July 23, 2008

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

RE: Response to Grand Jury report - “No County for Old Boomers”

Dear Judge Wieben Stock,

This letter is submitted in response to the recent Grand Jury report “No County for Old Boomers – When Orange County Baby Boomers Retire, Where Will They Live.” We appreciate the opportunity to provide the following responses to the four specific findings and recommendations in the report.

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

**Response 1.** The City of Stanton disagrees with this finding as we are unfamiliar with the housing needs analyzes for the elderly populations of the other cities and the County of Orange. The 2008 update to the City’s Housing Element includes an analysis of the elderly population (65 years and above, per 2000 Census data), as well as other “special needs groups”, pursuant to state Housing Element law. This analysis includes households by age cohorts; the elderly with disabilities; and by housing tenure. The draft Housing Element also includes an inventory of assisted affordable housing units (some of which are occupied by seniors), as well as an inventory of sites which could be developed for residential uses (including affordable seniors housing). Also included within the draft Housing Element is a listing of financial resources available to prospective developers of affordable seniors housing.

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

**Response 2.** The City of Stanton disagrees with this finding as we are unfamiliar with the efforts of other cities or the County of Orange in analyzing the population growth and housing needs of the aging baby boomer generation. Pursuant to state Housing Element law, the City’s 2008 update to the Housing Element does include an analysis of special needs housing groups, including the elderly. The Draft Housing Element also includes actions which specifically address the housing needs of the identified special groups (i.e., elderly persons, large households, female-headed households, persons with disabilities, homeless population and transitional housing, and farm workers).

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

Response 3. The City of Stanton disagrees with this finding as we are unfamiliar with the status of the online access of Housing Elements of the other cities and the County of Orange. The City's draft Housing Element is available for public review on the City's web site. Upon approval of the Final Housing Element, it too will be made available on the City's web site.

Finding 4. Municipalities are not proactive enough in encouraging development of affordable senior housing.

Response 4. The City of Stanton disagrees with this finding as we are unfamiliar with the efforts of the other cities and the County of Orange in encouraging the development of affordable senior housing within their jurisdictional boundaries. The City of Stanton has in the past, and will continue in the future, to work with developers through the provision of financial assistance; modification of development standards; and other incentives to encourage the production of affordable senior housing within the city.

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

Response 1. The City of Stanton will not be implementing this recommendation as part of the 2008 update to the Housing Element. State law requires every city and county in California to update the Housing Element of its General Plan periodically according to a state-mandated schedule. For jurisdictions in Orange County, the due date for the next Housing Element revision was June 30, 2008. Following the June 4, 2008 Stanton Planning Commission public hearing, the Draft Housing Element was forwarded to the state Housing and Community Development Department for review and comment. While the Grand Jury report raises very important issues related to the future housing needs of senior citizens, the timing of the requested action is problematic for the current Housing Element cycle. In addition, the data and analysis requested by the Grand Jury is not currently required under state Housing Element law. Therefore, while the City of Stanton supports this Grand Jury recommendation for future Housing Element updates, we respectfully disagree that this work should be completed for the current element because it is not feasible due to the scheduling reasons described above. If the current state Housing Element law was to change, the City of Stanton would amend its Housing Element to comply.

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

Response 2. The City of Stanton will not be implementing this recommendation as part of the 2008 update to the Housing Element. While the City agrees that this recommendation would provide valuable information for local government policy-makers and the housing industry, again the timing is problematic due to the state-mandated schedule for updating Housing Elements. The City supports the inclusion of such information in future Housing Element updates, but we respectfully disagree that this additional analysis should be required in the current housing element cycle for the reasons
described in Response 1, above. If the current state Housing Element law was to change, the City of Stanton would amend its Housing Element to comply.

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

**Response 3.** The City of Stanton agrees with this recommendation and has already implemented the recommendation by posting the City's Draft Housing Element on the City website. Upon approval of the Final Housing Element, it too will be made available on the City’s web site.

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

**Response 4.** The City of Stanton agrees with this recommendation. City staff routinely confers with developers regarding development opportunities, and we will continue to encourage the development of affordable senior housing pursuant to Housing Element policies.

Sincerely,

[Signature]

A.A. Ethans
Mayor

Cc: Ann Avery Andres
    Foreman, Orange County Grand Jury
    700 Civic Center Drive West
    Santa Ana, CA 92701