazza	Newport Beach, CA 92660
Jonathan W Abelove	

Index of Interested Parties

Community Development Block Grant Interested Parties List

Name	Organization	Address			
Brenda J. Rodriguez	Affordable Housing Clearinghouse	23861 El Toro Road, Suite 401	Lake Forest	CA	92630
Marc Mullendore	AIDS Services Foundation	17982 Sky Park Circle, Suite J	Irvine	CA	92614
Jackie Mark	Alzheimer's Orange County Assistance League of Tustin	2515 McCabe Way, Suite 200 445 El Camino Real	Irvine Tustin	CA	92614 92780
Megan Hartman	Big Brothers & Big Sisters of OC	1801 E. Edinger Ave., Ste 101	Santa Ana	CA	92705
Jamie Serrano	Boys & Girls Club of Tustin Child Abuse Prevention Center	580 W. 6th Street 7281 Garden Grove Blvd. #D	Tustin Garden Grove	CA	92780 92841
Maria Massai	Child Creativity Lab	1815 E. Wilshire Ave. #906	Santa Ana	CA	92705
Susan Knopick	Children's Bureau of So. Calif.	50 S. Anaheim Blvd., Suite 241	Anaheim	CA	92805
Gigi Zanganeh	City Net	4508 Atlantic Avenue, #292	Long Beach	CA	90807
Gregory Scott	Community Action Partnership of Orange County	11870 Monarch Street	Garden Grove	CA	92841
Georgina Maldonado	Community Health Initiative of Orange County	1505 E. 17th Street, Suite 121	Santa Ana	CA	92705
Holly Hagler	Meals on Wheels Orange County	1200 N. Knollwood Circle	Anaheim	CA	92801
Margot Carlson	Community Services Program	1221 E. Dyer Road, Suite 120	Santa Ana	CA	92705
Lisa W. Jenkins	Council on Aging Orange County	2 Executive Cir., #175	Irvine	CA	92614
Patricia Wenskunas	Crime Survivors, Inc.	PO Box 54552	Irvine	CA	92619
Elizabeth Campbell	Dayle McIntosh Center	501 N. Brookhurst St. #102	Anaheim	CA	92801
Greg LeFever	Empowered Youth Fair Housing Council of Orange County	1470 Voyager Drive 2021 E. 4th Street, Suite 122	Tustin Santa Ana	CA	92782 92705
Stella Verdeja	Fair Housing Foundation	3605 Long Beach Blvd., #302	Long Beach	CA	90807
Bryan J.C. Sualog	Families Forward	8 Thomas	Irvine	CA	92618
Cyndee Albertson	Family Promise of Orange County	310 W. Broadway	Anaheim	CA	92805
Colin Henderson	Friendship Shelter, Inc.	P.O. Box 4252	Laguna Beach	CA	92652
Jade Smith	Goodwill of Orange County	410 North Fairview Street	Santa Ana	CA	92703
Rick Adams	Goodwill of Orange County	410 North Fairview Street	Santa Ana	CA	92703
Katie Tarantino	Grace Harbor Church & School	12881 Newport Avenue	Tustin	CA	92780
Paula Garcia-Arsenault	Habitat for Humanity Orange County	2200 Ritchey Street	Santa Ana	CA	92705
Mirna Camarena	Human Options	P.O. Box 53745	Irvine	CA	92619
Maricela Rios-Faust	Human Options	P.O. Box 53745	Irvine	CA	92619
Judith Rose	Human Options	P.O. Box 53745	Irvine	CA	92619
Carol Anne Williams	Interval House	6615 East Pacific Coast Highway, Suite 170	Long Beach	CA	90803
Laura Archuleta	Jamboree Housing Corp.	17701 Cowan Ave., Suite 200	Irvine	CA	92614
Rebecca Ornelas	Learning for Life	1211 East Dyer Road	Santa Ana	CA	92705

Danielle Heramio	Legal Aid Society of Orange County	2101 N. Tustin Avenue	Santa Ana	CA	92705
Ed Gerber	Lestonnac Free Clinic	1215 E. Chapman Ave.	Orange	CA	92869
David Eiseman	Mardan Center of Educational Therapy	1 Osborn	Irvine	CA	92604
Jill Dominguez	Mary's Path	18221 E. 17th Street	Santa Ana	CA	92705
Donna Core	Meals on Wheels	1001 N. Tustin	Santa Ana	CA	92707
Allison Davenport	Mercy House Transitional Living Center	P.O. Box 1905	Santa Ana	CA	92702
Dave Lugo	MOMS Orange County	1128 W. Santa Ana Blvd.	Santa Ana	CA	92703
Andrea Pronk-Dunn	MOMS Orange County	1128 W. Santa Ana Blvd.	Santa Ana	CA	92703
Nancee Lee-Allen	National Alliance on Mental Illness	1810 E. 17th Street	Santa Ana	CA	92705
Jackson Wright	NeighborWorks Orange County	128 E. Katella Avenue, Suite 200	Orange	CA	92867
Doug Bistry	O. C. Affordable Housing	23861 El Toro Road, Suite 401	Lake Forest	CA	92630
Charmaine Linley	Olive Crest	2130 E. 4th Street, Suite 200	Santa Ana	CA	92705
Catherine Burnett	Olive Crest	2130 E. 4th Street, Suite 200	Santa Ana	CA	92705
Rachel Repko	Olive Crest	2130 E. 4th Street, Suite 200	Santa Ana	CA	92705
Laura Fisher	Orange County Council	1211 East Dyer Road	Santa Ana	CA	92705
	OC Food Access Coalition	1901 E. 4th St., Suite 100	Santa Ana	CA	92705
Laura Miller	OC Gateway to Housing	1300 Bristol Street N., Ste #100	Newport Beach	CA	92660
Elaine Lintner	Orange County SPCA	P.O. Box 6507	Huntington Beach	CA	92615
Penny Lambright	Patriots and Paws	9221 Atlanta Avenue, #471	Huntington Beach	CA	92646
Bob Winandy	Pilgrimage Family Therapy	23201 Mill Creek Drive, Suite 220	Laguna Hills	CA	92653
Lois McKoon	Probation Community Action Association	18627 Brookhurst Street #425	Fountain Valley	CA	92708
Warren Johnson	Salvation Army	10200 Pioneer Road	Tustin	CA	92782
Deb Johnson	Second Chance Orange County	290 Paularino Avenue	Costa Mesa	CA	92626
Branan Vlasic	Second Harvest Food Bank of Orange County	8014 Marine Way	Irvine	CA	92618
Jean Wegener	Serving People in Need	151 Kalmus Drive, Suite H	Costa Mesa	CA	92626
	Special Olympics of Southern California	1600 Forbes Way, #200	Long Beach	CA	90810
	St. Vincent de Paul Center for Reconciliation	1505 E. 17th Street, Suite 109	Santa Ana	CA	92705
Lorri Galloway	The Eli Home, Inc.	1175 N. East Street	Anaheim	CA	92805
Julie Damon	The Seed Institute	27 Lemon Grove	Irvine	CA	92618
Lorraine Martinez	The Villa Center, Inc.	910 North French Street	Santa Ana	CA	92701
Susan Stokes	Turning Point Center for Families	3151 Airway Avenue, F-206A	Costa Mesa	CA	92626
Barbara Foster	Tustin Area Council for Fine Arts	P. O. Box 145	Tustin	CA	92781
	Tustin Area Historical Society & Museum	395 El Camino Real	Tustin	CA	92780
	Tustin Chamber of Commerce	17390 17th Street, Suite C	Tustin	CA	92780

Erin Nielsen	Tustin Community Foundation	P.O. Box 362	Tustin	CA	92781
	Tustin Public Schools Foundation	150 El Camino Real, Suite 140	Tustin	CA	92780
Kristine Ceballos	Vast Homes, Inc.	1050 Lakes Drive, Ste 225	West Covina	CA	91790
KellyAnn Romanych	Veterans Legal Institute	1231 Warner Avenue	Tustin	CA	92780
Jim Oberst	Watts Up America	20136 State Road	Cerritos	CA	90703
	Women Helping Women	2305 McGaw Avenue	Irvine	CA	92614
Dorian Cassell	YMCA of Orange County	13821 Newport Ave., Suite 200	Tustin	CA	92780
Elizabeth Medina	YMCA of Orange County	13821 Newport Ave., Suite 200	Tustin	CA	92780

Index of Interested Parties
Outside Agencies and Developers List

CONTACT	TITLE	COMPANY	ADDRESS	CITY/STATE/ZIP	PHONE	EMAIL ADDRESS
Elizabeth Campbell		Veterans Service Dept. Dayle McIntosh Center	4360 Orange Street 501 N. Brookhurst Street, Suite 102	Riverside, CA 92501 Anaheim, CA 92801		
Dorian Cassell		Orange Coast Interfaith Shelter YMCA of Orange County Assistance League of Tustin	1963 Wallace Street 13821 Newport Ave., Suite #200 445 El Camino Real	Costa Mesa, CA 92627 Tustin, CA 92780 Tustin, CA 92780	(714)621-3300 (949)631-7213 (714)508-7616 (714)544-1798	aitustin101@gmail.com ; tustinmuseum@att.net ;
Margot Carlson		Tustin Area Historical Society & Museum Legal Aid Society of Orange County Community Services Programs Inc. Providinghope Community Action Assoc Mardan Foundation of Educational Therapy	395 El Camino Real 2101 N. Tustin Avenue 1221 East Dyer Rd., Suite 120 18627 Brookhurst Street #425 1 Osborn	Tustin, CA 92780 Santa Ana, CA 92705 Santa Ana, CA 92705 Fountain Valley, CA 92708-6748 Irvine, CA 92604	(714)731-5701 (714)571-5200 (949)250-0488 (714)393-3685 (949)733-1500	contactpcaa@aol.com ; contactus@mardanschool.org ; rgriffith@century.org ;
Ronald M. Griffith		Century Housing	1000 Corporate Pointe, Suite 200	Culver City, CA 90230	(310)642-2000	
Helen Anderson		Orange County Hunger Coalition	14452 Wildev Lane	Tustin, CA 92780	(714)838-1689	
Allen Peters Baldwin		OC Community Housing Corp	501 N. Golden Circle Dr.	Santa Ana, CA 92705	(714)558-8161	occhc@occhc.org ;
Jill Dominguez		Mary's Path	18221 East 17th St.	Santa Ana, CA 92705		gina@maryspath.org ;
Diane Aust		Tustin Area Council for Fine Arts Civic Center Barrio Housing Corp	P.O. Box 145 980 W. 17th Street, Unit E	Tustin, CA 92781 Santa Ana, CA 92706	(714)518-5519	
Patrick Carroll		Life Share	11421 Garden Grove Blvd.	Garden Grove, CA 92843		
Holly Hagler	President/CEO	Meals on Wheels	1101 S. Grand Ave. #K-M	Santa Ana, CA 92705	(714)220-0224 x217	
Gregory Scott		Community Action Partnership of Orange County	11870 Monarch Street	Garden Grove, CA 92841	(714)897-6670	
Megan Hartman		Big Brothers & Sisters of OC Women Helping Women	1801 E. Edinger Ave. Suite 101 2803 McGaw Ave.	Santa Ana, CA 92705 Irvine, CA 92614	(714)544-7773 (949)631-2333	info@whw.org ;
Colin Henderson		Friendship Shelter, Inc.	P.O. Box 4252	Laguna Beach, CA 92652	(949)494-6928	office@friendshipshelter.org ;
Warren Johnson		Salvation Army Habitat for Humanity of Orange County Tustin Public School Foundation Orange Children & Parents Together The Villa Center, Inc.	10200 Pioneer Road 2200 S. Ritchey Street 150 El Camino Real, #140 1063 N. Glassell Street 910 North French St	Tustin, CA 92780 Santa Ana, CA 92705 Tustin, CA 92780 Orange, CA 92867 Santa Ana, CA 92701		info@habitatoc.org ;
Elaine Lintner		Jamboree Housing Corp. OCSPCA-Paws Laurel House OC Office on Aging American Family Housing Lutheran Social Service of Southern California	17701 Cowan Ave., Suite 200 P.O. Box 6507 1 Hope Drive 1300 S. Grand Ave, Bldg B 15161 Jackson Street 247 East Amerige Ave.	Irvine, CA 92614 Huntington Beach, CA 92615 Tustin, CA 92782 Santa Ana, CA 92705 Midway City, CA 92655-1432 Fullerton, CA 92832	(949)263-8676 (714)964-4445	info@ocanimalallies.org ;
Donald VerLeur		Olive Crest	2130 E. Fourth Street, Suite 200	Santa Ana, CA 92705		info@LSSSC.org ;
Jamie Serrano		Boys & Girls Club of Tustin	580 W. Sixth Street	Tustin, CA 92780	(714)838-5223	
Joyce Riley		Learning Disabilities Association of Southern California St. Vincent de Paul Center for Reconciliation	P.O. Box 25772 1505 E. 17th Street, Suite 109	Santa Ana, CA 92799 Santa Ana, CA 92705	(714)547-4206	
Dani Skolnick		The Blind Children's Learning Center Turning Point Center for Families	18542-B Vanderlip Ave. 3151 Airway Ave, F-206A	Santa Ana, CA 92705 Costa Mesa, CA 92626	(714)573-8888	info@blindkids.org ;
Ed Gerber		Lestonnac Free Clinic Central Orange County YWCA	1215 E. Chapman Ave. P.O. Box 689	Orange, CA 92866 Orange, CA 92865		info@orangechamber.com ;
Jean Wegener		Serving People in Need Consumer Credit Counseling Service	151 Kalmus #H-2 1920 Old Tustin Ave.	Costa Mesa, CA 92626 Santa Ana, CA 92705		info@spinoc.org ;

Russell Etzenhouser		Orange County Council BSA	1211 E. Dyer Street	Santa Ana, CA 92705	
Lorri Galloway		The Eli Home, Inc.	1175 N. East Street	Anaheim, CA 92805	lorrig@elihome.org ;
Carol Anne Williams		Interval House	P.O. Box 3356	Seal Beach, CA 90740	admin@intervalhouse.org ;
Bob Winandy		Pilgrimage Family Therapy	23201 Mill Creek Drive, #220	Laguna Hills, CA 92653	
Rabecca F. Clark		LINC Housing	3590 Elm Ave.	Long Beach, CA 90807	
		Colette's Children's Home	7372 Prince Drive, Suite 106	Huntington Beach, CA 92647	
Steve PonTell		National Community Renaissance	9421 Haven Ave.	Rancho Cucamonga, CA 91730	
Jon Robertson		William Lyon Homes, Inc.	4695 MacArthur Ct	Newport Beach, CA 92660	
		Orange County Social Services, Tustin Family Campus	1928 S Grand Ave.	Santa Ana, CA 92705	
Miguel Hernandez		Orange County Congregation Community Organization	310 W Broadway	Anaheim, CA 92805	info@occcopico.org ;
		Mental Health Services	1200 N Main St., Suite 201	Santa Ana, CA 92701	
		Mercy Housing	1500 S Grand Ave., Suite 100	Los Angeles, CA 90015	
Brenda Rodriguez	Executive Director	Affordable Housing Clearinghouse	23861 El Toro Road, Suite 401	Lake Forest, CA 92630	
Steve LaMotte	Executive Officer	BIA Orange County Chapter	17192 Murphy Ave., #14445	Irvine, CA 92623	
		Affordable Home Owners Alliance	2 Park Plaza, Suite 100	Irvine, CA 92614-5904	
		Orange County Rescue Mission	1 Hope Drive	Tustin, CA 92782	info@rescuemission.org ;
Kenneth W. Babcock		Public Law Center	601 Civic Center Drive West	Santa Ana, CA 92701-4002	
Scott Larson	Chief Executive Officer	HomeAid Orange County	PO Box 53156	Irvine, CA 92619	(949)777-1660
Maricela Rios-Faust		Human Options, Inc.	5540 Trabuco Rd., Suite 100	Irvine, CA 92620	
Nikki Buckstead		Families Forward	8 Thomas	Irvine, CA 92618	info@families-forward.org ;
Judy Cooper		OC Gateway to Housing	PO Box 1562	Costa Mesa, CA 92628	(949)631-7213
Linda Tang	Senior Project Manager	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	Executive Director	Kennedy Commission	17701 Cowan Ave., Suite 200	Irvine, CA 92614	
Lucy Dunn	President and CEO	Orange County Business Council	2 Park Plaza, Suite 100	Irvine, CA 92614	ldunn@ocbc.org ;
Larry Landauer	Executive Director	Regional Center of Orange County	1525 North Tustin Ave.	Santa Ana, CA 92705	centraloffice@rcocdd.com ;
		OC Housing & Community Development	1501 E St. Andrew Place	Santa Ana, CA 92705	
		Tustin Unified School District	300 South C Street Tustin	Tustin, CA 92780	714-730-7301
		Orange County Health Care Agency	405 W. 5 th St.	Santa Ana, CA 92701	ETeam@ochca.com ;
Elizabeth Hansburg		People for Housing OC			Elizabeth@peopleforhousing.org ;
Rona Henry		Welcoming Neighbors Home (South OC)	23676 Birtcher Drive	Lake Forest, CA 92630-1769	(949) 581-0245
Pete Beatty	President	Tustin Historical Society			(714)504-4088
		Tustin Preservation Conservancy			bri.sjo@gmail.com ;
Marc Mullendore		AIDS Services Foundation	17982 Sky Park Circle, Suite J	Irvine, CA 92614	
Jackie Mark		Alzheimer's Orange County	2515 McCabe Way, Suite 200	Irvine, CA 92614	
Maria Massai		Child Creativity Lab	1815 E. Wilshire Ave. #906	Santa ana, CA 92705	
Susan Knopick		Children's Bureau of So. Calif.	50 S. Anaheim Blvd., Suite 241	Anaheim, CA 92805	
Gigi Zanganeh		City Net	4508 Atlantic Avenue, #292	Long Beach, CA 90807	
Georgina Maldonado		Community Health Initiative of Orange County	1505 E. 17th Street, Suite 121	Santa Ana, CA 92705	
Lisa W. Jenkins		Council on Aging Orange County	2 Executive Cir., #175	Irvine, CA 92614	
Patricia Wenskunas		Crime Survivors, Inc.	PO Box 54552	Irvine, CA 92619	
Greg LeFever		Empowered Youth	1470 Voyager Drive	Tustin, CA 92782	
		Fair Housing Council of Orange County	2021 E. 4th Street, Suite 122	Santa Ana, CA 92705	
Stella Verdeja		Fair Housing Foundation	3605 Long Beach Blvd., #302	Long Beach, CA 90807	

Cyndee Albertson		Family Promise of Orange County	310 W. Broadway	Anaheim, CA 92805	
Jade Smith		Goodwill of Orange County	410 North Fairview Street	Santa Ana, CA 92703	
Kathy Copeland		Goodwill of Orange County	410 North Fairview Street	Santa Ana, CA 92703	
Katie Tarantino		Grace Harbor Church & School	12881 Newport Avenue	Tustin, CA 92780	kt7701@cox.net
Yvette Visconte		Human Options	P.O. Box 53745	Irvine, CA 92619	
Rebecca Ornelas		Learning for Life	1211 East Dyer Road	Santa Ana, CA 92705	
Allison Davenport		Mercy House Transitional Living Center	P.O. Box 1905	Santa Ana, CA 92702	
Dave Lugo		MOMS Orange County	1128 W. Santa Ana Blvd.	Santa Ana, CA 92703	
Andrea Pronk-Dunn		MOMS Orange County	1128 W. Santa Ana Blvd.	Santa Ana, CA 92703	
Nancee Lee-Allen		National Alliance on Mental Illness	1810 E. 17th Street	Santa Ana, CA 92705	
Jackson Wright		NeighborWorks Orange County	128 E. Katella Avenue, Suite 200	Orange, CA 92867	
Doug Bistry		O. C. Affordable Housing	23861 El Toro Road, Suite 401	Lake Forest, CA 92630	
Charmaine Linley		Olive Crest	2130 E. 4th Street, Suite 200	Santa Ana, CA 92705	
Catherine Burnett		Olive Crest	2130 E. 4th Street, Suite 200	Santa Ana, CA 92705	
Rachel Repko		Olive Crest	2130 E. 4th Street, Suite 200	Santa Ana, CA 92705	
		OC Food Access Coalition	1901 E. 4th St., Suite 100	Santa Ana, CA 92705	
Laura Miller		OC Gateway to Housing	1300 Bristol Street N., Ste #100	Newport Beach, CA 92660	
Penny Lambright		Patriots and Paws	9221 Atlanta Avenue, #471	Huntington Beach, CA 92646	
Deb Johnson		Second Chance Orange County Special	290 Paularino Avenue	Costa Mesa, CA 92626	
		Olympics of Southern California The	1600 Forbes Way, #200	Long Beach, CA 90810	
Julie Damon		Seed Institute	27 Lemon Grove	Irvine, CA 92618	
		Tustin Chamber of Commerce	17390 17th Street, Suite C	Tustin, CA 92780	
Erin Nielsen		Tustin Community Foundation	P.O. Box 362	Tustin, CA 92780	
Kristine Ceballos		Vast Homes, Inc.	1050 Lakes Drive, Ste 225	West Covina, CA 91790	
KellyAnn Romanych		Veterans Legal Institute	2100 N. Broadway, Suite 209	Santa Ana, CA 92706	
Elizabeth Medina		YMCA of Orange County	13821 Newport Ave., Suite 200	Tustin, CA 92780	
Stephanie Enano		Child Abuse Prevention Center Watts	2390 E. Orangewood Ave., Suite 300	Orange, CA 92806	
Jim Oberst		Up America	20136 State Road	Cerritos, CA 90703	
		Santa Ana Unified School District City	1601 East Chestnut Ave.	Santa Ana, CA 92701-6322	(714)558-5501
		of Santa Ana	20 Civic Center Plaza	Santa Ana, CA 92701	(714)647-5400
		City of Irvine	1 Civic Center Plaza	Irvine, CA 92606-5207	(949)724-6000
		City of Orange	300 E. Chapman Ave.	Orange, CA 92866	(714)744-2225
		Orange County	333 W. Santa Ana Blvd.	Santa Ana, CA 92701 Irvine,	(855)886-5400
Stephen Edwards	Director	City Ventures	3121 Michelson Drive, Suite 150	CA 92612	714-504-3685
		OC Association of Realtors - Fountain	15040 Talbert Ave., Ste 225, West	Fountain Valley, CA 92708	
		Valley Office	Building,		
		OC Association of Realtors - Laguna	25552 La Paz Road	Laguna Hills, CA 92653	
		Hills Office			
		In-Home Supportive Services	1505 E. Warner Ave.	Santa Ana, CA 92705	
		Adult Protective Services	1505 E. Warner Ave	Santa Ana, CA 92705	
		Orange County Housing Finance Trust	1 Leage, #62335	Irvine, CA 92602	

sedwards@cityventures.com

Index of Interested Parties

Adjacent Jurisdictions, Utilities, and College Districts List

Organization

Tustin Unified School District
 Santa Ana Unified School District
 Irvine Unified School District
 Southern California Gas
 Southern California Gas
 Southern California Edison
 City of Irvine
 City of Orange
 City of Santa Ana
 County of Orange Development Services
 OC Flood Control District
 SCAQMD
 Southern California Edison
 Orange County Fire Authority
 SOCCCD
 Rancho Santiago CC District
 Irvine Ranch Water District
 Spectrum Cable
 AT&T
 Charter Communications
 Cox Communications
 Caltrans District #12
 OCTA Planning & Development
 Regional Water Quality Control Board
 County of Orange, Environmental Health Division
 Orange County Sanitation District #7
 County of Orange Public Works
 County of Orange Health Department
 Tustin Historical Society
 Airport Land Use Commission

Michelle Steel, OC Congressional Representative
 East Orange County Water District

Mailing Address

300 South C Street, Tustin, CA 92780
 1601 E. Chesnut Avenue, Santa Ana, CA 91701
 5050 Barranca Parkway, Irvine, CA 92714
 P.O. Box 3334, Anaheim, CA 92804
 1919 South State College Blvd. Anaheim, CA 92806-6114
 1325 S. Grand, Santa Ana, Ca 92705
 P.O. Box 19575, Irvine, CA 92723
 300 E. Chapman Ave., Orange, CA 92866
 PO Box 1988, Santa Ana, CA 92702
 PO Box 4048, Santa Ana, CA 92702-4048
 PO Box 4048, Santa Ana, CA 92702-4048
 21865 Copley Drive, Diamond Bar, CA 91765
 2131 Walnut Grove Blvd., 2nd Floor, Rosemead, CA 91770
 1 Fire Authority Road, Irvine, CA 92602
 28000 Marguerite Parkway, Mission Viejo, CA 92692
 2323 N. Broadway, Rm 112, Santa Ana, CA 92706
 15600 Sand Canyon Avenue, P.O. Box 57000, Irvine, CA 92619
 2230 East 17th Street, Santa Ana, CA 92705
 3939 East Coronado Street, 2nd Floor, Anaheim, CA 92806
 17777 Center Court Drive North, 8th Floor, Cerritos, CA 90703
 30652 Santa Margarita Parkway, F101D, Rancho Santo Margarita, CA 92688
 1750 E. 4th Street, Suite 100, Santa Ana, CA 92705
 500 S. Main Street, P.O. Box 14184, Orange, CA 92613
 3737 Main St., Suite 500 Riverside, CA 92501-3348
 1241 East Dyer Road, Suite 120, Santa Ana, CA 92705
 10844 Ellis Avenue, Fountain Valley, CA 92708
 P.O. Box 4048, Santa Ana, CA 92702-4048
 405 West 5th Street, Santa Ana, CA 92701
 395 El Camino Real, Tustin, CA 92780
 3160 Airway Avenue, Costa Mesa, CA 92626

17011 Beach Boulevard, Suite 570, Huntington Beach CA 92647
 185 N. McPherson Road, Orange, CA 92869

E-Mail Address

asoria@tustin.k19.ca.us;
kathleen.gil@sausd.us;
jessebarron@iusd.org;

jeff.clark@sce.com;
sescobedo@cityofirvine.org;
abrodkin@cityoforange.org;
mmccann@santa-ana.org;

lily.Sandberg@ocpw.ocgov.com;
lsun@aqmd.com;

AndrewKeyworth@ocfa.org;
ssembiazza@socccd.edu; mephrem@socccd.edu;
Darryl_Taylor@rscdd.edu;
rios@irwd.com; lew@irwd.com;

rb2751@att.com;
judy.bowers@charter.com;
travis.haught@cox.com;
scott.shelley@dot.ca.gov;
clarwood@octa.net;
ken.williams@waterboards.ca.gov;
eteam@ochca.com;
abrandt@ocsd.com;

Lchoum@ocair.com;

Contact Name

Anthony Soria
 Kathleen Gil
 Jesse Barron, Assistant Director
 Carey Downs
 Katrina Regan
 Jeff Clark
 Sarah Escobedo
 Ashley Brodtkin
 Melanie McCann

Lily Sandberg, OC Survey
 Lijin Sun, Prgm. Supervisor (CEQA IGR)
 Joycelyn Yue
 Andrew Keyworth
 Sandi Sembiazza; Medhanie Ephrem
 Darryl Taylor

Renee Bergeron
 Judy Bowers
 Travis Haught
 Scott Shelley
 Charles Larwood
 Ken Williams

Angela Brandt

Lea U. Choum

Index of Interested Parties
Orange County Housing Developers List

Company

Lennar Corp
Taylor Morrison
Irvine Pacific LP
Tri Pointe Homes Inc
Toll Brothers Inc
California Pacific Homes Inc
Brookfield Residential Southern California
Shea Homes
KB Home
Trumark Homes
Landsea Homes
The New Home Co.
Pulte Homes Inc
Meritage Homes Corp
Intracorp Homes
Bonanni Development
Melia Homes Inc
Richmond American Homes
Olson Co.
Baldwin & Sons
Century Communities
America Housing Partners
Innovative Housing Opportunities
Jamboree Housing Co
Valued Housing & Barker Management
WCN & Associated Inc

Mailing Address

15131 Alton Parkway
4695 MacArthur Court, 8th floor
550 Newport Center Drive
19540 Jamboree Road, Ste. 300
725 W. Town & Country Rd., Ste. 200
16530 Bake Parkway, Ste. 200
3200 Park Center Drive, Ste. 1000
2 Ada, Ste. 200
10990 Wilshire Blvd., 7th floor
450 Newport Center Drive, Ste. 300
660 Newport Center Drive, Ste. 300
15231 Laguna Canyon Road, Ste. 250
27401 Los Altos, Ste. 400
5 Peters Canyon Road, Ste. 310
895 Dove St., Ste. 400
5500 Bolsa Ave., Ste. 120
8951 Research Drive, Ste. 100
5171 California Ave., Ste. 110
3010 Old Ranch Parkway, Ste. 100
20 Corporate Plaza Drive
4695 MacArthur Court, Ste. 350
4075 Prospect Ave, Suite 101
501 N. Golden Circle Drive, Suite 100
17701 Cowan Ave, Suite 200
1101 E. Orangewood Avenue
17782 Sky Park Circle

Irvine, CA 92618-2385
Newport Beach, CA 92660-1863
Newport Beach, CA 92660-7011
Irvine, CA 92612-8452
Orange, CA 92868-4723
Irvine, CA 92618-4685
Costa Mesa, CA 92626-7228
Irvine, CA 92618-5325
Los Angeles, CA 90024-3907
Newport Beach, CA 92660-7657
Newport Beach, CA 92660-6499
Irvine, CA 92618-7714
Mission Viejo, CA 92691-8550
Irvine, CA 92606-1788
Newport Beach, CA 92660-8921
Huntington Beach, CA 92649-1188
Irvine, CA 92618-4237
Irvine, CA 92617-3036
Seal Beach, CA 90740-2751
Newport Beach, CA 92660-7901
Newport Beach, CA 92660-8816
Yorba Linda, California 92886
Santa Ana, CA 92705
Irvine, California 92614
Anaheim, CA 92805
Irvine, California 92614-6404

E-Mail Address

[info@irvinepacific.com;](mailto:info@irvinepacific.com)
[info@tripointehomes.com;](mailto:info@tripointehomes.com)

[Info@brookfieldrp.com;](mailto:Info@brookfieldrp.com)

[customerrelations@kbhome.com;](mailto:customerrelations@kbhome.com)
[rbuttigieg@trumarkco.com;](mailto:rbuttigieg@trumarkco.com)
[info@landsea.us;](mailto:info@landsea.us)
[press@nwhm.com;](mailto:press@nwhm.com)

[Elliot.mann@meritagehomes.com;](mailto:Elliot.mann@meritagehomes.com)
[newportbeach@intracorphomes.com;](mailto:newportbeach@intracorphomes.com)
[ed@bonannidevelopment.com;](mailto:ed@bonannidevelopment.com)
[info@melia-homes.com;](mailto:info@melia-homes.com)
[James.furey@mdch.com;](mailto:James.furey@mdch.com)
[vbaena@theolsonco.com;](mailto:vbaena@theolsonco.com)
[jnunes@baldwinsons.com;](mailto:jnunes@baldwinsons.com)

[info@AmericanHousingPM.com;](mailto:info@AmericanHousingPM.com)
[info@innovativehousing.com;](mailto:info@innovativehousing.com)

[contact@barkermgt.com;](mailto:contact@barkermgt.com)
[wncpp@wncinc.com;](mailto:wncpp@wncinc.com)

Index of Interested Parties

Tustin Home Owners Association/Property Management Companies List

Alicante HOA c/o First Service Residential
Almeria HOA c/o Optimum Property Management
Ambrose Lane c/o Transpacific Management Services
Arborwalk HOA c/o Association Management
Arcada Community Association
B Street Townhomes c/o Sterling Property Management
BAHAMAS c/o Regent Association Services
Barcelona Hoa c/o Encore Property Management
Bellewick Community Association
Briarcliff c/o Optimum Property Management
Brighton Terrace Community Association c/o Regent As
Broadmoor Park Association c/o Dynamic Management
Canela At Vintner Grove (Cantada) c/o Professional Con
Columbus Grove c/o Powerstone Property Managemen
Columbus Square c/o First Service Residential
Corte Villa c/o Regent Association Services
Eagle Crest HOA c/o Diversified Real Property
El Dorado c/o Lordon Management Company
Emerson c/o Lordon Management Company
Enderle Gardens c/o Accell Property Management, Inc.
Estancia HOA c/o Diversified Association Management
Estrella Hills HOA c/o Association Management
Flamingo Place c/o Linda Giel
Georgian HOA c/o Regent Association Services
Gold Key HOA
Greenwood HOA c/o Carlos Andrade, PMP Managemer
Influential Square HOA c/o Regent Association Services
La Montana c/o Optimum Property Management, Inc.
Laurelwood Townhouse Association c/o Optimum Prop
Macaw Cove HOA c/o Interpacific Asset Management
Madrid c/o Encore Property Management
Malaga Community Association
Mandevilla c/o DML Property Management LLC
Maricopa Community Association c/o Villageway Prope
Marshall Lane HOA
Miramonte Community c/o Powerstone Property Mana
Montecito Community Association c/o Action Property
Monterey At Tustin Ranch c/o Villageway Property Mar
Monterey Pines c/o Greenwood & McKenzie
The Orchards c/o Optimum Property Management
Palmwood Association c/o Diversified Real Property
Palo Vista c/o Encore Property Management
Park Tustin HOA c/o Cardinal Property Management
Pinetree Park Apartments c/o Anza Management
Presidio c/o Optimum Property Management
Prospect Park North & South HOA c/o Powerstone Proj
Prospect Village c/o Powerstone Property Management

Aliso Viejo, CA 92656
Irvine, CA 92602
Tustin, CA 92780
Chino Hills, CA 91709

Brea, CA 92821
Santa Ana, CA 92705
Corona, CA 92878
Tustin, CA 92781
Irvine, CA 92602
Tustin, CA 92780
Laguna Hills, CA 92653
Foothill Ranch, CA 92610
Tustin, CA 92782
Tustin, CA 92780
Santa Ana, CA 92705
Tustin, CA 92780
Tustin, CA 92780
Tustin, CA 92780
Laguna Hills, CA 92653
Tustin, CA 9270
Chino Hills, CA 91709
Tustin, CA 92780
Santa Ana, CA 92705

Valencia, CA 91355
Santa Ana, CA 92705
Irvine, CA 92602

Westminster, CA 92683
Corona, CA 92879
Tustin, CA 92780
Tustin, CA 92782
Laguna Hills, CA 92653

Irvine, CA 92618
Irvine, CA 92618
Laguna Hills, CA 92653
Tustin, CA 92780
Tustin, CA 92780
Tustin, CA 92780
Corona, CA 92879
Santa Ana, CA 92705
Newport Beach, CA 92660
Tustin, CA 92780
Irvine, CA 92618
Irvine, CA 92618

Katie Davies
Morgan Hardigree

Sasha Camargo

Sue Bosek
Lupe Vargas
Roxie Sanchez

Krista Difede
Jay Wilson
Jan (Yon) Esterhuizen

Fatima Lahouty
Holly Dawson
Jay Wilson
Alec Robbie
Ashley Bardman
Karina Almeida

Alec Robbie
Sasha
Linda Giel
Jay Wilson

Carlos Andrade
Martha Castillo
Adian Fonseca
Gabe Garcia
Yasmin Fahid
Roxy Sanchez

Danny Lemansky
John Muller
Rosemary
Larissa Quella
Samantha Alvarez
Lisa Terry

Gabe Garci
Alec Robbie
Stephanie Shumann
Mary Ann Hurley

Morgon Taylor
Valerie VanHorn
Tawni Farrell

Quail Meadows Community Association c/o Stonekastk
Rancho Monterey Apartments c/o Irvine Apartment Co
Rancho San Juan Estates c/o DML Property Manager
Rancho Santa Fe Apts. c/o Irvine Apartment Communit
Rancho Veracruz c/o Optimum Property Management
San Juan Meadows c/o Optimum Property Managemen
San Marino c/o Keystone Pacific Property Management
San Miguel Community c/o Optimum Property Manage
San Souci HOA
San Rafael c/o Lordon Property Management
Sedona c/o Crummack-Hueby Property Management
Serrano HOA c/o Encore Property Management
Sevilla HOA c/o Optimum Property Management
Shadow Canyon HOA c/o Optimum Property Managem
Shadowbrook c/o Optimum Property Management
Sierra Vista Apartment c/o Irvne Apartment Communit
Sycamore Gardens c/o Edenn Property Management
Sycamore Glen Condominium Association c/o Stonekas
Travilla Maintenance Association c/o Optimum Propert
Tree Haven Owners Association c/o Regent Association
Treviso HOA c/o Lordon Management Company
Tustin Acres c/o Progressive Property Mgmt.
Tustin Auto Center Association c/o Powerstone Propert
Tustin Commons HOA c/o Gallery Property Manager
Tustin Condominium Owners Association
Tustin Field I c/o Powerstone Property Management
Tustin Field II c/o Transpacific Property Management
Tustin Gold Key Association
Tustin Greens
Tustin Grove HOA c/o Keystone Pacific Property Manag
Tustin Imperial HOA c/o Villageway Property MGMT
Tustin Meadows HOA c/o Action Property Management
Tustin Park Villas c/o Regent Association Services
Tustin Place c/o The Management Trust
Tustin Ranch Community Association I c/o Action Prope
Tustin Ranch Community Association II c/o Regent Asso
Tustin Ranch Community Association III c/o Lordon Mar
Tustin Ranch Estates c/o Keystone Pacific Property
Tustin Township HOA c/o Amber Property Managemen
Tustin Village Community Association c/o Regent Assoc
Tustin Village II c/o La Palma Hills Management Co.
Tustin Villa HOA c/o Regent Association Services
Valencia c/o Encore Property Management
Ventana c/o Powerstone Property Management
Venturanza Del Verde c/o Sea Breeze Management Company
Vidorra c/o Optimum Property Management
Villa Vallerto Association c/o Dove Management

Anaheim, CA 92808
Newport Beach CA 92658
Tustin, CA 92782
Newport Beach, CA 92658
Tustin, CA 92780
Irvine, CA 92602
Irvine, CA 92606
Tustin, CA 92780

Tustin, CA 92780
Lake Forest, CA 92630
Corona, CA 92879
Irvine, CA 92602
Irvine, CA 92602
Irvine, CA 92602
Newport Beach, CA 92658
Laguna Hills, CA 92653
Anaheim Hills, CA 92808
Irvine, CA 92602
Santa Ana, CA 92705
Tustin, CA 92780
Placentia, CA, 92870
Irvine, CA 92618
Laguna Hills, CA 92653
Orange, CA 92867
Irvine, CA 92618
Tustin, CA 92870

Irvine, CA 92606
Laguna Hills, CA 92653
Irvine, CA 92614
Santa Ana, CA 92705
Tustin, CA 92780
Irvine, CA 92618
Santa Ana, CA 92705
Tustin, CA 92780
Irvine, CA 92606
Mission Viejo, CA 92691
Santa Ana, CA 92705
Anaheim, CA 92801
Santa Ana, CA 92705
Corona, CA 92879
Irvine, CA 92618

Tustin, CA 92780
Irvine CA 92606

Richard Romero

Danny Lemansky

Jennifer Sarkis
LeeAndra Compton

Morgan Taylor

Janet Monroe
Brittany Harmon
Melissa Wudzke
Nancy Blasco
Morgan Taylor
Shannon Thornhill

Rina Sagal
Xochitl Yocham
Julie Cardenas

Bradley D. Crocker
Cindy Cattern
Donna Hinshaw

Kate Manriquez

Katherine Sheppard
Lauren Sanders
Adrian Robertson
Dorota
Cecilia de Heras
Andrew Wynsen
Rob Quinn

Jay Wilson
Janet Serna
Dana Harle
Tara Abakumoff
Julie Cardenas
Karen Daniels
Julie Cardenas
Stephanie Shumann
Joshua Scott
Kathryn Hinton
Stephanie Jebbia
Heather Smith

Village Homes Of Tustin c/o Accell Property Manageme
Vintage Development c/o Crummack Huseby, Inc
Walnut Park HOA c/o Right-Way Property Management
Wellington Pines Association c/o Villageway Property M
Williamshire HOA c/o Regent Association Services
Coventry Court c/o Property Management
Heritage Place c/o Property Management
Tustin Gardens c/o Property Management
Tustin Terrace c/o Property Management
Silverado Hacienda Memory Care
The Groves of Tustin Senior Living

Laguna Hills, CA 92653
Lake Forest, CA 92630
Irvine, CA 92612
Irvine, CA 92618
Santa Ana, CA 92705
Tustin, CA 92780
Tustin, CA 92780

Jason Carter
Angel Melgar
Pat Harmon
Steve Humphrey
Julie Virgen

APPENDIX F
REFERENCES

REFERENCES

The data used for the completion of this Housing Element comes from a variety of sources. These include, but are not limited to:

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13. City of Tustin Consolidated Plan
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The data sources represent the best data available at the time this Housing Element Update was prepared. The original source documents contain the assumptions and methods used to compile the data.

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