

RESOLUTION NO. 2022-064

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA ANA APPROVING THE SANTA ANA GENERAL PLAN AMENDMENT FOR THE 6TH CYCLE HOUSING ELEMENT UPDATE (GPA NO. 2021-01) AND ADOPTING AN ADDENDUM TO THE PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE GENERAL PLAN UPDATE (SCH #2020029087)

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SANTA ANA AS FOLLOWS:

Section 1. The City Council of the City of Santa Ana hereby finds, determines, and declares as follows:

- A. California Government Code Section 65302(c) mandates that each city include a housing element in its general plan. The housing element sets forth goals, policies, and programs that address the future housing needs for all income levels.
- B. In 2022, the City Council of the City of Santa Ana approved the General Plan Update and adopted a Program Environmental Impact Report (SCH #2020029087) pursuant to the California Environmental Quality Act ("CEQA").
- C. Given the priority to address California's critical housing needs, the Housing Element is required to be updated every eight (8) years.
- D. The 6th Cycle Housing Element Update sets forth the housing policies for the City, facilitates the preservation and development of housing, and establishes programs to accommodate the City's share of the regional housing need.
- E. Pursuant to state law, the Housing Element must include the following provisions:
 - a. An analysis of existing and projected housing needs
 - b. An analysis of potential constraints on housing
 - c. An analysis of assisted housing developments that are "at-risk" and eligible to change from low-income housing uses
 - d. An inventory of sites suitable for housing development
 - e. An analysis of the plan's conformance with affirmatively furthering fair housing (AFFH) requirements
 - f. An analysis of any special housing needs

- g. An evaluation of the previous Housing Element
 - h. Goals, objectives, policies, and implementation programs
- F. The General Plan Amendment for the 6th Cycle Housing Element Update was initially circulated for public review on October 11, 2021, and submitted to the California Department of Housing and Community Development (HCD) on October 21, 2021, for its required review. The City subsequently submitted a revised element to HCD on February 24, 2022, for its required review. City staff worked closely with HCD staff assigned to review Santa Ana's draft Housing Element to address comments and revise the element to ensure compliance with state housing law.
- G. Pursuant to CEQA, City staff evaluated the proposed changes in the General Plan Amendment for the 6th Cycle Housing Element Update in light of the standards for subsequent environmental review outlined in State CEQA Guidelines section 15162, and concluded that the proposed changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified effects that were previously disclosed in the Program Environmental Impact Report. In addition, the City concluded there is no new information of substantial importance showing that the General Plan Amendment for the 6th Cycle Housing Element will have significant effects not previously identified; that previously examined significant effects will be more severe; or that mitigation measures previously found infeasible are now feasible. As such, no subsequent EIR or mitigated negative declaration is required. Nonetheless, the proposed changes would necessitate minor technical changes or additions to the Program Environmental Impact Report, and thus the City has prepared an Addendum to the Program Environmental Impact Report pursuant to State CEQA Guidelines section 15164.
- H. On December 20, 2021, the Planning Commission held a duly-noticed public hearing and considered the CEQA document, staff report, recommendations by staff, and public testimony concerning GPA No. 2021-01. The Planning Commission voted to recommend that the City Council adopt a resolution approving GPA No. 2021-01.
- I. On July 19, 2022, the City Council held a duly-noticed public hearing and considered the Program Environmental Impact Report, Addendum, staff report, recommendations by staff, and public testimony concerning GPA No. 2021-01.
- J. All statements and findings contained in the 6th Cycle Housing Element Update are incorporated herein by this reference as though fully set forth.

Section 2. State CEQA Guidelines section 15164 requires lead agencies to

prepare an addendum to a previously certified EIR or approved negative declaration if some changes or additions to the project are necessary but none of the conditions requiring preparation of a subsequent EIR are present. The City Council has reviewed and considered the General Plan Update Program Environmental Impact Report and the Addendum, and finds that these documents taken together contain a complete and accurate reporting of all of the potential environmental impacts associated with the General Plan 6th Cycle Housing Element Update. The City Council further finds that the Addendum has been completed in compliance with CEQA and the State CEQA Guidelines. The City Council further finds and determines that the Addendum reflects the City's independent judgment.

Section 3. Based on the substantial evidence set forth in the record, including but not limited to the General Plan Update Program Environmental Impact Report and the Addendum, the City Council finds that an addendum is the appropriate document for disclosing the changes to the General Plan 6th Cycle Housing Element Update, and that none of the conditions identified in Public Resources Code section 21166 and State CEQA Guidelines section 15162 requiring subsequent environmental review have occurred, because:

- (a) The General Plan 6th Cycle Housing Element Update does not constitute a substantial change that would require major revisions of the General Plan Update Program Environmental Impact Report due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (b) There is not a substantial change with respect to the circumstances under which the General Plan 6th Cycle Housing Element Update will be developed that would require major revisions of the General Plan Update Program Environmental Impact Report due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects.
- (c) New information of substantial importance has not been presented that was not known and could not have been known with the exercise of reasonable diligence at the time the General Plan Update Program Environmental Impact Report was adopted, showing any of the following: (i) that the modifications would have one or more significant effects not discussed in the earlier environmental documentation; (ii) that significant effects previously examined would be substantially more severe than shown in the earlier environmental documentation; (iii) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects but the applicant declined to adopt such measures; or (iv) that mitigation

measures or alternatives considerably different from those analyzed previously would substantially reduce one or more significant effects on the environment, but which the applicant declined to adopt.

Section 4. The City Council hereby approves and adopts the Addendum, attached hereto as a link in Exhibit A.

Section 5. The City Council hereby approves and adopts General Plan Amendment No. 2021-01. The 6th Cycle Housing Element Update is attached hereto as a link in Exhibit B and incorporated herein by reference as though fully set forth herein. This decision is based upon the evidence submitted at the above said hearing, which includes, but is not limited to the Request for City Council Action dated July 19, 2022, and exhibits attached hereto; and the public testimony, all which are incorporated herein by reference.

Section 6. The City Council hereby authorizes the Director of the Planning and Building Agency, or his or her designee, to approve ministerial revisions, or conforming edits, in the 6th Cycle Housing Element, such as spelling, formatting, punctuation, or revisions of such nature, which are non-legislative and that result from HCD's review for final certification of the Housing Element, without further Planning Commission or City Council consideration or re-adoption of the 6th Cycle Housing Element Update.

Section 7. This Resolution shall take effect immediately upon its adoption by the City Council, and the Clerk of the Council shall attest to and certify the vote adopting this Resolution.

Section 8. The adopted General Plan Update Program Environmental Impact Report and the Addendum are on file and available for public review at the City's Housing Element website and City Main Library at 20 Civic Center Plaza. The City Clerk is the custodian of these documents.

Section 9. City staff is directed to prepare and file a Notice of Determination within five working days of the adoption of this Resolution.

ADOPTED this 19th day of July, 2022.



Vicente Sarmiento
Mayor

APPROVED AS TO FORM:
Sonia R. Carvalho, City Attorney

By: John M. Funk
John M. Funk
Chief Assistant City Attorney

AYES: Councilmembers Hernandez, Lopez, Mendoza, Penaloza,
Phan, Bacerra, Sarmiento (7)

NOES: Councilmembers None (0)

ABSTAIN: Councilmembers None (0)

NOT PRESENT: Councilmembers None (0)

CERTIFICATION OF ATTESTATION AND ORIGINALITY

I, DAISY GOMEZ, Clerk of the Council, do hereby attest to and certify the attached Resolution No. 2022-064 to be the original resolution adopted by the City Council of the City of Santa Ana on July 19, 2022.

Date: 7/26/2022

N. A. Ozy
for Daisy Gomez
Clerk of the Council
City of Santa Ana

EXHIBIT A

All materials for Exhibit A, the General Plan Program Environmental Impact Report (PEIR) Addendum, may be accessed at: <https://www.santa-ana.org/general-plan-housing-element-update/> and are also on file and available at the City's Planning and Building Agency.

EXHIBIT B

All materials for Exhibit B, the Draft General Plan Housing Element Update, may be accessed at: <https://www.santa-ana.org/general-plan-housing-element-update/> and are also on file and available at the City's Planning and Building Agency.

City of Santa Ana General Plan Housing Element 2021-2029

City of Santa Ana
Planning Division



Certified: September 16, 2022

Acknowledgments

CITY COUNCIL

Vicente Sarmiento, Mayor, Citywide
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EXECUTIVE MANAGEMENT

Kristine Ridge, City Manager
Steven Mendoza, Assistant City Manager

CITY ATTORNEY

Sonia R. Carvalho, City Attorney

PLANNING & BUILDING AGENCY

Minh Thai, Executive Director
Fabiola Zelaya Melicher, Planning Manager
Ricardo Soto, Senior Planner
Jerry Guevara, Associate Planner

COMMUNITY DEVELOPMENT AGENCY

Judson Brown, Housing Manager
Holli Safran, Com. Dev. Analyst

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Key Acronyms and Terms

ACS..... American Community Survey

ADA..... Americans with Disabilities Act

ADU..... Accessory Dwelling Unit

AHOCO..... Affordable Housing Opportunity and Creation Ordinance

AFFH..... Affirmatively Furthering Fair Housing

AFH..... Assessment of Fair Housing

AI..... Analysis of Impediments to Fair Housing Choice

AMI..... Area Median Income

CBI..... Community Building Initiatives

CDA..... Santa Ana Community Development Agency

CDBG..... Community Development Block Grant

CEQA..... California Environmental Quality Act

CHAS..... Comprehensive Housing Affordability Strategy

CIP..... Capital Improvement Plan/Program

CLT..... Community Land Trust

COM-LINK..... Communication Linkage Forum

CPTED..... Crime Prevention Through Environmental Design

DFEH..... California Department of Fair Employment and
Housing

DP..... Development Project Review

DOF..... Californian Department of Finance

EDD..... California Employment Development Department

ESG..... Emergency Solutions Grant

FHA..... Fair Housing Act

FHEO..... Fair Housing and Equal Opportunity

GF..... Santa Ana General Fund

GPAG..... General Plan Advisory Group

HCD..... California Department of Housing and Community
Development

HHAP..... Homeless Housing, Assistance, and Prevention Grant

HOME..... HOME Investment Partnership Program

HOME-ARP..... HOME-American Rescue Plan

HQTA..... High Quality Transit Areas



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HUD..... Unites States Department of Housing and Urban Development

IHF..... Inclusionary Housing Fund

JCEO..... Just Cause Eviction Ordinance

LEAP..... Local Early Action Planning Grants

LEED..... Leadership in Energy and Environmental Design

LIHTC..... Low Income Housing Tax Credit Program

LMI..... Low or Moderate Income

LMIHAF..... Low and Moderate Income Housing Asset Fund

LUE..... General Plan Land Use Element

MEMU..... Metro East Mixed Use Overlay Zone

MFI..... Median Family Income

NIP..... Neighborhood Initiatives Program

OCCOG..... Orange County Council of Governments

OCHFT..... Orange County Housing Finance Trust

OCTA..... Orange County Transportation Authority

OEHHA Office of Environmental Health Hazard Assessment's

PBA..... Santa Ana Planning and Building Agency

PBV..... Project Based Voucher Program

PLHA..... Permanent Local Housing Allocation

PRCSA..... Santa Ana Parks, Recreation, and Community Services Agency

PREP..... Proactive Rental Enforcement Program

PRS..... Permanent Supportive Housing

RCAA..... Racially Concentrated Areas of Affluence

RCOC..... Regional Center of Orange County

RDA..... Santa Ana Redevelopment Agency

R/ECAP..... Racially or Ethnically Concentrated Areas of Poverty

RFP..... Request for Proposals

RHNA..... Regional Housing Needs Assessment/Allocation

RRT..... Residential Response Team

RSO..... Rent Stabilization Ordinance

SABHC..... Santa Ana Building Healthy Communities

SAHA..... Santa Ana Housing Authority

SAMC..... Santa Ana Municipal Code

SARTC..... Santa Ana Regional Transit Center

SCAG..... Southern California Association of Governments



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SD.....Specific Development
SD-84.....Transit Zoning Code: Specific Development No. 84
SEMAP..... Section 8 Management Assessment Program
SMART..... Santa Ana Multi-Disciplinary Response Team
SPR.....Site Plan Review
SP-2.....Harbor Mixed Use Transit Corridor Specific Plan
SP-4.....MainPlace Specific Plan
STATE.....State of California
TCAC..... California Tax Credit Allocation Committee
TOD.....Transit Oriented Development
VMT.....Vehicle Miles Traveled



Introduction

This chapter introduces the Housing Element: its purpose, content, public outreach process, and relationship to other City planning efforts.

OVERVIEW

Incorporated in 1886, Santa Ana has a rich historical and cultural heritage. As the county seat, it boasts an eclectic urban environment, burgeoning employment centers, transit hub, historic neighborhoods and downtown, and a rich history back to the mid-1800s. These features distinguish Santa Ana as Orange County's downtown.

The City of Santa Ana has seen significant changes in its housing market and housing conditions during the last decade. Housing and apartment rents have increased steadily during this time. As an urban center, the revitalization of housing and neighborhoods is also a critical concern. At the same time, the City of Santa Ana has one of the most diverse populations of all communities in the County of Orange.

The Housing Element recognizes the community's housing needs and the complexity of programs needed to address them. The vision, goals, policies, and programs are designed to address the following issues:

- Adapting to changing housing market conditions.
- Meeting state-mandated regional housing needs goals.
- Furthering quality housing and neighborhoods.
- Accommodating social and economic diversity.
- Assisting residents with special housing needs.
- Supporting the city's long-term economic development.

The Housing Element seeks to address each of these planning issues, while balancing them with other City goals and objectives that will further the city's long-term vision, as set forth in the General Plan of "Golden City Beyond: A Shared Vision for Santa Ana."



1

PURPOSE AND CONTENT OF ELEMENT



State law requires that cities develop housing programs to meet their fair share of the region's housing needs for their community. A key part of this goal is addressing the Regional Housing Needs Assessment (RHNA) and state law requirements to plan, facilitate, and encourage housing production commensurate with their assigned need. Santa Ana has a planning goal of accommodating 3,137 housing units from 2021 to 2029.

Santa Ana's housing element is the City's state-mandated plan to facilitate the development, improvement, and preservation of housing. The Housing Element is organized into the following sections:

- **Housing Element Framework.** This introduces Santa Ana's housing needs and contains an analysis of resources to address those needs. This is followed by the Policy Framework, which is a series of goals and policies, and a Housing Plan of implementation programs.
- **Appendix A: Housing Needs.** This appendix contains an analysis of demographic, economic, neighborhood, and housing characteristics; special needs of residents; and other housing needs in the community.
- **Appendix B: Housing Constraints.** This appendix contains an analysis of potential and actual market, government, and environmental constraints to the development, maintenance, and improvement of housing.
- **Appendix C: Housing Resources.** This appendix contains an inventory, analysis, and assessment of the City's resources to address its housing needs, including land, preservation opportunities, and financial resources.
- **Appendix D: Program Evaluation.** This appendix contains a summary of progress toward meeting the City's 2014–2021 housing goals and an evaluation of the appropriateness of those goals and programs.
- **Appendix E: Affirmatively Affirming Fair Housing.** This appendix includes an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal government and state of California to ensure fair housing choice.
- **Appendix F: Public Outreach.** This appendix details the venues provided to residents and stakeholders to discuss housing needs and opportunities, including workshops, stakeholders groups, study sessions, and visioning.



RELATIONSHIP TO THE GENERAL PLAN

Santa Ana's 2021-2029 Housing Element is directly related to local-, regional-, and state-mandated planning efforts. The following text describes the relationship of the Housing Element with these planning efforts and how the City maintains consistency with each effort.

General Plan

In 2022, the City of Santa Ana completed a years-long effort to comprehensively update its General Plan. The 2021-2029 Housing Element was updated in concert with other elements of the General Plan to ensure consistency. As required by California law, the Housing Element was updated to ensure consistency with the safety element, which provides and informs the Housing Element in relation to critical information about the location of natural and human-caused hazards. As required by state law, the Housing Element will periodically be updated over the 2021-2029 planning period to maintain consistency with the Santa Ana General Plan as amendments are proposed.

Regional Housing Needs Assessment

The Southern California Association of Governments (SCAG) is responsible for allocating fair shares of housing needs, assigned by the State of California, to jurisdictions under its planning authority. The allocation of housing needs is based on statewide and local projections. Local governments must ensure that adequate sites, public facilities, infrastructure, and services are available to facilitate housing production in accordance with their assigned share of the RHNA. The RHNA for the 2021 to 2029 planning period is 3,137 new units, which includes 42 units transferred from the County of Orange to Santa Ana as part of a joint powers agreement to co-develop an affordable housing project. The Housing Element contains goals, policies, and programs to address the City's share of the region's housing need.

Other Related Planning Efforts

The City continues to implement adopted plans and initiatives that implement the Housing Element. The update of the zoning code was initiated following the adoption of the General Plan and will implement revisions to development processes and standards, zoning districts, and other associated items discussed in the Housing Plan. The Housing Element is consistent with adopted specific plans and zoning districts and will be amended, as necessary, to maintain consistency with related planning efforts, in accordance with state law.



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Policy Framework

HOUSING VISION AND POLICY PLAN

Santa Ana's vision is to be the dynamic urban center of Orange County, acclaimed for its investment in children, neighborhood pride, enriching cultural experiences, appreciation of diversity, thriving economic climate, quality governmental services, and leadership among California cities. This vision underpins the Santa Ana General Plan—the blueprint for community development—and guides decision making regarding how resources should be allocated to different priorities.

Santa Ana community and civic leaders recognize the importance and value of together creating a community that provides opportunities for residents and workforce to meet their varied needs. The following is the overall housing vision that acknowledging the importance of equity, health, and sustainability in all housing policies:

Santa Ana residents have an equal right and opportunity to find suitable housing in quality residential neighborhoods that allow themselves, their families, and neighbors to live the fullest lives. We support an inclusive community that is multigenerational, culturally diverse, healthy, sustainable, and economically broad. The City will facilitate the production, rehabilitation, and improvement of rental and homeownership opportunities at different affordability levels consistent with these principles and the Santa Ana community.

Santa Ana is committed to this vision of a diverse community that increases housing choice, addresses housing insecurity, and improves neighborhoods for all residents. This Housing Element is the City's approach to achieving this vision. The following describes key topic areas for the Housing Element and presents goals and policies to provide a foundation for the Housing Plan.



2

HOUSING AND NEIGHBORHOODS



Vintage home in north Santa Ana

Santa Ana has a rich mosaic of neighborhoods distinguished by their history, architecture, housing types, and amenities. The city has a number of neighborhoods with historic resources, including French Park, Floral Park, Wilshire Square, West Floral Park, Washington Square, and Heninger Park. The city is also known for its original Mexican barrios, including the Logan, Lacy, Delhi, and Santa Anita neighborhoods, some of which date back to the late 1880s.

Rich in history and culture, Santa Ana's neighborhoods are more than simply collections of housing; in fact, our neighborhoods are the fundamental building blocks of the community. They profoundly define the quality of life experienced. Neighborhoods are where residents feel safe, where friendships and social ties develop, and where people identify with their community. Ultimately, neighborhoods are home. Therefore, the design and maintenance of neighborhoods—their buildings, streets, parks, open space, trees, and infrastructure—are critical to quality of life.



Quality neighborhoods provide a safe place for children

Some residential neighborhoods in Santa Ana are well preserved: streets are lined with trimmed canopy trees; physical infrastructure is sufficiently sized and in proper working order; and housing is well maintained. Some neighborhoods are stable but are beginning to show signs of deterioration and could benefit from neighborhood improvement. Yet other neighborhoods require significant reinvestment in housing, infrastructure, parks/open space, and public services.

Recent research also underscores how neighborhood conditions directly influence health. Important features that improve health include, among others: 1) rental housing that is affordable to residents; 2) affordable and available homeownership opportunities; 3) parks, trails, and recreational facilities; 4) affordable and healthy food options; 5) safety from crime and traffic; and 6) the mitigation or removal of environmental hazards. All of these pieces are as essential as the quality of housing and are critical to promoting more complete and healthy neighborhoods.

As a city committed to fostering neighborhood pride, investing in the lives of children and families, and providing a safe and supportive environment for its residents, Santa Ana's highest priority is creating livable neighborhoods. This will require the implementation of multifaceted strategies tailored for different neighborhoods. The City continues to direct substantial resources to achieving these objectives



and has set forth the following goals and policies to guide quality and sustainable housing and neighborhoods in Santa Ana.

Goal 1

Livable and affordable neighborhoods with healthy and safe housing conditions, community services, well-maintained infrastructure, and public facilities that inspire neighborhood pride and ownership.

Policies

- HE-1.1 **Housing Conditions.** Support the rehabilitation, repair, and improvement of single-family, multiple-family, and mobile homes.
- HE-1.2 **Neighborhood Involvement.** Encourage active and informed participation in neighborhood organizations to help identify needs and implement programs aimed at the beautification, improvement, and preservation of neighborhoods.
- HE-1.3 **Complete Neighborhoods.** Improve neighborhood quality by locating or providing access to complementary services and public facilities, including the integration of community gardens and access to healthy food options in neighborhoods.
- HE-1.4 **Healthy Neighborhoods.** Create and maintain parks and open spaces; plant trees, green parkways, and medians; support access to healthy food options; and maintain a continuous pattern of pathways that encourage an active and healthy lifestyle.
- HE-1.5 **Infrastructure and Public Services.** Provide quality community facilities, physical infrastructure, traffic management and parking control, and other public services to promote the livability, safety, and vitality of neighborhoods.
- HE-1.6 **Proactive Code Enforcement.** Enforce building and property maintenance standards by proactively conducting property inspections, educating landlords and tenants, and removing blighted, unhealthy, or dangerous housing conditions while ensuring low-income residents are not criminalized.



Neighborhood projects



- HE-1.7 **Historic Preservation.** Support preservation and enhancement of residential structures, properties, street designs, lot patterns, and other visible reminders of neighborhoods that are considered local historic or cultural resources.
- HE-1.8 **Public Safety.** Support efforts to improve neighborhood safety through environmental design, housing maintenance, rent stabilization, community-oriented policing, youth diversion activities, traffic safety, and other violence-prevention measures.
- HE-1.9 **Tenant Protections.** Provide information and resources to residential tenants regarding landlord-tenant laws that provide protection against unjust evictions, and State and local rent increase limits.
- HE-1.10 **Parking Management.** Support innovative and creative strategies that proactively minimize parking impacts and deficiencies within residential neighborhoods, including parking management requirements, installation of parking lifts, and incentives for active transportation.
- HE-1.11 **Community Ownership Opportunities.** Explore a right-of-first-refusal ordinance that would give a nonprofit housing organization the right of first refusal to purchase mobile home parks and publicly supported multifamily residential properties on the market to prevent tenant displacement, promote homeownership opportunities, and create long-term affordability.



HOUSING SUPPLY AND DIVERSITY

Where should we live? Near work, family, or community amenities? What kind of housing can we afford? Does this neighborhood, size of home, or quality of housing meet our household needs? Where would be the safest or most desirable place to retire? All of us ask these housing questions at different times in our lives—as we look for the first job, as we begin to have families, when our children move out of town, as we contemplate retirement, or when other life-changing events occur.

As expressed in the City’s vision, an adequate housing supply for our children, our workforce, our families, and our parents is a critical goal. Housing products and prices must also be diverse, providing a range of choices and price points suited to the different incomes, lifestyles, and needs of our residents and workforce. A broad housing stock includes single- and multiple-family housing, mobile homes, mixed/multiuse, and special needs housing. Providing affordable housing will help foster an inclusive community that accommodates residents of all ages and income levels.

To protect and enhance residential neighborhoods, the City is committed to growing strategically. Residential development is directed to locations that can accommodate population growth, and that growth must support larger, community-wide goals. The Metro East Mixed-Use Overlay Zone, Downtown Santa Ana, MacArthur Place, and similar areas support our economy and burgeoning job centers. Infill housing is encouraged along selected transit corridors and within existing neighborhoods as a means to reinvest in the community and create thriving neighborhoods.

Facilitating various housing solutions requires creative approaches. Market forces drive up land and construction costs, increasing the cost of housing. Although necessary to guide growth, land use regulations, development standards, building codes, local fees and taxes, and permit procedures also increase costs. Environmental and transportation issues influence where housing should be located and how it is designed.

Santa Ana will encourage housing projects that meet the needs of our residents and workforce. Through the implementation of design guidelines, new housing will include the latest in creative designs and site planning techniques. Increasing efforts will be placed on making housing accessible and suitable to people of all abilities and ages. Housing will incorporate sustainable “green” practices in design, site planning, and construction. The City will support active housing designs that encourage wellness.



Santa Ana is at the forefront of creating attractive and unique housing options.



The following goal and policies guide the City's efforts to improve supply and diversity of housing in Santa Ana.

GOAL 2

Foster an inclusive community with a diversity of quality housing, affordability levels, and living experiences that accommodate Santa Ana's residents and workforce of all household types, income levels, and age groups.

Policies

- HE-2.1 **Citywide.** Designate adequate land in the General Plan Land Use Element and Zoning for the development of a range of housing types to meet the identified needs of all economic segments of the community while providing a high quality of life for all residents.
- HE-2.2 **Downtown.** Strengthen Santa Ana's core downtown as a vibrant mixed-use and mixed-income environment by capitalizing on the government center, arts district, historic downtown, transit-oriented housing, and diverse neighborhoods.
- HE-2.3 **Urban Villages.** Create higher intensity, mixed-use urban villages and pedestrian-oriented experiences that access and support the office centers, commercial services, and cultural activities within District Centers and Urban Neighborhood designated areas.
- HE-2.4 **Rental Housing.** Facilitate the construction of rental housing for Santa Ana's residents and workforce, with a commitment to provide rental housing for extremely low-, very low-, and low-income residents as well as moderate-income Santa Ana workers.
- HE-2.5 **Diverse Housing Types.** Facilitate diverse types, prices, and sizes of housing, including single-family homes, apartments, townhomes, duplexes, mixed/multiuse housing, transit-oriented housing, multigenerational housing, accessory dwelling units, and live-work opportunities.
- HE-2.6 **Housing Design.** Require excellence in architectural design through the use of materials and colors, building treatments, landscaping, open space, parking, and environmentally sensitive ("green") building and design practices.



- HE-2.7 **Affordable Component.** Pursuant to the Affordable Housing Opportunity and Creation Ordinance (AHOCO), require eligible rental and ownership housing projects to include at least 15 percent of the rental housing units as affordable for low-income households; or 10 percent of the rental units affordable to very low-income households; or 5 percent of rental units affordable to lower income households (5 percent to low-income, 3 percent to very low-income, and 2 percent to extremely low-income households); or at least 5 percent of the units ineligible ownership projects affordable to moderate-income households. Implement various strategies using the in-lieu fees generated by AHOCO to provide a wide array of affordable housing options.
- HE-2.8 **Entitlement Process.** Provide flexible development review and entitlement processes that facilitate innovative and creative housing solutions, offer a consistent approval process, and allow for appropriate oversight.
- HE-2.9 **Housing Authority–Owned Sites.** Facilitate the development of affordable housing for very low-income and moderate-income families on Housing Authority–owned properties while keeping the properties under public ownership.
- HE-2.10 **Overcrowding Conditions.** Facilitate the development of accessory dwelling units and additions and improvements to existing homes to alleviate overcrowded housing conditions.
- HE-2.11 **Surplus Land.** Comply with the Surplus Land Act to promote affordable housing development on unused or underutilized public land.



HOUSING ASSISTANCE



Santa Ana’s community is defined by the many people who have made their way across the country or from other parts of the world, bringing with them different cultures and traditions. Many residents are first-, second-, or third-generation citizens and residents. Despite their varied backgrounds, the importance of family and shared sense of community form a common thread connecting Santa Ana residents.

There are challenges for how to assist residents in securing and maintaining affordable housing. Rising housing prices and rents make it increasingly difficult for lower- and moderate-income households to afford housing, resulting in growing cost burdens for residents. Rising cost burdens have contributed to significant overcrowding, displacement, and relocating out of Santa Ana.



The City of Santa Ana also faces unprecedented pressures. In 2011, the California legislature ended redevelopment and the federal government cut back funding for housing and community development activities. As a result, the City must be creative in leveraging resources with partner agencies to assist households and provide affordable housing. Moreover, the City must also make deliberate decisions about how best to allocate limited financial resources to different housing programs, given the trade-offs required.

The City’s housing vision affirms and supports a vibrant Santa Ana with a socially and economically diverse community of renters and homeowners. Housing our residents and workforce is a critical concern. Assisting households of all backgrounds, circumstances, and income levels will play an important role in achieving and maintaining homeownership, providing renters with relief from rent burdens and a greater range of choices in housing, and protecting vulnerable individuals and families from displacement.



GOAL 3

Increase opportunities for extremely low-, very low-, low-, and moderate-income individuals and families to find affordable housing, and afford a greater choice of rental and homeownership opportunities.

Policies

- HE-3.1 **Rental Assistance.** Provide rental assistance for individuals and families with extremely low-, very low-, and low-incomes with funding from the federal government.
- HE-3.2 **Homeownership.** Expand homeownership opportunities for low- and moderate-income residents and workers in Santa Ana through the provision of financial assistance, education, and collaborative partnerships.
- HE-3.3 **Housing Preservation.** Initiate and support collaborative partnerships with nonprofit organizations with a mission to provide affordable housing, identify state and federal funding, subordinate existing loans, and offer technical assistance to preserve the low and moderate affordability of publicly subsidized affordable housing at risk of conversion.
- HE-3.4 **Supportive Services.** Support the provision of employment training, child care services, rental assistance, youth services, and other community services that enable households to attain the greatest level of self-sufficiency and independence.
- HE-3.5 **Collaborative Partnerships.** Collaborate with nonprofit organizations, community land trusts, developers, and other government agencies to develop and provide affordable housing for residents.
- HE-3.6 **Homeownership Preservation.** Educate residents on foreclosure prevention assistance available through the state or federal government.
- HE-3.7 **Workforce Housing.** Explore opportunities for creating workforce housing, including for teachers, artists, and other residents working in Santa Ana.
- HE-3.8 **Affordable Housing.** Support the preservation of mobile home parks as affordable housing, including support for collective ownership to prevent displacement.



- HE-3.9 **Housing Stabilization.** Support measures that address impacts related to private and public development that may result in displacement from existing affordable housing.
- HE-3.10 **Prevent Displacement.** Prevent and avoid displacement of low-income households and ensure that, where necessary, it is carried out in an equitable manner, and ensure a priority preference for displaced families in affordable projects financed with City funds.

SPECIAL NEEDS



Santa Ana is unique in Orange County, containing a diversity of people of all backgrounds, family types, lifestyles, and income levels. While adding to the richness of Santa Ana, many residents have special housing needs. Some special needs are common to all, while others are more common to people of different ages and incomes. These groups include, but are not limited to, seniors, large families with children, people with disabilities, female-headed households, single-parent families, and people experiencing homelessness.

Fashioning an appropriate, creative, and effective response to this challenge requires a better understanding of the nature of special needs. Special needs may arise due to one's income, family characteristics, disability, health condition, or many other circumstances. This complexity requires a broad range of strategies for housing and services.

Providing housing for an aging population is one example. The retirement and aging of baby boomers have created the need for new housing options. While many seniors desire to age in place in their home, new forms of housing, such as life care facilities, offer a broader continuum of care. These types of facilities reduce the need for seniors to relocate multiple times to new housing. Single-family homes for the elderly are another popular option that give residents the ability to stay within their community and are typically affordable to moderate incomes.

Equally important is the changing nature of families. A growing trend is multigenerational households, defined as those consisting of more than two generations living under the same roof. This trend is due in part to the aging of residents, economic conditions and challenges of finding affordable housing, lifestyle preferences, and the cost of senior housing. Whereas the accessory dwelling unit or room addition concept is not new, developers are now building housing products for



multigenerational living as well as increasing the supply of accessory dwelling units.

Housing for people with disabilities or people experiencing homelessness is also changing. The traditional way to address homelessness with emergency shelters, transitional housing, and permanent supportive housing is being blended with the housing-first model. This approach focuses on placing people immediately into permanent housing. Housing First does not require people experiencing homelessness to address all of their problems, including behavioral health problems, or to graduate through a series of services programs before they can access housing. Housing First also does not mandate participation in services either before obtaining housing or in order to retain housing.

Santa Ana recognizes these changes and has set forth the following goal and policies to guide its approach to housing special needs groups.

GOAL 4

Provide sufficient rental and ownership housing opportunities and supportive services for seniors, people with disabilities, families with children, and people experiencing homelessness.

Policies

- HE-4.1 **Senior Housing.** Support development of affordable senior rental and ownership housing, readily accessible to support services; provide assistance for seniors to maintain and repair their homes to facilitate the maximum independent living.
- HE-4.2 **Family Housing.** Facilitate and encourage the development of larger rental and ownership units for large families, including extremely low-, very low-, and low-income families as well as the provision of childcare, after-school care, and other services on-site when feasible.
- HE-4.3 **Housing for Disabled People.** Support the development of permanent, affordable, and accessible housing that allows people with disabilities to live independent lives, and assist them in maintaining and repairing their homes.
- HE-4.4 **Service-Enriched Housing.** Support the provision of supportive services and service-enriched housing for persons with special needs, such as seniors, disabled people, homeless people, families, veterans, and people with medical conditions.



Sunrise Gardens is an example of assisted living housing in Santa Ana.

- HE-4.5 **Healthy Homes.** Support efforts to make homes healthier by addressing health hazards associated with lead-based paint and soil, asbestos, vermin, mold, and VOC-laden materials, and prohibiting smoking in multifamily projects, among others.
- HE-4.6 **Homeless Services.** Partner with homeless service providers to provide tenant-based and project-based housing opportunities linked with case management, employment, physical and mental health, substance abuse, and other wrap-around services for people experiencing homelessness.
- HE-4.7 **Regulatory Oversight.** Exercise appropriate land use, planning, and regulatory oversight over the operation, location, and impact associated with special needs housing and facilities consistent with state and federal housing laws.
- HE-4.8 **Housing Priority.** Provide that Santa Ana residents and workers receive a priority local preference for affordable housing created under the Affordable Housing Opportunity and Creation Ordinance or with City funding to the extent allowed under state law.

AFFIRMATIVELY FURTHERING FAIR HOUSING

State law now requires that all housing elements promote and affirmatively further fair housing opportunities in their communities for all persons based on the California Fair Employment and Housing Act, Government Code Section 65008, and any other state and federal fair housing law. This broad statement requires cities to proactively address housing discrimination and treat residents fairly and equally in the provision, securing, retention, and all other aspects of the housing market.

Orange County's Analysis of Impediments to Fair Housing Choice (AI) examines 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). While the federal FHA and California Fair Employment and Housing Act provide Santa Ana residents with some protections from displacement and work to increase the supply of affordable housing, continued action is needed in Orange County and in Santa Ana to provide access to fair housing.

The AI lays out meaningful strategies to be implemented as a means of achieving progress toward the County's obligation to affirmatively



further fair housing. The AI outlines specific priorities and goals for the City of Santa Ana to overcome fair housing issues, such as: reviewing and amending the Affordable Housing Opportunity and Creation Ordinance to increase its effectiveness; evaluating and creating a motel conversion ordinance to increase the supply of permanent supportive housing; exploring opportunities to amend the Density Bonus Ordinance for transit-oriented development (TOD); exploring and establishing a dedicated funding source for a right-to-counsel program to ensure residents have access to legal representation during eviction proceedings; and continuing to invest in prevention strategies to reduce the number of homeless individuals and families in Santa Ana.

Looking forward, the City of Santa Ana is committed to continued action in ensuring that all residents are treated fairly and equally in the provision, securing, and retention of housing. The following goal and policies provide a starting point for affirmatively furthering fair housing and achieving a more promising future for all residents.

GOAL 5

Affirm, promote, and implement social justice and equity in the provision, type, and affordability of housing and the availability of services for all residents.

Policies

- HE-5.1 **Housing Opportunities.** Ensure housing opportunities are available to all without regard to race, color, ancestry, national origin, religion, marital status, familial status, age, gender, gender identity, disability, source of income, sexual orientation, military status, immigration status, or other arbitrary factors.
- HE-5.2 **Housing Discrimination.** Prohibit discriminatory actions in all aspects affecting the sale, rental, or occupancy of housing.
- HE-5.3 **Communication Channels.** Continue to provide an open and receptive forum for city residents, commissions, and City staff to discuss opportunities for affirmatively furthering fair housing.
- HE-5.4 **Resources and Services.** Continue to fund services and support organizations that provide counseling, dispute resolution, and fair housing services, and make a concerted effort to disseminate resources to underrepresented residents, including non-English speakers.



- HE-5.5 **Community Development.** Continue to administer municipal programs and activities relating to housing and community development in a manner that is consistent with the obligation to affirmatively further fair housing.
- HE-5.6 **Preserve Housing.** Seek to preserve housing opportunities for all residents through actions aimed at limiting displacement, preserving affordable housing, and expanding housing opportunities.



Housing Plan

This chapter sets forth the City housing programs that are designed to further the housing vision for Santa Ana.

OVERVIEW

The goals and policies of the Housing Element are implemented through programs designed to encourage the maintenance, improvement, development, and conservation of housing and neighborhoods in the community. These programs are organized into functional groupings that relate to specific goals. However, in many cases a program achieves multiple goals and policies. In pursuing these goals, the City will also seek to achieve quantified objectives. These objectives are summarized for major housing activities in Table 1.

**Table 1
Housing Element Quantified Objectives, 2021-2029**

	<i>Total</i>	<i>Affordability Level</i>				
		<i>Ext. Low</i>	<i>Very Low</i>	<i>Low</i>	<i>Moderate</i>	<i>Above</i>
New Housing Construction (RHNA)	3,137	606		362	545	1,624
Single-Family Housing Rehabilitation	60		20	40		
Acquisition and/or Rehabilitation	150	100	50			
Preservation of At-Risk Units	512	512				
Rental Assistance	2,800 ¹	2,800				
Homeowner Assistance	80			60	20	

Source: City of Santa Ana, 2021.
1. 2,800 annually for eight years.

The remainder of this chapter describes programs the City will implement to achieve the objectives for the 2021-2029 planning period. Housing programs are grouped under four categories that correspond to housing goals, although programs often achieve multiple goals.



3

HOUSING AND NEIGHBORHOODS

HOUSING REHABILITATION

1. Single-Family and Mobile Home Rehabilitation

Periodic repair and rehabilitation of single-family and mobile home units are critical for maintaining the quality of housing and preserving residential neighborhoods. The City estimates that up to 12,819 single-family, owner-occupied homes may require repair and rehabilitation. Additionally, Santa Ana has 29 mobile home parks containing 3,913 spaces. Six of the mobile home parks and 1,020 spaces in the city are currently age-restricted to persons 55 years of age or older. These parks provide affordable housing options for many extremely low-, very low-, and low-income residents. The City offers a Residential Rehabilitation Grant Program and provides grants of up to \$25,000 to 25 households per year for the repair and rehabilitation of single-family and mobile homes units. The residential rehabilitation grant prioritizes households in R/ECAP and TCAC census tracts, seniors (62 years and older), disabled residents, and low-income households.

2. Multiple-Family Acquisition and Rehabilitation

The City of Santa Ana's multiple-family acquisition and rehabilitation program is designed to provide financial assistance to support the acquisition, timely rehabilitation, and construction of new multiple-family properties to preserve and increase affordable housing opportunities for lower income households throughout the community. Once per year, the City issues a Request for Proposals (RFP) for the development of affordable housing. The RFP is sent to a list of interested developers, posted on Planet Bids, posted to local newspapers, and posted on the City's website. Proposed developments may be for acquisition and rehabilitation of eligible properties for rental and/or ownership housing; acquisition and conversion of nonresidential property to multifamily housing units; and/or new construction of housing units for rental and/or ownership housing. The objective is to finance the development of at least one multifamily affordable housing project per year. Moreover, Santa Ana has many deteriorated apartment projects characterized by lesser-quality construction, overcrowding, and absentee ownership. Left unattended, deteriorated apartments depress the values of surrounding properties and negatively influence the quality of life in neighborhoods. To stabilize neighborhoods and provide affordable housing, the City financially supports nonprofit and for-profit organizations to acquire and rehabilitate projects to improve the living environment of existing residents. When feasible, housing units are reconfigured to meet the housing needs of larger families.



NEIGHBORHOOD INITIATIVES

3. Neighborhood Initiatives Program

The Neighborhood Initiatives Program provides City staff support and technical assistance for neighborhood organizations to facilitate improved communication among all parties, between neighborhoods, and with the City. The City has also established the Communication Linkage Forum (Com-Link) to promote leadership, civic participation, unity, and pride in all Santa Ana's participating neighborhoods. The City also supports the Santa Ana Resource Network, which includes hundreds of community-based organizations, including 64 neighborhood associations. The steering committee organizes and sponsors the Most Beautiful Yard Award, Neighborhood Hero Award, and Celebrate Santa Ana. The City assigns staff to work with neighborhoods to provide training and capacity building that will enable individuals to improve their neighborhoods.



Lush trees beautify parks and neighborhoods in Santa Ana.

4. Neighborhood Infrastructure

Santa Ana recognizes that neighborhood quality depends on the condition of infrastructure. To that end, the City is strategically planning to improve and maintain its infrastructure. As part of the Capital Improvement Program, the City continues to make substantial investments in water facilities, sewers, sidewalks, streets, street lights, and storm drains. Neighborhoods are kept clean through waste management and street cleaning programs. Public landscaping and street tree programs are also provided to beautify and improve neighborhoods. The City will continue to implement these neighborhood infrastructure projects and seek additional local, state, and federal funds and grants to continue efforts, while prioritizing improvements that further health and wellness in R/ECAP and TCAC census tracts.



5. Healthy Neighborhood Initiatives

The City recognizes that a healthy neighborhood requires more than housing and physical infrastructure; equally important are parks, open spaces, recreation opportunities, and other projects that improve resident health. Santa Ana has established its Santa Ana Green Program, encouraging clean fuel technologies, water conservation, and energy saving efforts throughout the community. The city is a Tree City USA, implements a community forestry program, and is involved in installing greenways where feasible and improving parks throughout the community. The Parks, Recreation, and Community Services Agency has a Wellness Education Program to promote healthy lifestyles. Part of this effort includes the Community Garden Program, where participants learn how to establish and maintain their own vegetable gardens at home, receive nutritional tips,



and participate in recreational activities throughout the year. Another example is the varied recreation class options offering opportunities for youth and adults to become and stay active and healthy. Additionally, the City's update to its zoning code development and operational standards for industrial zones will address incompatibility of uses, including requiring minimum distances between heavy industrial uses and sensitive receptors like residences and schools.

COMMUNITY-BUILDING INITIATIVES

6. Santa Ana Healthy Communities

In 2009, Central Santa Ana was selected as one of the 14 sites in California to participate in The California Endowment's Building Healthy Communities. This \$10 million and 10-year initiative made strides to improve resident health and achieve the Endowment's healthy community outcomes by intentionally addressing social determinants of health—at the individual, housing, block, and neighborhood levels. The initiative has also worked to influence and shape public policy at all levels in the community, including the City's comprehensive general plan, safe routes to schools, business community, parks and recreation opportunities in neighborhoods, and even at home. While Santa Ana Building Healthy Communities (SABHC) is in the process of assessing its mission and organizational future, it is anticipated that they will continue to effect system change and to sustain a healthier and prosperous community for the current and future generations of residents living in Santa Ana. The City will continue to provide support to this transformative community building initiative.

7. Building-Community Efforts

The City of Santa Ana is committed to and actively involved in supporting programs and capital improvements that improve neighborhood livability. Recent projects include new community centers and parks, community gardens projects, public art, and the completion of the City's first ever Parks Master Plan, which provides a 10-year roadmap in the area of park acquisition, equity, access and environmental justice, trail connectivity, investment and recreational opportunities. The City is active in sponsoring community efforts such as libraries and educational services, both free-standing and within City-initiated housing projects. The City of Santa Ana will continue to seek additional partnering opportunities to build stronger and healthier neighborhoods through a wide variety of community building programs. To monitor the success of these efforts, the City will prepare an annual report for City Council and public review providing the progress made toward achieving the quantifiable objectives in the Housing Element. The reporting will include monitoring the production and distribution of housing units and capital improvements, especially lower income units, by TCAC areas, CalEnviroScreen ranking, and R/ECAP status.



8. Neighborhood Safety

Safe neighborhoods are an indispensable part of quality of life. This goal is achieved through the efforts of multiple City departments, including the Planning and Building Agency, Police Department, and Public Works Agency, who implement programs to improve and maintain the safety of neighborhoods. The City is active in promoting safe routes to school for children to walk and bicycle. Traffic control measures are in place to reduce speeding and reduce safety hazards from vehicular traffic. The City is active in making curb cuts and repairing its many sidewalks. The Police Department is working with community leaders to start up Neighborhood Watch groups and provide mentoring activities for youth. Additionally, there are an unknown number of unpermitted housing units constructed throughout the city that pose a health and safety risk to occupants of the structure and broader neighborhood. To protect the health and safety of all residents in Santa Ana, the City will create and implement a housing amnesty program for unpermitted units to facilitate legalization and address potential life safety issues, prioritizing neighborhoods with a disproportionate number of code enforcement cases for unpermitted units.

CODE ENFORCEMENT

9. Property Maintenance Standards

Santa Ana requires adherence to building and property maintenance standards in its municipal code (e.g., International Property Maintenance Code and Health and Safety Standards related to substandard housing). Research has increasingly pointed toward a strong link between property maintenance, neighborhood quality, and the health of residents. The American Public Health Association and National Center for Healthy Housing have created a National Healthy Housing Standard to complement the policies and regulations already adopted and implemented by cities. Santa Ana has the opportunity to incorporate the latest in best practices for healthy homes into the City's existing building and maintenance codes used by building and code enforcement officials. The City will collaborate with community-serving organizations to educate residents regarding property health and maintenance issues. The City's Code Enforcement Division will also work cooperatively with the County Health Department to address interior infestation of insects, vermin, or rodents and the lack of adequate garbage storage and removal facilities.

Many jurisdictions are exploring additional ways to enforce property maintenance standards, especially when related to health and safety conditions in interior living spaces. When a property demonstrates substantial habitual violations and failure to conduct repairs and maintenance, state law provides tenant protection clauses that allow



rent reductions, protection from eviction or other retaliation, relocation, and a delay of rental payment until repairs are completed.

10. Proactive Rental Enforcement

The Proactive Rental Enforcement Program (PREP) promotes public health and safety through systematic and proactive code enforcement. Santa Ana has many rental housing properties with deferred maintenance. PREP focuses on identifying these code violations in rental properties that threaten the occupants' safety, the structural integrity of the building, or the condition of the surrounding neighborhood. Code violations are routinely identified citywide and addressed in a proactive inspection effort to preempt the necessity for submittal of complains. Properties are charged a fee for service unless the property receives a Gold Seal for meeting standards of excellence in property maintenance. To maximize effectiveness of this program, the City seeks to augment levels of funding and personnel where feasible.

11. Residential Response Team

The Residential Response Team (RRT) complements the existing PREP program and focuses on single-family residential units. RRT is a focused code enforcement effort that investigates complaints alleging substandard housing conditions, property maintenance violations, and land use violations on owner or rented-occupied single-family homes. The team also handles traditional code enforcement concerns involving the lack of exterior property maintenance and abandoned vehicles that detract from the neighborhood. The most common violations involve substandard housing, hazardous conditions, unpermitted work, illegal home business, and dangerous and abandoned buildings. Property owners are given a fixed period to abate conditions before enforcement actions are taken. To maximize the effectiveness of this program, the City seeks to augment levels of funding and personnel where feasible.



HISTORIC PRESERVATION

12. Historic Program and Ordinance

The City of Santa Ana recognizes the value of its heritage and has therefore established Chapter 30 of the Santa Ana Municipal Code to regulate and preserve places of historical and architectural significance. The City implements its Historic Code by placing properties on the Local Register of Historic Resources and reviewing requests for exterior work or demolitions of historic structures; recommending policies and regulations for the protection, reuse, and rehabilitation of historical property; and encouraging public understanding and involvement in historic and architectural heritage. The City will continue to seek



opportunities to implement its historic preservation program, where feasible, to preserve its important resources.

13. Historic Home Rehabilitation Incentive

The City of Santa Ana supports the Mills Act property tax incentive program, which grants property tax relief for rehabilitation improvements as a financial incentive for owners to preserve their historic properties. The Mills Act Agreements allow for up to 50 percent property tax savings. However, funds are in short supply for smaller repairs. To complement its incentive programs, the City will seek new funding sources, including grants and loans that can be used or leveraged with others to focus on preventive rather than corrective repairs. Additionally, the City will seek funds to provide a fee reduction or waiver program for low-income applicants to ensure equitable access and participation in the program.

HOUSING SUPPLY AND DIVERSITY

HOUSING SUPPLY

14. Transit Zoning Code

Santa Ana continues to pursue efforts to revitalize its historic core. The City adopted the Transit Zoning Code in 2010 and updated several of its sections in 2019 to encourage residential/mixed-use housing opportunities and support transit goals. The Transit Zoning Code applies to properties adjacent to and near Santa Ana Boulevard, Santa Ana Regional Transportation Center, the Downtown, Civic Center area, and the Logan and Lacy neighborhoods. The Transit Zoning Code has provisions that will strengthen existing neighborhoods and allow for development that creates a walkable, transit-supportive environment. The City will continue its ongoing direct outreach to developers, which includes emails to list serves and participation in industry conferences, to market development opportunities within the plan area.

15. Metro East Mixed-Use Overlay

The MEMU Overlay Zone was approved in 2007 and its boundaries were expanded in 2018. The MEMU is intended to introduce new forms and land uses that provide for the creation of a high-intensity, mixed-use urban village within a previously developed mid- to high-rise office environment near the I-5 and SR-55. The plan provides a framework for the development of three mixed-use districts—Neighborhood Transitional, Village Center, and Active Urban. Within the MEMU Overlay Zone, up to 5,500 multiple-family residential and live-work



units are allowed. To facilitate development, residential land uses are permitted by right in the three districts subject to a site plan approval by the Planning Commission. The MEMU has been a primary location for new housing, mixed-use, and commerce during the prior eight years and will continue to be into during this planning cycle. The City will continue its ongoing direct outreach to developers, which includes emails to list serves and participation in industry conferences, to market development opportunities within the plan area.

16. Harbor Mixed-Use Transit Corridor Specific Plan

Harbor Boulevard spans Santa Ana and links key commercial, employment, and residential districts. Santa Ana has made considerable capital investments in the Harbor corridor to reestablish this corridor as a major north-south spine linked to the city's future fixed-guideway system. The City updated the specific plan in 2014 to create a vibrant corridor that supports mixed residential uses, business and employment opportunities, access to multimodal transportation options, and environment supporting health and wellness. The specific plan creates a zoning framework that allows for new compact transit-oriented housing combined with nonresidential uses along Harbor Boulevard. This corridor is zoned to accommodate part of the City's share of the regional housing needs targets with a mix of high quality, transit-oriented housing. The City will continue its ongoing direct outreach to developers, which includes emails to list serves and participation in industry conferences, to market development opportunities within the plan area.

17. General Plan

The City of Santa Ana updated and adopted the General Plan in 2022. The General Plan covers a wide variety of topics, including employment and economic vitality, community health and wellness, supporting strong neighborhoods, multimodal transportation system, public safety, education, and parks and recreation, among other topics. To ensure that the goals, policies, and actions in the General Plan are effective in facilitating housing production, community building, and the promotion of environmental justice, among other goals, the City will monitor and review the General Plan annually. If the goals established in the plan are not being met, the plan will be amended as needed.

18. Zoning Code Update

The updated General Plan created a need to review the Zoning Code for consistency and for additional direction to implement the vision, goals, and policies of the General Plan. To that end, the Zoning Code Update will include a revision to development standards that will align with the



General Plan. To the extent determined, the effort will include provisions that address parking, height, setbacks, and open space requirements to facilitate sustainable, quality housing and mitigate potential constraints to housing throughout the community. Additionally, the Zoning Code will comply with all applicable local, state, and federal laws, including addressing current laws pertaining to low-barrier navigation centers, supportive housing, and employee housing, among others.

BUILDING DESIGN

19. Building Design Standards

Building design is a key component of the City's overall housing strategy. Poor quality housing design, in the long term, leads to premature deterioration, adverse impacts to quality of life, poor resident health, and public opposition to new housing. Santa Ana's Citywide Design Guidelines provide specific guidance about preferred and discouraged methods of planning, neighborhood design, and construction. In recent years, however, State regulations have begun to prohibit the use of subjective design standards in favor of objective standards for certain types of housing projects. As the City encourages new forms of housing that further health, wellness, and sustainability, the development of new objective design standards that further these concepts will be needed to continue fostering sustainability, health, and wellness.

20. Development Review

Santa Ana's urbanization has raised the awareness of the individual and cumulative impacts of land use decisions on community quality of life. Consistent with State law requirements and City policy, the City of Santa Ana requires Development Project Review, Design Review, and Environmental Review of proposed residential projects. City staff review projects for compliance with City development standards and operating standards, building and site design standards, and potential environmental impacts. In an effort to continue to improve and protect the community's quality of life and implement healthy-community best practices, the City will continue to ensure appropriate review with existing requirements and develop a simplified healthy design checklist for use by planners. The City will also seek additional resources to support an expedited and efficient development project review process through creation of applicant guides or additional staffing.



HOUSING INCENTIVES

21. Affordable Housing Incentives

The City actively provides financial incentives for the provision of quality, affordable housing for extremely low-, very low-, and low-income families. These include direct financial assistance with HOME Investment Partnerships Program funds, Low and Moderate Income Housing Asset Funds, local inclusionary housing in-lieu fees, and other sources of financial assistance. The amount of financial assistance depends on the availability of local, State, and federal funds. The City also defers payment of development fees to just before final occupancy. The City of Santa Ana will continue these incentives and facilitate their application to each planning area as appropriate; in some areas, a development incentive may be more appropriate and, in other areas, direct financial assistance may be more appropriate.

22. Extremely Low Income Housing

Housing Element law includes a focus on the housing needs of extremely low-income households. According to 2021 SCAG Existing Housing Needs Data Report (2012-2016 HUD CHAS), the city has 18,185 extremely low-income households, of which 14,255 are renters. The Housing Authority provides up to 2,699 housing choice vouchers to extremely low- and very low-income households each year, of which 75 percent are for extremely low-income households. The City has a priority for providing financial assistance to projects for extremely low-income households. Specifically, in selecting among competing project proposals, consideration is given to projects that benefit a higher percentage of units for extremely low-income households with deeper affordability. The City will continue to seek opportunities to apply for funding and provide other incentives as feasible to support the production of affordable housing for extremely low-income households.

23. Successor Housing Agency

Prior to 2011, the Santa Ana Redevelopment Agency (RDA) played a key role in facilitating and encouraging the production, rehabilitation, and preservation of housing. Santa Ana also allocated tax increment funds generated from redevelopment project areas to increase, preserve, and improve the supply of low- and moderate-income housing as well as support housing, economic, and community development activities. With the dissolution of redevelopment agencies across California and reallocation of funds to the State, the City no longer has an RDA. The Santa Ana Housing Authority acts as the Successor Housing Agency and is responsible for completing all remaining enforceable obligations.



24. Density Bonus Ordinance

The City's density bonus ordinance, Section 41-1600, will be updated to reflect recent changes in State law as part of the Zoning Code Update. The State's Density Bonus Law (Government Code §65915 to 65918) provides developers with powerful tools to encourage the development of affordable and senior housing, including up to a 50 percent increase in project densities for most projects, depending on the amount of affordable housing provided, and an 80 percent increase in density for projects that are completely affordable. The State Density Bonus Law is a large package of incentives intended to help make the development of affordable and senior housing economically feasible.

25. Affordable Housing Opportunity and Creation Ordinance

The Affordable Housing Opportunity and Creation Ordinance (AHOCO) was adopted in 2011, then known as the Housing Opportunity Ordinance (HOO), and amended in 2015, 2020, and most recently in May of 2022. For eligible ownership projects, at least 5 percent of the units must be set aside for moderate-income households for at least 55 years. For eligible rental projects, at least 15 percent must be affordable to low-income households; or at least 10 percent must be affordable to very low-income households; or 10 percent shall be affordable to lower income households (5 percent to low-income, 3 percent to very low-income, and 2 percent to extremely low-income households) for at least 55 years. Provisions allow for the payment of in-lieu fees rather than building the affordable housing units on-site. The City will continue to review the effectiveness of the Affordable Housing Opportunity and Creation Ordinance to provide affordable housing opportunities throughout the community.

26. Adaptive Reuse

Santa Ana contains a variety of buildings not originally constructed for residential uses that are vacant or underutilized and may be candidates for reuse as new housing. Santa Ana's Adaptive Reuse Ordinance allows the adaptive reuse of historic and/or underutilized buildings to create a diversity of housing opportunities and stimulate new investment. To increase the number of buildings that qualify for adaptive reuse, the City will evaluate whether it is appropriate to amend the requirements and incentives area.



REGULATORY INCENTIVES

27. Variety in Household Sizes

Santa Ana is committed to providing housing appropriate for residents. Santa Ana has historically had a high demand for large family units. This requires that the City's housing stock provide units large enough to accommodate larger families, while also providing smaller housing units for newly forming households. Policy HE-4.2 states the City will facilitate and encourage the development of larger rental and ownership units for families with children, including extremely low-, very low-, and low-income families. The City will seek to establish guidelines as part of the Zoning Code Update for new housing development projects to include a variety of unit sizes, including units for large families, that are affordable to extremely low-, very low-, and low-income families, in addition to incentivizing the creation of larger units through the annual Request for Proposals for Affordable Housing Development.

28. Parking Study and Management

Parking issues caused by changes in automobile ownership rates and the number of adults who drive per household have led to certain neighborhoods being parking impacted. The City will build on the results of past parking studies to evaluate parking needs, standards, and programs to mitigate parking constraints for affordable housing development through the Zoning Code Update while simultaneously seeking solutions to address parking-impacted neighborhoods. The City will also reevaluate the Residential Parking Permit Program to provide an equitable citywide permit parking program that incorporates best practices and complies with State law.

HOUSING ASSISTANCE

RENTAL ASSISTANCE

29. Housing Choice Voucher

The Housing Authority of the City of Santa Ana (CA093) administers the Department of Housing and Urban Development's Housing Choice Voucher Program. Funded by the federal government, the program provides rental subsidies to very low- and extremely low-income households. The rent subsidy equals the difference between the contract rent and what the tenant can afford to pay, which is generally defined as about 30 percent of monthly income. As of 2021, the Housing Authority serves 2,699 households under this program with regular vouchers, of which the majority go to extremely low-income households. The



Housing Authority also administers 650 additional special purpose vouchers that serve homeless veterans, non-elderly homeless people with a disability, and emancipated foster youth.

30. Family Self-Sufficiency Program

The Family Self-Sufficiency Program is available to Housing Choice Voucher participants to enable them to achieve economic self-sufficiency. Since this program is only available to those currently utilizing a voucher, the program is marketed through the annual newsletter for voucher holders. Participants who voluntarily register for the program sign a Contract of Participation and work with a Workforce Development Specialist to pursue employment, education, or training that will allow them to become self-sufficient. As of 2021, the Housing Authority serves over 120 households. During the program, the participant continues to receive Housing Choice Voucher Program assistance, although their contribution toward their rent may increase as their earned income increases. As a component of this program, the Housing Authority establishes an interest-bearing savings account, with payments equivalent to the extra rent paid toward housing, as the participant improves their economic status. Upon successful completion of the contract, the participant receives the funds in the escrow account.



The City worked with for-profit and nonprofit organizations to rehabilitate and preserve over 500 units of affordable housing at Cornerstone Village.

HOUSING PRESERVATION

31. Preservation of At-Risk Housing

The City implements a preservation program for its affordable housing properties to mitigate potential displacement and provide housing security for its lower income residents, seniors, disabled people, and other individuals and families who would otherwise be at risk of losing housing should apartment properties convert to market rents. When pipeline projects are completed, the City of will have more than 50 affordable housing projects providing more than 5,000 units of rental housing affordable to lower income households. Of that total, only two projects totaling 512 units are at risk of losing affordability controls and reverting to market rents by 2031. The City will adhere to all requirements with respect to noticing and undertake proactive efforts to maintain and extend affordability covenants for eligible properties.

32. Antidisplacement and Local Housing Preservation

A shortage and uneven distribution of affordable housing has plagued the Orange County region for a considerable length of time. Such shortages, coupled with potential increases in land values and rents due to continued urban development, have led to potential displacement of



long-standing residents. To ensure existing residents continue to have a home in Santa Ana and that new affordable units coming online are made available to existing community members first, the City will implement a local preference program, explore a right-of-first-refusal ordinance, and pursue a collective ownership model for mobile home parks.

33. Rent Stabilization and Just Cause Eviction

To further combat increasing rents and potential displacement that rent increases may cause, the City adopted rent stabilization and just cause eviction ordinances in October of 2021. The City's Rent Stabilization Ordinance (RSO) is a local law that limits rent increases to the lower of 3% per year, or 80% of the percent change in the Consumer Price Index over the most recent 12-month period for certain residential rental units and mobilehome spaces in the City. The rent stabilization cap will apply to buildings built on or before February 1, 1995 pursuant to the Costa-Hawkins Rental Housing Act. The rent stabilization cap for mobilehome spaces will apply to mobilehome parks established before 1990 regardless of ownership. However, the RSO will not apply to mobilehomes with long-term leases (over 12 months). The Just Cause Eviction Ordinance (JCEO) became effective November 19, 2021. The JCEO is a local law that provides "just cause" eviction protections for most tenants that occupy a residential real property or mobilehome for 30 days. Under the JCEO, tenants can only be evicted for one of the "just cause" reasons listed in the ordinance, which are categorized into "At-Fault" and "No-Fault" reasons. The program will identify and implement the regulatory framework and administrative infrastructure necessary to implement both ordinances.

HOMEOWNERSHIP ASSISTANCE

34. Down Payment Assistance Program

The City of Santa Ana offers a down payment assistance loan to help low-income and moderate-income households buy their first home. Under the program, the City will offer a loan of up to \$120,000 for low-income households and up to \$80,000 for moderate-income households toward the purchase of a home. To qualify, a prospective buyer must attend a HUD-certified housing counseling program, choose a home in Santa Ana that meets maximum home values, and make a down payment of at least 3 percent. The dramatic escalation in the prices of single-family homes has required deep subsidies that have been cost prohibitive. The high level of subsidy required for a single homeowner must be balanced with the need to provide suitable assistance to a greater number of rental households. The City will periodically review the program to increase or



adjust the amount of assistance needed per household to purchase their first home. The City has worked with NeighborWorks of Orange County, Habitat for Humanity, and the Orange County Community Housing Corporation to provide homeownership assistance and facilitate the construction of infill, owner-occupied housing in residential neighborhoods. In addition, the City will work toward identifying funding and partner with a community-based organization to support a Community Land Trust (CLT) program. CLTs create affordable housing while still allowing low-income residents to build equity as homeowners. Because the CLT retains ownership of the underlying land, this housing remains permanently affordable. CLTs may play a critical role in stabilizing communities and countering market-driven displacement.

SPECIAL NEEDS HOUSING

35. Care Facilities

Care facilities typically come in two forms: 1) facilities licensed by the State of California for mentally, physically, or developmentally disabled children and adults who require supervised care, and 2) care facilities outside the regulatory control of the Community Care Facilities Act. Whereas state law preempts enacting local regulations on the former, the City can impose reasonable regulatory measures on the latter to ensure that such facilities are compatible with and do not detract from the residential character of neighborhoods. To further housing opportunities for people with disabilities throughout the community, the Municipal Code will be reviewed and amended for changes in state law with respect to these facilities and to ensure barrier-free housing choices. This action will be incorporated into the Zoning Ordinance update.



Residential care homes allow people with disabilities to live in neighborhoods.

36. Housing for People with Disabilities, Including Developmental Disabilities

The City works with partners to address the housing and service needs of people with disabilities, including developmental disabilities. In 2021, the City worked with Community Development Partners to develop the 56-unit Casa Querencia project, which provides supportive housing with on-site wrap-around services and amenities to chronically homeless individuals with a disability. The City also funds organizations serving the needs of people with a disability. The City will continue to work with affordable housing developers to expand independent living options for the developmentally and physically disabled throughout the community. This may include reviewing or endorsing grant





San Miguel Residence

applications, soliciting applications for projects, reviewing and providing assistance for new projects, or other actions to facilitate the rehabilitation of housing for persons with disabilities.

HOUSING FOR PEOPLE WHO ARE HOMELESS

37. Emergency Shelters and Transitional Housing

Homelessness is a complex issue that requires everyone's attention. Our community has the need to understand the many root causes of homelessness and what is being done to address the issue. The City, along with our numerous partners, is doing our part to ensure that homelessness is addressed on behalf of our residents and community. As of 2021, the City has 600 emergency shelter beds. The City will amend Municipal Code related to emergency shelter standards to comply with State law such as AB 139 and AB 101, and will incorporate the recent best practices for development, operation, and maintenance of emergency shelters and associated navigation centers.

38. Permanent Supportive Housing

Access to decent, safe, and affordable permanent supportive housing is the ultimate goal of Santa Ana's comprehensive system of care for people experiencing homelessness. As a complement to its current services model, the City is striving to place homeless people immediately into permanent housing with supportive services, bypassing the need for stays in emergency shelter or transitional housing. This approach follows the Housing First approach. As of 2021, the City and Housing Authority have assisted the development of 227 units. In addition, the Santa Ana Housing Authority has 449 tenant-based vouchers for people experiencing homelessness, including veterans, people with a disability, and foster youth. Santa Ana Housing Authority continues to provide funds, where available, to assist in the development of permanent supportive housing or provide tenant-based vouchers for people experiencing homelessness. The City will continue to support this model and encourage homeless service providers to make every effort to provide housing for people experiencing homelessness. There is no set goal for the amount of permanent supportive housing units, however in RFPs, the City encourages the construction of these units by making funding available. Developers of PSH units are included in the outreach for the RFP each year. The City will amend the Municipal Code in accordance with AB 2161.

39. Supportive Services

Santa Ana's homeless strategy includes the provision of outreach and supportive services to assist individuals and families who are homeless



or at risk of becoming homeless. In addition, a key part of this strategy is to prevent, to the extent feasible, individuals and families from slipping into homelessness. To that end, the City supports a wide variety of services to enable people who are homeless to live full and productive lives. Funds are provided through the Emergency Solutions Grant (ESG) and Community Development Block Grant funds. The City will continue to provide funding and technical assistance, as available, to support and encourage the provision of a range of prevention, outreach, and supportive services for people experiencing homelessness. Over the next 5-year Consolidated Plan cycle, the City expects to assist 12,000 people with supportive services.

HOUSING FOR SENIORS

40. Senior Services

Senior citizens in Santa Ana can benefit from a broad range of supportive services that enable them to live in their homes as independently as possible. Through federal and state funding, the City funds a broad range of organizations that provide nutritious meals, recreation, health advice, and resource programs. Many of the senior programs operate from the Santa Ana Senior Center and the Southwest Senior Center. A meal delivery service and referral services currently serve homebound seniors residing in Santa Ana. Subsidized public transit is also available through transit providers and the City's own Senior Transportation Program, providing seniors with mobility issues or lacking their own transportation with rides to and from their home to the senior center of their choice. The Orange County Council on Aging also serves as the lead advocate for seniors throughout the county. The City works with agencies to address the housing needs of seniors. Over the planning period the City expects to serve 200 seniors, 55 years and older, under Community Development Block Grant funding alone. This number does not include the number of people served by the Senior Centers and under other City funding sources.

HOUSING FOR FAMILIES

41. Family Housing

The City has a multifaceted approach for increasing and maintaining the supply of family housing. The Housing Authority provides housing choice vouchers to lower income families in Santa Ana, and the City's homeownership programs are targeted to low-income households. The City provides financial assistance to developers to create affordable housing for families. Over the past eight years, the City and Housing Authority have funded various projects to provide affordable housing for



families. The City will continue to provide financial assistance to build family housing and alleviate overcrowding while providing tenant-based vouchers for families through the Santa Ana Housing Authority. Annually the City sends out a postcard to list housing resources available to them. All of this information is also posted on the City's website and featured on the City's social media accounts as information is updated.

42. Childcare Options

The availability of affordable, conveniently located, quality childcare is one of the most pressing concerns of contemporary family life, particularly for families with a single parent or two working parents. Santa Ana complies with state regulations allowing childcare facilities and offers density bonuses for qualified childcare facilities per state law. Recognizing the shortage of quality and affordable childcare facilities, the City will: 1) review and update the Zoning Code to ensure that day care and childcare provisions are consistent with state law as part of Zoning Code Update; 2) consider incentives for co-locating childcare facilities in affordable housing; 3) give funding priority for projects that include family support and childcare facilities; and 4) continue funding organizations that serve Santa Ana children throughout the community.

43. Multigenerational Housing and Accessory Dwelling Units

According to Generations United, 51.4 million Americans live in multigenerational households—a 10 percent increase since 2007. Multigenerational households are defined as more than two generations living under the same roof or a household with a grandparent and at least one other generation. This topic is particularly relevant in recent years given the increasing number of seniors, individuals leaving home at a later age, cost of health care, and lifestyle preferences. Whereas the ADU or room addition concept has been around for decades, builders are beginning to respond with innovative products. This includes housing models from shared living spaces to housing that caters to different lifestyles all situated in the same or adjacent buildings. In order to facilitate and encourage ADUs, the City will implement monitoring, regulatory, and other mechanisms to achieve its production goals.

FAIR HOUSING SERVICES

44. Fair Housing

The City of Santa Ana contracts for a variety of fair housing services. Under this contract, the Orange County Fair Housing Council conducts Department of Housing and Urban Development counseling, landlord/tenant services, mediation, and legal enforcement where



necessary to address discrimination. The City also participates in a countywide Analysis of Impediments to Fair Housing Choice. The City continues to provide opportunities to educate the public regarding fair housing issues. Through education, mediation, and enforcement, the City is committed to affirmatively furthering fair housing opportunities.

45. Reducing Second-Hand Smoke in Multifamily Housing

Exposure to smoke, whether direct or secondhand, causes adverse health outcomes such as asthma and other respiratory illnesses, cardiovascular disease, and cancer. This public health threat is particularly harmful to children, the elderly, and those with preexisting health concerns. The private housing industry has become increasingly aware of the impact of second-hand smoke. Various multifamily unit complexes in Santa Ana have already adopted voluntary bans on smoking, as have several nonprofit affordable housing developers. Over the past few years, the Department of Housing and Urban Development has also been encouraging property owners to limit exposure to second-hand smoke in multifamily housing projects. As the City of Santa Ana is committed to creating healthful environments for its residents, the City will explore opportunities for implementing smoke-free ordinances at multifamily housing in Santa Ana in partnership with nonprofit organizations, the Orange County Health Care Agency, and other community stakeholders. This may include crafting an ordinance, educating property managers and owners, and building community consensus around this important health consideration.



HOUSING PLAN

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>	
Housing and Livable Neighborhoods					
Housing Rehabilitation					
No. 1	Single-Family and Mobile Home Rehabilitation	A. Contract with a local nonprofit organization (currently Habitat for Humanity) to implement the City's Residential Rehabilitation Grant Program. Provide grants of up to \$25,000 to 25 households per year until 2024—after 2024 dependent on funding—for the repair and rehabilitation of single-family and mobile homes, prioritizing applicants in R/ECAP and TCAC census tracts, seniors (62 years and older), disabled residents, and low-income households.	CDA, Housing Division	CDBG & HOME	Ongoing
		B. Conduct an annual workshop starting Fiscal Year 2023-2024 to promote rehabilitation grants and available housing programs/opportunities to all owner occupied single-family and mobile home residents in the city.	CDA, Housing Division	CDBG & HOME	Annually
No. 2	Multiple-Family Acquisition and Rehabilitation	A. Provide financial assistance to support the acquisition, rehabilitation, and new construction of properties to preserve and increase affordable housing opportunities for lower income households through the following programs: (1) Low and Moderate Income Housing Asset Fund (LMIHAF) including land assets owned by the Housing Successor Agency; (2) Inclusionary Housing Fund (Inclusionary); (3) HOME Investment Partnerships Program (HOME); (4) Community Development Block Grant Program (CDBG); (5) Project-Based Voucher Program (PBV); and (6) HOME- American Rescue Plan (HOME-ARP).	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Ongoing
		B. Once per year, issue a Request for Proposals (RFP) for the development of affordable housing in the city. Proposed developments may be for acquisition and rehabilitation of eligible properties for rental and/or ownership housing; acquisition and conversion of nonresidential property to multifamily housing units; and/or new construction of housing units for rental and/or ownership housing. The objective is to finance the development of at least one multifamily affordable housing project per year.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually
Neighborhood Initiatives					
No. 3	Neighborhood Improvement	A. Create, assist, and support neighborhood associations, especially in R/ECAP and TCAC census tracts, to collaborate on projects, and sponsor and hold annual events.	PBA, Planning Division	CDBG	Annually
		B. Provide capacity-building support to the Santa Ana Communication Linkage Forum (Com-Link) – the City's neighborhood associations'	PBA, Planning Division	CDBG	Annually

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>		<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
		advocacy organization, and the Santa Ana Neighborhood Associations to engage and support residents to involve and emerge as leaders in their neighborhoods.			
No. 4	Neighborhood Infrastructure	A. Complete infrastructure improvements in residential neighborhoods consistent with the City's Capital Improvement Program (CIP). The CIP is updated every fiscal year and is available to view on the City's website: https://www.santa-ana.org/capital-improvement-program . Identify improvements from the City's asset management plans for inclusion in the yearly CIP/budget.	PWA	M2, SR2S, Prop 84, CDBG, & GF	Annually & Ongoing
		B. Seek additional funds to improve infrastructure, including state and federal grants for improvements for health and wellness, prioritizing R/ECAP and TCAC census tracts. Prioritize grant opportunities to fund active transportation and infrastructure improvements on an ongoing basis and maximize opportunities in R/ECAPs and TCAC census tracts.	PWA	M2, SR2S, Prop 84, CDBG, & GF	Annually & Ongoing
No. 5	Healthy Neighborhoods Initiatives	A. Continue to implement Santa Ana Green program, including tree planting, corridor greenways, build-green initiatives, and energy conservation.	PWA	GF	Ongoing
		B. Collaborate with neighborhoods and community organizations, especially in R/ECAP and TCAC census tracts, to promote Healthy Neighborhood Initiative, hold five community garden workshops, program the City's fitness courts, hold annual 5k and Fit festival, and operate Street Team with the objective of bringing recreation activities to communities that are challenged with lack of park space.	PRCSA	Grants	Annually & Ongoing
		C. Update the City's zoning code development and operational standards for industrial zones to address incompatibility with adjacent uses, including minimum distance requirements to buffer heavy industrial uses from sensitive receptors. Conduct a study to evaluate and establish appropriate minimum distances and landscape buffers between polluting industrial uses from sensitive receptors such as residences.	PBA, Planning Division	LEAP	Dec. 2023
Community Building					
No. 6	Santa Ana Building Healthy Communities	A. Proactively engage SABHC leaders and other advocacy stakeholders to forge a comprehensive health agenda to be included in the zoning code update (see Program 18).	PBA, Planning Division	LEAP	Dec. 2023

HOUSING PLAN

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>		<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
No. 7	Building Community Efforts	A. Prepare an annual report for City Council and public review providing the progress made toward achieving the quantifiable objectives in the Housing Element implementation table. Report to include monitoring of housing production and distribution, especially lower income units, by TCAC areas, CalEnviroScreen ranking, and R/ECAP status.	PBA, Planning Division	GP	Apr. Annually
		B. Pursue grants and partnership opportunities from local, state, federal, and nonprofit partners to continue and expand strategic investments that build community.	PRCSA & PWA	CIP & GF	Annually
		C. Continue to make strategic investments in parks, recreation, access to healthy food, safe routes to school, and other capital improvements, such as achieving three acres of parkland per 1,000 residents set out in Land Use and Open Space elements, and Parks Master Plan to improve resident health.	PRCSA & PWA	CIP & GF	Ongoing
No. 8	Neighborhood Safety	A. Apply the principles of Crime Prevention Through Environmental Design (CPTED) to all development project applications to enhance safety and security within all residential developments.	PBA & PD	GF	Ongoing
		B. Create and implement a housing amnesty program for unpermitted units in the city, prioritizing neighborhoods with a disproportionate number or code enforcement cases for unpermitted units, to facilitate legalization and address potential life safety issues.	PBA, Planning & Code Enforcement Divisions	GF	Dec. 2024
No. 9	Property Maintenance Standards	A. Evaluate the appropriateness of the new Healthy Housing Standards for applicability to Santa Ana Municipal Codes and incorporate relevant portions to assist city staff in conducting inspections and enforcing city codes.	PBA, Code Enforcement Division	CDBG & GF	Dec. 2023
		B. Connect residents with Orange County Health Department regarding County health services and educational opportunities, including Senate Bill 488 mandates related to lead hazards.	PBA	GF	Ongoing
		C. Coordinate the City's Residential Rehabilitation Grant Program (see program No. 1) with Code Enforcement and Proactive Rental Enforcement Program (PREP) to provide assistance to low-income households and prevent displacement where feasible when the City is requiring health and safety repairs to comply with building code.	CDA, Housing Division & PBA, Code Enforcement Division	CDBG & HOME	Ongoing
No. 10	Proactive Rental Enforcement (PREP)	A. Inspect at least 4,200 rental housing units annually and bring them into compliance with City codes and standards while also preserving the City's housing stock.	PBA, Code Enforcement Division	Rental Fee, CDBG, & GF	Annually

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>		<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
No. 11	Residential Response Team (RRT)	B. Prepare an annual report for City Council summarizing Proactive Rental Enforcement Program (PREP) activities and accomplishments.	PBA, Code Enforcement Division	GF	Annually
		C. Work with the Orange County Health Care Agency to identify infestation code violations and streamline resolution of violations.	PBA, Code Enforcement Division	GF	Annually
		A. Inspect at least 2,000 housing units annually and bring them into compliance with City codes and standards.	PBA, Code Enforcement Division	CDBG & GF	Annually
		B. Work with the Orange County Health Care Agency to identify infestation code violations and streamline resolution of violations.	PBA, Code Enforcement Division	GF	Annually
		C. Continue to incorporate traditional code enforcement with community education and empowerment by continuing to offer neighborhood beautification programs such as tree planting, cleanup programs, and other initiatives.	PBA, Code Enforcement Division	GF	Annually
Historic Preservation					
No. 12	Historic Program and Ordinance	A. Implement the historic preservation program and associated ordinances and incentives, including Mills Act, design review, etc., with a goal of entering into contract with and/or renewing at least 20 historic resource preservation agreements annually during the planning period.	PBA, Planning Division	CDBG, Grants, & GF	Annually
		B. Proactively reach out to at least 20 owners of properties eligible for placement on the local register of historic properties annually to encourage voluntary listing and preservation of resource during the planning period.	PBA, Planning Division	CDBG, Grants, & GF	Annually
No. 13	Historic Home Rehabilitation Incentive	A. Seek new funding sources, including grants and loans, that can be used or leveraged with others funding sources to focus preventive, rather than corrective, repairs of historic homes and complement the Mills Act program.	PBA, Planning Division	Grants & GF	Dec. 2023
		B. Establish a fee reduction or waiver program for low-income applicants to ensure equitable access and participation in the Mills Act Program. The number of participants in the program will be determined once funding is secured.	CDA, Housing Division & PBA, Planning Division	Grants & GF	Dec. 2023
Housing Supply and Diversity					
Housing Supply					
No. 14	Transit Zoning Code / Specific Development No. 84 (SD-84)	A. Update the development review processes and standards for the plan area to streamline and incentivize by-right housing and mixed-use developments.	PBA, Planning Division	Grants & GF	Dec. 2023

HOUSING PLAN

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Housing Implementation Summary**

<i>Housing Program</i>		<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
		B. Through the City's RFP for Affordable Housing Development (see program No. 2), facilitate and encourage the development in SD-84 plan area of a variety of housing types and mix of affordability levels, including for lower income households using appropriate incentives, such as awarding bonus points to developers whose projects provide at least 75% or more of the number of units to extremely low-income families at 30% AMI.	CDA, Housing Division	CDBG & HOME	Annually
No. 15	Metro East Mixed-Use Overlay Zone (MEMU)	A. Update the development review processes and standards for the plan area to streamline and incentivize by-right housing and mixed-use developments.	PBA, Planning Division	Grants & GF	Dec. 2023
		B. Through the City's RFP for Affordable Housing Development (see program No. 2), facilitate and encourage the development in MEMU plan area of a variety of housing types and mix of affordability levels, including for lower income households using appropriate incentives, such as awarding bonus points to developers whose projects provide at least 75% or more of the number of units to extremely low-income families at 30% AMI.	CDA, Housing Division	CDBG & HOME	Annually
No. 16	Harbor Mixed-Use Transit Corridor Specific Plan (SP-2)	A. Update the development review processes and standards for the plan area to streamline and incentivize by-right housing and mixed-use developments.	PBA, Planning Division	Grants & GF	Dec. 2023
		B. Through the City's RFP for Affordable Housing Development (see program No. 2), facilitate and encourage the development in SP-2 plan area of a variety of housing types and mix of affordability levels, including for lower income households using appropriate incentives, such as awarding bonus points to developers whose projects provide at least 75% or more of the number of units to extremely low-income families at 30% AMI.	CDA, Housing Division	CDBG & HOME	Annually
No. 17	General Plan	A. Implement, monitor, and review the City's General Plan and its elements, in particular the Land Use Element, to determine its effectiveness in facilitating housing development as part of the City's General Plan Annual Progress Report. If goals of the General Plan are not being met, amend as needed.	PBA, Planning Division	GF	Apr. Annually
No. 18	Zoning Code Update	A. Comprehensively update the Zoning Code and design standards to achieve consistency with the updated General Plan land use designations and goals, and to comply with new state laws such as AB 1397, AB 139, AB 101, AB 2162, and the Employee Housing Act.	PBA, Planning Division	LEAP	Dec. 2023
No. 19	Building Design Standards	A. Create comprehensive objective design standards as part of the Zoning Code Update (see program 18) to address the unique needs of	PBA, Planning Division	LEAP	Dec. 2023

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<i>Housing Program</i>		<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
		residential/mixed-use products and provide a level of development design certainty to the community and developers alike.			
		B. Create new Active Design Guidelines and accompanying incentives as part of the Zoning Code Update (see program 18) to encourage and foster housing designs that improve health and wellness.	PBA, Planning Division	LEAP	Dec. 2023
No. 20	Development Review	A. Create a checklist of healthy design components based on the adopted Active Design Guidelines in the Zoning Code Update (see program 18) to allow implementation healthy community components into new projects.	PBA, Planning Division	LEAP	Jun. 2024
		B. Develop recommendations for additional resources to support expedited and efficient development project review, such as an applicant guide or additional staffing.	PBA, Planning Division	GF	Dec. 2023
Housing Incentive					
No. 21	Affordable Housing Incentives	A. Provide financial support and technical assistance to nonprofit and for-profit organizations that provide affordable housing for extremely low-, very low-, and low-income families in Santa Ana.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually
		B. Provide financial assistance to support the acquisition, rehabilitation, and new construction of properties to preserve and increase affordable housing opportunities for lower income households through the following programs: (1) Low and Moderate Income Housing Asset Fund (LMIHAF) including land assets owned by the Housing Successor Agency; (2) Inclusionary Housing Fund (Inclusionary); (3) HOME Investment Partnerships Program (HOME); (4) Community Development Block Grant Program (CDBG); (5) Project-Based Voucher Program (PBV); and (6) HOME- American Rescue Plan (HOME-ARP).	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually
		C. Issue a Request for Proposals (RFP) annually for the development of affordable housing in Santa Ana. Proposed developments may be for acquisition and rehabilitation of eligible properties for rental and/or ownership housing; acquisition and conversion of nonresidential property to multifamily housing units; and/or new construction of housing units for rental and/or ownership housing. The objective is to finance the development of at least one multifamily affordable housing project per year.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually

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<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
No. 22 Extremely Low-Income Housing	A. Provide financial support and technical assistance to nonprofit and for-profit organizations that provide affordable housing for extremely low-income households.	CDA, Housing Division	GF, CDBG, HOME, LMIHAF, PBVs, HOME-ARO, & Inclusionary	Annually & Ongoing
	B. Apply for additional funding and provide other incentives as feasible to support the production of affordable housing for extremely low-income households.	CDA, Housing Division	GF, CDBG, HOME, LMIHAF, PBVs, HOME-ARO, & Inclusionary	Annually & Ongoing
	C. Apply for opportunities to expand the number of housing choice vouchers provided by the Housing Authority, and set aside at least 75% of vouchers for extremely low-income households.	CDA, Housing Division	GF, CDBG, HOME, LMIHAF, PBVs, HOME-ARO, & Inclusionary	Annually & Ongoing
	D. Through the City's RFP for Affordable Housing Development, award bonus points to Developers whose projects provide at least 75% or more for the number of units for extremely low-income families at 30% AMI.	CDA, Housing Division	GF, CDBG, HOME, LMIHAF, PBVs, HOME-ARO, & Inclusionary	Annually & Ongoing
No. 23 Successor Housing Agency	A. Provide and/or leverage Successor Housing Agency funds with other sources of funding to support the production and/or rehabilitation of affordable housing for extremely low-, very low-, and low-income families.	CDA, Housing Division	LMIHAF, SERAF, & Boomerang Funds	Evaluate Availability Annually
	B. Set aside Successor Housing Agency funding for the purpose of increasing, improving and preserving the community's supply of low- and moderate-income housing. The Successor Housing Agency funding sources are generated from proceeds from the sale of former Redevelopment Agency housing assets, residual receipts from former Redevelopment Agency assets (i.e. loans), and a portion of the loan repayments from the former Redevelopment Agency to the City. This fund includes land assets owned by the Housing Authority acting as the Successor Housing Agency that must be developed for affordable housing or sold at or above fair market value to increase the Low and Moderate Income Housing Asset Fund.	CDA, Housing Division	LMIHAF, SERAF, & Boomerang Funds	Evaluate Availability Annually
No. 24 Density Bonus Ordinance Update	A. Update the City's local density bonus ordinance as part of the Zoning Code Update (see program 18) in accordance with recent changes to state law to incentivize the development of extremely low-, very low-, and low-income rental units.	PBA, Planning Division & CDA, Housing Division	LEAP & GF	Dec. 2023
	B. Maintain up-to-date density bonus information on the City's website to provide developers with information on the opportunities to develop affordable housing using state density bonus law.	PBA, Planning Division & CDA, Housing Division	GF	Ongoing
	C. Prepare and make density bonus application determinations within three months of application submittal to the review/approval body,	PBA, Planning Division & CDA, Housing Division	GF	Ongoing

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<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
	contingent upon any other discretionary actions required for approval of the project.			
No. 25 Affordable Housing Opportunity and Creation Ordinance (AHOCO)	A. Continue to offer incentives beyond the requirements of the City's inclusionary housing ordinance, known as the Affordable Housing Opportunity & Creation Ordinance (AHOCO). The city will continue to promote the program via the City's website and with developers. Every developer that brings a project forward will be made aware of the incentives available at the time.	PBA, Planning Division & CDA, Housing Division	GF & Inclusionary	Ongoing
	B. Collect and leverage in-lieu fees with other sources to support the production and/or rehabilitation of affordable housing for extremely low-, very low-, and low-income families with a goal of funding eight projects for the planning period.	PBA, Planning Division & CDA, Housing Division	GF & Inclusionary	Ongoing
	C. Monitor the level of housing production and AHOCO qualifying projects every two years. If production levels fall below historic trends, take actions to review and revise AHOCO fees and requirements to ameliorate potential constraints to development.	PBA, Planning Division & CDA, Housing Division	GF & Inclusionary	Every Two Years
No. 26 Adaptive Reuse	A. Evaluate, and if appropriate, amend the Adaptive Reuse Ordinance as part of the Zoning Code Update (see program 18) to remove potential constraints, such as expanding the eligible areas and structures.	PBA, Planning Division	LEAP	Dec. 2023
	B. Proactively promote opportunities for adaptive reuse of structures with historic merit or otherwise suitable to be converted to quality residential and mixed-use projects to property owners and interested developers on the City's website.	PBA, Planning Division	GF	Ongoing
No. 27 Variety of Household Sizes Program	A. Establish guidelines as part of the Zoning Code Update (see program 18) for new housing development projects to include a variety of unit sizes, including units for large families, that are affordable to extremely low-, very low-, and low-income families.	PBA, Planning Division	LEAP	Dec. 2023
	B. Through the issuance of the annual RFP for Affordable Housing Development, the City will facilitate and encourage the development of larger rental and ownership units for families, including lower and moderate-income families, and the provision of childcare, after-school care, and other services when feasible, by including selection criteria and points for projects that significantly increases affordable housing opportunities for large families (three- and four-bedroom units). The RFP for Affordable Housing Development is released once per year, with the objective of financing the development of at least one multifamily affordable housing project per year.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually

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<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>
No. 28 Parking Study and Management	A. Build on results of recent parking studies and programs to identify need to mitigate parking constraints for affordable development and evaluate residential/mixed-use standards. Utilize the results of studies to inform parking standards in the Zoning Code Update.	PBA, Planning Division	LEAP & GF	Dec. 2023
	B. Reevaluate the Residential Parking Permit Program to provide an equitable citywide permit parking program that incorporates best practices and complies with state law.	PWA	GF	July. 2023
	C. Collaborate with SCAG in a Curb Management Study to identify best practices and pilot project for parking, deliveries, and travel for all modes of travel in the downtown.	PWA	GF	Dec. 2024
	D. Develop a pilot program to partner with commercial property owners and school districts to utilize parking at centers and schools adjacent to residential uses to expand parking options for residential neighborhoods.	CDA, Economic Development Agency	GF	Dec. 2023
	E. Work with OCTA and other transportation agencies to develop strategies that encourage the utilization of alternatives to current parking standards to lower the cost of housing, support greenhouse gas and vehicle miles traveled goals and recognize the emergence of shared and alternative transportation modes.	PBA, Planning Division	LEAP & GF	Dec. 2023
Rental Assistance				
No. 29 Housing Choice Voucher	A. Provide housing assistance payments to eligible households in the Housing Choice Voucher Program and adhere to policies and procedures in the federal regulations and in the Housing Choice Voucher Program Administrative Plan. Administer 100 percent of the funding provided to the Housing Authority on an annual basis for eligible households. This includes Special Purpose Vouchers including the Veterans Affairs Supportive Housing Program, Mainstream Voucher Program, Foster Youth to Independence Program, and Emergency Housing Voucher Program. The objectives are to: (1) utilize 100 percent of the Annual Budget Authority provided by HUD for each CY; (2) apply for new funding opportunities for additional vouchers; (3) retain High Performer SEMAP status; and (4) communicate on a regular basis with active landlords by providing information on key program updates.	SAHA	Federal Funds	Ongoing
No. 30 Family Self-Sufficiency	A. Administer the Family Self-Sufficiency program to empower and support Housing Choice Voucher Program participants to achieve economic independence and self-sufficiency while adhering to	SAHA	Federal Funds	Ongoing

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<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>	
	policies and procedures in the federal regulations and in the FSS Action Plan. Graduate at least two families per year.				
Housing Preservation					
No. 31	Preservation of At-Risk Housing	A. Annually monitor the status of at-risk housing projects, specifically the Warwick Square, Highland Manor, and other projects that may have expiring affordability covenants. Contact owners of properties at risk of conversion within one year of expiration to discuss City's desire and support to preserve projects as affordable housing.	CDA, Housing Division	HOME	Ongoing
		B. Coordinate with property owners to ensure notices to tenants are sent out at three years, twelve months, and six months; educate tenants regarding tenants' rights and conversion procedures pursuant to state law (Government Code Section 65863.13).	CDA, Housing Division	HOME	Ongoing
		C. As resources are available, contact agencies interested in purchasing and/or managing at-risk units, including entities from the State's qualified entities list.	CDA, Housing Division	HOME	Ongoing
		D. As resources are available, provide technical assistance, financial or regulatory assistance as feasible to encourage and facilitate the preservation of projects at risk of conversion.	CDA, Housing Division	HOME	Ongoing
No. 32	Anti-displacement and Local Housing Preservation	A. Implement a local preference for residents who live or work in Santa Ana and need affordable housing in compliance with all state and federal fair housing laws.	CDA, Housing Division	HOME, LMIHAF	2024
		B. Explore a right-of-first-refusal ordinance for mobile home parks and publicly supported multifamily residential properties (including properties at risk of conversion) to minimize tenant displacement and preserve affordable housing stock.	CDA, Housing Division	HOME, LMIHAF	2024
		C. Evaluate and pursue collective ownership models for mobile home parks as a tool to prevent displacement.	CDA, Housing Division	HOME, LMIHAF	2024
No. 33	Rent Stabilization and Just Cause Eviction	A. Implement the Just Cause Eviction Ordinance and Rent Stabilization Ordinances that were adopted in October 2021 to provide tenant protections beyond state mandates and manage affordability of housing by regulating rent increases.	CDA, Housing Division	Rental Fee, Inclusionary & GF	Dec. 2023 & Ongoing
		B. Identify and implement the regulatory framework and administrative infrastructure necessary to implement residential rent stabilization, just cause eviction, and other protections for tenants facing housing instability, including: (1) ongoing outreach and education sessions at least annually to landlords, tenants, and the public on the rent stabilization and tenant protections and policies;	CDA, Housing Division	Rental Fee, Inclusionary & GF	Dec. 2023 & Ongoing

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	(2) establishing a Rent Stabilization Board to serve as an advisory body responsible for developing policies and procedures to implement the program; (3) conduct a fee study to establish an Annual Housing Fee charged to units subject to the Ordinance(s) to finance the program; (4) support the billing of fees charged to units subject to the ordinance(s); (5) develop a comprehensive rental unit database; (6) publish the allowable rent increases annually; (7) monitor for program compliance; and (7) establish a schedule of penalties that may be imposed for noncompliance.				
	C. Hire program staff and establish a new division to administer the Just Cause Eviction Ordinance and Rent Stabilization Ordinances that were adopted in October 2021 for tenants facing housing instability.	CDA, Housing Division	Rental Fee, Inclusionary & GF	Dec. 2023 & Ongoing	
	D. Periodically commission studies of the effectiveness of the program, who it is serving, and how well it is meeting its objectives.	CDA, Housing Division	Rental Fee, Inclusionary & GF	Dec. 2023 & Ongoing	
Homeownership Assistance					
No. 34	Down Payment Assistance	A. Assist low-income households with down payment assistance loans of up to \$120,000 for low-income households and up to \$80,000 for moderate-income households.	CDA, Housing Division	CDBG & Inclusionary	Ongoing
		B. Periodically review the down payment assistance program to increase or adjust the amount of assistance needed per household to purchase their first home based on the private market.	CDA, Housing Division	CDBG & Inclusionary	Ongoing
		C. Hold quarterly workshops for local lenders and mortgage brokers to provide outreach and education on utilizing the City's program in conjunction with a first mortgage. Workshops will start in August 2022 and continue quarterly.	CDA, Housing Division	CDBG & Inclusionary	Once Every Quarter of a Year
		D. Hold quarterly workshops for residents to provide education on the application process to assist in the pathway to homeownership. Workshops will start in August 2022 and continue quarterly.	CDA, Housing Division	CDBG & Inclusionary	Once Every Quarter of a Year
		E. Continue to advertise and promote the program to all forms of media to reach out to all residents who may be eligible for the program.	CDA, Housing Division	CDBG & Inclusionary	Ongoing
		F. Provide financial support and technical assistance to nonprofit organizations to provide homeownership assistance and opportunities for families.	CDA, Housing Division	CDBG & Inclusionary	Ongoing

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<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Time Frame</i>	
	G. Support nonprofit and for-profit organizations to educate homeowners, administer programs, and expand homeownership opportunities.	CDA, Housing Division	CDBG & Inclusionary	Ongoing	
	H. Identify funding and partner with community based organizations to support a Community Land Trust (CLT) homeownership program.	CDA, Housing Division & PBA, Planning Division	Inclusionary	Dec. 2024	
Special Needs					
People With Disabilities					
No. 35	Care Facilities	A. Conduct a comprehensive analysis of the City's Care Home Ordinance as part of the Zoning Code Update (see program 18) to identify constraints and amend the ordinance to ensure consistency with state and federal laws, and to create barrier-free housing choices for persons with disabilities.	PBA, Planning Division	GF	Dec. 2023
		B. As part of the Zoning Code Update (see program 18), define facilities not regulated under the Community Care Facilities Act and specify permit process consistent with state law.	PBA, Planning Division	GF	Dec. 2023
No. 36	Housing for People with Disabilities, including Developmental Disabilities	A. Work with affordable housing developers and the Regional Center of Orange County to expand independent living options for persons with a developmental and/or physical disability.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually
		B. Reviewing or endorse grant opportunities, solicit applications for projects, review and facilitate new projects, or other actions to facilitate the new construction or rehabilitation of housing for persons with disabilities.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually
		C. Update the Reasonable Accommodation ordinance's findings for approval to ensure compliance with Federal Fair Housing Acts and California Fair Employment and Housing Act by removing constraints, such as amending finding number eight, and ensuring the review process and evaluation criteria meet current fair housing requirements and HUD guidance.	PBA, Planning Division & CDA, Housing Division	GF	Dec. 2023
		D. Hold annual small apartment-managers' workshop to train and educate property owners, HOAs, property managers, and tenants about best practices in property management, neighborhood safety, and landlord/tenant responsibilities (see program 44). The training will also cover specific concerns regarding families with children, occupancy standards, and reasonable accommodations and modifications.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually

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	E. Provide affordable housing opportunities for people with disabilities as part of the City's RFP for Affordable Housing Development to support the development of permanent, affordable, and accessible housing that allows people with disabilities to live independent lives.	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Annually	
	F. Provide financial assistance to single-family homeowners and renters to make ADA-accessible improvements to their homes.	CDA, Housing Division	CDBG & HOME	Ongoing	
People Who Are Experiencing Homelessness					
No. 37	Emergency Shelters and Transitional Housing	A. Continue to provide funding for providers of emergency shelter and permanent supportive housing for people who are experiencing homelessness. Release an RFP by the end of 2022 for the delivery of permanent housing.	CDA, Housing Division	PLHA, Inclusionary, HHAP, CDBG, ESG, & GF	Ongoing
		B. Continue to facilitate establishment of emergency shelters and transitional and supportive housing throughout the planning period. Approve and finance 10 new permanent supportive housing projects and a new 200+ bed emergency shelter in the planning period.	CDA, Housing Division	PLHA, Inclusionary, HHAP, CDBG, ESG, & GF	Ongoing
		C. Amend the City's Municipal Code as part of Zoning Code Update to revise its homeless shelter ordinance to comply with state law, such as AB 139 and AB 101, and most recent best practices.	PBA, Planning Division	GF	Dec. 2023
No. 38	Permanent Supportive Housing	A. Provide funding and technical assistance to support the development of permanent supportive housing for people experiencing homelessness.	CDA, Housing Division	PLHA, Inclusionary, HHAP, CDBG, ESG, & GF	Ongoing
		B. Continue efforts to address Homeless Youth needs through access to permanent and supportive housing and workforce development.	CDA, Housing Division	PLHA, Inclusionary, HHAP, CDBG, ESG, & GF	Ongoing
		C. Amend the Municipal Code to comply with AB 2162.	PBA, Planning Division	GF	Dec. 2023
		D. As part of the RFP for Affordable Housing Development (see program 2), request proposals for permanent supportive housing from owners and/or affordable housing developers together with at least one service provider. Projects will provide affordable housing opportunities for special needs populations including, but not limited to, homeless individuals and families, and persons with a disability.	CDA, Housing Division	PLHA, Inclusionary, HHAP, CDBG, ESG, & GF	Ongoing
No. 39	Supportive Services	A. Annually, allocate grant funding as available to agencies that provide services to people experiencing homelessness or at risk of becoming homeless.	CDA, Housing Division	CDBG	Ongoing

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	B. Every five years, participate with other local jurisdictions in the Orange County ESG Collaborative to leverage funds and ensure maximum impact. Re-evaluate and participate in ESG Collaborative for the next five-year period at the end of this term.	CDA, Housing Division	ESG	Every Five Years	
Senior Services					
No. 40	Senior Services	A. Support food distribution programs and similar senior services. Provide a minimum of \$30,000 (proportionate to funding available) to service providers that apply for funding and are eligible under CDBG.	CDA, Housing Division	CDBG	Ongoing
		B. Support private and nonprofit entities to match seniors in house-sharing arrangements. Provide a minimum of \$30,000 (proportionate to funding available) to service providers that apply for funding and are eligible under CDBG.	CDA, Housing Division	CDBG	Ongoing
		C. The City's PRCSA will continue to fund Meals on Wheels, a nonprofit organization that provides healthy meals to seniors at two City community centers. In addition, the CDBG public service application is released every two years to nonprofits to provide public services to Santa Ana residents that include services to seniors. For FY 2022 and FY 2023, the CDBG program awarded a total of \$60,000 to Working Wardrobes to address the employment challenges faced by seniors and will provide workforce development services to seniors age 55 and over.	PRCSA	CDBG & GF	Ongoing
Housing for Families					
No. 41	Family Housing	A. Provide Housing Choice Vouchers to extremely low-income and very low-income families (see program No. 29).	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Ongoing
		B. Provide financial assistance to support the production and/or rehabilitation of affordable housing for extremely low-, very low-, and low-income large families (see program No. 1).	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Ongoing
		C. Offer down payment assistance to qualified low-income and moderate-income families (see program No. 34).	CDA, Housing Division	CDBG, HOME, LMIHAF, PBVs, HOME-ARP, & Inclusionary	Ongoing
		D. Encourage the development of larger rental and ownership units for families, including lower and moderate-income families, through the selection criteria for the RFP for Affordable Housing Development (see	CDA, Housing Division & PBA, Planning Division	CDBG, HOME, LMIHAF, PBVs,	Ongoing

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		program 2) that is issued once a year. The objective is to finance the development of at least one multifamily affordable housing project per year.		HOME-ARP, & Inclusionary	
No. 42	Child Care Options	A. Review and update regulations pertaining to day/childcare as part of the Zoning Code Update (see program 18) to ensure consistency with state laws and consider incentives for co-locating childcare facilities in affordable housing projects or other alternatives if found to be infeasible.	PBA, Planning Division	GF	Dec. 2023
		B. Continue funding organizations that help address and meet the supportive service needs of Santa Ana's children.	CDA, Housing Division	CDBG	Ongoing
		C. Issue a CDBG public service application every two years to eligible nonprofit organizations to provide public service programs to Santa Ana residents that include services for children and youth.	CDA, Housing Division	CDBG	Every Two Years
No. 43	Multi-Generational Housing and Accessory Dwelling Units (ADUs)	A. Incorporate development and site design standards in residential zones through the Zoning Code Update (see program 18) that offer flexibility to promote innovative models of multigenerational housing.	PBA, Planning Division	GF	Dec. 2023
		B. Publish preapproved ADU prototype plans to provide greater certainty and quality in the development of such housing.	PBA, Planning Division	SB2 & GF	Jul. 2022
		C. Market the ADU program through a dedicated web page on the City's planning website; provide downloadable educational flyers in English, Spanish, and Vietnamese that publicize the program.	PBA, Planning Division	GF	Jul. 2022
		D. Pursue grant funding to assist lower- and moderate-income homeowners to construct ADUs.	CDA, Housing Division	Inclusionary	Ongoing
		E. Study ADU plan review fees to seek opportunities to reduce fees and costs of developing ADUs.	PBA, Planning Division	GF	Dec. 2023
		F. Monitor the level of production of ADUs every two years, and if production levels fall below goals, take actions to increase production or find suitable sites to accommodate a shortfall within six months.	PBA, Planning Division	GF	Every Two Years
		G. Amend the ADU ordinance to comply with state law and to incorporate best practices.	PBA, Planning Division	GF	Dec. 2023
No. 44	Fair Housing	A. Ensure all City programs and activities relating to housing and community development are administered in a manner that affirmatively furthers fair housing.	CDA, Administrative Services Division	HOME, CDBG, ESG, & SAHA	Ongoing
		B. Continue to provide CDBG funds on an annual basis to a fair housing organization to discourage unlawful practices, resolve tenant/ landlord disputes, provide education, and further equal	CDA, Housing Division	CDBG	Annually & Ongoing

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	housing opportunities, including focused outreach in R/ECAP and TCAC census tracts.			
	C. Periodically prepare the Analysis of Impediments to Fair Housing Choice to identify, remove, and/or mitigate potential impediments to fair housing in Santa Ana.	CDA, Housing Division	CDBG, HOME, & SAHA	Jul. 2025, and every 5 years after
	D. Hold annual small apartment-managers’ workshop to train and educate property owners, HOAs, property managers, and tenants on best practices in property management, neighborhood safety, and landlord/tenant responsibilities.	CDA, Housing Division	GF	Annually
	E. Partner with legal assistance organizations to provide legal clinics for tenants on tenants’ rights and recourse for intimidation and unjust evictions.	CDA, Administrative Services Division	Inclusionary & Renter Fees	Annually
	F. Provide a mandatory fair housing training to all Housing Authority and Housing Division staff involved in the development, provision, or implementation of housing programs.	CDA, Housing Division	SAHA	Annually
No. 45	Reducing Second-Hand Smoke			
	A. Conduct education efforts in concert with stakeholders and partners in the community.	CDA, Housing Division & PBA, Planning Division	CDBG & GF	Ongoing
	B. Explore a smoke-free ordinance in multifamily housing in Santa Ana. If determined to be feasible, include ordinance along with Zoning Code Update (see Program 18).	CDA, Housing Division & PBA, Planning Division	GF & Inclusionary	Dec. 2023
	C. Continue to issue the CDBG public service application every two years to eligible nonprofit organizations to provide public service programs to Santa Ana residents that include health education services to teens and adults.	CDA, Housing Division	CDBG	Every Two Years

Source: City of Santa Ana, 2022.

Notes:

Renter Fees: Fees collected through Proactive Rental Enforcement (PREP) or Rent Stabilization Ordinance.

FUNDING:

GF: General Fund
 CDBG: Community Development Block Grant
 HOME: HOME Partnership Funding
 LIHTC: Low-Income Housing Tax Credits
 ESG: Emergency Solutions Grant
 PLHA: Permanent Local Housing Allocation
 Inclusionary: In-lieu fees collected under the City's AHOCO.
 LEAP: Local Early Action Planning Grants
 SAHA: Santa Ana Housing Authority

AGENCY:

CDA: Community Development Agency
 PBA: Planning and Building Agency
 SAHA: Housing Authority of the City of Santa Ana
 PRCSA: Parks, Recreation, and Community Services Agency

HOUSING PLAN

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Appendices



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Housing Needs

This chapter analyzes demographic, economic, housing, and special needs groups in Santa Ana to understand housing needs in the City and provide a foundation for the development of responsive housing goals, policies, and implementation programs to address that need.

OVERVIEW

Over the years, Santa Ana has seen significant challenges to housing its population and workforce. Population and economy changes, the housing market boom and downturn, and other factors affect Santa Ana's ability to address its housing challenges. This Housing Needs Assessment is designed to explore many of these factors that influence the City's housing needs today and define the challenges to addressing these needs.

This chapter is divided into five sections, each providing information and analysis that augments discussion provided in the Framework.

- **Demographic Characteristics.** Demographic characteristics include population growth and change, race and ethnicity, age characteristics, and household composition and type.
- **Economic Characteristics.** Employment trends, occupations of residents, household income and distribution, and other factors that affect the demand for housing and the ability to afford housing.
- **Neighborhood and Housing Profile.** Inventory of housing, including its supply, characteristics, vacancy and tenure, housing prices, and affordability to residents of different income levels.
- **Special Needs.** Special needs in the city, including seniors, people with disabilities, large families, single-parent families, people who are experiencing homelessness, and other special needs groups.
- **Housing Needs.** An assessment of housing production needs, housing rehabilitation, and the preservation of housing.



A

DEMOGRAPHIC CHARACTERISTICS

This section analyzes the primary demographic characteristics of Santa Ana residents, including population growth and change, race and ethnicity, age characteristics, and household characteristics to identify housing needs in Santa Ana.

POPULATION GROWTH

Santa Ana is the 2nd largest of 34 cities in Orange County. The county experienced rapid growth in the 1980s and 1990s, with the majority of growth occurring in new cities in southern Orange County and unincorporated areas. From 1980 to 1990, the county's population increased 25 percent, followed by an 18 percent increase between 1990 and 2000. Santa Ana also experienced a rapid increase of residents between 1980 and 1990 (44 percent), primarily due to in-migration of residents from other countries or areas outside of the city.

During the 1990s the city experienced slower population growth (15 percent). Slowing population growth is reflective of the built-out nature of the city's residential areas and low vacancy rates. Between 2000 and 2010 the city's population decreased by about 4 percent, and decreased by 4.4 percent from 2010 to 2020 according to the U.S. Census. While there continues to be concerns over the undercount in the Census, and its implications, the decline in population since 2000 is noteworthy.

Growth forecasts generated by Southern California of Governments (SCAG) for the regional plan, *Connect SoCal*, predict a steady increase in population through 2045. From 2020 to 2030, SCAG estimates that Santa Ana's population will grow by approximately 2,000 residents annually. Santa Ana has nearly 7,000 units in the pipeline that, based on an average household size of 3 to 4 persons, may result in a population increase of 21,000 to 28,000 new residents by 2030 (see Table A-1).

**Table A-1
Population Growth Trends**

<i>City / County</i>	<i>2010</i>	<i>2020</i>	<i>2030</i>	<i>%Change 2020-2030</i>
Santa Ana ¹	324,647	331,304	350,500	5.8%
Santa Ana (rev.) ²	324,647	310,227	331,000–338,000	6.7–9.0%
Orange County ¹	3,010,232	3,180,491	3,535,000	11.14%

Sources:

1. SCAG Growth Forecast, Connect SoCal, 2030.

2. CA DOF E-5 Population and Housing Estimates, 2010 and 2020.



RACE AND ETHNICITY

Santa Ana is known for its international and diverse population. As the county seat and one of the oldest cities in Orange County, Santa Ana is a major gateway for newcomers from all over the world, particularly Latin America, Southeast Asia, and the Philippines. The various ethnic groups that constitute Santa Ana's population have helped create a rich pattern of cultural experiences and diversity. Although 77 percent of the city's population is Hispanic (based on 2020 Census), Santa Ana has one of the larger and faster growing Vietnamese-American populations in the county, representing 8 percent of the city's total population.

Between 2000 and 2010, Santa Ana experienced demographic change; the Hispanic population increased its share of total population by 3 percent, while the non-Hispanic White population declined by 29 percent. However, between 2010 and 2020, the Hispanic population declined by 6 percent and the non-Hispanic White population declined by 12 percent. The Asian population had the most significant gain, increasing by 11 percent, the majority of which was Vietnamese. According to the 2020 Census, Santa Ana has the highest percentage of Hispanics of any other Orange County city (see Table A-2).

Table A-2
Race and Ethnicity

<i>Race/Ethnicity</i>	<i>2010</i>		<i>2020</i>	
	<i>Population</i>	<i>Percent</i>	<i>Population</i>	<i>Percent</i>
Total Population	324,528	100%	310,227	100%
White (non-Hispanic)	29,950	9.2%	26,438	8.5%
Hispanic	253,928	78.3%	238,022	76.7%
Black or African American	3,177	1.0%	2,745	0.9%
American Indian and Alaska Native	507	0.2%	485	0.2%
Asian	33,618	10.4%	37,440	12.1%
Native Hawaiian/Pacific Islander	826	0.3%	635	0.2%
All Others	2,522	0.8%	4,462	1.4%

Source: US Census Bureau, 2010 and 2020 Censuses.

According to the 2014-2018 ACS, Santa Ana has a large population of foreign-born residents—45 percent are foreign born compared to 30 percent countywide. During the 1990s, one in every four immigrants to Orange County moved to Santa Ana. Though immigration has slowed in recent decades, Santa Ana continues to have one of the largest foreign-born populations in the region. Later sections of this appendix describe the various household and economic characteristics of immigrants and potential implications for housing needs.



AGE CHARACTERISTICS

Age characteristics profoundly influence housing needs. Typically, younger households look for more affordable rental opportunities as they begin their careers and accumulate wealth. As adults begin to form families, the demand increases for larger rentals or more affordable single-family homes that can accommodate children. Demand for move-up housing is strongest as residents approach the peak earning years of 45–64. As retirement approaches, seniors may wish to downsize into smaller units that are more easily maintained.

According to the 2014-2018 ACS, the population of Santa Ana is 50.9 percent male and 49.1 percent female. Santa Ana experienced a decline in its child, college age, and young adult population subgroups between 2010 and 2018. Table A-3 shows the age groups of Santa Ana residents. In 2018, residents between 25 and 44 years old represented the largest group (30.9 percent), followed closely by the age group 0 and 19 (29.8 percent). Santa Ana’s median age is 31.4 years.

Table A-3
Current Population by Age and Sex

<i>Age in Years</i>	<i>Total</i>	<i>Percentage</i>	<i>Male</i>	<i>Percentage</i>	<i>Female</i>	<i>Percentage</i>
0-19	99,509	29.8%	50,788	29.9%	48,721	29.7%
20-24	28,520	8.6%	14,800	8.7%	13,720	8.3%
25-44	103,121	30.9%	54,662	32.1%	48,459	29.6%
45-64	73,728	22.1%	36,963	21.7%	36,765	22.45%
65+	28,621	8.6%	12,618	7.4%	16,003	9.7%
Median Age	31.4		30.9		32.1	

Source: American Survey 2014-2018 5-year Estimates.

Between 2010 and 2018, the population of children/youth, college age, and young adults decreased, and the population of middle-aged adults and seniors increased. Growth in these subgroups coincides with the nationwide aging of the Baby Boom generation. These changes indicate that Santa Ana residents are aging in place, which may create additional demand for affordable housing as these subgroups become dependent on fixed incomes. New housing types such as multigenerational and cohousing could also be viable options for this segment of the population. With the aging of the Baby Boom population, Santa Ana can expect to see a modest increase in demand for senior housing. These demographic trends shape housing demand and provide an opportunity to institute responsive policies and programs.



HOUSEHOLD CHARACTERISTICS

Household characteristics are equally important in determining housing need in Santa Ana. Between 2010 and 2018, Santa Ana saw a decrease in married families with children, as shown on Table A-4. However, the number of married families without children and other families increased. Single persons and other nonfamilies declined from 2010 to 2018. In 2018, the city household composition was 81 percent families—15 percent higher than the national average (66 percent).

According to the U.S. Census, the City has an average household of 4.0 persons, which is the largest household size in Orange County. According to the 2006-2010 and 2014-2018 ACS, from 2010 to 2018, the number of small families with two to four family members increased in number by 1.6 percent, from 7,500 families to 7,620 families. Large families with five or more members declined by 5 percent, and smaller families of two to four members increased 11.3 percent.

Changes in household type and size together significantly affect the need for different types of housing. Preserving and rehabilitating the existing supply of housing may provide opportunities and help alleviate some of the overcrowding pressures in the city. At the same time, providing more housing opportunities for the aging baby boomers will allow seniors a greater opportunity to stay in the community.

Table A-4
Household Composition, 2010-2018

<i>Household Type</i>	<i>2010</i>		<i>2018</i>		<i>Percent Change in Hhlds</i>
	<i>No. of Hhlds</i>	<i>Percent</i>	<i>No. of Hhlds</i>	<i>Percent</i>	
Households	74,381	100%	76,521	100%	2.8%
Family Households	59,898	80.5%	62,184	81.2%	3.8%
With own Children	35,577	47.8%	30,886	40.3%	-13.1%
Single Persons	10,208	13.7%	9,549	12.4%	-6.4%
Unrelated Individuals	4,275	5.7%	4,788	6.2%	12%
Household Size					
One Person	10,208	17.7 %	9,549	12.4%	-13.1%
Two to Four	36,132	48.5%	40,224	52.5%	11.3%
Five or More	28,041	37.6%	26,748	24.9%	-4.6%
Householder Age					
Less than 35 years	17,998	24.1%	14,861	19.4%	-17.4%
35 years to 64 years	46,233	62.1%	48,434	63.2%	4.7%
65 years and older	10,150	13.6%	13,226	17.2%	30.3%
Average Hhld Size	4.30		4.30		0.0%

Source: American Survey 2006-2010 and 2014-2018 5-year Estimates



ECONOMIC CHARACTERISTICS



As the county seat, Santa Ana has a thriving public-sector job center for local, state, and federal government.

The economy plays a fundamental role in defining housing needs by creating a demand for housing, determining the wages paid to employees, and ultimately influencing the ability to afford housing. This section explores some of the more fundamental economic forces shaping housing needs in Santa Ana.

SANTA ANA JOB MARKET

Santa Ana has a lot to offer the business community. With lower lease and sales prices than in adjacent cities, its central location in Orange County, proximity to transportation hubs (e.g., John Wayne Airport and major freeways, a major railroad line, and the Santa Ana Regional Transportation Center), Santa Ana is a competitive place for locating business.

The California Employment Development Department provides the following composition of industries in Santa Ana.

- **Government and Education.** As the county seat, Santa Ana is a public sector job center. The County of Orange is the city's largest employer, providing over 11,000 jobs in 2021. Taking into account Santa Ana Unified School District, Rancho Santiago Community College District, City of Santa Ana, and the US Postal Service, the public sector provides over 29,000 jobs. Nearly 15 percent of all jobs in Santa Ana takes place in a government or educational institution.
- **Professional Workforce.** Santa Ana employs a large number of professionals involved in the information, banking, real estate, management, and technical sectors. Excluding professionals employed in the government and education industries, one in five jobs in Santa Ana is in a professional field. First American Title Company, for example, a Fortune 100 company, is headquartered in Santa Ana and employs more than 6,000 people.
- **Administrative Support.** More than 10,000 administrative support occupations work in many of the same locations as those in the government and education sector. This sector encompasses industries that support business activity and includes temp agencies and janitorial and landscaping services.
- **Manufacturing Sector.** The city's established manufacturing base provides approximately 15 percent of jobs in Santa Ana. The top three manufacturers are Power Circuits Inc., Curtiss-Wright Surface Technologies, and Behr Process Corporation.



Employment

The ability to afford housing depends on household income, which is influenced by employment status and occupation. The California Employment Development Department provides annual and monthly estimates of labor force participation, employment levels, and unemployment rates in cities. The number of employed residents in Santa Ana increased 7 percent, from 126,100 in May 2020, to 145,100 in August 2021. With the downturn in the regional economy due to the COVID-19 pandemic, Santa Ana's unemployment rate rose from 2.8 percent in February 2020 to an unprecedented 15.1 percent by May of 2020 (versus 14.5 percent countywide). The job market has started to recover, and unemployment improved to 6 percent in August 2021, which is slightly above the county's 5.9 percent unemployment rate.

Employment by Industries

According to the American Community Survey 2014-2018, four sectors accounted for 60 percent of jobs held by Santa Ana residents. These were Manufacturing (15 percent); Professional Services (15 percent); Art, Entertainment, Recreation (14 percent); and Education and Social Services (14 percent). Since 2010, large increases in employment were recorded in three industries—Professional/Scientific, Management, Administrative, Educational/Health Care/Social Assistance, and Arts/Recreation/Food/and Hospitality (see Table A-5).

Table A-5
Industry Employment Trends

<i>Occupations</i>	<i>2010</i>	<i>2018</i>	<i>Trend</i>
All Occupations	146,520	161,159	10%
Natural Resources	2,105	1,952	-7%
Construction	14,001	13,557	-3%
Manufacturing	27,076	25,279	-7%
Wholesale trade	4,748	3,985	-16%
Retail trade	15,637	17,812	14%
Transportation, warehousing, and utilities	4,518	5,221	16%
Information	2,659	1,543	-42%
Finance, insurance, real estate	7,922	8,815	11%
Professional, scientific, mgmt, administrative	20,214	24,408	21%
Education, health care, social assistance	17,391	22,000	27%
Arts, entertainment, recreation, accommodation, food services	17,149	22,465	31%
Other services	10,208	11,315	11%
Public administration	2,892	2,807	-3%

Source: American Community Survey, 2006-2010, 2014-2018.



Employment by Occupations

As shown in Table A-6, the 2014-2018 ACS reports that service occupations are the primary occupational group making up 28.2 percent of all occupations in Santa Ana with an average earning of \$30,154 for full-time employees. Sales and office occupations at 21.5 percent and natural resources, construction, and maintenance occupations at 20.1 percent are the second largest occupational groups. Management, business, science, and arts occupations make up 18.8 percent. Production, transportation, and material-moving occupations hold the smallest percentage of all occupants in Santa Ana at 11.3 percent and have average earnings of \$38,452.

Table A-6
Occupations and Annual Earnings

<i>Occupations</i>	<i>Total Part- and Full-Time Jobs</i>	<i>Percent of Occupations</i>	<i>Median Earnings</i>
All Occupations	161,159	100%	
Management, business, science, and arts	30,378	18.8%	All jobs: \$47,355 FT only: \$68,727
Services (healthcare support, food prep, building maintenance, and personal care)	45,487	28.2%	All jobs: \$20,502 FT only: \$30,1545
Sales and office occupations (including administrative support)	34,637	21.5%	All jobs: \$26,028 FT only: \$41,504
Production, transportation, and material-moving	18,185	11.3%	All jobs: \$26,084 FT only: \$38,452
Natural resources, construction, and maintenance	32,472	20.1%	All jobs: \$27,742 FT only: \$44,078

Source: American Community Survey, 2014-2018.

Commute Patterns

An important consideration in addressing housing needs is the commute patterns of residents and the workforce and the extent to which a balance in jobs and housing is desired. In a large metropolitan area where employment centers cross municipal boundaries, a jobs/housing balance is more often achieved at a regional level, as opposed to a city level. However, to the extent that minimizing commutes and improving air quality are important objectives, striving to achieve an acceptable jobs/housing balance is worthwhile. According to the 2014-2018 ACS, the majority of Santa Ana's working residents, approximately 92.3 percent, are employed within Orange County. While the majority of employed Santa Ana residents work outside of the city, approximately 26.7 percent work within the city.



HOUSEHOLD AND FAMILY INCOME

Household Income

Except for housing costs, household income is the most critical factor affecting the ability to afford housing in Santa Ana, like any other community in Orange County. According to the 2014-2018 ACS, Santa Ana's median household income was \$61,774 compared to \$85,398 for Orange County. Santa Ana's household income is one of the lowest among Orange County cities. The following describes and analyzes the differences in household income by family type (married families, married families with children, non-families, etc.) and distribution.

Like most cities, household income also varies significantly by householder age. For households under age 25, the median income was \$44,889 and increased to \$57,292 for householders between the ages of 25 and 44 as of the year 2018. The median household income progressively increased to \$72,890 for householders 45 to 64 years of age, the prime working years. Following retirement, however, the median income drops to \$47,675, slightly higher than the youngest age group. The fact that Santa Ana's population is the youngest in Orange County is another reason for the city's low median household income.

Table A-7 displays changes in household income in Santa Ana from 2010 to 2018 according to the ACS.

Table A-7
Household Income, 2010-2018

<i>Household Income</i>	<i>2010</i>		<i>2018</i>		<i>Change in Number of Households</i>
	<i>Total Households</i>	<i>Percent</i>	<i>Total Households</i>	<i>Percent</i>	
Total Households	74,381	100%	76,521	100%	2.8%
Less than \$15,000	6,024	8.1%	5,203	6.8%	-13.6%
\$15,000 to \$24,999	7,363	9.9%	6,504	8.6%	-11.6%
\$25,000 to \$34,999	8,107	10.9%	7,575	9.9%	-6.6%
\$35,000 to \$49,999	12,049	16.2%	10,712	14%	-11%
\$50,000 to \$74,999	16,215	21.8%	15,533	20.3%	-4.2%
\$75,000 to \$99,999	10,338	13.9%	10,406	13.6%	0.6%
\$100,000 to \$149,999	9,669	13%	12,319	16.1%	27.4%
\$150,000 or more	4,760	6.4%	8,187	10.7%	71.9%
Median Household Income	\$54,877		\$61,774		
Percent of County Median	73.8%		72.3%		

Source: American Community Surveys 2006-2010 and 2014-2018.



Income by Family Type

The median income in Santa Ana varies between different types of families. Married couples without children, which compose 54 percent of all households, earn the highest median income at \$67,251. Married couples with children under 18 years of age compose 28 percent of all households and earn the second highest median income of \$58,818. Other family and nonfamily households, collectively composing 46 percent of all households, earn an average income of \$47,000.

Income Distribution

The California Department of Housing and Community Development (HCD) uses these household income surveys to identify the need for housing assistance in communities. There are five primary income categories based on Area Median Income (AMI) and adjusted for household size:

- Extremely low: households earning 30 percent or less of AMI
- Very low: households earning 31 to 50 percent of AMI
- Low: households earning 51 to 80 percent of AMI
- Moderate: households earning 81 to 120 percent of AMI
- Above Moderate: households earning above 120 percent of AMI

State housing program guidelines often combine extremely low and very low-income into one category, called very low-income. The extremely low, very low, and low-income categories are also often considered “lower” income. These terms are used throughout the Housing Element.

The City of Santa Ana has a high proportion of its households earning lower incomes—approximately two-thirds of all households earn lower incomes. The difference is significant based on tenure: 80 percent of renters and 50 percent of homeowners earn lower incomes. Higher income households, as expected, are predominantly homeowners.

State law defines affordability in terms of target household incomes and the relative percentage these households must pay to purchase or rent decent and safe housing. Affordability is therefore relative to both household income and housing unit cost. In most cases, affordable housing is defined as housing and related cost (e.g., utilities, insurance) that require no more than 30 percent of a household’s gross income. In Santa Ana, 48 percent of the households are considered cost burden, spending more than 30 percent of their gross income on mortgage, rent, and housing costs. As detailed in Table A-8, lower-income renters households experience the highest rate of overpayment at 96 percent.



Table A-8
Santa Ana Household Characteristics by Tenure

<i>Household Characteristics</i>	<i>Owners</i>		<i>Renters</i>		<i>Total</i>	
	<i>No. of Hhlds</i>	<i>Percent</i>	<i>No. of Hhlds</i>	<i>Percent</i>	<i>No of Hhlds</i>	<i>Percent</i>
Median Household Income	\$82,953		\$49,383		\$61,774	
Household Income Categories						
Extremely Low	3,640	10.5%	12,855	30.9%	16,495	21.7%
Very Low	5,610	16.2%	10,940	26.3%	16,550	21.7%
Low	8,655	25.1%	9,495	22.8%	18,150	24%
Moderate	4,305	12.4%	3,105	7.4%	7,410	9.7%
Above Moderate	12,260	35.5%	5,115	12.3%	17,375	23%
Total	34,470		41,510		75,980	
Cost Burden and Overpayment						
Hhlds Overpaying for Housing (>30%)	11,195	32.4%	25,330	61%	36,526	48%
Lower-Income Hhlds Overpaying (>30-80%)	9,320	83.2%	24,605	96%	33,925	92.8%
Sources: Comprehensive Housing Affordability Strategy 2013-2017; American Community Survey 2014-2018.						

Recent years have seen significant research on the progression of immigrants/foreign born residents (see: Population Dynamics Center at the University of Southern California). The ACS tracks the median income household of foreign-born residents and their progression in housing ownership and attainment. Forty-two percent of foreign-born residents own a home, with an average household size of 5.1 persons. Renters have a lower household size with an average of 4.75 persons.

Although no single study describes the characteristics of foreign-born residents, the research shows that many immigrant households, particularly those with limited English skills, earn lower incomes than later generations. With slowing immigration patterns, housing needs could likely be more influenced by second and third generations of immigrant families. Median incomes and housing opportunities gradually improve as immigrants become more educated, learn English skills, assimilate into the country, and gain higher paying jobs. A key challenge facing Santa Ana for years to come will be how to facilitate greater housing opportunities and move-up options for its population.



NEIGHBORHOOD AND HOUSING PROFILE



Vintage Home in Santa Ana



Rowhouses in Santa Ana.



High-rise and mixed-uses define Santa Ana's District Centers.

Neighborhood and housing characteristics define housing needs in Santa Ana. This section analyzes neighborhood characteristics, housing growth patterns, housing characteristics, tenure and vacancy trends, housing prices, affordability, and implications for housing needs.

NEIGHBORHOOD CHARACTERISTICS

Santa Ana has a rich mosaic of neighborhoods, each distinguished by its history, architecture, housing types, and amenities. Sixty-four neighborhood associations have been formed to address neighborhood issues. Approximately 70 percent of all residential areas in the city are single-family neighborhoods that are well established and maintained and contain historic resources.

Santa Ana has many neighborhoods made up of a variety of residential uses: a mixture of single-family, townhouses, and apartments and a combination of industrial and residential uses. The diversity of these neighborhoods is great, and conditions in each neighborhood vary widely. The diverse urban and suburban fabric of many of these neighborhoods has been woven over time and reflects the complexity of land use policies implemented over the long history of Santa Ana. The City has undertaken extensive efforts to stabilize neighborhoods through appropriate land use direction and housing programs.

To protect and stabilize residential neighborhoods, support the City's economic base, and provide housing for the local workforce, Santa Ana has established new neighborhoods close to employment centers. These district centers include Metro East, MacArthur Place, Downtown, City Place, and similar locations. Reflective of modern employment centers, Santa Ana's district centers are defined by eclectic skylines of high-rise residential and mixed-use projects, townhouses, and apartments. These neighborhoods are urbanized, transit oriented, and designed to support economic development and a more equitable job-housing balance.

The Neighborhood Initiatives Program (NIP) provides staff support and acts as a liaison between neighborhoods, communities, and the City. NIP provides technical assistance and community improvements to facilitate improved communication between residents, the community, and City Hall. The City has place-based initiatives ongoing in the community, including a \$10 million, ten-year effort from The California Endowment. Santa Ana's neighborhood programs can be found at: <https://www.santa-ana.org/departments/neighborhood-initiatives/>.



HOUSING GROWTH

Like many Southern California cities, the City of Santa Ana experienced a post–World War II residential construction boom. During the 1940s three military facilities were opened adjacent to the city, providing thousands of jobs and a need for additional housing opportunities in the area. Santa Ana’s housing construction boom spanned three decades; two-thirds of the city’s housing was built between 1950 and 1979. In addition, significant housing construction continued during the 1980s, though to a much lesser degree.



By the late 1980s, however, the City of Santa Ana faced a number of challenges regarding its housing, particularly apartments. Recently constructed multiple-family structures had a lack of adequate open space, low quality architectural designs, and poor use of quality materials. The city was also impacted by crime, overcrowding, and need for community services in these areas. Coupled with poor maintenance practices, these properties generated a poor image for higher density residential development. Further, many of these apartment structures were built in stable single-family neighborhoods.

In response to these challenges, the City developed strategies to stabilize residential neighborhoods and manage the quality of development. This included design guidelines, traffic management plans, and neighborhood revitalization programs. As a result, the City led a wide variety of efforts to identify distressed residential properties. Many of these properties were revitalized with federal funds. In some cases, entire blocks of apartment properties were restored and preserved.

As development pressures increased throughout the region, the City began to embark on reviewing areas for focused development, such as the MEMU, Harbor Corridor, and other locations suited for housing. The City responded to the housing crisis by adopting several specific plans that allow for high-density housing of up to 90 units per acre. According to the State Department of Finance, from 2010 to 2020 a total of 2,266 housing units were built (average of 224 units per year). Additionally, population from 2010 to 2020 increased by two percent.

Looking forward, the City embarked on a multi-year comprehensive update to its general plan, one of the first in decades. In 2022, the City completed a comprehensive General Plan update that will further strengthen the Housing Element through a series of land use policies. This comprehensive update will assist in the City in meeting its housing obligations through the 7th RHNA cycle, from 2030 onward.



HOUSING TYPE

Santa Ana’s range of housing types and prices accommodate the varied lifestyles and housing needs of people from all walks of life. In 2020, the Department of Finance reported 79,181 housing units in Santa Ana. Between 2010 and 2020, the housing stock increased by 2,262 units. As of 2020, the city’s housing stock consists predominantly of single-family homes (53 percent). Multiple-family (2 to 4 units) housing composes 10 percent, and larger multiple-family housing with five or more units makes up 33 percent of all housing. Mobile home units make up the remaining 5 percent (see Table A-9).



Mixed-Use Prototypes



Residential Care Facility

Table A-9
Housing Growth, 2010-2020

Unit Type	Housing Units			
	2010	Percent	2020	Percent
Total Units	76,919	100%	79,181	100%
1 Unit, Detached	35,444	46%	35,814	45.2%
1 Unit, Attached	5,637	7.3%	5,807	7.3%
2 to 4 Units	7,500	9.7%	7,603	9.6%
5 or More Units	24,289	31.5%	25,904	32.7%
Mobile Home	4,049	5.2%	4,053	5.1%
Housing Types				
Single-Family	41,081	53.4%	41,621	52.6%
Multiple-Family	31,789	41.3%	33,507	42.3%
Other	4,049	5.2%	4,0453	5.1%

Source: California Department of Finance, 2010-2020.

As Santa Ana’s population has diversified and housing needs have become more differentiated, the city has experienced significant levels of construction in innovative housing types. High-rise and mixed-use condominiums are under construction near major employment centers. Mixed-use and live-work units are sensitively integrated into industrial/residential neighborhoods and near employment centers. Artist’s lofts have added vibrancy to special districts.

A growing segment of housing is accessory dwelling units. Housing for people with special needs is located in commercial corridors and residential neighborhoods. Many of these homes are standard single-family and multiple-family housing, but are used for group quarters and shared by residents. A number of specialized facilities, including residential care, senior housing, emergency and transitional housing, and other special needs housing are also in Santa Ana.



Housing Tenure and Vacancy

The American dream is often represented by homeownership, as this can provide financial independence, economic stability, and personal safety. Home investment and the presence of homeowners contribute to neighborhood quality and stability. The ACS 2014-2018 identifies 76,521 occupied housing units with an overall vacancy rate of 2.4 percent. In addition, 46.1 percent of the housing units are owner-occupied and 53.8 percent are renter-occupied (see Table A-10). The share of renters in Santa Ana is higher than the County's overall.



Apartment Project in Santa Ana

Table A-10
Housing Tenure, 2010-2018

	2010		2018	
	Number	Percent	Number	Percent
Total Housing Units	77,796	100%	78,597	100%
Occupied Housing Units	74,381	95.6%	76,521	97.3%
Owner Occupied	36,613	49.2%	35,321	46.1%
Renter Occupied	37,768	50.7%	41,200	53.8%
Vacant Housing Units	3,415	4.3%	2,076	2.6%
Homeowner Vacancy Rate	1.9%		0.8%	
Renter Vacancy Rate	3.5%		1.6%	

Source: American Community Survey 2006-2010 and 2014-2018

Growth in renter households between 2014-2018 outpaced both the construction of rental units and the conversion of single-family homes to rental units. The City recognizes the importance of a range of rental opportunities to meet the varied lifestyles of individuals and families in the community and proposes policies to support increasing the supply of quality rental housing opportunities in the city.

An adequate supply of housing helps maintain adequate choices for residents, moderate housing prices, and encourage housing repairs. This is a delicate balance that must be maintained. Low vacancy rates result in price and rent escalation, while excess vacancy rates result in price depreciation, rent declines, and deferred maintenance. Although market forces are beyond the control of any one city, maintaining an optimal balance of housing supply and demand is a desirable goal.

The building industry assumes that a vacancy rate of 1.5 to 2.0 percent for ownership units and 5 to 6 percent for rental units are optimal. In 2010, the vacancy rate was 4.9 percent for rental units and 1.9 percent for homeowners. Based on the 2020 Census, the citywide housing vacancy rate of 3.2 percent was lower than the county rate of 4.9 percent.



HOUSING REHABILITATION NEEDS

Well-maintained housing is a critical part of safe and healthy neighborhoods. Housing conditions also influence property values and the city's image. In the absence of a comprehensive survey, the age of a home is often used to identify housing repair needs. Generally, homes less than 30 years old are in good condition and begin to require rehabilitation after that. Generally, homes built 50 or more years ago (unless well maintained) are more likely to require substantial repairs.

The City prioritizes housing program activities to address identified housing needs. A great emphasis is placed on the use of rehabilitation loans and grant monies to maintain and upgrade existing stock. In addition, the City uses CDBG and HOME funding sources to assist in improvement and expansion to the City's existing housing stock.

While the homes built in the last 30 years are presumed in good condition, Santa Ana homes built between 1960 and 1980 may begin to require rehabilitation. Much of Santa Ana's housing was built during this period, before the development of the latest residential design standards. Typically, these homes require reroofing, repainting, and other exterior work. In other cases, more significant repairs may be needed, depending on the use.

Homes more than 50 years old are typically most in need of rehabilitation. An estimated 43,803 housing units, or 56 percent of the housing stock, were built before 1970. Unless periodically repaired, many of these housing units will require significant repair, rehabilitation, and in some cases replacement. Typical rehabilitation needs include the replacement of major subsystems, such as the electrical, plumbing, and other systems.

Different definitions of substandard housing exist, depending on the source of information used. Substandard housing conditions may refer to structural deficiencies, such as leaking roofs, holes in the floor or walls, sloping walls, or crumbling foundations. Substandard housing can refer to a lack of adequate facilities: for example, frequent lack of hot water or heating systems that emit unsafe fumes or break down. These and other considerations are important to note when discussing housing conditions. The City's code enforcement is complaint based and responds to code violations on a case by case basis. Based on complaints and cases resolved, an estimated 10 percent of the city's housing stock could require rehabilitation. The City continues to refer residents to Habitat for Humanity through a contract in conjunction with the CDBG program to help with code violations and repairs.



Substandard Housing Conditions

The 2014-2018 ACS and City surveys also provide an indication of housing repair and rehabilitation needs in Santa Ana. Because of the different methodologies used, differences in data cannot be reconciled. The point here is to provide the best available information, understanding limitations in data sources, so as to inform the development of housing policy. The latest information references three substandard housing conditions:

- **Deficient Utilities.** The 2014-2018 ACS reported that 646 of occupied units lack complete kitchen facilities, of which 511 are renter occupied and 135 are owner occupied. The 2014-2018 ACS also reported that 223 units lack complete plumbing facilities. Approximately 40 percent of these units are renter occupied. Deficient utilities are not always an indication of substandard housing however, as they are not structural in nature. Lack of kitchens could also occur in accessory dwellings.
- **Structural Inadequacies.** Structural inadequacies include leaks, holes in the floor or walls, loose or missing steps, sloping exterior walls, sagging roofs, crumbling foundations, and other conditions. Based on 2018 Federal Reserve Bank of Philadelphia, it is estimated that 36.3 percent of housing units in the Los Angeles-Long Beach-Anaheim Metro Area have repair needs, though the estimates do not distinguish between routine repairs or more serious conditions that would suggest structural inadequacies. No estimates are provided for Orange County.
- **Lead-Based Paint and Soils.** Lead paint hazards are typically found in structures built before 1978 due to the use of lead-based paint. Lead poisoning can affect every system in the body, leading to learning disabilities, behavioral problems, and medical conditions. Lead-based paint and varnishes were used in housing until 1978 and are still assumed to be present in the home unless the house has been fully remediated by a certified contractor. Children age 6 and younger are at the highest risk for physical and mental damage from lead poisoning.

According to the 2020-2024 Consolidated Plan, more than 60,000 units were built before 1980 (used as a proxy for 1978), accounting for 87 percent of the ownership stock and 76 percent of the rental stock. There are 23,340 households with children, however, only an estimated 5,990 units are occupied with children aged six or younger. Thus, 26 percent of households with young children are assumed to live in housing that may contain lead-based paint. According to the State Department of Public Health, 57 children within Orange County had blood lead levels greater than 9.5 micrograms per deciliter in 2019.



HOUSING PRICES AND AFFORDABILITY

Housing Prices

This decade has seen unparalleled changes in the housing market. Fueled by historically low interest rates, overly flexible lending, and pent-up demand for housing, the prices of single-family homes soared. According to SCAG Local Profiles, between 2000 and 2018, median home sales prices in Santa Ana increased 198 percent while prices in the SCAG region increased 151 percent. In 2018, median homes sales prices in Santa Ana were \$540,000 and the highest experienced since 2000 was \$570,000 in 2006.

Housing Affordability

The costs of homeownership and rent can be compared to household’s ability to pay for housing, using the 2020 HUD-established Area Median Family Income (MFI) limit for Orange County of \$106,700. Table A-11 illustrates maximum affordable mortgage payments and rents by household size in Santa Ana. Affordable housing cost is based on a maximum of 30 percent of gross household income devoted to mortgage or rental costs. The maximum affordable cost is adjusted based on the number of household members.

**Table A-11
Housing Affordability by Income Group**

	<i>Annual Household Income adjusted by Household Size¹</i>	<i>Affordable Payment</i>	
		<i>Renter²</i>	<i>Owner³</i>
Extremely Low (0-30 MFI)		30% AMI	
One Person (Studio)	\$28,250	\$706	\$49,500
Two Person (1 Bedroom)	\$32,300	\$757	\$56,800
Three Person (2 Bedrooms)	\$36,350	\$908	\$57,100
Four Person (3 Bedrooms)	\$40,350	\$1,049	\$55,300
Five Person (4 Bedrooms)	\$43,600	\$1,170	\$48,900
Very Low (30-50 MFI)		50% AMI	
One Person (Studio)	\$47,100	\$1,177	\$117,500
Two Person (1 Bedroom)	\$53,800	\$1,261	\$134,400
Three Person (2 Bedrooms)	\$60,550	\$1,513	\$144,400
Four Person (3 Bedrooms)	\$67,250	\$1,748	\$152,300
Five Person (4 Bedrooms)	\$72,650	\$1,951	\$153,700
Low (50-80 MFI)		80% AMI	70% AMI
One Person (Studio)	\$75,300	\$1,884	\$185,300
Two Person (1 Bedroom)	\$86,050	\$2,018	\$212,000
Three Person (2 Bedrooms)	\$96,800	\$2,422	\$231,700
Four Person (3 Bedrooms)	\$107,550	\$2,748	\$249,300
Five Person (4 Bedrooms)	\$116,200	\$3,122	\$258,400
Moderate (81-100 MFI)		120% AMI	110% AMI



Table A-11
Housing Affordability by Income Group

	<i>Annual Household Income adjusted by Household Size¹</i>	<i>Affordable Payment</i>	
		<i>Renter²</i>	<i>Owner³</i>
One Person (Studio)	\$89,650	\$2,825	\$383,300
Two Person (1 Bedroom)	\$102,450	\$3,026	\$438,200
Three Person (2 Bedrooms)	\$115,250	\$3,631	\$486,300
Four Person (3 Bedrooms)	\$128,050	\$4,195	\$532,00
Five Person (4 Bedrooms)	\$138,300	\$4,682	\$563,900

Sources: Based on 2021 Orange County MFI \$106,700 and 2021 HCD State Income Limits; Based on CA Tax Credit Allocation Committee 2021 Maximum Rents.

Notes: Moderate income rents set at 120% AMI rents. Monthly affordable rent based on payment of no more than 30% of household income.

Maximum affordable home sales prices based on CA H&SC Section 50052.5 methodology. Assumes a down payment of 5 %, annual interest rates of 4%, and a 30-year mortgage. Based on a monthly payment 30% of gross household income for Extremely Low, Very Low, and Low-income households, and 35% of gross household income for Moderate income households.

Home prices across the Southern California region have increased exponentially over the last several years. Single-family home prices in Santa Ana are mostly affordable to moderate and above moderate income households. In Fall 2021, the median price for a single-family detached home was \$780,000, which is affordable to households earning \$135,000 or more annually. However, newer single-family homes or those within certain neighborhoods of Santa Ana (e.g., north Santa Ana) will cost substantially more and require an even higher income.

Condominiums provide low-income households, moderate-income households, seniors, and first-time homebuyers with a more affordable and lower maintenance opportunity than single-family detached homes. In fall 2021, the median price of a condominium/townhome was \$400,000, which is affordable to households earning about \$75,000 annually. The price range of affordability depends on the size of the down payment and the cost burden assumed. However, much of the existing condominium stock was built in the 1970s and 1980s. New condominiums are typically priced at levels affordable only to moderate- and above moderate-income households.

Given the current sales prices and corresponding required down payment amounts, homeownership is unattainable for many households. The average annual income in the Santa Ana/Anaheim/Irvine metropolitan area is \$37,700 for a manufacturing assembler, \$37,800 for a retail salesperson, \$42,000 for an office clerk, and \$54,300 for a postal service clerk. Even with two wage earners in one household, the annual income needed to purchase a condominium may be beyond the income earned by many Santa Ana residents.



Housing Rents and Affordability

Apartments and rental single-family homes provide an important housing option for young adults, families, and seniors. The majority of Santa Ana's apartments were constructed prior to 1980. These apartments therefore generally do not support the demographics of the City's current renter households. Whereas 21 percent of Santa Ana's households consist of six or more people, a survey of over 24,941 units in multifamily apartment complexes in Santa Ana revealed that only approximately 4 percent offer three or more bedrooms.



Apartments are typically stratified for purposes into three classes—A, B, and C. These classes distinguish apartment properties in terms of amenities, property condition, and investment opportunity. A survey of 1,089 properties in Santa Ana found the following:

- Class A: Santa Ana has 28 Class A apartments, which represent the highest quality buildings and are characterized by newer properties, with top amenities, and high-income rents.
- Class B: Santa Ana has 126 Class B properties that are generally older, often with some deferred maintenance, which tend to have lower rents, and may not be professionally managed.
- Class C: Most of the apartment properties (915 properties or 86 percent) in Santa Ana are Class C. Typically, Class C properties are more than 30 years or older, have some renovation and rehabilitation needs, and have the lowest rent in a market.



The average Santa Ana apartment rent in 2021 was approximately \$1,971. The average apartment rent in Santa Ana was \$1,497 in 2013, a 31 percent increase over 8 years or an approximate 4 percent increase per year for the 8-year period (see Table A-12). Although rents have increased over the decade, the median income of Santa Ana's renter households has remained relatively flat. The benefit of an older apartment stock is that it largely stays more affordable as newer housing is constructed.

Table A-12
Existing Rental Survey and Affordability, 2021

	<i>Apartments by Bedrooms</i>				<i>Total</i>
	<i>Studios</i>	<i>1-Bed</i>	<i>2-Beds</i>	<i>3-Beds and Above</i>	
Average Vacancy Rate	2.10%				
Total Units	2,018	12,182	9,626	1,116	24,941
Average Rent Per Unit	\$1,512	\$1,732	\$2,287	\$2,476	\$1,971
Property Class	Average Rent by Bedroom				
Class A (28 Properties) ¹	\$2,151	\$2,415	\$2,966	\$3,657	\$2,886
Class B (126 Properties) ²	\$1,502	\$1,739	\$2,268	\$2,579	\$1,976
Class C (915 Properties) ³	\$1,157	\$1,575	\$1,953	\$2,221	\$1,725
Vacancy / Occupancy Rate	Average Vacancy Rate				
Class A (28 Properties) ¹	7.9%				
Class B (126 Properties) ²	2.5%				
Class C (915 Properties) ³	0.9%				
Number of Units	Number of Units by Bedroom				
Class A (28 Properties) ¹	495	1,370	1,254	257	3,376
Class B (126 Properties) ²	482	3,272	2,831	267	6,852
Class C (915 Properties) ³	1,041	7,539	5,541	593	14,714

Source: Costar, September 2021.

Notes: Class A properties represent the highest quality buildings in their market. These are often newer properties with top amenities and high-income rents.

Class B properties are generally older, often with some deferred maintenance, tend to have lower income rents, and may or may not be professionally managed.

Class C properties are typically more than 30 years or older, have some renovation and rehabilitation needs, and have the lowest rental rates in a market.

While Class B and C apartments provide a valuable source of affordable housing, they do not provide opportunities for Orange County's growing upwardly mobile market niche. Without additional Class A apartments, the City cannot attract above moderate income renters. The nearby cities of Costa Mesa and Irvine offer several executive rental opportunities for professionals who would potentially choose to live in Santa Ana should the proper location, amenities, and price be offered in Class A housing. New housing development can provide Class A rental housing. The City's Metro East Overlay Zone, Transit Zoning Code, Harbor Mixed-Use Transit Corridor Specific Plan, and MainPlace Specific Plan will provide opportunities for the construction of affordable and Class A apartments.



Housing Problems

The federal government considers housing overcrowding or housing overpayment to be evidence of a housing problem. These conditions also lead to a number of hardships for households, including insufficient income to afford other necessities, undue burden on families, and accelerated wear on a home. In some cases, the inability to afford housing can lead to foreclosures or other loss of housing. The following defines and describes the prevalence of overcrowding and overpayment in Santa Ana.

The Department of Housing and Urban Development (HUD) defines housing problems as a household 1) not having complete kitchen facilities or bathroom facilities, 2) paying more than 30 percent of gross income for housing costs, or 3) having more than 1 person/ room (excluding bathrooms and kitchens). According to the 2020-2024 Consolidated Plan, of all households within Santa Ana earning less than 100 percent AMI, 57 percent experience at least one housing problem. At this income range, 65 percent of rental households and 43 percent of owner households experience at least one housing problem.

Of all lower income households, 35,037 households (66 percent) are cost burdened. This share is predominantly composed of renter households (24,483). Of these rental households, more than half (53 percent) of all small family households (2-4 persons) are cost burdened. Further, 45 percent of all large rental families (5+ persons) at this income range are cost burdened. A smaller overall share (38 percent or 19,885 households) earning less than 80 percent AMI experience overcrowding. However, of those experiencing overcrowding, 79 percent are rental households. Just over 1 percent of all households earning less than 100 percent AMI experience substandard kitchen or bathroom facilities.

Overcrowding

Housing overcrowding is a critical issue for many communities. In recent years, considerable public concern has been voiced regarding the level of overcrowding in Santa Ana and its impact on parks and recreation services, facilities for students, parking and traffic management, and overall condition of infrastructure and its ability to support residents. The U.S. Census considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, and severely overcrowded if more than 1.5 occupants per room.

According to the 2014-2018 ACS, 32 percent of housing units are overcrowded. The ACS acknowledges error rates of 25 to 50 percent



(based on sampling methodology), so these figures may not reflect current housing problems. Housing overcrowding is most severe among lower income households and large renter families. According to the 2014-2018 ACS, 19 percent of homeowners live in overcrowded conditions, while 42 percent of renters live in overcrowded housing. Forty percent of foreign born residents live in overcrowded conditions, while an estimated 13 percent of native residents live in overcrowded situations.

Housing Overpayment

Housing overpayment is also a significant issue in Santa Ana. The state-recognized definition of overpayment is spending 30 percent or more for a renter and 35 percent or more for a homeowner of one's income on housing. Housing overpayment is a critical issue in that households spending too much for housing often forego other necessities, including health insurance and adequately sized housing. In recent years, the housing boom led to unprecedented increases in sales prices. Many low and moderate income households purchased homes in the past decade with adjustable rate mortgages and are now incurring high cost burdens.

Overpayment occurs at two levels. Moderate overpayment refers to housing costs between 30 to 50 percent of gross income; severe overpayment refers to housing costs in excess of 50 percent of gross income. The 2014-2018 ACS reports 45 percent of households overpaid for housing. Of this total, nearly two-thirds were renters and one-third were homeowners. Housing overpayment is most severe among extremely low, very low, and low-income and special needs groups. Table A-13 displays the prevalence of housing overcrowding and overpayment in Santa Ana by the tenure of household.

Table A-13
Housing Problems

	<i>Total</i>		<i>Owners</i>		<i>Renters</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
Overcrowding						
None	52,676	69%	28,851	82%	23,825	58%
Moderate Over	20,317	27%	5,922	17%	14,395	35%
Severe	3,528	5%	548	2%	2,980	7%
Overpayment						
None	41372	55%	23342	66%	18030	45%
Moderate	27923	37%	6744	19%	21179	53%
Severe	6150	8%	5019	14%	1131	3%

Source: American Community Survey 2014-2018.



SPECIAL HOUSING NEEDS



Certain segments of the population have special housing needs because of a special difficulty in finding adequate and affordable housing. Circumstances may include income, household characteristics, disability, or medical conditions. Within the City of Santa Ana, special needs groups may include seniors, disabled persons, large families, single-parent households, extremely low-income households, farm workers, and homeless persons.

SENIORS

Many seniors with fixed incomes have limited income for housing expenses. Seniors may also be less mobile due to disabilities and require building features to allow greater mobility and provide a safer living environment. Seniors with limited vision or mobility may need transportation assistance to meet primary needs such as grocery shopping and medical care. All of these issues can make it difficult for seniors to find suitable and affordable housing.

According to the 2014-2018 ACS, 28,621 Santa Ana residents are 65 years of age and older, accounting for 9 percent of the city's population. Seniors account for 27 percent of owner-unit householders and 9 percent of rental-unit householders. The ACS reports that of the 13,226 total senior households, 9,534 (72 percent) were owner households and 3,692 (28 percent) were renter households. As the baby boom generation ages, the city will experience a continued increase in its senior population, potentially creating demand for lower-income housing, barrier-free housing, and supportive services for seniors.

Since many seniors live on fixed incomes, overpaying for housing is a major concern. The median income of a senior household in Santa Ana is \$56,535, which is considered lower income. Lower income senior households overpaying for housing have less income to spend on food, health care, and transportation.

Santa Ana's seniors are diverse in age, income, and housing needs. Between 2010 and 2018, the senior population increased by 42 percent; seniors age 65 to 74 years old had the largest increase at 58 percent. Each of these groups has different health, transportation, and housing needs. The magnitude and complexity of senior housing needs in Orange County led to the Orange County Grand Jury encouraging cities to provide greater policy and program guidance to meet the housing needs of this group. The Framework sets forth appropriate senior programs.



Housing and Services

The City of Santa Ana permits a wide range of senior housing to allow residents to stay within the community. These include age-restricted apartments, mobile homes, and continuing care facilities:

- **Age-Restricted Apartments.** Santa Ana has publicly subsidized affordable apartment projects, providing approximately 944 units of housing for lower income seniors. In addition, 419 units are currently under construction at 2222 East First Street, Santa Ana, CA 92705.
- **Residential Care Facilities.** According to the Department of Social Services, the city has 486 beds in State-licensed facilities that are often called assisted living facilities, retirement homes, and board-and-care homes. The city is also home to one continuing care facility.
- **Senior-Only Mobile homes.** Santa Ana has six mobile home parks and 1,028 spaces that are age restricted to persons 55 years of age or older. These parks provide affordable housing options for many extremely low, very low and low-income residents.



Whereas the focus is often on providing housing, support services are essential to help seniors live as independently as possible without having to move. Services can include transportation, health care, home maintenance assistance, low-cost loans or grants to rehabilitate homes, referral services, and many other services that can improve the lives of our seniors. Orange County’s Office on Aging is the lead advocate for addressing the needs of seniors in the county.

Santa Ana operates two community centers for seniors, out of which recreational, social, health, and educational programs are administered. Seniors also have access to low-cost public transportation and services. These are just some of the many services provided by the City and other public agencies. Table A-14 summarizes senior housing in Santa Ana.



**Table A-14
Santa Ana Senior Housing Options**

<i>Type of Housing</i>	<i>Number of Facilities</i>	<i>Capacity (beds or units)</i>
Senior Apartments	7	1,363 ¹ units
Senior Mobile Homes	6	1,028 units
Continuing Care Facility	1	240 beds
Residential Care Facility for the Elderly	27	486 beds
Total	43	2,391 units; 726 beds

Source: California Department of Social Services, September 2021; City of Santa Ana, September 2021.
Notes: Total includes 491 units that are currently under construction



PEOPLE WITH DISABILITIES

As a large urban area, Santa Ana has a significant population of people with physical, mental, developmental, or other disabilities. People with disabilities, including the developmentally disabled, have special needs in that many earn very low incomes, have higher health costs, and are often dependent on supportive services. People with disabilities also may face discrimination in the housing market, because landlords may be concerned about how a disability is perceived by other tenants or the disabled person's ability to afford a unit.

Disabilities fall within several categories:

- **Developmental.** The Regional Center of Orange County (RCOC) is contracted by the State Department of Developmental Services to provide community-based services to developmentally disabled persons. RCOC serves 2,785 people with disabilities living in the city of Santa Ana. Table A-14 summarizes the number of developmentally disabled residents in Santa Ana.
- **Physical.** According to the 2014-2018 ACS, the City of Santa Ana has approximately 25,099 people in the community with a physical or other Census-reported disability who live in a non-institutional setting. The prevalence of disabilities among residents is as follows:
 - 1.9 percent with a vision difficulty
 - 2.1 percent with a hearing difficulty
 - 2.6 percent with an ambulatory difficulty
 - 2.6 per cent with a self-care difficulty
 - 4.1 percent with a cognitive disability
 - 4.3 percent with an independent living disability and
 - 4.6 percent with an ambulatory difficulty
- **Mental.** While there are no local studies estimating the prevalence of mental illness, the 2020-2024 Consolidated Plan reports that approximately 9,793 residents who suffer from some form of severe mental illness need housing assistance, based on national prevalence estimates that are extrapolated to Santa Ana. The Census does not provide the prevalence of individuals with a mental illness.
- **Substance Abuse.** While there are no local studies estimating the prevalence of substance abuse, a recent study published by Kaiser Family Foundation revealed an estimated 13.3 percent of adult have been confirmed for using substances to manage their stress during the Coronavirus pandemic. In addition, approximately 26 percent of Santa Ana's homeless population is challenged with substance abuse.



Housing and Services

Meeting the complexity of housing and service needs of people with disabilities in Santa Ana requires a comprehensive housing strategy. The strategy should include facilitating independent living through in-home modifications, providing suitable housing opportunities, allowing for supportive services, and implementing existing state and federal law. In other cases, the preferred strategy is to provide, through land use planning and zoning, appropriate locations where supportive housing can be provided.

For people with physical or mobility limitations, the California Administrative Code Title 24 sets requirements for access and adaptability that apply to public buildings, employee housing, privately funded housing, and newly constructed apartment houses. For public housing construction, the State, through the California Building Code, requires that at least 5 percent of dwelling units must be provided with mobility features, and 2 percent of dwelling units must be provided with communication features.

Although home modifications can improve the ability of people to live in independent housing, many individuals may require more extensive care. Table A-15 and the discussion below summarize the various licensed care housing options for people with disabilities in Santa Ana.

- **Adult Residential Care.** These facilities provide 24-hour nonmedical care for adults ages 18–59 who are unable to provide for their own daily needs. Adults may be physically, developmentally, and/or mentally disabled.
- **Group Homes.** Group homes are facilities that provide 24-hour nonmedical care and supervision to children in a structured environment. Group homes provide social, psychological, and behavioral programs for troubled youths.
- **Alcohol and Drug Rehabilitation.** These are facilities licensed by the Department of Alcohol and Drug Programs for 24-hour residential nonmedical alcoholism or drug abuse recovery or treatment serving adults.
- **Skilled Nursing.** These facilities are institutions that are primarily engaged in providing skilled nursing care and related services for residents who require medical or nursing care or rehabilitation services.



- **Immediate Care Facility.** A facility for individuals ages 0 to 59 with developmental disabilities who require higher level assistance in meeting daily living needs. The facility's focus is to provide care to residents ranging from 24-hour personal care to supportive health services.

Several agencies provide services to people with disabilities. The Dayle McIntosh Center and Goodwill Industries provide programs to improve the income and quality of life of disabled persons, such as job training, independent living skills training, and barrier-free housing referrals. Goodwill Industries also operates a fitness center in Santa Ana designed for people with disabilities. Their specialized equipment, classes, and staff fill the gap between conventional fitness centers and the needs of the disabled. The Orange County Aging and Disability Resource Connection (ADRC) offers consumers, caregivers, and long-term care professionals a single point of contact for accessing community-based services to empower individuals to live independent lives.

The Regional Center of Orange County, located in Santa Ana, also provides services for developmentally disabled residents and has partnerships with several community-based groups, including Orange County STEP, a behavior management day service for adults with developmental disabilities. Santa Ana College, Work Creation Program, and the Adaptive Behavior Center all offer a variety of classes to promote independent living and job training. Several of these providers also offer day programs, group homes, and community living facilities.

**Table A-15
State-Licensed Facilities for People with Disabilities**

Type of Housing	Facilities	Capacity (beds or units)
Adult Residential Care ¹	37	257 beds
Residential Care for Children ¹	2	200 beds
Alcohol and Drug Rehabilitation ²	21	337 beds
Skilled Nursing Facilities ³	8	1,160 beds
Intermediate Care Facilities ³	1	6 beds
Total	69	1,960 beds

Sources:

1. California Department of Social Services, September 2021.
2. California Department of Health Care Services, September 2021.
3. California Department of Public Health, September 2021.



FAMILIES

State law specifies large families and female-headed households as special needs groups. Cities are also allowed to consider other groups as having special needs. According to the 2014-2018 ACS, 81 percent of the city's households are families, and the average family size is 4.5 persons. Single-parent households make up 27 percent of the city's households. Given the shortage of affordable and adequately sized housing (particularly large rental units) and service needs, many families have special needs.

Large Households

Large households consist of five or more persons. According to the 2014-2018 ACS, approximately 26,748 households in Santa Ana (35 percent) are large, of which 11,814 are owners and 14,934 are renters. While the city has the largest average household size in the county, this segment of Santa Ana has declined by more than 10 percent over the decade. Still, a shortfall in housing units for this group exists. As a result, these households often have difficulty in finding and affording adequately sized housing. As of 2018, 23 percent of rental units contain three or more bedrooms, whereas 35 percent of renter households are large households. The city has 9,367 occupied rental units with three or more bedrooms for its 14,934 large renter families, yielding a shortfall of 5,567 units. As a result, overcrowding is typically more prevalent among larger households who are living or doubling up in smaller housing units.

Single Parents

According to the 2014-2018 ACS, 12 percent (9,288) of Santa Ana households are single parents with children, of which 72 percent (6,672) are female headed. The 2014-2018 ACS, reports that the median income of single-parent households ranged from \$26,232 (female-headed family) to \$42,194 (male-headed family) versus a median of \$56,818 for married couples with children. Additionally, 58 percent of all female single-parent households earned incomes below the poverty level compared to 18 percent for the citywide population. The availability and accessibility of affordable child care (including before-school, after-school, and day care) is thus essential for single parents. These basic services are an important factor that limits the opportunity to find suitable housing. Without them, single-parent families are at risk of overcrowding, overpayment, and simply being unable to adequately provide for basic family needs.



Housing and Services

The shortage of affordable family housing impairs family well-being, education, and health. Unsafe and overcrowded housing makes parenting difficult and places stress on parent-child relationships. Living in substandard housing can lead to health problems, particularly lead exposure and respiratory diseases. Living in poor quality housing may also result in frequent moves by a family, leading to poorer school performance. The following ideas can address the needs of families.

Create Affordable Rental Housing

Homeownership opportunities are not immediately feasible or affordable for many large families or families earning low and moderate incomes. The City provides 2,699 housing choice vouchers to extremely low and very low-income households each year. While publicly subsidized housing can meet a portion of the extremely low-income need, the resources are too limited to address existing unmet need. The creation of affordable family rental housing, including large units with three or more bedrooms, continues to be a priority.



AMG & Associates is building a 552-unit affordable family project in Santa Ana

The Affordable Housing Opportunity and Creation Ordinance (AHOCO), formerly known as the Housing Opportunity Ordinance (HOO), was adopted in 2011 and amended in 2015, 2020, and in 2022. It is the City's inclusionary housing ordinance, designed to support the production of affordable housing units. For eligible ownership projects, at least 5 percent of the units must be set aside as affordable to moderate-income households for at least 55 years. For eligible rental



projects, at least 15 percent must be affordable to low-income, or 10 percent affordable to very low-income households, or 10 percent affordable to lower income households (5 percent to low-income, 3 percent to very-low income, and 2 percent to extremely low-income households) for at least 55 years. Provisions allow for the payment of in-lieu fees rather than building affordable units on-site. The City will continue to review the effectiveness of the AHOCO to provide affordable housing. Programs 25, 29, and 30 of the Policy Framework provide financial and technical assistance for those in need of lower rental housing, and for monitoring of the effectiveness of the AHOCO.

Improve Housing Conditions

Santa Ana has many apartment projects that were built before the City adopted modern residential design guidelines. Although safeguards are in place to ensure that new projects are built to modern standards, older projects need rehabilitation. Issues include the physical condition of the unit, lack of or condition of utilities, lack of open space and recreational amenities, and insufficiently sized units for families. The Housing Framework constitutes the City's Community Building Initiatives (CBI) to provide guidance for building healthy communities and supporting collaborative projects to improve neighborhood livability. Santa Ana is also involved in the acquisition and rehabilitation of housing to improve the living conditions of residents and provide a long-term or permanent source of affordable housing. The CBI Framework contains programs to encourage and facilitate the preservation and rehabilitation of housing.



The Redevelopment Agency funded the rehabilitation and reconfiguration of the Ross Durant Apartments, adding long-term affordability covenants.

Promote Homeownership

Homeownership is one of the key ways to accumulate wealth. It can provide physical, emotional, and financial security to low-income families and can assist in strengthening neighborhoods. But for many lower income families, homeownership is largely unattainable without financial assistance. Santa Ana has the opportunity to promote homeownership in several ways. With the dramatic increase in sales prices for single-family homes, condominiums, and townhomes, homeownership is simply unattainable for all income levels, including above moderate incomes. The Housing Plan states that the City will assist low-income households with down payment assistance loans to allow residents to afford housing ownership opportunities. Program 34 is designed to support existing and prospective homeowners.

Promote Mixed Income Housing

Many affordable multiple-family residential projects were built as stand-alone affordable projects, and state and federal funding sources still encourage and facilitate these types of development. While these



affordable projects tend to compete well for limited government funding, many now believe that the most vibrant neighborhoods are ones with a mixture of affordable and market-rate housing. This approach allows lower and moderate income households, many of which are younger, newly forming families and seniors, the opportunity to live in the same neighborhood. The City's AHOCO supports the production of mixed income housing units as a priority.

In recent years, the City has supported the production of multiple-family housing consisting of a range of unit sizes and affordability levels. Table A-16 shows projects built or approved during the housing element planning period that provide a broad mix of housing types and sizes.

**Table A-16
Sample of Multifamily Residential Projects, 2017 to Present**

<i>Project Name</i>	<i>Parking Ratio</i>	<i>Density</i>	<i>Number of Bedrooms</i>		
			<i>0-1</i>	<i>2</i>	<i>3+</i>
Casa Querencia (Supportive Hsg)	0.63	63 du/acre	57	--	--
AMG First Point (Affordable Hsg)	1.03	80 du/acre	27	239	286
Legacy Square (Affordable Hsg)	1.1	53 du/acre	30	41	22
Crossroads (Affordable Hsg)	1.4	37 du/acre	42	22	22
Charlie Family Apts.	1.5	58 du/acre	113	96	19
La Placita Cinco (Affordable Hsg)	1.83	21 du/acre	--	20	30
Central Pointe Mixed Use Project	2	77 du/acre	365	248	31
Warner Redhill Mixed-Use Project	2	75 du/acre	811	275	15
Legacy Sunflower	2	62 du/acre	149	77	--
4th & Mortimer	2.5	62 du/acre	59	66	44

Source: City of Santa Ana, September 2021.

Provide the Service Network

Many families depend on a network of services to meet their needs. This includes the provision of childcare services near where they work or live to allow parents the opportunity to be close to their children. The availability of adequate parks, open space, and recreational amenities near homes is also a critical need for children. Employment training may be important in certain cases or college extension course work for individuals seeking a new job or changing their occupation. Even income support services and rental assistance, such as the vouchers available from the Housing Authority, are important ways to support Santa Ana families. The City has made it a priority to include these types of services in its apartment projects selected for acquisition, major rehabilitation, and reconfiguration. The Housing Framework details the City's resources and actions toward helping families in Santa Ana.



EXTREMELY LOW-INCOME HOUSEHOLDS

Extremely low-income households are those earning annual incomes that are 30 percent or less of the area median income. Homeownership opportunities for extremely low-income households are generally considered financially infeasible throughout much of California, including Santa Ana, due to the levels of subsidies required for a single unit. According to 2021 Southern California Association of Governments Existing Housing Needs Data Report (using 2012-2016 HUD CHAS), the City has 18,185 extremely low-income households (24 percent), of which 14,255 are renter households. This is the average income in service occupations. Extremely low-income households experience a broader range and severity of housing problems than other households.

Santa Ana's housing strategy for extremely low-income households is focused on providing rental assistance through the Housing Choice Voucher Program, acquisition/rehabilitation, and new construction to meet the needs of extremely low-income households.

- **Rental Assistance.** The Santa Ana Housing Authority (SAHA) provides over 3,026 housing vouchers to Santa Ana residents, predominantly those with extremely low incomes. Given the magnitude of need, vouchers serve much less than the need. The waiting list is approximately 16,000 applications. SAHA continues to seek additional vouchers to serve extremely low-income households and special needs populations.
- **Housing Rehabilitation.** The City of Santa Ana provides financing to acquire and rehabilitate multiple-family apartments, as affordable to low and extremely low-income households. The City's focus in past housing element cycles was acquisition and rehabilitation, and the City continues to facilitate acquisition and rehabilitation of apartment properties to increase the supply of affordable rental housing for families.
- **New Construction.** SCAG has established a construction goal of 606 very low-income units from 2021 through 2029. Of that total, the City estimates that the construction need for extremely low-income units is 50 percent of that total, or 454 units. The City is providing financial incentives to encourage new multiple-family units that are deed restricted as affordable to extremely low-income households through implementation of the City's Housing Opportunity ordinance and a variety of partnerships.



FARM WORKERS

Orange County has historically relied on an immigrant labor for its agricultural industries. In its early years, labor was provided by Chinese immigrants, who were later replaced in the early 1910s by Mexicans escaping from the revolution in Mexico. Following World War II, the federal Bracero program, which was active from 1942 to 1964, brought millions of Mexicans to work in the nation's agriculture industry. For several decades, Orange County's citrus-based economy relied on immigrant Mexican laborers to support it.

Farm workers are a special needs group because their limited income and the lack of affordable housing places them in a precarious situation with respect to finding and maintaining adequate housing. Although the community has an agricultural past, Santa Ana is now completely urbanized. The ACS 2014-2018 reports that 1,454 Santa Ana residents, or 1 percent of the employed population, held farming, fishing, and forestry occupations. The average annual wage of Santa Ana farm workers was \$20,293, which is very low-income.

The USDA National Agriculture Statistics provide data on hired farm labor across the United States. The data is compiled at both a state and county level. Within Orange County, a total of 99 farms reportedly hired 1,772 workers in 2017. Permanent workers, those who work 150 days or more, represent the largest category of workers with 1,106 workers. A total of 666 workers are considered seasonal and work less than 150 days. Orange County reported 340 migrant workers with full-time hired labor in 2017. In addition, the county reported 176 unpaid workers.

Today, there is one agricultural zone in the city but it is completely built out with single-family homes. The only areas with prime farmland are two smaller, privately held agricultural operations directly south of the city, near the I-405. It is estimated that Santa Ana has about 1 percent of hired farmworkers residing in the city but not working within city limits. Therefore, based on the seasonal nature and location of the work, not just income, the primary housing need for this group is permanent affordable housing.

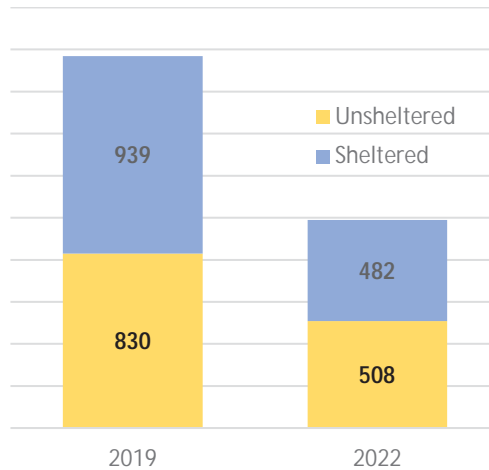
To encourage and facilitate the development of housing for persons with special needs, such as farmworkers, the City will address the provision of special needs housing as part of the Housing Element Programs. Specifically, the zoning code will be amended to allow for employee housing in accordance with Section 17021 of the Health and Safety Code. As discussed in Appendix C, the City has a significant number of affordable housing projects in the development pipeline.



PEOPLE EXPERIENCING HOMELESSNESS

Santa Ana has historically had a significant homeless population. Between 2009 and 2019, the county’s homeless population rose from 6,860 to 8,333, and the city’s share varied from 1,804 to 1,769 homeless residents. Prior to 2018, many historically resided along the Santa Ana River or around the Civic Center near county offices, but today the homeless are dispersed throughout the city along major corridors.

Around 2019, the County and City began an aggressive and sustained campaign of building housing to reduce homelessness. Over the next few years, the 2022 Homeless Count reported that the number of homeless people countywide declined 32 percent to 5,718 people, of which 990 live in Santa Ana (a 44 percent decline). Of homeless Santa Ana residents, 508 need shelter (see figure to the right).



Homelessness in Santa Ana, 2019-2022

Homelessness is caused by a complex set of interrelated factors—unemployment, mental illness, family problems, and substance abuse. Homeless people also have a variety of unmet needs—from health care to child care to education. Shown in Table A-17, the draft 2022 survey revealed the following characteristics of the homeless population.

Table A-17
Homeless Subpopulations and Disabling Conditions

<i>Demographics</i>	<i>Percent of Unsheltered</i>	<i>Percent of Housed Homeless People</i>
Females	27%	62%
Veterans	5%	7%
Transitional Age Youth	4%	6%
Seniors	10%	20%
Hispanic/Latino	34%	55%
Black/African American	6%	11%
Asian	3%	4%
White (includes Hispanic)	65%	77%
Substance Use Issues	41%	20%
Physical Disability	32%	25%
Mental Health Issues	29%	28%
Developmental Disability	14%	2%
Domestic Violence	10%	11%

Source: County of Orange Point In Time Survey, 2022.



Housing and Services

Santa Ana’s comprehensive continuum of care approach is predicated on the understanding that homelessness is caused by underlying physical, economic, and social needs. People who are experiencing homelessness require a range of services to reenter the mainstream. Beyond bringing persons into the system through outreach, the Continuum of Care Program is based on the provision of a full range of housing and support services to enable one to achieve and maintain self-sufficiency.

Prevention

Santa Ana and nonprofit agencies provide monetary assistance and counseling/support services to households at risk of becoming homeless. Annually the City provides Emergency Solutions Grant funds to one or more organizations that administer homelessness prevention programs. Many of the homeless service providers provide a mix of wrap-around services at their respective facilities or contact with off-site agencies to provide a mix of services for their residents.

Emergency Shelter

Short-term facilities, detoxification programs, and vouchers. These include transitional shelter and case management services to prepare residents to obtain and maintain housing and live self-sufficiently. The City has three shelters providing between 625 to 825 beds, depending on time of year. In June 2022, the City opened the new Carnegie Shelter (which replaces “The Link”) and provides 200 emergency shelter beds with wrap-around services. This facility will support the County’s Yale Center, which can provide up to 425 beds, and the Armory cold weather shelter , which can provide up to 200 beds.



Santa Ana’s Carnegie Emergency Shelter



Transitional Housing

Transitional housing is typically a residence that provides a stay of up to two years, during which residents receive case management services that prepare them to obtain and maintain housing and live self-sufficiently. Transitional housing can also include rehabilitation services for substance abuse, temporary housing for domestic violence survivors, and other varied services.

While many transitional housing projects countywide have been gradually converted to permanent supportive housing, there is still a need for transitional housing. The City has 16 state-licensed and -certified alcohol and drug rehabilitation centers that provide short-term housing for participants. Additional providers of transitional housing in Santa Ana include, but are not limited to, the following:

- | | |
|--------------------------|--------------------|
| WisePlace | New Life Treatment |
| Mercy House (4 projects) | Isiah House |
| New Start Recovery | House of Hope |



The City has actively supported its youth in transition. In 2016 and 2019, the City held a TEFRA hearing for a \$45 million bond to (re)finance educational, dormitories, and related facilities at Orangewood Foundation’s Samueli Academy for transitional/foster care youth. The City, School District, and partners such as Project Kinship provide a host of other supportive services for children and youth.



Samueli Academy



Permanent Supportive Housing

Permanent supportive housing residence that provides permanent affordable housing for formerly homeless individuals and families that is linked with ongoing support services. In contrast to emergency shelter or transitional housing, this type of housing is geared to permanent long-term occupancy. In the past five years, the City has financed 10 permanent supportive housing projects, with many under construction or in the pipeline as of January 2022.

Among others, City-funded permanent supportive housing projects include the following:

- | | |
|------------------|----------------------|
| The Orchard | Legacy Square |
| Casa Querencia | Arts Collective |
| Heroes Landing | Crossroads |
| Depot @ Santiago | Westview Housing |
| FX Residences | North Harbor Village |

The City of Santa Ana continues to work with its housing partners to pursue creative opportunities for expanding the supply of permanent supportive housing. This includes converting older motels, as illustrated below. Other opportunities include working with Home to WISEPlace to redesign and modernize the historic YMCA to provide permanent supportive housing for 48 women experiencing homelessness.



The City of Santa Ana is working with Jamboree Housing to develop North Harbor Village, the conversion of a motel to permanent supportive housing.



Rental Housing Vouchers

The Santa Ana Housing Authority is also active in securing and restricting rental housing vouchers to assist at-risk individuals and families in securing housing. The Housing Authority currently provides more than 500 tenant-based vouchers for people experiencing homelessness in the following four programs:

- Mainstream Program Vouchers: 231
- HUD VASH Vouchers (veterans): 171
- Foster Youth to Independence: 47
- Emergency Housing Vouchers: 89

Unmet Need

The federal government prepares an annual housing inventory count that details facilities, utilization rates, and potential unmet need. The revised estimate based on the 2022 point in time count will be released later this year. In lieu of that estimate, Table A-18 provides an estimate of unmet need to house 508 homeless residents. To meet this need, the City has four permanent supportive housing projects coming online that will add an additional 281 permanent supportive housing units. When these projects are complete, the City's remaining unmet need for homeless housing totals 227 units, the lowest number in a decade.

Table A-18
Santa Ana Homeless Housing Gaps Analysis

<i>Jurisdiction</i>	<i>Point in Time 2022</i>
Orange County	5,718
Santa Ana Homeless Population	990
Unsheltered Homeless Residents	508
Housing Units Coming Online (assuming 1 pph)	281
Unsheltered Homeless Need in Santa Ana	227

Source: City of Santa Ana, May 2022

Note: Table does not include seasonal emergency shelter beds. Utilization rates are not available until the revised Housing Inventory County is completed by HUD in late 2022.

The City works through the Orange County Continuum of Care to implement an integrated HMIS system and jointly pursue programs to address homelessness. The City also serves as the Chair of the Housing Opportunities Committee for the COC Board. The City is presently creating a plan for \$10 million in funding as part of the HAP-03 grant. Resources used to address homelessness are detailed in Appendix C. Programs 37 to 39 detail the City's commitment to addressing homelessness over the 2021-2029 housing element planning period.



HOUSING PRESERVATION

State law requires that housing elements include an analysis of “assisted multiple-family housing” projects regarding their eligibility to convert from low-income housing to market rate housing by 2031 (10 years from the start of the planning period). Assisted housing refers to multiple-family rental housing that receives government assistance under federal, state, and/or local programs. Under state law, assisted multiple-family housing also includes projects that are deed restricted due to local density bonus and inclusionary housing ordinance requirements.

Santa Ana has about 50 multiple-family affordable housing properties that provide more than 5,000 affordable units. Most of the units are built, and several projects are entitled or under construction. Typically, these projects provide housing units affordable to very low- and low-income households, including special needs. Several projects maintain their affordability restrictions in perpetuity. The majority of projects, however, are restricted for 55 years, after which they can begin charging market rents.

The City of Santa Ana also has an expansive inventory of mobile homes that are currently under rent control. Thirty mobile home parks provide just under 4,000 mobile home units that are subject to the rent-control ordinance, many of which are affordable to lower income households. While these projects are exempt from the “at-risk” analysis required pursuant to Government Code § 65583(a)(9), they are nonetheless an important contributor to the City’s overall supply of affordable housing.

Housing units that are eligible to convert from low-income housing to market-rate housing during the planning period (2021–2029) are of immediate concern to the City and its residents. If there are units at risk of converting to market rate rents by 2031, the housing element must include the following items in accordance with state housing preservation law:

- Each development by project name and address
- Type of governmental assistance received
- Earliest possible date of conversion from low-income to market rates
- Total elderly and nonelderly units that could be converted
- An analysis of costs of preserving and/or replacing those units
- Resources that could be used to preserve the at-risk units
- Programs for preservation of at-risk units and quantified objectives



Table A-19 details the City's affordable housing inventory, including projects at risk of converting to market rate housing by June 30, 2031. Included is the project name, project characteristics, and at-risk status.

Table A-19
Affordable Housing Inventory, Santa Ana

<i>Project Name and Address</i>	<i>Project Characteristics</i>				
	<i>Occupancy</i>	<i>Type of Public Assistance</i>	<i>Affordable Units</i>	<i>Date of Potential Conversion/Status</i>	<i>At-Risk Status</i>
Warwick Square	All Ages	LIHTC	500	2025	At Risk
Highland Manor	All Ages	HUD	12	2022	At Risk
City Gardens	All Ages	LIHTC	55	2061	Not At Risk
La Gema Del Barrio	All Ages	LIHTC	6	2046	Not At Risk
Rosswood Villa	Senior	HUD	198	2038	Not At Risk
North Harbor Village	Special	LIHTC; CDBG, PBV	89	2074	Not At Risk
Crossroads	Special	LIHTC/HOME/NSP	85	2074	Not At Risk
Wilshire & Minnie	All Ages	LIHTC	143	2063	Not At Risk
Washington Place	Senior	LIHTC; HUD	198	2067	Not At Risk
Ross & Durant	Senior	LIHTC; HOME; RDA	48	2061	Not At Risk
First Street	Senior	LIHTC	68	2071	Not At Risk
Vista Del Rio	Special	LIHTC	40	2067	Not At Risk
Arts Collective	Special	LIHTC; INCL	57	2071	Not At Risk
Townsend and Raitt	All Ages	NSP	28	2065	Not At Risk
Nineteen01	All Ages	INCL	10	2069	Not At Risk
Heninger Village	Senior	LIHTC	57	2070	Not At Risk
Raitt Street	All Ages	LIHTC	6	2047	Not At Risk
Guest House/Orchard	Special	LIHTC	71	2070	Not At Risk
Santa Ana Courtyards	All Ages	LIHTC/NSP	50	2066	Not At Risk
Metro East Snr Park	Senior	LIHTC/DB	415	2072	Not At Risk
La Placita Cinco	Special	LIHTC/INCL	50	2072	Not At Risk
Sullivan Manor	Senior	LIHTC; HUD; CalHFA	53	2068	Not At Risk
Aqua/Casa Querencia	Special	LIHTC	50	2072	Not At Risk
Heroes Landing	Special	LIHTC/ INCC/PBV	75	2072	Not At Risk
Santa Ana Towers	Senior	LIHTC; HUD; CalHFA	199	2054	Not At Risk
Station District Ph. II	All Ages	LIHTC	39	2066	Not At Risk
Station District Ph I	All Ages	LIHTC	73	2067	Not At Risk
Lacy & Raitt	All Ages	LIHTC/HOME/RDA	34	2064	Not At Risk
Cornerstone	All Ages	LIHTC/HOME	126	2073	Not At Risk
Andalucia	All Ages	LIHTC	69	2069	Not At Risk
Flower Park Plaza	Senior	LIHTC; HUD; CalHFA	198	2060	Not At Risk
Depot at Santiago	All Ages	LIHTC; CalHFA; HCD	69	2069	Not At Risk
901 E. Sixth Street	All Ages	HOME; RDA	24	2060	Not At Risk
Civic Center Barrio	All Ages	LIHTC (1991)	70	2060	Not At Risk
Santiago Villas	Senior	MFHB	89	2058	Not At Risk
Garnsey Apartments	All Ages	NSP2	25	2068	Not At Risk
Innovative Housing	All Ages	In process	80		Not At Risk
Innovative Housing	All Ages	In process	80		Not At Risk



**Table A-19
Affordable Housing Inventory, Santa Ana**

<i>Project Name and Address</i>	<i>Project Characteristics</i>				
	<i>Occupancy</i>	<i>Type of Public Assistance</i>	<i>Affordable Units</i>	<i>Date of Potential Conversion/Status</i>	<i>At-Risk Status</i>
Westview Housing	Special	LIHTC; HOME; INCL	84	2075	Not At Risk
Legacy Square	All Ages	LIHTC/INCL	92	2074	Not At Risk
FX Residences	Special	LMIHAF; PBV; Ground lease	16	2077	Not At Risk
First Point I	All Ages	LIHTC/MFHRB/DB	346	2072	Not At Risk
First Point II	All Ages	LIHTC/MFHRB/DB	204	2072	Not At Risk
WisePlace	Special	Private funding	28	2075	Not At Risk
MercyHouse	Special	Private funding	37	2075	Not At Risk
Toll Brothers MU	Family	DB	11	2075	Not At Risk
Caribou Industries	Family	DB	19	2075	Not At Risk
AMG East	Family	DB	557	2075	Not At Risk
CrossRoads	Special	HOME; NSP; PBV; OCHFT; Ground lease	85	2075	Not At Risk
Total			5,018		

Source: City of Santa Ana, California Housing Partnership, 2022.

Local Funding Sources	State and Federal
OCHF: Orange County Housing Trust	LIHTC: Low Income Housing Tax Credits
MHRB: City/Housing Authority Revenue Bonds	PBV: Project Based Voucher
INCL: City Inclusionary Housing Funds	NSP: Neighborhood Stabilization funds
RDA: Former RDA Tax Set-Aside Funds	CALHFA: California Housing Finance Agency
DB: Local Density Bonus	DB: State Density Bonus
LMIHAF: Low and Moderate Income Housing Fund	HOME: Local HOME Partnership funds

Table A-20 shows that two projects totaling 512 units (out of more than 5,000 affordable, deed-restricted units in the city) are at risk of conversion within 10 years of the beginning of the planning period (2031).

**Table A-20
Units at Risk of Conversion by 6/30/2031**

<i>Project Name and Address</i>	<i>Type and Income Target</i>	<i>Type of Public Assistance</i>	<i>Total</i>	<i>Total</i>	<i>Date of Potential Conversion/Status</i>
			<i>Project Units</i>	<i>Affordable Units</i>	
Highland Manor 1128 W. Highland St.	Family 50% AMI	LMSA 236(j)(1); HUD PBRA	12	12	Renews Yearly
Warwick Square 780 S. Lyon St.	Family 60% AMI	Low-Income Housing Tax Credit	500	500	2025
Units at Risk from 2021–2031			512	512	--

Source: City of Santa Ana, 2021.

EVALUATION OF PRESERVATION OPTIONS



This section analyzes four options to preserve affordable units: 1) transfer of ownership or sale 2) purchase of affordability covenants, 3) rental assistance, and 4) replacement of the units. The following discussion examines the cost of preserving units at-risk and the cost of producing new rental units comparable in size and rent levels as replacement for units which convert to market rate. The discussion also includes a comparison of the costs of replacement and new production.

Transfer of Ownership or Sale

One way to keep the affected units affordable would be for the City or the Santa Ana Housing Authority to purchase the units at risk of conversion. Using typical assumptions on revenue and expenses, Table 1 estimates the market value of the at-risk units. Taken together, purchasing these projects would cost approximately \$136 million.

Table A-21
Estimated Market Value of Units At Risk

<i>Project</i>	<i>Restricted Units</i>
Total At-Risk Units	512
Annual Operating Cost	\$2,705,920
Gross Annual Income	\$13,605,580
Net Annual Income	\$10,899,660
Market Value	\$136,245,760

Sources: HUD Fair Market Rents (FY 2021).

Notes: * = Income brought in by the project annually.

Assumptions used to calculate the estimated market value are:

1. Average market rent based on Fair Market Rents (FY 2021) established by HUD. Bedroom data not available, therefore all units are assumed to be two units (Two-bedroom unit = \$2,331).
2. Annual income is calculated on a vacancy rate = 5%
3. Annual operating expenses per unit = \$5,285
4. Market value = Annual net project income * multiplication factor
5. Multiplication factor for a building in good condition is 12.5.

Purchase of Affordability Covenants

Another option to preserve the affordability of an at-risk project is to provide financial incentives to maintain the project as affordable housing. Incentives could include bonds, 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 complex is too highly leveraged and interest on the owner's part to utilize the incentives found in this option. By providing lump sum financial incentives or ongoing subsidies in rents or reduced mortgage interest rates to the owner, the City could ensure that some or all of the units remain affordable.

Rental Assistance

Similar to Housing Choice 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 cost affordable by a lower income household. Table A-22 estimates the rent subsidies required to preserve the affordability of the 512 at-risk units. Based on the estimates and assumptions shown in this table, \$10.5 million in rent subsidies would be required annually.

**Table A-22
Rental Subsidies Required**

<i>Total Units (2 BR)</i>	<i>Fair Market Rent</i>	<i>Household Size</i>	<i>Household Annual Income</i>	<i>Affordable Cost (Minus Utilities)</i>	<i>Monthly per Unit Subsidy</i>	<i>Total Monthly Subsidy</i>
Very Low Income (30–50% AMI)						
512	\$2,331	4	\$61,774	\$615	\$1,716	\$878,592

Note: Fair Market Rents FY 2021 are determined by HUD. 2014-2018 ACS data used for Santa Ana Median Household Income (AMI). Affordable cost = 30% of household income minus utility allowance.

Replacement Costs

The cost of developing new housing depends upon many factors, including but not limited to density, number of bedrooms, location, land costs, and type of construction. In general, land costs in Southern California are high. Unit replacement cost has a range of cost estimates depending on unit size for multifamily rental housing. Based on the range shown, it would cost \$330,000 to construct one multiple-family housing unit. For the identified 512 at-risk units, new construction would cost \$169 million. This estimate assumes \$200 per square foot costs and does not include the cost of land acquisition (Table A-23).

**Table A-23
Estimated New Construction Cost**

<i>Column A Total Units</i>	<i>Column B Estimated Average Unit Size</i>	<i>Column C Estimated Gross Building Size</i>	<i>Column D Estimated Gross Building Cost</i>
512	1,100	675,840	\$168,960,000
Average Cost per Unit			\$330,000

Source: RS Mean Database, accessed October 2021.
 (C) = (A) x (B) x 1.20 (i.e. 20% inflation to account for hallways and other common areas)
 (D) = Estimated Valuation x 1.25 (i.e. 25% inflation to account for parking and landscaping costs)

Preservation vs. Replacement

The above analysis attempts to estimate the cost of preserving the at-risk units under various options. However, because different projects have different circumstances and therefore different options available, a



direct comparison would not be appropriate. In general, providing additional incentives/subsidies to extend the affordability covenant would require the least funding over the long run, and the construction of new units would be the most costly option. Over the short term, providing rent subsidies would be least costly, but this option does not guarantee the long-term affordability of the units.

The cost of constructing 512 units to replace the currently at-risk units is high, with an estimated total cost of nearly \$169 million, excluding land costs. This cost estimate is higher than the cost associated with the transfer of ownership option (\$136 million). While the annual cost of providing rent subsidies similar to Housing Choice Vouchers (\$10.5 million annually) appears low, once amortized over a long period of affordability, provision of rent subsidies may be equally costly.

Entities Interested in California's First Right of Refusal Program

An owner of a multifamily rental housing development with rental restrictions (e.g., is under agreement with federal, State, and local entities to receive subsidies for low-income tenants) may plan to sell an at-risk property. HCD maintains a database of listed qualified entities that may be interested in participating in California's First Right of Refusal Program. If an owner decides to terminate a subsidy contract or prepay the mortgage or sell or otherwise dispose of the assisted housing development, or if the owner has an assisted housing development in which there will be the expiration of rental restrictions, the owner must first give notice of the opportunity to offer to purchase to a list of qualified entities provided to the owner.

HCD lists 20 entities interested in participating in California's First Right of Refusal Program in Orange County. The list is on HCD's website at <https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml>. Three of those organizations include Jamboree Housing, Innovative Housing Development, and Civic Center Barrio Housing, all of which develop, acquire, renovate, and manage affordable housing in Santa Ana and in other cities in California for working families, seniors, and people with special needs. Dozens of additional interested parties are certified for all regions/counties. Several that currently work in Santa Ana include National Core, Mercy Housing, and other nonprofit and for-profit organizations.



Program Efforts to Preserve At-Risk Units

The following strategies have been developed to address the preservation of assisted units eligible to convert from affordable to market rate. The Community Development Agency will be responsible for implementing the programs. Funding for implementation could be provided through funding sources cited above.

- **Monitoring At-Risk Units.** The City will maintain contact with owners of at-risk units, communicate to the owners the City's desire to preserve the units as affordable, determine the owner's needs, and desire for their individual projects. The City will confirm that the owners will continue to maintain their affordability covenants. If their affordability covenants are going to expire, the City will determine if there are financial resources to preserve the units.
- **Financial Assistance.** If the affordability covenants are going to expire, the City will determine if it can provide financial resources. In lieu of financial assistance, the City works with applicants to hold TEFRA hearings to approve applications for tax credits.
- **Technical Assistance.** As resources are available, the City will assist the owners of properties eligible for conversion to market rate housing to seek funds and complete other tasks necessary to secure funds that preserve the affordability of housing.
- **Preservation of Units.** The City has identified 512 affordable units at imminent risk of conversion. City staff will work with the property owners to explore opportunities to preserve the long-term affordability of the projects.
- **Identify and Work with Qualified Entities.** The City has close working relationships with numerous nonprofit entities, for-profit organizations, and developers who may be interested in acquiring and/or managing units at risk of conversion. HCD also lists qualified agencies interested in managing affordable housing throughout California. The City will consult the list of qualified entities to expand its administrative capacity to preserve affordable housing.

Housing element law requires that cities establish the maximum number of units that can be preserved over the planning period. The City's objective is to preserve all at-risk units where feasible, pending funding availability. Through implementation of Program 31, the City will allocate, as feasible, technical, administrative, and financial resources to preserve all 512 at-risk housing units in Santa Ana.



Housing Constraints

This chapter provides the requisite analysis of potential and actual market, governmental, and environmental constraints to the production, maintenance, and improvement of housing pursuant to state law.

OVERVIEW

Various factors influence the City's ability to meet its housing goals. These include governmental constraints, such as land use regulations, and nongovernmental constraints, such as market and environmental factors. State law requires the housing element to analyze potential and actual constraints to the production, maintenance, and improvement of housing for persons of all income levels and persons with disabilities.

This chapter analyzes three potential constraints:

- **Market factors:** such as land costs, construction and rehabilitation costs, the availability of financing, and recent trends in foreclosures.
- **Governmental factors:** such as land use regulations, development standards, building codes, permit procedures, and other local policies.
- **Environmental factors:** such as the adequacy of infrastructure, public services, and water supply to support new development.

The constraints analysis must also describe the City's efforts to address and, where appropriate and legally possible, to remove constraints when they prevent achievement of state and local housing goals with respect to the maintenance, improvement, and development of housing.

To that end, this chapter reviews the City's General Plan, Zoning Code, Consolidated Plan, Analysis of Impediments to Fair Housing, Housing Authority Plans, and other planning documents to analyze policies and governmental regulations that may limit housing opportunities. Actions required to remove existing constraints are also detailed in this section.



B

MARKET FACTORS

The feasibility of building new housing, including affordable housing, is influenced by a variety of market factors, including the cost of land, construction and rehabilitation costs, and financing issues. The housing market and achievable rents and sales prices for builders also play key roles. This section details market factors, their general impact on housing costs, and how the City addresses those impacts to the extent feasible.

LAND COSTS

Land costs and the cost of assembling parcels are among the largest components of the total cost of building new housing. Since Santa Ana is a 99 percent built-out community, very few vacant parcels remain. Thus, in most cases residential developers must buy the land and any existing structure on it. Land costs also depend on the zoning for the site, the proposed use of the property, and the allowable density.

The following land prices were obtained from online real estate database tools and the State of California TCAC database.

- **Single-family residential land.** Based on data obtained from Costar for land sales within the last four years, single-family residential land values range from \$26 per square foot for unentitled sites to \$99 per square foot for fully entitled sites. The weighted average cost of single-family residential land is estimated at \$48 per square foot. With home sales increasing in the market, the price of residential land for single-family homes is expected to increase throughout the city.
- **Mixed-use residential land.** Based on data obtained from Costar for land sales within the last four years, mixed-use land values range from \$60 per square foot to \$70 per square foot. The high price of land, compared to single- and multifamily parcels, is due to the location of mixed-use residential sites in higher intensity areas of the city near employment centers and amenities.
- **Multiple-family residential land.** Based on data obtained from Costar for land sales within the last four years, multiple-family residential land values range from \$52 per square foot to \$66 per square foot. In addition, City appraisals for income-restricted apartment projects estimate the land value for these projects between \$53 per square foot to \$72 per square foot.

Changes in the housing market will continue to affect achievable rents and sales prices of housing.



CONSTRUCTION AND REHABILITATION COSTS

Construction costs are the largest component of costs associated with new and rehabilitated housing. Construction costs include labor, materials, site improvements, and developer profit. The cost will vary by project type, quality of materials, location, height, and whether underground parking is required. The following provides a range of estimates that can be used to estimate costs.

Construction Costs

Per the R.S. Means database, construction costs for a one- to seven-story apartment building in Santa Ana range from \$160 to \$200 per square foot, which translates to \$176,000 to \$220,000 for a 1,100-square-foot unit. Residential development with limited ground preparation, simplified architectural features, and standard quality interior materials would be in the lower range of these estimates. Construction costs will be higher for luxury buildings and projects with underground parking.

Based on a review of recent income-restricted apartment projects that were provided financial assistance by the City, construction costs range from \$200 to \$300 per square foot; however, it is important to note that many of these projects are required to pay State of California and/or Federal Davis Bacon prevailing wages. According to the State of California tax credit database, tax credit projects provide even higher construction cost estimates.

Rehabilitation/Motel Conversion Costs

During the prior housing element planning period, the City was actively involved in funding the rehabilitation of multiple-family projects as well as the acquisition and conversion of motel projects. The direct costs for rehabilitation-only projects were \$15,000 per unit. However, the direct rehabilitation costs for projects involving the conversion of existing motel rooms to apartment units were estimated at \$90,000 per unit, which accounts for the removal and/or combining of smaller units to create larger units. The acquisition costs and other indirect and extraordinary direct costs associated with rehabilitating housing or motels (e.g., relocation, replacement of units, removal of asbestos or lead-based paint, etc.) can add substantial additional costs.

In other cases, private property owners may initiate repairs or more extensive rehabilitation of their homes. The City's Single-family and Mobile Home Rehabilitation Program is designed to improve and preserve affordable housing through the use of Community Development Block Grant (CDBG) funds. The program provides grants



of up to \$25,000 to 25 households per year until 2024. The Housing Plan describes these programs in greater detail.

FINANCING COSTS

Financing affects the feasibility of developing new housing and housing affordability. This includes the ability to secure the various sources of financing necessary to develop affordable housing.

Construction Loans

Construction financing costs also affect the feasibility of building new housing. After the Great Recession, construction lenders have maintained conventional underwriting limits for construction financing. Typically, construction lenders will limit construction loans to 65 percent to 75 percent of total construction costs. Developers will need to provide equity or alternate financing sources for the remainder of the project's construction costs.

Although there is no hard threshold for how much equity is too much before a project would be deemed infeasible, the higher the proportion of equity required, the more unlikely a developer would proceed with the project. Not only would it require more up-front cash, but higher equity contribution also means a project must be able to achieve an even higher value at completion in order to generate the net cash flow needed to meet the minimum acceptable cash-on-cash return threshold. These types of trends underscore the condition of the housing market facing communities in southern California today.

Homeowner Assistance

The high price of housing makes it financially infeasible for many cities to offer homebuyer assistance to residents. In some cases, the public subsidies needed to provide homeownership assistance were too high, and renter assistance served a greater number of residents. In other cases, rising market prices made it infeasible for cities to offer subsidized loans, because the median home price well exceeded the maximum price allowed under the loan. As a result, the City is now providing down payment assistance up to \$80,000 for low-income families and up to \$40,000 for moderate-income families to buy a home.

Market changes have also affected residents wishing to purchase a home. While interest rates for mortgage loans are at historic lows, there is a severe lack of for-sale inventory in the Southern California region. Consequently, housing prices have increased substantially within the last few years. These higher sales prices in turn require higher down payment amounts. A combination of these factors has impacted the ability of many residents to attain homeownership opportunities.



GOVERNMENT CODE 65583(A)(6) DEVELOPMENT ANALYSIS

Government Code § 65583(a)(6) requires an analysis of requests to develop housing at densities below those anticipated in the housing sites inventory. The analysis must also indicate the length of time between a developer receiving approval for housing development and the submittal of a building permit application (refer to Table B-15 on Page B-39 for permit processing time frames). Further, the analysis must look at local efforts to remove nongovernmental constraints that create a gap in the jurisdiction's ability to meet the RHNA by income category.

Requests for Lower Development Densities

In Santa Ana, requests for development at densities below anticipated densities are rare. Development approval of projects with densities lower than what is allowed by the General Plan and zoning regulations is not expected based on review of applications over the past several years. In almost all cases, development applications aim for densities as close as possible to what is allowed and regularly exceed the established maximums through density bonus agreements.

The length of time between a developer receiving entitlement approval for a housing (or mixed-use) development and issuance of a building permit is typically three months for a single-family residence and six months for a multifamily residential project, depending on project complexity. For example, a multifamily residential project with complex excavation (for underground parking), grading, and drainage plans may take longer than usual to respond to City requests for additional information. Further information can be found later in this chapter.

Summary

Housing elements are required to demonstrate local efforts to remove nongovernmental constraints that create a gap in the City's ability to meet its RHNA by income category. The primary development constraint in Santa Ana is high land and development costs, but this has not prevented the City from achieving its RHNA. While the City cannot afford to fully mitigate the high land and development costs, Santa Ana is implementing various housing incentive programs that create more flexibility and clarity in development standards, facilitate housing production (programs 14 to 27, 41, and 43), and otherwise lessen the cost impact of potential nongovernmental constraints.



GOVERNMENTAL FACTORS

This section reviews potential governmental constraints to the development, maintenance and provision of housing. These include land use regulations, housing opportunities, development regulations, building codes and their enforcement, permit processing, development fees and exactions, and housing for people with disabilities. If actual governmental constraints are identified, the Housing Plan identifies programs to mitigate them to the extent feasible.

LAND USE REGULATIONS

Adopted in May of 2022, the Land Use Element (LUE) of the Santa Ana General Plan 2045, "Golden City Beyond: A Shared Vision for Santa Ana," sets forth the City's policies for guiding local development. The LUE guides the distribution, location, and size of new development, ensuring that residential neighborhoods are protected and that future growth is sustainable and minimizes potential conflicts.

The City's growth strategy is to concentrate new growth opportunities into key parts of the city while maintaining and enhancing its existing neighborhoods, employment centers, and intact industrial centers.

In coordination with the General Plan Advisory Group (GPAG) and the General Plan Advisory Committee, the City identified five focus areas suitable for new growth and development, including housing. These areas are: South Main Street, Grand Avenue/17th Street, West Santa Ana Boulevard, 55 Freeway/Dyer Road, and South Bristol Street. These five areas are along major travel corridors, the OC Streetcar line, and/or linked to the Downtown. The intent is to expand opportunities for development through a transition to multiuse land use designations near transit corridors.

In addition to these new focus areas, the City has five additional planning areas, including specific plans and other special zoning areas, that have remaining development capacity. These areas are:

- Adaptive Reuse Overlay, adopted in 2014
- Harbor Mixed-Use Transit Corridor: Specific Plan No. 2 (SP-2), adopted in 2014
- Metro East Mixed-Use Overlay Zone (MEMU), adopted in 2007 and amended in 2018
- Transit Zoning Code: Specific Development No. 84 (SD-84), adopted in 2010 and amended in 2019
- MainPlace Specific Plan No. 4 (SP-4), adopted in 2019



The LUE sets four primary residential land use categories and 13 mixed-use residential and commercial land use categories (Table B-1).

**Table B-1
General Plan Designations Allowing Housing**

<i>Land Use Designation</i>	<i>Maximum Density/Intensity</i>	<i>Typical Maximum Height</i>	<i>Housing Type Allowed</i>
Low Density Residential (LR-7)	7 du/ac	2 stories	Allows for single-family homes and accessory dwelling units
Low Medium Residential (LMR-11)	11 du/ac	3 stories	Allows for single-family detached homes, small lot subdivisions, townhomes, duplexes, and mobile home parks
Medium Density Residential (MR-15)	15 du/ac	3 stories	Allows for apartments, townhomes, live-work units, and small lot subdivisions
Corridor Residential (CR-30)	30 du/ac	3 stories	Allows for attached townhomes and apartments
Industrial/Flex – Low (FLEX-1.5)	1.5 FAR and/or 30 du/ac	3 stories	Allows live-work units
Urban Neighborhood-Low (UN-20)	1.0 FAR and/or 20 du/ac	3 stories	Allows a mix of uses, including medium and medium high density apartments, townhomes, and garden-or motor-court homes
Urban Neighborhood-Medium Low (UN-30)	1.5 FAR and/or 30 du/ac	4 stories	
Urban Neighborhood-Medium (UN-40)	1.5 FAR and/or 40 du/ac	5 stories	
Urban Neighborhood-Medium High (UN-50)	1.5 FAR and/or 50 du/ac	6 stories	
One Broadway Plaza District Center (OBPDC)	2.9 FAR	37 stories	Allows a mixed-use tower with apartments
District Center-Low (DC-1)	1.0 FAR and/or 90 du/ac	6 stories	Allows a mix of uses, including medium, medium-high, and urban density condominiums, apartments, and townhomes
District Center-Medium Low (DC-1.5)	1.5 FAR and/or 90 du/ac	10 stories	
District Center-Medium (DC-2)	2.0 FAR and/or 90 du/ac	10 stories	
District Center-Medium (DC-2.1)	2.1 FAR	20 stories	
District Center-Medium (DC-2.54)	2.54 FAR	5 stories	



**Table B-1
General Plan Designations Allowing Housing**

<i>Land Use Designation</i>	<i>Maximum Density/Intensity</i>	<i>Typical Maximum Height</i>	<i>Housing Type Allowed</i>
District Center-Medium High (DC-3)	3.0 FAR and/or 90 du/ac	10 stories	
District Center-Medium High (DC-5)	5.0 FAR and/or 125 du/ac	25 stories	

Source: City of Santa Ana, General Plan Land Use Element, June 2022

Notes: Refer to the Land Use Element (LUE) for additional information regarding density/intensity, development standards, focus areas and interim development standards, and other land use regulations.

Urban Villages

Santa Ana’s Land Use Element guides the long-range vision for land use and development in specific areas of the city to promote “urban villages.” Areas designated District Centers are intended to serve as anchors and accommodate a mixture of high-rise office, commercial, and residential uses. Areas designated Urban Neighborhood encourage low- to midrise residential uses with neighborhood-serving retail and public spaces. These urban village areas provide a range of shopping, business, cultural, educational, recreational, entertainment, and housing.

Residential development in District Centers and Urban Neighborhoods are guided through the implementation of specific plans, overlay zones, and the Specific Development (SD) zoning district. District Centers, where development interest is strong, include areas within the SP-2, SP-4, and MEMU. In addition, SD-84 area in Downtown Santa Ana is one of the county’s major employment centers, with the potential for a vibrant mixed-use and mixed-income environment benefitting from transit-oriented development at the Santa Ana Regional Transportation Center. With the updated General Plan, the “Five Focus areas” will also allow for the construction of additional housing.



PERMITTED HOUSING OPPORTUNITIES

Santa Ana provides a range of housing types that allow for households of all types and income levels to find suitable housing and further fair housing opportunities. Table B-2 summarizes the housing types allowed in each zoning district and whether the housing is permitted by right (denoted as “P”) or conditionally permitted (denoted as “C”). The Zoning Code is silent in areas where state law preempts local land use regulations, and the City’s practice is to comply with state law. These residential uses are denoted with a superscript letter ‘a’.

**Table B-2
Permitted Housing Types in Santa Ana**

Permitted Housing	Zoning Districts								
	A1	RE	R1	R2	R3	R4	M1/ M2	CR	SD
Single-Family Residence	P	P	P	P	P			P	P
Two-Family Residence				P	P			P	P
Townhouses				P	P				P
Multiple-Family Residence					P	P		P	P
Manufactured Housing ^a	P	P	P	P	P	P		P	P
Mobile Homes	P								
Accessory Dwelling Units	P	P	P	P	P	P		P	P
Transitional Housing	P	P	P	P	P	P		P	P
Supportive Housing	P	P	P	P	P	P		P	P
Emergency Shelters							P		
Low Barrier Navigation Ctr	See text on Page B-16								
Employee Quarters ^a	P	P	P	P	P	P			
Mixed-Uses									P/C
Live-Work Community									P/C
Care Homes									
+ six or fewer clients ^a	P	P	P	P	P	P		P	P
+seven or more clients				C ^b	C	C		C	

Source: City of Santa Ana Municipal Code, September 2021.

Notes:

a = Administered pursuant to State law that preempts local land use regulations.

b = Care homes that were previously permitted through a valid issued Conditional Use Permit and subsequently lost the permitted use.

P = Permitted by Right

C = Conditionally Permitted

While the Zoning Code has been amended numerous times to make minor improvements pending more significant updates, the existing Zoning Code has not been comprehensively updated. With the recently adopted General Plan, the City’s Zoning Code will need to be comprehensively updated to be consistent with the General Plan and has been included as Program 18 in the Housing Plan.



The following describe the primary types of residential uses and their compliance with state and federal housing law.

Single-, Two-, Townhouses, and Multiple-Family Residences

The Santa Ana Zoning Code permits single-family residences as a by-right use in the General Agricultural (A1), Residential-Estate (RE), Single-Family Residence (R1), Two-Family Residence (R2), and Multiple-Family Residence (R3) zoning districts. In 2006, the City amended the Zoning Code to continue to allow single-family residences with six or fewer bedrooms as a by-right use, but require single-family residences with seven or more bedrooms to secure a conditional use permit. This was due to mansionization concerns, parking constraints in neighborhoods, and the desire to preserve neighborhood character. As appropriate, the City will be reevaluating its local standards to comply with new State legislation such as Senate Bill 9. Two-family residences are permitted by right in the R2 and R3 zoning districts. Townhouses are permitted in the R2 and R3 zoning districts. Multiple-family residences (three or more units per structure) are permitted by right in the R3 and Suburban Apartment (R4) zoning districts.

Manufactured Housing

The Housing Element is required to encourage the production of a variety of housing types, including manufactured housing and mobile homes; identify adequate sites for manufactured housing and mobile homes; and permit such uses in conformance with existing state law. The following explains how such uses are permitted in Santa Ana.

Government Code §§ 65852.3 and 65852.4 specify that permanently sited manufactured homes may generally not be excluded from lots zoned for single-family dwellings. Local governments must treat such uses like other single-family homes permitted in the same zone. The City's Zoning Code defines manufactured housing consistent with state law, allows such uses by right in all residential zones, and treats such uses in the same manner as other conventional single-family homes located in the same zone, in conformance with state law.

The Zoning Code defines mobile homes consistent with state law and allows mobile home parks in the A-1 and General Commercial (C-2) zoning districts. Santa Ana's 29 mobile home parks contain 3,913 spaces. Six mobile home parks and 1,020 spaces in the city are age restricted to persons 55 years of age or older. These parks provide affordable housing options for extremely low-, very low-, and low-income residents. The City's Single-family and Mobile Home Rehabilitation Program offers very low-income households and seniors grants of up to \$25,000 to make home repairs.



Accessory Dwelling Units

Accessory dwelling units (ADUs), previously known as “second units” or “granny flats,” are attached or detached dwelling units that provide for complete independent living facilities. The ADUs include permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel as the single-family dwelling and can be an important source of affordable housing. In accordance with Government Code § 65852.2, ADUs in Santa Ana are permitted by right in all zoning districts that allow residential uses.

ADUs must be a minimum of 220 square feet and cannot exceed 1,000 square feet in size. The City’s Accessory Dwelling Unit Ordinance establishes criteria for design, yard, setback, and height. Since 2017, nearly 100 accessory dwelling units have been built in Santa Ana, and from 2018 to 2020, 300 ADUs were permitted, thus adding incrementally to the number of affordable housing units in the city.

During the 6th cycle Housing Element draft review, HCD noted that several sections of the City’s current ADU ordinance were not consistent with State ADU law. The City has included Program No. 43 in the element to update the existing ADU ordinance to comply with Government Code § 65852.2.

Farmworker and Employee Housing

The Health and Safety Code (§ 17021.6) declares that it is the policy of the state that each city permit and encourage the development and use of sufficient numbers and types of employee housing facilities as are commensurate with local needs. Section 17021.5 requires that employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation, treated as a residential use of property, and that the use not be subject to any regulations or fees not otherwise required of a single-family residence within the same zone.

While the City once had agricultural land, none remains today. The A1 zone allows one single-family dwelling, a detached guest home, and employees’ quarters, all of a permanent character. The density is limited to one unit for each 6,000 square feet of lot area, provided the lot is one-half acre or less in size. However, the Zoning Code needs to be updated for changes to state law. Program 18 in the Housing Plan proposes to define employee housing and revise the permitting process, as required, in accordance with the Health and Safety Code §§ 17021.5 and 17021.6.



Mixed-Use

As a major employment and transit center in Orange County, the City of Santa Ana recognizes the importance of providing a broad range of housing, such as mixed-use and live-work communities. Zoning areas like the SD-84's Industrial Overlay zone allow industrial and residential uses to coexist and transition in the Lacy and Logan neighborhoods, where efforts are underway to enhance design standards to protect and ensure a healthy living environmental. Live-work lofts were also built and are encouraged in areas near the Santa Ana Regional Transportation Center. These mixed-use opportunities reduce vehicle miles traveled, improve jobs/housing balance, and encourage social interaction.

The General Plan will facilitate mixed-use housing in Urban Neighborhoods and District Centers. Residential development is permitted in these areas at 20 to 125 units per acre (du/ac) with a floor area ratio of 1.0 to 5.0. In addition, the SD zoning district is one implementing tool that allows flexible standards to facilitate a mix of uses. Examples of these types of mixed-use development opportunities are: MacArthur Place, City Place, Metro East, and other focused areas. SD-84 also provides opportunities for mixed-use developments.



Proposed Mixed Use Project, Innovative Housing Opportunities

The SAMC also allows for live-work buildings, defined as a building, or portion thereof, used for units that are each a combination of a studio/workshop and a living quarters and may be either a building, or portion thereof, originally designed for nonresidential purposes and converted to such use, or a new building initially designed for such use. Live-work communities are allowed by right in the Transit Village, Downtown, Urban Center, and Corridor districts and conditionally permitted in the Urban Neighborhood 1 and 2 districts of SD-84.



Housing People Experiencing Homelessness

Recent state legislation has dramatically changed the way local governments address homelessness. The state legislature has recognized the growing problem of homelessness, the complex causes (lack of affordable housing, mental illness and substance abuse, release from prison, etc.), the lack of available facilities for individuals and families, and the need for all communities to provide housing for this segment of the population. Senate Bill 2 and additional bills have been passed over the years to require cities to proactively address these needs.

The following shows how the City actively provides a continuum of housing options for homeless people.

Emergency Shelters

Emergency shelters provide the first step in getting people off the street. Emergency shelters, as defined by the Santa Ana Municipal Code (SAMC), means housing with appropriate supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. Emergency shelters are permitted by right in the Light Industrial (M-1) and Heavy Industrial (M-2) zoning districts and in SD zoning districts that allow industrial uses. These zones comprise 995 acres of land, are near transit and access jobs, and provide adequate capacity to accommodate the city's unsheltered homeless.

The SAMC identifies development and operation standards for emergency shelters. Section 41-1201 (2) of the SAMC requires a 500-foot separation between emergency shelters and residential properties/zones, parks, childcare centers, and K-12 schools. This separation requirement is inconsistent with State law. In accordance with Program 37 in the Housing Plan, the City will amend the separation criteria and comprehensively update the Emergency Shelter ordinance to clarify opportunity sites best suited for emergency shelters. Program 37 also proposes to revise parking requirements consistent with AB 139.

Transitional and Supportive Housing

The SAMC defines "transitional housing" as a building(s) configured as rental housing developments, operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, no less than six months. "Supportive housing" is housing with no limit on length of stay, that is occupied by persons and families who were homeless when approved for tenancy in the supportive housing project in which they reside, and that is linked to on-site or off-site services that assist the resident to retain



HOUSING CONSTRAINTS

the housing, improve his or her health status, maximize his or her ability to live, and when possible, work in the community.

Transitional and supportive housing is allowed as a residential use, subject only to restrictions that apply to other dwellings of the same type (both single or multiple family) in the same zone. AB 2162 requires that supportive housing with 50 or fewer units be permitted by-right in zones where multiple family and mixed-use projects are permitted, provided they meet certain standards. In addition, the bill prohibits parking requirements based on the number of units for supportive housing developments within one-half mile of a public transit stop. Through Program 38, the City will amend the Zoning Code to address these supportive housing provisions and ensure compliance with State law.



Proposed CrossRoads at Washington Permanent Supportive Housing

Low Barrier Navigation Centers

State law requires that a low barrier navigation center development be permitted by right in areas zoned for mixed-use and nonresidential zones permitting multiple family uses if it meets certain requirements. A “low barrier navigation center” is a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing by providing temporary living facilities while case managers connect homeless people to income, public benefits, health services, shelter, and housing. The provisions of AB 101 are effective until 2026, when they sunset. Santa Ana’s larger emergency shelters function as low barrier navigation centers. However, the SAMC has not been updated to clearly identify this type of development as a permitted use; therefore, through Program 37 of the Housing Plan, the City will amend the SAMC to ensure consistency and transparency with AB 101.



Care Homes

The Welfare and Institutions Code (Lanterman-Petris Act) and the Health and Safety Code (Community Care Facilities Act) declare that it is the policy of the state that people with a wide variety of disabilities are entitled to live in normal residential settings. Under this authorizing legislation, state law sets forth regulations and guidelines for community care facilities that preempt or limit many local regulations. A community care facility is a broad term that refers to many types of facilities, including but not limited to group homes, adult residential care facilities, alcohol and drug rehabilitation facilities, and others.



Community care facility

Under the above two acts, state law generally requires that licensed community care facilities serving *six or fewer* persons be: (1) considered a residential use of property; 2) treated the same as any other residential use; (3) allowed by right in all residential zones; and (4) subject to the same development standards, fees, taxes, and permit procedures as those imposed on the same type of housing in the same zone. The City permits licensed care homes serving six or fewer residents by right in all residential zones, in a manner consistent with state law.

The Santa Ana Zoning Code regulates “care homes” serving seven or more clients. A care home is “any facility which is maintained and operated to provide living accommodations for and 24-hour nonmedical care to persons in need of personal services, supervision, assistance, guidance, or training essential for sustaining the activities of daily living or for the protection of the individual, such as the elderly, convalescents, invalids, dependent or neglected children, or handicapped, mentally impaired or incompetent persons.” Care homes are conditionally permitted in the R2, R3, R4, and other zones in the community.

Santa Ana has received requests to establish a wide range of facilities that serve people with disabilities or other health conditions and are not State-licensed. The types of unlicensed facilities continues to increase. Moreover, many of these unlicensed facilities may provide some but not all of the services provided by “care homes.” It is becoming increasingly difficult to distinguish between the services provided by these facilities, thus complicating local land use, zoning, and permitting. State law is also gradually evolving in response to these realities.

To respond to this evolution of state law and to continue the City’s practice of facilitating and encouraging housing opportunities for people with disabilities, the Housing Element continues two programs. Programs 35 and 36 monitor changes to state law and update the the City’s reasonable accommodation ordinance in accordance with state law to assist persons with disabilities and seniors with housing options in Santa Ana.



DEVELOPMENT REGULATIONS

The Zoning Code establishes residential development standards to promote a livable residential environment—including adequate yards for open space, height restrictions and setbacks to ensure privacy from adjacent homes, and in some cases minimum unit sizes to ensure sustainable and adequate living areas. This section analyzes residential development regulations that apply citywide.

Citywide Development Standards

Santa Ana allows a range of residential uses through a variety of densities, height, and other requirements. Table B-3 shows common residential development standards in Santa Ana’s residential zones. These include density ranges, lot standards, open space, and building height standards. These residential development standards apply to more urbanized areas of the community that have long-established land use and development patterns. The SD is the most flexible zone allowing for a wide range of product types.

**Table B-3
Residential Development Standards**

<i>Zone</i>	<i>Development Standards</i>				
	<i>Corresponding Density¹</i>	<i>Minimum Lot Size</i>	<i>Lot Cover</i>	<i>Building Height</i>	<i>Front / Rear Yard Size</i>
A1 Zone (General Agricultural)	7 du/ac	6,000 sq. ft.	N/A	35' max	25' and 25'
RE Zone (Residential-Estate)	None specified	None specified	N/A	35' max	25' and 25'
R1 Zone (Single Family)	7 du/ac	6,000 sq. ft.	35%	27' max	20' and 20'
R2 Zone (Two-Family)	15 du/ac	6,000 sq. ft.	50%	27' max	20' and 15'
R3 Zone (Multiple-Family)	See Table B-4.				
R4 Zone (Apartments)	16–29 du/ac	1,500 sq. ft.	50%	20'–50' max	1' per 1' in bldg. height
SD Zone (Specific Development)	Varies	Varies	Varies	Varies	Varies

Source: City of Santa Ana Municipal Code, September 2021.

1 The maximum density is determined by the General Plan land use designation, cumulative standards, and concessions available in accordance with the SAMC and state law.

2. Individual specific plans may have different residential development standards based on the location, vision, and intended type of residential and mixed use environment for each specific plan.

3 In accordance with transparency act requirements all residential development standards can be found online at: <https://www.santa-ana.org/pb/planning-division/zoning-documents>.



Multiple-Family Development Standards

Santa Ana has many multiple-family residential projects built between 1960 and 1980. Because of the development standards and lack of design guidelines at that time, many of these projects did not age well and do not offer desired amenities. Conditions include the lack of on-site parking, open space, privacy, and aesthetic quality. Overcrowding, public safety concerns, and the lack of community services also detract from quality of life. The City also is addressing off-site parking shortages in many of these areas, as noted in Program 28 of the Housing Plan.

In an effort to provide quality housing, further neighborhood preservation goals, and maintain property values, in the 1990s, the City revised its development and design standards for multiple-family residential projects, as shown in Table B-4. Multiple-family housing projects are allowed different density standards, based on the size and configuration of lots, to accommodate new housing. Projects proposing affordable and/or senior units specified under state density bonus law can apply for modifications and/or concessions.

**Table B-4
Multiple-Family Residential Development Standards**

<i>Project Specifics</i>	<i>Building Classification</i>			
	<i>Class 1</i>	<i>Class 2</i>	<i>Class 3</i>	<i>Class 4</i>
Building				
Density Range	0–22 dwelling units per acre	23–35 dwelling units per acre	36–60 dwelling units per acre	61–90 dwelling units per acre
Minimum Lot Size	12,000 square feet	21,700 square feet	43,500 square feet	65,300 square feet
Street Frontage	75' frontage 20' setback	135' frontage 15' setback	135' frontage 15' setback	200' frontage 15' setback
Maximum Building Height	35'	45'	60'	No Limit
Open Space				
Passive	Individual units shall have at least 100 square feet of passive open space per dwelling unit and an area equivalent to at least 750 square feet in size with a minimum dimension of 20 feet in each direction			
Active	An area equivalent to at least 500 square feet in size with a minimum dimension of 20 feet in each direction, except 20 percent of the total open space requirement may be met with recreational building space			
Private	Individual units shall have no less than 90 square feet of private open space and have a minimum dimension of 6 feet in each direction			
Unit Sizes				
Minimum Unit Sizes	Bachelor Unit: 450 square feet One-Bedroom Unit: 550 square feet Two-Bedroom Unit: 750 square feet Three-Bedroom Unit: 950 square feet			

Source: City of Santa Ana Municipal Code, September 2021.

Parking Solutions

The cost of structured parking can be detrimental to the financial feasibility or affordability of a proposed project, particularly with the increases in the price of construction materials. Recent years have seen innovations in parking. Hydraulic, stacked parking systems allow the doubling and tripling of capacity beyond that allowed by conventional concrete parking structures, significantly decreasing the cost of structured parking. These systems—which have been in use for over a decade in California—can be used for a wide range of multiple-family projects and lot sizes: from a 40-foot by 100-foot infill parcel to 25-story high rise.



Parking Standards

The provision of adequate parking in Santa Ana is an important issue. Adequate parking is needed to prevent traffic congestion caused by shortage of parking spaces and the unloading of trucks on public streets, improve the efficiency of roadways, protect the public safety, and provide for the special needs of the physically handicapped. At the same time, parking requirements can deter the production of housing if the standards bear little relation to need. Thus, parking standards must be adequate to ensure sufficient spaces to serve residential uses, but not create an actual constraint to housing development.

As an older established community, the city has many neighborhoods characterized by residences with smaller, unusable garages. Moreover, as discussed earlier, a significant portion of the multiple-family projects built before 1990 lacked adequate parking. In tandem with overcrowding in multiple-family developments and vehicle ownership patterns, the shortage of on-site parking has also created significant parking shortages today in certain neighborhoods. Therefore, in order to protect the health and welfare of residents and provide for adequate public safety, the City has established the parking ratios in Table B-5.

**Table B-5
Residential Parking Standards**

<i>Residential Type</i>	<i>Parking Standards</i>	
	<i>Basic Requirement</i>	<i>Comments</i>
Single-Family Dwelling	Four parking spaces per unit plus one space for each add'l bedroom in excess of five	At least half of all spaces must be in enclosed garages
Two- and Three- Family Dwellings	Three parking spaces per unit plus one add'l space for each bedroom in excess of two bedrooms	Two spaces shall be in an enclosed garage; remainder may be in tandem
Multiple-Family Dwellings	One parking space per unit plus off-street parking equivalent to the number of bedrooms on-site	Guest parking not less than 25% of the required resident parking mentioned
Senior Housing (62 years and older)	One parking space for each studio or one bedroom unit and 1.5 spaces for each two-bedroom unit	One space must be covered; guest parking must equal 15% of minimum required spaces
Care Homes	One parking space required for every three beds	No guest parking requirements
Trailers and Mobile Home Parks	Two parking spaces for each unit	At least one space covered; no guest parking requirements
Accessory Dwelling Units	One parking space per unit as allowed under state law	No other requirements for guest parking

Source: City of Santa Ana Municipal Code, September 2021



Certain types of residential uses, particularly those in close proximity to transit or residential/office land use, encourage transit-oriented development and create vibrant activity nodes. This strategy has also been implemented to improve mobility and air quality. Table B-6 shows the parking requirements in transit-oriented districts. Recent projects that received parking standard reductions include Casa Querencia (0.63 space per unit), AMG First Point (1.03 spaces per unit), Central Pointe (2 spaces per unit) and Warner Redhill Mixed-Use (2 spaces per unit).

**Table B-6
Parking in Transit Oriented Districts**

<i>Location of Housings</i>	<i>Bedrooms</i>			
	<i>Studio</i>	<i>One</i>	<i>Two</i>	<i>Three</i>
Transit-Oriented				
• SD-84 Residential/Live Work	2.25	2.25	2.50	2.75
• MEMU Mixed-Use	2.25	2.25	2.25	2.25
• District Centers Mixed-Use	2.50	2.50	2.50	2.50
• Density Bonus Affordable	1.00	1.00	2.00	2.00

Source: City of Santa Ana Municipal Code, September 2021.
Notes: City parking standards and density bonus standards are inclusive of guest parking

Santa Ana allows additional parking reductions for affordable housing. For projects that provide a mere 5 percent very low- or 10 percent low-income units and comply with State density bonus law (Government Code § 65915), developers can receive the parking standards that are an additional 25 percent to more than 50 percent below the City's reduced standards. Finally, developers may request an exception to allow tandem and shared parking under certain conditions. Multiple-family projects, particularly those that provide affordable units, could easily qualify for these reduced parking standards, which is why the City's current multiple-family parking standards are not a constraint.

Parking remains a key issue for developers. Program 28 of the Housing Plan proposes to collaborate with transportation organizations, and build on studies to evaluate parking needs and standards for residential uses. These efforts will inform programs to address parking issues caused by changes in automobile ownership rates, which have led to parking-impacted neighborhoods, and parking standards and regulations that do not unduly burden their neighborhood. Should it be determined that current parking requirements are an undue constraint to the development of multiple-family housing, City staff will propose a program to City Council to mitigate the constraint and related impacts. Because of the relationship of parking to other residential development standards (open space, height, lot coverage, etc.), this effort may be completed in conjunction with the update to the Zoning Code.



Lot Sizes

The second critical issue in facilitating housing along corridors is determining the desired project size and acquiring a site. Developers desire larger parcels because this offers more flexibility and available land to include on-site amenities, arrange buildings and/or units, and generate a greater revenue source for the project. For affordable housing developers, larger projects also score more competitively on state and federal loan and grant applications. However, lot consolidation is often needed to assemble a desired lot size.

Lot consolidation is typically achieved through the voluntary purchase of land. Property owners are more likely to sell if the sale generates a high enough profit. However, if a proposed project would result in significant financial gain but the price is not right or a landowner decides to hold out for an exorbitant price, an otherwise desirable project may never materialize. In cases where there is insufficient incentive for voluntary purchase and consolidation of sites, City action is often required to purchase and assemble lots.

One promising planning strategy to encourage property owners to voluntarily consolidate parcels into larger, more developable parcels is graduated density. A graduated density provision is one that allows progressively higher residential density based on the size of the lot. Graduated density is an especially appropriate tool to encourage the consolidation of small or irregularly shaped parcels into larger parcels that are suitable for development. This tool is often applied to transit-oriented development or the reuse of older commercial strips.

Donald Shoup, UCLA researcher, notes that graduated density zoning relies on market incentives to motivate property owners to voluntarily assemble land. Property owners may see a financial incentive to consolidate lots prior to development or sale of the lot to a third party and therefore enter into agreements with property owners of adjacent sites. Landowners who do not wish to consolidate their lots or decide to hold out from consolidation in the hope of gaining the highest price may miss the chance to reap the financial benefits of lot consolidation.

As needed, the City may consider a graduated density program as part of its update to the Zoning Ordinance (see Program 18). Working with the state density bonus ordinance and a minimum lot size, developers will be able to seek progressively higher densities for assembling lots into larger sizes that facilitate quality housing.



Flexibility in Standards

The City implements a variety of administrative procedures and specialized zoning districts to facilitate the development of quality housing. These procedures allow the developer to seek relief from typical development standards that may constrain a potential project or physical hardships that may arise due to the size, shape, or dimensions of a site or existing structures. The primary local tools to facilitate development are the minor exception process, the density bonus ordinance, and Specific Development Zone, as explained below.

Minor Exception Process

The minor exception procedure is intended to provide relief from zoning regulations that result in unintended inequities or hardships when applied to specific properties and must not be a grant of special privilege. The minor exception process allows the City additional flexibility in facilitating new residential products in a variety of settings. A developer may seek modification of the following zoning standards:

- Yards: up to 20 percent of the minimum lineal dimension.
- Building Separation: up to 50 percent of the minimum separation required.
- Lot Coverage: up to 20 percent of the minimum standard.
- Building Height: up to 25 percent of maximum height.
- Off-Street Parking: up to 20 percent of the minimum number of stalls provided that the exception does not result in parking impaction.

The City Council, Planning Commission, or Zoning Administrator can grant a minor exception or variances when specific criteria are met and when the following findings are made prior to approval:

- That because of special circumstances applicable to the property, strict application of the zoning ordinance would deprive privileges not otherwise at variance with the intent and purpose of this chapter.
- That the granting of a variance or minor exception is necessary for the preservation and enjoyment of one or more substantial property rights.
- That the granting of a variance or minor exception will not be materially detrimental to the public welfare or injurious to surrounding property.
- That the granting of a variance or minor exception will not adversely affect the general plan of the City.



Density Bonus

The City of Santa Ana implements the State Density Bonus Law in California Government Code §§ 65915 to 65918, which provides developers with powerful tools to encourage the development of affordable and senior housing, including up to a 50 percent increase in project densities for most projects, depending on the amount of affordable housing provided, and an 80 percent increase in density for projects which are completely affordable.

The density bonus provisions are widely used and have helped mitigate potential governmental and nongovernmental constraints to development. The City has approved numerous density bonus projects in recent years that have included, but are not limited to the following:

- FX Residences
- Crossroads at Washington
- AMG Family Affordable Apartments
- Legacy Square
- WISEPlace Permanent Supportive Housing
- Warmington Residential
- First American Title (Rafferty)
- 3rd and Broadway Mixed Use
- AMG Senior Apartments

The Density Bonus Law is about more than the density bonus itself. It is actually just one component of a larger package of regulatory incentives and concessions that are intended to help make the development of affordable and senior housing economically feasible. As part of the density bonus agreement, other tools include reduced parking requirements and incentives and concessions such as reduced setback and minimum square footage requirements.

In addition to the density bonus, the City is required to provide one or more “incentives” or “concessions” to each project that qualifies for a density bonus (except that market-rate senior citizen projects with no affordable units, and land donated for very low-income housing, do not appear to be entitled to incentives or concessions). The City’s density bonus ordinance, § 41-1600, incorporates State Density Bonus Law, as it may be amended from time to time. As described in the Housing Plan (Program 24), the City will revise its density bonus ordinance to reflect changes in State law.



Affordable Housing Opportunity and Creation Ordinance

The City's Affordable Housing Opportunity and Creation Ordinance (AHOCO), previously known as the Housing Opportunity Ordinance (HOO), was first adopted in 2011 and has been amended since then to address market conditions, community needs, and the COVID-19 pandemic. On April 19, 2022, the City Council adopted several amendments to the AHOCO. The intent of the AHOCO is to encourage development of housing that is affordable to a range of household incomes. The AHOCO applies to projects of 5 or more units and/or lots and which fall under one or all of the following thresholds:

- (1) A change in use to allow for residential or that exceeds the general plan or zoning prescribed densities or percentage of residential development of the subject property at the time of application; or
- (2) Implementation of the permitted residential density or percentage of residential development allowed as a result of city initiated zone changes or city initiated general plan amendments after November 28, 2011; or
- (3) Increase of the permitted percentage of residential development allowed for a mixed-use development above the percentage permitted under the zoning classification at the time of application; or
- (4) Development of new residential uses or increase of the permitted residential density or percentage of residential development within an overlay zone approved pursuant to Division 28 of Article I of Chapter 41 (Zoning) of the SAMC; or
- (5) Conversion of rental units to condominium ownership.

Projects subject to an approved Development Agreement or Regulatory Agreement or Adaptive Reuse projects are exempt from the AHOCO.

Inclusionary requirements only apply to the incremental units beyond what is allowed. For-sale projects are required to provide a minimum of 5 percent of the total number of units as moderate-income units. For-rent projects are required to provide affordable units as follow:

- (1) A minimum of 15 percent of the units shall be rented to low-income households; or
- (2) A minimum of 10 percent shall be rented to very low-income households; or
- (3) A minimum of 5 percent shall be rented to extremely low-income households; or



- (4) A minimum of 10 percent shall be available at an affordable housing cost, of which 5 percent rented to low-income households, 3 percent rented to very low-income households, and 2 percent rented to extremely low-income households.

Developers can satisfy the inclusionary requirements in three ways: (1) build the units on-site or off-site; (2) rehabilitate units within a designated target area or outside a designated area; and (3) pay an in-lieu fee instead of constructing some or all of the required units. The in-lieu fee, per square foot (psf) of habitable area, is \$6.00 psf for projects with 5 to 9 lots/units, \$9.00 psf for projects with 10 to 14 lots/units, \$12.00 psf for projects with 15 to 19 lots/units, and \$15 psf for projects with 20 or more lots/units. To assist in compliance with the AHOCO requirements, the City provides incentives to applicants to construct the inclusionary units. Incentives include reduction in required off-street parking and building setbacks and building height and density increase.

One of the new amendments to the AHOCO was the use of local skilled and trained workforce. The AHOCO now requires the use of local skilled and trained workforce for projects of 20 or more lots/units opting to exercise the in-lieu fee payment option. The implementation of this requirement is a phased approach.

- (1) Between April 19, 2022 and December 31, 2025: A project proposing 20 or more lots/units and opting to pay the in-lieu fee is not required to utilize a local skilled and trained workforce. However, if a local skilled and trained workforce is desired, the in-lieu fee could be reduced to \$10.00 psf if 30 percent of the workforce utilizing 2 or more construction trades or \$5.00 psf if 60 percent of the workforce utilizing 3 or more construction trades with a minimum of 20 percent of the above work hours be performed in accordance with local hire policies as approved by the City.
- (2) January 1, 2026, and thereafter: A project proposing 20 or more lots/units and opting to pay the in-lieu fee will be required that 30 percent of the workforce utilized to complete the construction of the project be derived from a skilled and trained workforce and that a minimum of 35 percent of the required skilled and trained workforce's total work-hours be performed in accordance with local hire policies. The in-lieu fee may be reduced if the developer commits to a higher utilization level—to \$10.00 psf for 60 percent of workforce commitment or to \$5.00 psf for 90 percent of workforce commitment with a minimum of 35 percent of the work-hours performed in accordance with local hire policies as approved by the City.



Since the adoption of the HOO in 2011, a total of 33 affordable units have been developed on-site, including 23 ownership units for-sale and 10 rental units. All in-lieu fees, penalties, and other monies collected pursuant to the HOO, including interest, are deposited into the Inclusionary Housing Fund. Since inception, the Inclusionary Housing Fund has generated \$28.2 million that has been used to develop new affordable housing, provide emergency shelter, and create homeownership opportunities. A total of 107 affordable housing units have been created, and an additional 86 units have been committed through such fees.

Inclusionary housing requirements cannot be confiscatory or deprive an owner of a fair and reasonable return. California Gov't Code § 65583(a) requires assessments of the potential and actual constraints on the development of housing. Within that context, it is important for affordable housing programs to be set up to balance the interests of property owners and developers against the public benefit created by the production of affordable housing units. As such, the in-lieu fees above are based on an evaluation of the affordable housing requirements that could be supported from an economic perspective. The results of this analysis were translated into order-of-magnitude estimates of the in-lieu fee amounts that could be charged on a financially feasible basis.

Although the AHOCO was recently amended, the City, as indicated in Program 25, will continue to monitor the AHOCO requirements, fees, and incentives every two years to ensure effectiveness and positive housing production. Should such ordinance requirements create a housing constraint, the City will amend the ordinance as appropriate.

Renter Protections

Recent years have seen significant rent increases statewide for housing while cities have grappled with the displacement effects on its residents. While rent stabilization has long been an available tool for jurisdictions to address soaring rents and displacement concerns, few cities have taken advantage of that tool. In 2019, the Legislature passed the Tenant Protection Act, which limited annual rent increases that landlords could charge to 5 percent plus the annual change in the Consumer Price Index (CPI) or 10 percent, whichever is less. The law also defines just cause evictions.

While these tools have long been available, the City of Santa Ana has had a disproportionate proportion of lower income households who are impacted by rising rents, even with statewide rent stabilization laws. Therefore, on November 19, 2021, the City adopted a local rent



stabilization ordinance and just cause eviction ordinance to address rising rents and their displacement effects in Santa Ana.

City Rent Stabilization Ordinance

The City's RSO is a local law that limits the annual rent increase to the lower of 3 percent per year or 80 percent of the percent change in the CPI for certain residential rental units and mobile home spaces. The rent stabilization cap only applies to "qualified" buildings, built on or before February 1, 1995, pursuant to the Costa-Hawkins Rental Housing Act. The RSO does not apply to housing built in the last 15 years and only applies to certain types of housing. The rent stabilization cap for mobile home spaces applies to mobile home parks established before 1990, but not to mobile homes with long-term leases (over 12 months).

This RSO is not deemed a constraint to the development, maintenance, or improvement of housing. The RSO only affects housing built before 1995 and exempts new housing construction. With respect to maintenance, the ordinance allows the property owner to petition for higher rent increases due to the completion of capital improvements or rehabilitation work related to the residential real property or mobile home space or other qualifying conditions. By providing for a mechanism to ensure a fair return in light of certain conditions, the RSO does not constrain the maintenance and improvement of housing.

For further information, Ordinance No. NS-3009 provides greater detail on the program. The City publishes a webpage at <https://www.santa-ana.org/documents/rent-stabilization-ordinance-english/> where residents, real property managers, and others can read the ordinance. The Housing Plan provides a program for implementing the RSO.

City Just Cause Eviction Ordinance

The City of Santa Ana has adopted a Just Cause Eviction Ordinance (JCEO) effective November 19, 2021. The City's Just Cause Eviction Ordinance is a local law that provides "just cause" eviction protections for most tenants that continuously and lawfully occupy a residential real property or mobile home space for at least 30 days. This ordinance is designed to protect residents from displacement and ensure property owners can evict tenants that do not follow the terms of tenancy.

Like the RSO, the JCEO has a variety of exemptions and qualifications. Key provisions are as follows:

- After 30 days, an owner shall not terminate a tenancy without just cause, which shall be stated in a written notice.



- “Just cause” includes certain at-fault (e.g., when a tenant has broken the rental agreement in specified ways) and no-fault (when a tenant has not broken the rental agreement) causes in the ordinance
- Before issuing a notice to terminate for just cause, the owner shall first give notice of the violation with a time period for the tenant to fix the violation(s).
- The JCEO shall not apply to certain types of residential property, including housing produced in the last 15 years; deed-restricted affordable housing; hotel and transient occupancy; hospital and care facilities; dormitories; and other shared living quarters.
- Under a no-fault just cause termination, the owner shall either provide 3 months of relocation assistance or waive payment of rent for the final 3 months of the tenancy.
- Property owners must provide notice to existing tenants before December 19, 2021 or at commencement or renewal of their lease of the JCEO protections. A written notice will be published by the City at the link below no later than November 19, 2021.

Ordinance No. NS-3009 provides greater detail on the program. The City publishes a webpage at <https://www.santa-ana.org/justcauseevictions/> where residents, real property managers, and other interested parties can read the ordinance. The Housing Plan provides a program for implementing the JCEO along with an action to revisit the program periodically to ensure it operates as designed and does not constrain the production, maintenance, improvement, or availability of housing.

Specific Development Zoning District

The General Plan focuses new residential and mixed-use development into District Centers. District Centers have historically been intended to provide for distinctly urban retail, residential mixed-use, and employment centers that are well connected to public transportation. It includes the city's primary activity centers and opportunities for new urban-scale residential and mixed use development.

The implementing zone for District Centers is often the Specific Development (SD) zoning district. SDs are the primary means to facilitate the development of unique residential projects, including live-work, mixed-use, and high-rise residential developments. These types of residential projects require flexibility in development standards to accommodate new housing products and unique site constraints and achieve General Plan goals and objectives.



The SD district is intended to achieve several objectives: 1) protect and enhance the value of properties by encouraging the use of good design principles and concepts; 2) encourage the orderly and harmonious appearance and aesthetic development of structures and grounds; 3) provide a method for specific development plans to be based on broader general plan goals; 4) recognize the interdependence of land values and aesthetics; and 5) encourage excellence in project design and site use.

Over the years, the City has approved a total of 97 SD zoning districts to facilitate high-quality and large-scale residential, mixed-use, and/or commercial projects. Project examples include the 1,221-unit Broadstone, the 1,100-unit Warner Redhill, and the 85-unit Westview Housing developments. The SD zoning district is obtained in the same manner as any other zone change and requires a public hearing before the Planning Commission and City Council. The SD zoning district will continue to facilitate residential and mixed-use projects.

Transit Corridors Development Standards

Programs 14 to 16 of the Housing Plan propose to facilitate residential/mixed-use development along major corridors or focus areas. With the adoption of the updated General Plan, the City will undertake a comprehensive update to the Zoning Code (Program 18), which will need to be reviewed for consistency and for additional direction to implement the vision, goals, and policies of the General Plan.

To that end, the Zoning Code update will include a revision to development standards that will align the Zoning Code with the General Plan. To the extent determined, the effort will include best practice provisions that address parking, height, setbacks, and open space requirements to facilitate sustainable, quality housing, and mitigate potential constraints to housing.

The City will also review and update parking standards to balance the needs of providing adequate and flexible parking requirements, ensuring parking does not create spillover impacts to residential neighborhoods, and allowing innovative and creative approaches to provide parking for all residential projects. Evaluation of parking standards will consider best practices, available development scenario models, and compare City-approved projects from 2017 to present. Table B-7 summarizes the parking standards that were approved to facilitate a variety of housing types.



Table B-7
Sample of Multiple-Family Residential Projects Approved Since 2017

<i>Project Name</i>	<i>Parking Ratio</i>	<i>Density</i>	<i>Bedrooms</i>		
			<i>0-1</i>	<i>Two</i>	<i>Three+</i>
Casa Querencia (supportive housing)	0.63	63 du/acre	57	--	--
AMG First Point (affordable housing)	1.03	80 du/acre	27	239	286
Legacy Square	1.1	53 du/acre	30	41	22
Crossroads (affordable housing)	1.4	37 du/acre	42	22	22
The Charlie	1.5	58 du/acre	113	96	19
La Placita Cinco (affordable housing)	1.83	21 du/acre	--	20	30
Central Pointe	2	77 du/acre	365	248	31
Warner Redhill Mixed-Use	2	75 du/acre	811	275	15
Legacy Sunflower	2	62 du/acre	149	77	--
4th & Mortimer	2.5	62 du/acre	59	66	44

Source: City of Santa Ana, 2021.

Metro East Mixed-Use Overlay Zone

The MEMU introduces development forms and uses that help provide for the creation of a high-intensity, mixed-use urban village within a previously developed mid- to high-rise office environment. Its explicit vision is to facilitate residential development and provide for a mix of housing types that encourages a continuum of living. The residential types allowed include but are not limited to loft-style units, live-work units, attached row houses, and stacked flats.

Table B-8 summarizes allowable residential uses and development standards in each district. The Village Center District allows commercial, office, and residential uses in the same building or on the same site in buildings of six to ten stories. The Active Urban District allows for a similar mix of uses within one vertical mixed-use building or a mix of uses within freestanding buildings on the same site. Multifamily and live-work units are permitted in all districts, except the Office District, which promotes a balance between office, commercial, and residential uses. Consistent with the MEMU vision to encourage and facilitate mixed use, stand-alone residential development is not allowed in the Village Center and Active Urban districts unless it is part of a mixed-use development that has different uses in multiple buildings and is designed as an integrated development on a single development site.



**Table B-8
Residential Development Standards in Metro East Mixed-Use Overlay Zone**

<i>Standards</i>	<i>Development District¹</i>		
	<i>Neighborhood Transitional</i>	<i>Village Center</i>	<i>Active Urban</i>
Allowable Uses			
Multiple-Family Uses	Permitted	Permitted	Permitted
100% Stand-Alone Residential Allowed (Yes or No)	Yes	No ²	No ²
Live-Work Uses	Permitted	Permitted	Permitted
Building Standards			
Floor Area Ratio Range	0.75–3.0 FAR	0.75–3.0 FAR	0.75–3.0 FAR
Minimum Lot Size	20,000 sq. ft.	30,000 sq. ft.	43,560 sq. ft.
Building Height	Max. 4 stories	Max. 10 stories	Min. 3 stories – no max
Building Setback (Front)	0–10 feet	0–10 feet	0–10 feet
Building Setback (Side/Rear)	0–10 feet	0–10 feet	0–10 feet
Private/Common Open Space	90 sq. ft./unit	90 sq. ft./unit	90 sq. ft./unit
Publicly Accessible Open Space	5% of total site	10% of total site	15% of total site
Parking Spaces/Unit ³	2.25	2.0–2.25	2.0–2.25

Source: Metro East Mixed-Use Overlay Zone, September 2021.

1. The ultimate permitted density for each site is dictated by the specific development standards and building type applied in each development district.
2. Stand-alone residential buildings are allowed as a component of a mixed-use project that has different uses in multiple buildings designed as an integrated development on a single site.
3. Includes guest parking. For the Village Center and Active Urban Districts, developments that devote 10 percent or more of the gross floor area to a nonresidential use must provide at least 2.25 parking spaces per unit, inclusive of guest parking.

Residential and mixed-use development in the three districts are required to include 90 square feet of private and/or common open space per unit. Development can satisfy this requirement in private areas such as balconies or patios or common areas such as courtyards, rooftop decks, recreation facilities, multipurpose rooms, or other areas designed for common use by residents. Additionally, each development must set aside a certain percentage of the total development site for publicly accessible open space and to provide for a high level of pedestrian connectivity and activity throughout the MEMU.

Reflecting the desired urban nature of the overlay zone, the required building setbacks are minimal and facilitate the incorporation of publicly accessible open space while reinforcing a continuous urban street frontage. Open space standards are flexible; each project can incorporate either large private areas or large common areas, or a combination of smaller private and common open spaces. Greater lot coverage allows for a greater number of units to be constructed, which can decrease the incremental cost of developing each unit, thereby permitting lower sales or rental prices.

Properties within the MEMU may develop to the standards of the underlying zoning district or the MEMU. To exercise the latter option, a



Site Plan Review (SPR) application approved by the Planning Commission is required (Refer to Page B-43 for SRP process).

Since the MEMU's adoption in 2007, the City amended the MEMU boundaries in order to allow development of other underutilized properties. As of September 2021, two mixed-use projects have been constructed, including the Nineteen 01 with 264 housing units, completed in 2016, and the Metro East Senior Park with 419 senior housing units, completed in early 2021. In addition, the following projects have been entitled and/or are under construction:

- AMG First Point is a mixed-use project with 552 affordable housing units under construction and expected to be completed in 2022.
- Elan is a mixed-use project with 603 housing units under construction and expected to be completed in 2022.
- Central Pointe is a mixed-use project with 644 housing units entitled in 2020.

Altogether, the MEMU development standards have not constrained the development of residential or mixed-use products, and new housing opportunities are anticipated to be created over the planning period.

Transit Zoning Code / Specific Development No. 84 (SD-84)

SD-84 provides a planning framework to strengthen existing neighborhoods and guide future development along the Santa Ana Boulevard corridor, the Downtown, the civic center area, and the Logan and Lacy neighborhoods. This plan strengthens Santa Ana's core as a regionally important transit-oriented district and government center supported by diverse neighborhoods. SD-84 was adopted in 2010 and amended in 2019 to reflect current development trends and to provide flexible development standards.

SD-84 was designed to expand housing choices within pedestrian-friendly residential and mixed-use neighborhoods by allowing single-family homes, rowhouses, stacked flats, liner housing, and high rises. Multiple-family housing is permitted by right, if the structure is four stories in height or less, in the Urban Neighborhood 1 and 2 districts and only subject to administrative Development Project (DP) Review (Refer to Page B-42 for DP process). Multifamily housing as part of a mixed-use development is permitted in the Transit Village, Downtown, Urban Center, and Corridor zoning districts. Structures/ developments over four stories in height require approval of a SPR.

For existing industrial uses within SD-84, property owners may develop sites as residential uses should they choose to activate the overlay zone,



much like MEMU. Table B-9 illustrates the housing types allowed for each district within SD-84.

**Table B-9
Permitted Residential Building Types by District in SD-84**

<i>Building Type</i>	<i>Building Types Allowed by Development District</i>					
	<i>TV</i>	<i>DT</i>	<i>UC</i>	<i>CDR</i>	<i>UN-2</i>	<i>UN-1</i>
100% Stand-Alone Residential Allowed (Yes or No)	No ¹	No ¹	No ¹	No ¹	Yes	Yes
Tower-on-Podium	Y	--	--	--	--	--
Flex Block	Y	Y	Y	Y	--	--
Lined Block	Y	Y	Y	--	--	--
Stacked Dwellings	Y	Y	Y	--	--	--
Hybrid Court	--	--	--	--	Y	--
Courtyard Housing	Y	Y	Y	--	Y	--
Live-Work	Y	Y	Y	Y	Y	Y
Rowhouse	--	--	--	--	Y	--
Tuck-Under	Y	Y	Y	--	Y	--
Bungalow Court	--	--	--	--	Y	Y
Duplex/Triplex/Quadplex	--	--	--	--	Y	Y
House	--	--	--	--	Y	Y

Source: Transit Zoning Code, September 2021.

1. Residential use permitted only on second or upper floors, or behind retail or service ground-floor use.

Residential Development Standards

SD-84 provides a range of residential development standards that are based on building type. SD-84 allows for 12 different building types, of which 10 permit multiple-family housing. Densities range from 5 units per acre for a single-family house to 90 units per acre for tower-on-podium products. The wide range of densities and building heights permitted in SD-84 greatly facilitate housing production for a wide range of family types and household incomes.

Summarized in Table B-10, the development standards facilitate the development of building types affordable to a range of income levels. The parking requirements, two spaces plus 0.15 to 0.25 guest space per unit, reflect the transit-oriented nature of the area. SD-84 modest minimum and maximum setbacks (0 to 15 feet), depending upon the development zone, help promote a more active street front. The open space requirements are flexible, reflect the urban feel of the area, and facilitate the efficient and cost-effective use of developable area.



Table B-10
Residential Development Standards in SD-84

<i>Building Type</i>	<i>Multiple-Family</i>	<i>Density Range¹</i>	<i>Lot Width²</i>	<i>Max Stories</i>	<i>Open Space³</i>
Tower-on-Podium	Yes	75–90	200' - 250'	25	20%
Flex Block	Yes	30–40	75' min	10	15%
Lined Block	Yes	45–50	125' - 300'	5	15%
Stacked Dwellings	Yes	40–50	125' - 200'	6	15%
Hybrid Court	Yes	45–50	150' - 200'	5	15%
Courtyard Housing	Yes	20–30	125' - 200'	5	15%
Live-Work	No	12–15	75' - 125'	3	15%
Rowhouse	Yes	7–18	75' - 150'	3	15%
Tuck-Under	Yes	12–18	94' - 250'	3	15%
Bungalow Court	Yes	10–15	100' - 180'	2	15%
Duplex/Triplex/Quadplex	Yes	10–15	50' - 75'	3	15%
House	No	5–7	40' - 60'	2	15%

Source: Transit Zoning Code, September 2021.

1. Density ranges represent the limits of each building type and the dwellings it can accommodate per acre.
2. The first number is the minimum lot width and the second number is the maximum lot width.
3. Unless otherwise noted, the amount of open space required is calculated as a percentage of the lot area.
4. Each ground floor unit shall have a yard of at least 150 square feet. Aboveground floor units are exempt.
5. Homes are required to have one side yard of 10x10 feet and a rear yard calculated as 15 percent of lot area.

Altogether, the SD-84 development standards have not constrained the development of residential or mixed-use products, and new housing opportunities are anticipated to be created over the planning period.

Harbor Mixed Use Transit Corridor Specific Plan (SP-2)

SP-2, adopted in 2014, provides the foundation for a more livable and sustainable environment along Harbor Boulevard. Harbor Boulevard is a gateway to the western part of Santa Ana. The plan allows for new housing and mixed-use development opportunities and development flexibility to meet market demands. SP-2 allows a variety of housing types and has the general plan land use designations and zoning districts in place to support the development of new housing.

Table B-11 illustrates the housing uses allowed, development standards, and types of housing envisioned for each zoning district. Stand-alone multifamily developments are allowed in the Corridor and Neighborhood Transitional zoning districts. Multifamily units with a mixed-use development are allowed in the Transit Nodes districts. Structures/developments over three stories in height within SP-2 require approval of a SPR application (refer to Page B-43 for SPR process). Projects not exceeding three stories in height require approval of a DP application (refer to Page B-42 for DP process).



Table B-11
Permitted Residential Uses by District in SP-2

<i>Standard</i>	<i>Zoning Districts</i>			
	<i>Transit Node North</i>	<i>Transit Node South</i>	<i>Corridor</i>	<i>Neighborhood Transitional</i>
Uses Permitted				
Live Work	P ¹	P	P ²	CUP
Care Homes	N	N	CUP	CUP
Single Family Dwellings	N	N	P	P
Multi-Family Dwellings	P ¹	P ¹	P	P
100% Stand-Alone Residential Allowed (Yes/No)	No ¹	No ¹	Yes	Yes
Structures over 3 stories in height	SPR	SPR	SPR	SPR

Source: Harbor Mixed Use Transit Corridor Specific Plan, September 2021.

Notes:

P = Use permitted by right.

N = Use not permitted.

CUP = Use permitted subject to approval of a Conditional Use Permit.

SPR = Use permitted subject to approval of a Site Plan Review.

1. Residential use permitted only on second or upper floors, or behind retail or service ground floor use.

2. Use permitted as part of a vertical mixed use development, with upper residential floor.

Residential Development Standards

SP-2 provides a range of residential development standards that are based on building type. SP-2 allows for 10 different building types, of which 10 permit multiple-family housing. Densities range from 5 units per acre for a single-family house to 50 units per acre for stacked and lined block products. The wide range of densities and building heights permitted in SP-2 greatly facilitate housing production for a wide range of family types and household incomes.

Summarized in Table B-12, the development standards facilitate the development of building types affordable to a range of income levels. The lot sizes and maximum building heights specified below also are designed to accommodate the parcel sizes within the district while allowing and facilitating flexibility in product type.

Table B-12 illustrates the housing uses allowed, development standards, and types of housing envisioned for each zoning district. As demonstrated in the next section, these development standards have not constrained the development of housing given the projects built. Three affordable housing projects have been built within this zone in just the last five years.



Table B-12
Building Type and Development Standards by District

<i>Building Type</i>	<i>Density Range</i>	<i>Lot Size (feet)</i>		<i>Minimum & Maximum Building Heights (stories)</i>			
		<i>Depth</i>	<i>Width</i>	<i>Transit Node North</i>	<i>Transit Node South</i>	<i>Corridor</i>	<i>Neighborhood Transitional</i>
House	5 - 12	70 FT	25 - 100 FT	Not Allowed		2 - 3	2 max.
2/3/4-plex	10 - 15	100 FT	50 - 125 FT	Not Allowed		2 - 3	2 max.
Bungalow Court	10 - 15	130 FT	100 - 180 FT	Not Allowed		2 - 3	3 max.
Live-Work	7 - 18	100 - 200 FT	75 - 125 FT	Not Allowed	3 - 3	2 - 3	2 - 3
Rowhouse	8 - 18	100 - 200 FT	75 - 150 FT	Not Allowed	3 - 3	2 - 3	2 - 3
Tuck-Under	12 - 18	75 FT	95 - 250 FT	Not Allowed	3 - 3	2 - 3	2 - 3
Courtyard Housing	20 - 30	130 - 150 FT	125 - 200 FT	Not Allowed	4 - 5	2 - 4	2 - 3
Flex Block	30 - 40	130 FT	75 - 200 FT	4 - 10	4 - 10	2 - 4	Not Allowed
Stacked Dwellings	40 - 50	130 FT	125 - 200 FT	4 - 10	4 - 10	2 - 4	Not Allowed
Lined Block	40 - 50	170 FT	125 - 130 FT	4 - 10	4 - 10	2 - 4	Not Allowed

Source: Harbor Mixed Use Transit Corridor Specific Plan, September 2021.

Stand-Alone Residential Developments in MEMU, SD-84, & SP-2

As indicated on prior sections, stand-alone residential developments within MEMU, TZC, and SP-2 are limited to certain zoning districts. The majority of the zoning districts within these specific areas do require that multifamily units be developed within a mixed-use development or as an integrated horizontal mixed-use development. These specific areas are in transit facilities and major city and county hubs that ensure adequate access to goods, facilities, and jobs. By encouraging mixed-use development, the City intends to build environments that reduce vehicle miles traveled (VMT), improve air quality, and create a more equitable jobs-housing balance.

Shown in Table B-13, both 100 percent residential projects and mixed-use projects have been approved and built within these districts. Requiring multifamily units within mixed-use projects/areas has not constrained housing development. In addition, the development community has not expressed any issue or concern with not allowing stand-alone residential developments in certain zones, and development activity continues to be robust in the MEMU, TZC, and SP-2 areas. The commercial uses that have been developed under these requirements are occupied and operating successfully in concert with the residential developments above and around the commercial uses.



Table B-13
Residential and Mixed-Use Projects in MEMU, SD-84, and SP-2 Districts

<i>Project Name</i>	<i>Project Type</i>	<i>Total Units / Affordable</i>	<i>Affordable Income Limit</i>	<i>Status</i>
MEMU				
AMCAL First Street	100% Stand-Alone MFR-	Total: 69 Afford: 68	60% AMI	Built (2019)
Nineteen 01	Mixed-Use	Total: 264 Afford: 10	80% AMI	Built (2016)
Metro East Senior Housing	Mixed-Use	Total: 418 Afford: 415	50-60% AMI	Built (2021)
The Orchard	100% Stand-Alone MFR-	Total: 72 Afford: 71	60% AMI	Built (2018)
AMG East First Apts./1st Point One	Mixed-Use	Total: 552 Afford: 552	30-60% AMI	Under Const. (2022)
SD-84				
Terraces at Santiago	100% Stand-Alone MFR	Total: 36 Afford: 35	30-50% AMI	Built (2013)
Depot at Santiago	Mixed-Use	Total: 70 Afford: 69	30-60% AMI	Built (2018)
Triada at the Station	Mixed-Use	Total: 74 Afford: 73	30-50% AMI	Built (2013)
Triada at the Station	100% Stand-Alone MFR	Total: 40 Afford: 39	30-50% AMI	Built (2013)
Legacy Square	Mixed-Use	Total: 93 Afford: 92	60% AMI	Under Const. (2023)
5th & Porter Street Condos	100% Stand-Alone MFR	Total: 8	Market Rate	Built (2015)
Lacy Crossing Development	100% Stand-Alone MFR	Total: 117	Market Rate	Under Const. (2023)
City Ventures @ Santa Ana/Garfield	100% Stand-Alone MFR	Total: 17	Market Rate	Built (2014)
SP-2				
Andalucia	100% Stand-Alone MFR	Total: 70 Afford: 69	50-110% AMI	Built (2017)
Heroes' Landing	100% Stand-Alone MFR	Total: 75 Afford: 75	30% AMI	Built (2020)
North Harbor Village	100% Stand-Alone MFR	Total: 89 Afford: 89	30% AMI	Under Const. (2022)
Santa Ana Collection	100% Stand-Alone MFR	Total: 80	Market Rate	Built (2017)
KB Lotus in Santa Ana	100% Stand-Alone MFR	Total: 35	Market Rate	Built (2018)
Harbor Collection Community	100% Stand-Alone MFR	Total: 38	Market Rate	Built (2018)

Source: City of Santa Ana, 2022.

BUILDING CODES AND ENFORCEMENT

Santa Ana enforces building codes, property maintenance standards, on- and off-site improvement requirements, and other sections of the



municipal code to ensure quality housing and neighborhoods for residents. Although building codes and improvement requirements do raise construction costs, the public interest is best served when buildings adhere to proper construction and engineering practices and neighborhoods have appropriate infrastructure.

Building Codes

The State of California Health and Safety Code (§ 17958) mandates that the California Building Standards Commission adopt and publish the California Building Standards Code every three years. These codes contain the latest advances in construction practices and engineering concepts. The 2019 edition of the California Code of Regulations, Title 24, became effective on January 1, 2020.

As required by state law, local governments must adopt these codes by a specified date, but may make amendments to address local geological, climatic, or topographical conditions provided the modifications are no less restrictive than the state standards. The City has adopted the most recent building codes to reflect the latest advances in construction technology and building practices. Table B-14 lists the City's adopted building code standards.

**Table B-14
Building Code Standards**

<i>Code Types</i>	<i>Adopted Building Code</i>
Building/Dwelling Code	2019 California Building Code / 2019 Residential Building Code
Plumbing Code	2019 California Plumbing Code
Mechanical Code	2019 California Mechanical Code
Electric Code	2019 California Electrical Code
Fire/Life Safety	2019 California Fire Code
Structural	2019 California Building Code
Accessibility	2019 California Building Code
Energy Code	2019 California Energy Code
Historical Code	2019 California Historical Code
Existing Building Code	2019 California Existing Building Code
Solar Code	2019 California Energy Code
Property Maintenance	2018 International Property Maintenance Code

Source: Santa Ana Municipal Code, September 2021.

The Building and Safety Division made modifications to the 2019 edition of the California Building, Residential, Plumbing, Mechanical, Electrical, Fire, and Building Codes that are reasonably necessary due to local conditions in Santa Ana and are found within Chapter 8, Buildings



and Structures, of the SAMC. Amendments adopted pertain to seismic concerns, drainage issues, soil conditions, humidity, and fire hazards in the city. Other modifications of an administrative or procedural nature were made. These amendments do not impose a constraint to housing development.

Code Enforcement

The City enforces code compliance to promote property maintenance in accordance with the city's zoning and building ordinances and State and County health codes. Like most cities, the City's Code Enforcement Division receives and investigates complaints regarding alleged violations. Properties that receive citations or notices for correction are provided with information on how to address such violations. Most cases deal with issues such as inoperable vehicles, poor property maintenance, debris accumulation, and inappropriate storage of vehicles or materials. The Code Enforcement Division works closely with property owners to resolve such violations. Code Enforcement inspectors proactively guide property owners through the code complaint process. The City also proactively applies and monitors the availability of grants to provide funding for housing repairs. Enforcement activities are necessary for the public health, safety, and welfare of Santa Ana residents and are an important tool to maintain the quality of the city's housing stock and do not constrain housing development in the city.

Overcrowding

Section 41-192 of the SAMC prohibits residential overcrowding. Pursuant to *Briseño v. City of Santa Ana* 6 Cal. App. 4th 1378(1992), the court held that this ordinance was "invalid," which deprives it of legal force. However, there was no order to repeal SAMC 41-192. The court in *Briseño* interpreted the occupancy limitation ordinance as "invalid" pursuant to the Uniform Housing Code (UHC) and state law, which preempted the City of Santa Ana's local ordinance. The court held that in order to validate the ordinance, the City was required, under UHC § 17958.7, to provide findings that a departure from the standards set forth in the UHC occupancy limitation was necessary. The City of Santa Ana affirms the ordinance is nonoperative.

ON-AND OFF-SITE IMPROVEMENTS

On- and off-site improvements are important components of new development and ensure public safety and quality of life. The City sets requirements through the General Plan, Municipal Code, and through conditions of approval set on a development or subdivisions as set forth in Chapter 34, Subdivisions, of the SAMC. Common improvements



include grading and street work, curbs and gutters, sidewalks, drainage, fire hydrants, street trees, lighting, and water and sewer lines.

While most required improvements are provided through subdivision approvals, some improvements apply to all development projects, such as curb, gutter, and sidewalks; streetlights and street trees; and landscaping. Such improvements are typical for urbanized, built-out communities with aging infrastructure. Dedications may be required for projects abutting a street to dedicate land and improve portions of the lot in order to meet the standards of the ultimate street design. Typical street widths in Santa Ana are shown in Table B-15.

**Table B-15
Required Street Widths**

<i>Street Classification</i>	<i>Number of Lanes</i>	<i>Right of Way Width</i>	<i>Sidewalk Width</i>
Principal Arterial	8 Lanes	124 feet	Both 10 feet
Major Arterial	6 Lanes	100 feet	Both 10 feet
Primary Arterial	4 Lanes	80 feet	Both 10 feet
Secondary Arterial	4 Lanes	60 feet	Both 10 feet
Collector Street	2 Lanes	40 feet	Both 10 feet
Local Street	2 Lanes	40 feet	Both 8 feet

Flexibility in street standards, access requirements, minimum lot sizes, and setbacks can be provided through the establishment of an SD zoning district. Furthermore, in 2018, the City adopted a small lot subdivision ordinance to encourage the development of fee-simple home ownership opportunities (SAMC Chapter 41, Article XX). The ordinance allows for small lot subdivisions with a minimum lot size of 1,000 square feet, for reduced street frontages, access and setbacks, for creative driveway designs, and for greater lot coverage in certain parts of the City.

The cost of all improvements enumerated are borne by the developer, except such improvements of a type, size, or quality over and above the standards required to service the project, and where the City Council has enacted provisions for the City to bear that portion of the costs for such installations required in order to serve additional areas. The cost of on- and off-site improvements have not been a constraint to the development of housing in Santa Ana.

PERMIT PROCESSING

Santa Ana is committed to ensuring that residential developments are of lasting value, provide a decent and quality living environment for residents, and improve property values. The City's development review process is designed to ensure that residential projects meet these objectives. Although the process adds to the length of time to approve a



Design Solutions
Recognizing the need to balance the City's housing goals with neighborhood stabilization and revitalization goals, and provide for a quality living environment, the City adopted Citywide Design Guidelines in 2006.

The Design Guidelines provide specific guidance (objective standards where possible) and graphics to illustrate the preferred and discouraged methods of planning, neighborhood design, and construction. Topics include:

- Site Planning, Compatibility, Lot Design
- Open Space and Landscaping
- Lots and Buildings
- Architectural Design

project, the City is charged with the responsibility of ensuring that residential projects are decent, safe, and well designed. This process and the time frames are described below and summarized in Table B-16.

Initial Submittal

The development review process begins with submittal of the development application. The initial submittal may be preceded by an initial consultation with the Planning and/or other departments. The City of Santa Ana has a "First Look" process that allows applicants to meet with a Senior Planner prior to submitting a formal Development Project Review application in order to discuss major project issues and consistency with policies and development standards. The First Look process was established to enhance the efficiency of the Development Project Review process, where a more formal response to the proposed project is made. This process takes about one to two weeks.

Development Project Review

All discretionary applications and new construction projects over 2,500 square feet must submit a Development Project Review (DP) application. The DP process is an administrative review process that entails the review of project submittals for consistency with the General Plan, City standards, and codes by the Development Review Committee (DRC), comprised of representatives from the Planning, Building, Public Works, Police, and Fire departments. The project is reviewed by the committee, and the applicant receives a list of comments, potential conditions of approval, if applicable, and a preliminary staff recommendation. The DP review typically takes four weeks to complete.

Design review is a component of the DP process. The applicant submits the appropriate elevations, architectural treatments, site layout, and any other design aspects to the City. The materials are sent to Planning Staff and the DRC to evaluate the project's consistency with adopted residential and mixed-use design standards. The City's design standards provide quantitative, written, and illustrations of preferred design treatments and concepts to incorporate in residential projects. Because design review is incorporated into the DP process and written, objective standards are available to the project applicant, the design review process is not considered a constraint to the development of housing.

Environmental Review

City staff initiates the environmental review for all discretionary projects, as required by the California Environmental Quality Act (CEQA) and implementing Guidelines. The City prepares or oversees the preparation of an environmental assessment for any project that is not exempt from CEQA. This assessment may involve a Negative



Declaration or Mitigated Negative Declaration for projects that either have no effect on the environment or can be conditioned to have no impact. In cases where a significant environmental impact may occur, an Environmental Impact Report (EIR) is required. The general time frame is one month for a Negative Declaration, six months for a Mitigated Negative Declaration, and one year for an EIR.

Discretionary Actions

Variances, zone changes, general plan amendments, conditional use permits, tract and parcel maps, minor exceptions, Site Plan Review (SPR), and all other discretionary actions require a public hearing before the City Zoning Administrator, Planning Commission, and/or City Council. The Zoning Administrator has delegated authority from the Planning Commission to grant certain variances, conditional use permits, and minor exceptions. Discretionary approvals are also required for the proposal and approval of Specific Development Districts. From submittal of application to the City Council or approval body is two to three months. The approving body may approve, conditionally approve, or deny a permit application after making certain findings pursuant to the SAMC. Typical conditions of approval include adjusted hours of operation, security, loading requirements, and management. Conditions are consistent throughout all uses and do not constrain housing development.

SPR applications, as noted previously, are required for certain housing developments in MEMU, TZC, and SP-2. The SPR process is the same as other discretionary actions noted above. The SPR process is also not a constraint on the development of housing because approval is only subject to conformity with all adopted standards of the zone and the goals, policies and objectives of the adopted zoning document and General Plan, including the Housing Element. The approving body's discretion on SPR applications is limited; it reviews the project to ensure the site plan and building(s) are consistent with the governing zoning document development standards, such as setbacks, height, lot coverage, floor area ratio, parking, and landscaping.

Table B-16 provides a summary of the City's development permit processing steps and the associated time frames to process a prototypical single-family, condominium, and multiple-family residential product. Permit processing times vary from two months to ten months, depending on the complexity of the project and associated environmental clearance required.



Table B-16
Permit Processing Timeframe for Housing Projects

<i>Permit Processing</i>	<i>Single-Family Residence</i>	<i>Condominium</i>	<i>Multiple-Family Residence</i>
Initial Submittal	2 to 4 weeks	N/A	N/A
Development Project Review	N/A	4 weeks to 3 months	4 weeks to 4 months
Discretionary Actions	None typically	2 to 3 months	2 to 3 months
Environmental Review	N/A	3 to 8 months	3 to 8 months
Total	2 months	7 to 12 months	7 to 12 months

Source: Santa Ana Municipal Code, September 2021.

Note: Single-family projects are assumed to require minimal, if any, environmental review; condos and multiple-family projects typically require subdivision maps and greater environmental review.

DEVELOPMENT FEES AND EXACTIONS

The City of Santa Ana charges processing fees and exactions to recover the costs of providing services to new development. Development fees are designed to ensure that developers pay a fair, pro rata share of the costs of providing infrastructure, and to compensate for processing development application. Regional entities also charge development impact fees to cover the costs of providing schools, sanitation, and regional transportation improvements. Table B-17 displays the planning fees for typical city permits and actions.

Table B-17
Planning Division Fees in Santa Ana

<i>Planning Service</i>	<i>Fee</i>
Development Project Review	
0 – 999 SF	\$5,039.98 + \$6.16 per additional SF in range
1,000 – 1,900 SF	\$6,179.78 + \$4.55 per additional SF in range
2,000 – 4,499 SF	\$10,373.53 + \$2.57 per additional SF in range
\$4,500 – 9,999 SF	\$17,219.06 + \$1.46 per additional SF in range
10,000 – 19,999 SF	\$25,335.62 + \$0.81 per additional SF in range
20,000 – 49,999 SF	\$33,453.64 + \$0.30 per additional SF in range
50,000 – 99,999 SF	\$42,130.46 + \$0.17 per additional SF in range
100,000 or more SF	\$50,497.33 + \$0.07 per additional SF
Environmental Review	
Categorical Exemptions	\$683
Negative Declaration without Traffic Study	\$8,577
Negative Declaration with Traffic Study	\$78,089
Environmental Impact Report	\$119,603



Table B-17
Planning Division Fees in Santa Ana

<i>Planning Service</i>	<i>Fee</i>
Other Actions	
New Single-Family Residence Review	\$1,593
Accessory Dwelling Unit Review	\$2,421
Discretionary Land Use Actions	
Change of Zone or District	\$5,722
Conditional Use Permit	\$6,151
Development Agreement/Review	\$14,372
General Plan Amendment	\$10,310
Parcel Map (Tentative)	\$4,962.02 + \$21.12 per lot
Tract Map (Tentative)	\$5,365.47 + \$21.12 per lot
Actions to Allow for Flexible Standards	
Lot Line Adjustment	\$1,465
Minor Exception	\$2,841
Specific Development Zone	\$18,221
Variance	\$5,967

Source: City of Santa Ana Planning Division Fees, September 2021

Cumulative Cost

City staff compiled the fees for four prototypical projects—a duplex, an 18-unit condo project, a 266-unit apartment project, and a mixed-use development with 552 affordable units and 10,000 sq. ft. of commercial space. As shown in Table B-18, total fees for the residential projects ranged from \$19,398 to \$46,370 per unit. It should be noted that a significant percentage of the per-unit fee is due to charges from other agencies. The City makes a concentrated effort to waive fees for affordable housing projects. Therefore, residential development fees are not a constraint to the production of affordable housing.

Table B-18
Residential Development Fees in Santa Ana

<i>Permitted Housing</i>	<i>Product Types¹</i>			
	<i>Van Ness Duplex</i>	<i>Edinger 17-Unit Condo</i>	<i>Legacy 226-Unit Apart.</i>	<i>AMG First Point Mixed-Use (552 Affordable Units)</i>
City Development Fees				
Building Fees	\$17,607	\$65,982	\$382,454	\$1,327,504
Planning Fees	\$18,797	\$45,190 ²	\$137,225 ³	\$116,269 ⁴
Public Work Fees	\$10,410	\$20,820	\$102,783	\$78,458
City Impact Fees				
Park Fees	\$12,830	\$104,153	\$902,749	\$3,058,433
Sewer	\$2,940	\$24,941	\$194,677	\$927,733
Drainage	\$1,627	\$0	\$0	\$0
TSIA, Residential MFR	\$0	\$34,764	\$258,170	\$398,967
Fire Facility Fee	\$0	\$0	\$247,928	\$664,575



**Table B-18
Residential Development Fees in Santa Ana**

<i>Permitted Housing</i>	<i>Product Types¹</i>			
	<i>Van Ness Duplex</i>	<i>Edinger 17-Unit Condo</i>	<i>Legacy 226-Unit Apart.</i>	<i>AMG First Point Mixed-Use (552 Affordable Units)</i>
Regional Impact (Other Agency)				
School Fees (\$3.20/sf)	\$16,166	\$101,132	\$844,012	\$2,700,000
Orange County Fire Authority	\$626	\$1,992	\$8,325	\$10,256
Orange County Sanitation District	\$11,548	\$87,837	\$617,135	2,032,562
SMIP - State Seismic	\$143	\$1,464	\$1,680	\$38,119
Federal Clean Water	\$2,706	\$5,413	\$8,124	\$20,699
State Building Stds	\$44	\$1,464	\$1,680	\$6,201
Transportation Corridor Fee	\$0	\$0	\$602,064	\$1,092,804
Total Fees per Unit				
Total Fees	\$92,739	\$495,154	\$4,383,944	\$12,472,585
Total Fees Per Unit	\$46,369	\$29,126	\$19,397	\$22,595
City Fees Only Per Unit	\$32,106	\$17,403	\$9,849	\$11,182
Other Agency Fees Per Unit	\$14,263	\$11,723	\$9,548	\$10,689

Source: City of Santa Ana, September 2021.

1. Projects based on samples obtained from planning and development staff.
2. Project required a Mitigated Negative Declaration & General Plan Amendment.
3. Project required a Mitigated Negative Declaration, General Plan Amendment, and Zone Change.
4. Project required a Site Plan Review application, Density Bonus Agreement, and a Parcel Map.

Transparency in the Development Process

To increase transparency and certainty in the development application process as required by law, the City has a variety of tools available for developers. The City's Planning and Building Agency web page provides links to planning applications, building applications, the online permitting system, and an appointment scheduler. As a part of the Planning Division, web pages provide links to items such as the Municipal Code, zoning maps, fee schedules, and other useful information available to the public. These resources and others for developers and residents can be found at the following links:

- <https://www.santa-ana.org/pb>
- <https://www.santa-ana.org/pb/planning-division>
- <https://www.santa-ana.org/pb/building-safety-division>



HOUSING FOR PEOPLE WITH DISABILITIES

Government Code § 65008 requires localities to analyze the constraints on housing for persons with disabilities in their housing elements. The following section addresses the assessment of potential constraints and programs included to remove or mitigate constraints to housing for persons with disabilities.

Building Codes

The City has already removed some potential constraints to housing by adopting the California Building Code, 2019 edition, including Appendix 1, based on the 2018 International Building Code, which requires sites, facilities, and buildings to address accessibility requirements. The City has the authority to enforce accessibility laws and regulations (California Code of Regulations Title 24) when evaluating new construction requests.

The aging of the nation's population has underscored the need to make housing accessible to people with different ranges of abilities. The building industry has responded by developing various housing accessibility standards. One such approach, referred to as "visitability," is intended to make housing more accessible to people who have trouble with steps or who use wheelchairs or walkers. A house is considered "visitable" when it meets three requirements: one zero-step entrance, doors with 32 inches of clear passage space, and one bathroom on the main floor accessible by a wheelchair.

Given that most housing in Santa Ana was built prior to the enactment of federal and state accessibility guidelines, many homes were not designed with visitability concepts. As part of rehabilitation loan programs, the City's housing rehabilitation programs can fund wheelchair ramps, wider doors, grab bars, lower counter tops, and other rehabilitation projects for persons with disabilities or with limited mobility. As part of its Housing Plan (Program 36), the City will offer incentives to developers who incorporate accessibility components in the construction or rehabilitation of housing. For existing homes, the City will implement its reasonable accommodation ordinance.

Land Use and Zoning

Land use and zoning are often cited as potential constraints to the provision of special needs housing. The City is committed to facilitating a broad range of housing types as required under state law. This includes community care facilities. The Zoning Code does not explicitly address care homes serving six or fewer residents, but the City's long-standing practice is to permit them as a by-right use in all residential zones and



in conformance with state laws. The City's Zoning Code permits care homes serving seven or more clients in the R2, R3, R4, and commercial zones, subject to a conditional use permit. No unique spacing/concentration requirements are imposed on care homes.

SB 520 also references the need for an analysis of local occupancy standards that apply specifically to unrelated adults and not to families. The Zoning Code does not have occupancy standards that treat families differently than unrelated adults. Furthermore, there is no definition of family in the Zoning Code that defines the number or type of members that can constitute a family. Although Section 41-192 of the Municipal Code prohibits residential overcrowding, the courts ruled in *Briseño v. City of Santa Ana* (6 Cal. App. 4th 1378[1992]) that the ordinance was invalid pursuant to the Uniform Housing Code. The City affirms that the ordinance remains nonoperative.

Permitting Process

Santa Ana processes a request to retrofit homes for accessibility modifications over the counter in an administrative fashion. The City permits licensed residential care homes with six or fewer persons as a by-right use in all single-family zones. The City does not have a set of particular conditions or use restrictions for residential care homes with more than six persons, except for a conditional use permit. Care homes that require a CUP follow the same noticing and public hearing requirements as other uses, as noted on Pages B-43 to B-45.

The Housing Element continues Programs 35 and 36 to clarify implementation of the Zoning Code and further fair housing for residents with special needs. In these programs, the City will continue to monitor changes in state law and will update the Zoning Ordinance as necessary with respect to care facilities, the rehabilitation of housing, and maintenance of the reasonable accommodation ordinance.

With regards to residential care homes, a CUP is required in the R-2, R3, and R-4 residential zones for more than six persons. Care homes are also allowed within certain specific plans/developments such as SP-2. While the City has approved various CUP applications for residential care homes over the years, the CUP process may pose a constraint to the development of housing for persons with disabilities. Through Program 35, the City will conduct a comprehensive analysis of the Care Home Ordinance to identify constraints and amend the zoning code to alleviate such constraints and ensure barrier-free housing choices for persons with disabilities. Amendments may include the elimination of the CUP process for large care homes and requiring just an administrative DP application.



Reasonable Accommodation

In 2010, Santa Ana adopted a process for disabled persons to request reasonable accommodation from zoning, permitting procedures, administrative, or building requirements. The City recognizes the importance of reducing barriers to the provision of adequate housing for disabled persons and has a reasonable accommodation ordinance (Programs 36). The City's reasonable accommodation information is available at City Hall and on the City's website.

The reasonable accommodation process is outlined in SAMC §§ 41-652 through 41-658. The decision to grant, grant with modifications, or deny an application for reasonable accommodation by the review authority is based on findings of consistency with state and federal laws and taking into consideration all of the following factors:

- (1) Whether the housing or housing related facilities, which are the subject of the request, will be used by an individual with a disability under the Acts;
- (2) Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability under the Acts;
- (3) Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the city;
- (4) Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a city program or law, including but not limited to land use and zoning;
- (5) Whether the requested reasonable accommodation would be contrary to the public health, safety, or welfare, or be injurious to the property or improvements of adjacent properties;
- (6) Whether the requested reasonable accommodation adequately considers the physical attributes of the property and structures;
- (7) Whether alternative reasonable accommodations could provide an equivalent level of benefit; and
- (8) Whether the property is in compliance with the then existing laws and regulations otherwise applicable to the property that is the subject of the request. If any noncompliance is



HOUSING CONSTRAINTS

through no fault of the applicant or unrelated to the request for reasonable accommodation, the executive director may waive this requirement. However, such a waiver shall not preclude the City from requiring that the existing violations be corrected in accordance with the SAMC.

In accordance with state law, this process is ministerial unless the decision is appealed.

Through Program 36, the City will re-evaluate its Reasonable Accommodation ordinance and process to ensure compliance with the Federal Fair Housing Acts and the California Fair Employment and Housing Act, amend the ordinance as required, and remove Factor No. 8.



ENVIRONMENTAL FACTORS

This section discusses the various environmental factors in relation to the production, maintenance, and improvement of housing in Santa Ana. These include environmental hazards, infrastructure issues for water and sewer, and opportunities for energy conservation.

ENVIRONMENTAL HAZARDS

Natural Hazards

Like the entire Southern California region, Santa Ana is in an area of high seismic activity. Although no active fault traces cross the city, Santa Ana's close proximity to five major fault zones subjects it to surface rupture, ground shaking, and ground failure. Several of Santa Ana's public buildings have undergone rehabilitation to reduce seismic risk. Flooding is also a consideration for several areas in Santa Ana. The principal watercourse traversing the city is the Santa Ana River, and Santiago Creek is the main tributary located at the northern part of the city. With the Prado Dam improvements to the flood control system, only a small portion of the northwest area of the city and an area adjacent to the Santiago Creek are subject to the 100-year floodplain.

Man-Made Hazards

Certain land uses in Santa Ana use hazardous materials or pose fire hazards. The majority of hazardous materials are on industrially zoned land or in commercial development that either sells or uses such materials. According to the CalEPA EnviroScreen, no sites have hazardous materials that would impact the ability to construct new housing on sites discussed in Appendix C. Since the City of Santa Ana is largely developed, there is minimal potential for fire related to brush or other natural materials. Fire hazards within the city may be associated with heavy industrial uses, older commercial and residential structures, overcrowding in residential units, the presence of hazardous materials, and arson.

INFRASTRUCTURE CONSTRAINTS

According to the 2020 Urban Water Management Plan and 2016 Sewer Master Plan, the existing infrastructure system is well developed and largely sufficient on a citywide basis. Current and projected deficiencies are primarily a result of recent growth and development pressures within the city, although increased consumption by existing customers is also a factor. The following provides a citywide discussion of infrastructure systems. A more focused analysis on areas of potential residential growth can be found in the land inventory discussion.



Water Infrastructure

The sole source of water for Santa Ana is a municipally owned system operated by the Santa Ana Public Works Agency. Santa Ana is a member of the Metropolitan Water District and receives approximately 25 percent of its water supply from northern California via the State Water Project and the Colorado River via the Colorado River Aqueduct. The City of Santa Ana receives the remaining 65 to 70 percent of its water supply from groundwater wells accessing the Santa Ana River groundwater basin.

The City's 2020 Urban Water Management Plan (UWMP) indicates that existing water supplies and planned capacity improvements are sufficient to meet anticipated water demands. Therefore, on a citywide level, the availability of an adequate supply of water is not a constraint to the production of housing. The UWMP also did not indicate the presence of undersized water mains that would preclude the development of housing in the community. Adequate fees are in place and revised to maintain, repair, and replace water mains as necessary.

Sewer Infrastructure

The City of Santa Ana maintains approximately 409 miles of local sewer lines. Main sewer trunks within the City of Santa Ana are owned and maintained by the Orange County Sanitation District (OCSD), which provides sewage collection and treatment service. The City's sewage is diverted to Reclamation Plant Number 1 in Fountain Valley. The Reclamation Plant has a design capacity of 204 million gallons per day (gpd). OCSD requires all developers of residential projects within its service area to pay capital facility charges that are designed to fund the construction, maintenance, and improvement of facilities.

The 2020 Sewer System Master Plan states that, in general, the capacity of the major sewers is adequate under dry weather flow conditions. Additional surcharging would be expected during most rainfall events. Under extreme peak wet weather flow conditions, expected to occur less than once in five years, more sewers will surcharge and a few of the worst may overflow.

The Sewer Master Plan lists the recommended interceptor improvements and their associated planning level costs. Projects on OCSD trunk sewers are not included in the list, as those projects are not the responsibility of the City (Sewer System Master Plan, Executive Summary). To date, many sewer infrastructure improvements have been completed since the 2003 Sewer System Master Plan that have alleviated some of the worst conditions, and additional capacity projects are planned for construction, as noted in 2016 Sewer System Master Plan.



ENERGY CONSERVATION

Rising energy costs, dependence on fossil fuels, and increasing evidence of the adverse impacts of global warming have provoked the need in California and nationwide to improve energy management strategies. Recognizing that the design, construction, and operation of buildings have a profound impact on energy use and global warming, state housing element law requires an expanded analysis of the opportunities for energy conservation.

State Requirements

On a regulatory level, the City enforces the 2019 California Energy Code (California Code of Regulations, Title 24). The 2019 California Energy Code focuses on residential photovoltaic systems, thermal envelope standards, and nonresidential lighting requirements. Homes built under this code are about 53 percent more energy efficient than those built under the 2016 Energy Code. Nonresidential buildings are expected to use about 30 percent less electricity due to lighting upgrades.

Green Building Programs

In response to an increased understanding of the relationship between buildings and impact on the environment, the building industry has developed “green” building programs. The two most prominent green building programs are California Green Builder, sponsored by the California Building Industry Association, and Leadership in Energy and Environmental Design (LEED), sponsored by the US Green Building Council (USGBC).

- **Green Builder** is a voluntary environmental building and certification program for homes. The program focuses on energy efficiency, water conservation, wood conservation, advanced ventilation, and waste diversion. Certified homes incorporate water-efficient landscaping and fixtures, utilize high-efficiency insulation and ventilation systems, contain environmentally sound building materials, initiate waste reduction methods during construction, and exceed Building Code energy efficiency standards by 15 percent.
- **LEED** is a national rating system for green buildings that focuses on commercial and multiple-family residential projects. The USGBC reviews projects for conformance and assigns points based on various efficiency, sustainability, materials quality, and design factors. Once LEED has reviewed the project, a certification is issued based on the number of points achieved. The City has 30 projects



registered with the USGBC, including the LEED Platinum ABC Home 1.0 project at 2238 South Flower Street, Santa Ana, CA 92707.

City Programs

Santa Ana has established its Santa Ana Green Program, supported by the Environmental Transportation Advisory Committee, which promotes good environmental practices through a variety of efforts. The following highlights a few ways the City is promoting energy resource conservation:

- **Climate Protection Initiative.** The City participates in the US Mayors Climate Protection Agreement, which strives to meet or exceed the Kyoto Protocol targets through actions ranging from antisprawl land-use policies to urban forest restoration projects to public information campaigns.
- **Tree Program (Tree City USA).** The City is recognized as a Tree City USA, which signifies that the City has established a Tree Board, a Tree Care Ordinance, and a Community Forestry Program with an annual budget of at least \$2 per capita. Trees also help clean the air and soil, control noise pollution, slow stormwater runoff, provide shade, and increase property values.
- **Water Conservation Initiative.** The City educates residents on water conservation opportunities, provides high-efficiency water conservation devices in public facilities, provides water conservation incentives to residents, uses reclaimed water to commercial and industrial users for irrigation or processes, and works with regional water purveyors on a variety of conservation efforts.
- **Recycling Programs.** The City continually surpasses the State of California's recycling goals through the implementation of several successful programs. These programs include residential curbside recycling, multiple-family recycling, construction and demolition recycling, composting, and annual household hazardous waste collections.

Taken together, the City's programs help to conserve water, encourage recycling and divert waste from the landfill, encourage alternative energy sources and lower energy use, and conserve water resources. The Housing Element proposes expanding these initiatives in conjunction with the City's 2021 Climate Emergency Action Resolution to further policies and programs to accelerate the transition to clean energy and reduce use of fossil fuels.



Housing Resources

This chapter provides an analysis and assessment of the City's resources to address its housing needs, including the City's regional housing needs allocation.

OVERVIEW

The Regional Housing Needs Allocation (RHNA) is a fundamental part of the housing element and is intended to indicate how the City will provide housing for its existing and future residents. Compliance with this requirement is a fundamental part of achieving a housing element that is in compliance with state law. The City has taken a thoughtful and deliberate approach to address this requirement.

As Southern California's designated council of governments, the Southern California Association of Government (SCAG) develops a methodology to allocate, by income level, the region's share of statewide housing need to cities. This process is achieved as part of the regional Sustainable Communities Strategy (formerly the Regional Comprehensive Plan). Allocations are developed in coordination with the Orange County Council of Governments (OCCOG).

In allocating statewide housing needs among local governments, SCAG has developed a complex model that considers a wide variety of considerations. Under state law, SCAG is required to consider, among other things, the following factors: market demand for housing, employment opportunities, availability of suitable sites and public facilities, commuting patterns, a fair share adjustment, type and tenure of housing, loss of units in assisted housing developments, and an over-concentration of lower income households.

The City's RHNA allocated by SCAG is 3,095 housing units for the 2021–2029 planning period. Within this housing goal, the City is required to plan for four income and affordability goals: very low, low, moderate, and above moderate. The City's RHNA by affordability level is 586 units of housing affordable to very low-income households, 362 units of housing affordable to low-income households, 523 units of housing



affordable to moderate-income households, and 1,624 units of housing affordable to above moderate income households.

Additionally, the City of Santa Ana and the County of Orange entered into a joint powers agreement and transfer agreement of RHNA allocations to jointly develop an affordable housing project known as the Crossroads at Washington (85 affordable units and one manager’s unit), which comprises two adjacent parcels. One parcel is owned by Santa Ana’s Housing Authority and the other is owned by the County of Orange. As a result of that agreement, Santa Ana’s final RHNA allocation includes 42 additional units, 20 of which are in the very-low-income category, and 22 are in the moderate-income category.

Table C-1 details the RHNA for Santa Ana for the 2021-2029 period.

**Table C-1
Regional Housing Needs Allocation 2021–2029**

	<i>Very Low (0–50% of MFI)</i>	<i>Low (51–80% of MFI)</i>	<i>Moderate (81–120% of MFI)</i>	<i>Above Moderate (120% above MFI)</i>	<i>Total</i>
2021–2029 RHNA	586	362	523	1,624	3,095
County of Orange Transfer	20	0	22	0	42
Total 2021-2029 RHNA	606	362	545	1,624	3,137

Source: SCAG, 2021; City of Santa Ana, 2021.

It is important to note that local governments are not required to build housing or financially subsidize development of new housing. However, cities are responsible for ensuring that adequate sites are available during the planning period that are suitable for housing to be built at the RHNA. Moreover, appropriate programs must be in place to facilitate and encourage the production of housing commensurate with the RHNA. In accordance with state law, Santa Ana will use the following strategies to address the RHNA:

- **Accessory Dwelling Units.** Anticipated levels of accessory dwelling units permitted and built between July 1, 2021, and October 15, 2029.
- **Housing Development.** Housing units built and occupied (received a certificate of occupancy) between July 1, 2021, and October 15, 2029.



HOUSING DEVELOPMENT CREDIT

This section discusses the primary ways the City will comply with its RHNA: accessory dwelling units (ADUs) and pipeline projects. However, while ADUs and pipeline projects together meet the 2021-2029 RHNA, this appendix contains a section evaluating additional development opportunities on vacant and underutilized sites that are not being used to satisfy the RHNA, but are meant to highlight additional opportunities in the city to develop housing in the future.

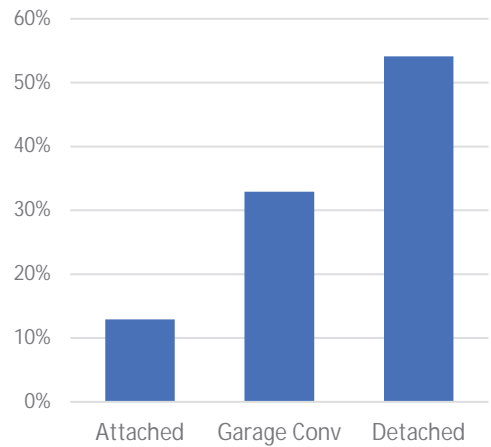
ADU PRODUCTION

ADUs will play a more substantial role during this planning cycle in producing affordable housing units due to increased public awareness and recent changes in legislation that has elevated the state's focus on ADUs as a tool for expanding the supply of affordable housing. ADUs come in many sizes and styles (see examples from Santa Ana, below).

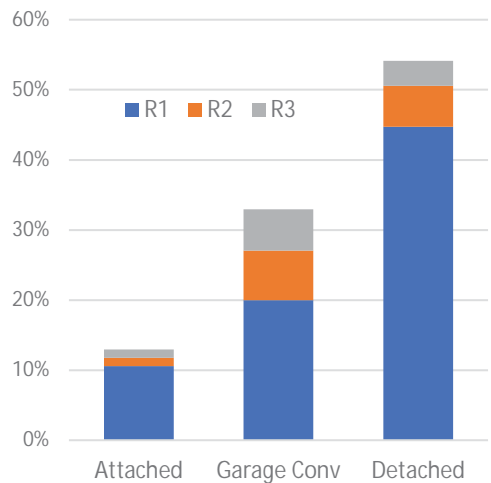


The City established its Accessory Dwelling Unit provisions in 2003. As required by state law, the City has been proactive in modifying its accessory dwelling unit ordinance. Due to changes in legislation in 2017 and 2018, the City updated its ADU ordinance in 2018 (Ordinance NS-2940), which incorporated amendments to state law. Subsequently, the City later amended its ADU ordinance (Ord. No. 2986) to address legislative updates that became effective January 1, 2020. Specifically, the ordinance addressed limits on regulating ADUs and Junior ADUs.

Santa Ana surveyed the type and location of ADUs to understand the demand for housing. As shown to the right, 54 percent of the units were detached products; 33 percent were garage conversions, and the remaining 13 percent were attached ADUs. JADUs are classified in any of these categories based on the unit location and specifications.



With respect to location, the majority of units were built in the R-1 zone, including historic districts. The second most frequent location is the City's R-2 zoning district. This demonstrates the observation that affordable units are being constructed throughout the city, from lower to higher income areas, furthering fair housing.



ADUs Approved by Type and Zone

SCAG surveyed ADUs across the region to gather rent and affordability data for different income groups. The survey found that 25 percent were affordable to very low-income households, 43 percent to low-income households, and 30 percent to moderate-income households. This is a conservative estimate given that Santa Ana has lower rents than many Orange County cities.

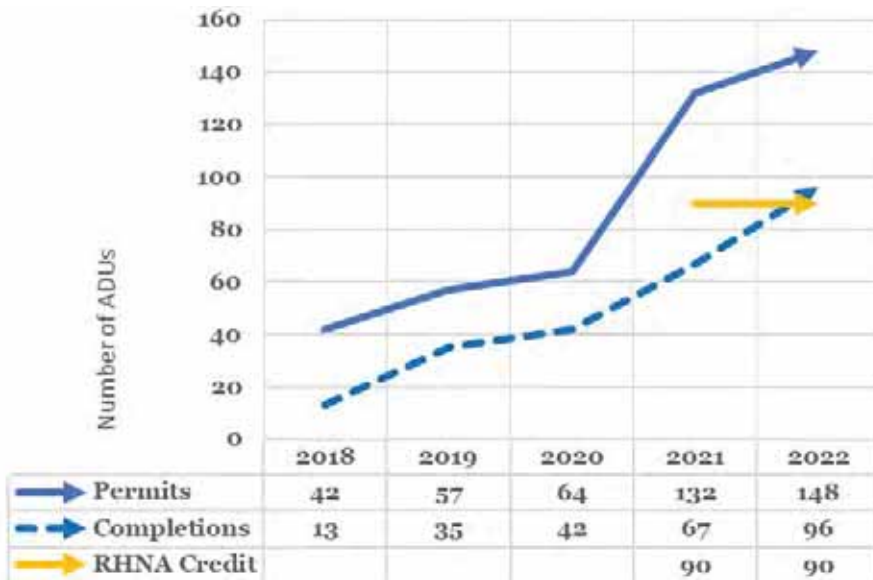
The City has seen a dramatic increase in the number of ADUs permitted and built each year since 2018, particularly following the amendment in 2020 that changed the standards for ADUs and allowed the development



of JADUs. Between 2018 and 2021, the City has seen year-over-year increases in both categories. In summary, ADU activity has increased each year—units receiving a building permit have increased threefold, and completions have increased sevenfold.

Past trends provide a reliable basis for projecting future building activity. Over the past 5 years (January 2018 through 2022—when extrapolating 2022 quarter year data for a full year), Santa Ana averaged the issuance of 90 ADU building permits and 50 ADU completions each year. Based on the year-over-year increase in permitting and development, the City assumes that a RHNA credit of 90 ADUs annually is reasonable given the level of activity. The affordability of the units is determined in accordance with SCAG’s survey of ADUs built in Orange County.

The City strongly believes that the ADU projection credit toward its 2021-2029 RHNA obligation remains exceptionally conservative given the year over year increases, especially since the City modified its ADU ordinance in mid-2020. Moreover, the City’s ADUs are predominantly affordable to lower income households, unlike many cities in south or north Orange County. Therefore, achieving the annual goal of permitting 90 ADUs for development in Santa Ana is realistic.



ADU Trends and Implications for RHNA Credit



To apply for an ADU, an applicant must complete the forms, demonstrate compliance with codes, and remit a planning fee for City staff to review the application. The City provides a web page that offers an application for ADUs, including a detailed submittal checklist at:

<https://www.santa-ana.org/documents/accessory-and-junior-accessory-dwelling-unit-application/>

In addition, ADU development standards are posted at:
<https://www.santa-ana.org/documents/accessory-and-junior-accessory-dwelling-unit-standards/>.

While fulfilling the 2021-2029 RHNA, the production of ADUs in Santa Ana also furthers fair housing goals. The City is able to facilitate the production of affordable options in all neighborhoods, including higher priced single-family residential neighborhoods. ADUs also expand affordable housing opportunities to special needs groups that are disproportionately lower income, such as seniors, people with disabilities, students, smaller families with children—not to mention providing opportunities for larger families to offer housing to relatives.

Looking forward, the City will continue to promote the development of (J)ADUs through Program 43 in the Housing Element to achieve its RHNA goals. Among other actions, the City is committed to:

- Monitor the level of production of ADUs every two years, and, if production levels fall below goals, take actions to increase production or find suitable sites to accommodate a shortfall.
- Publish preapproved ADU prototype plans to provide greater certainty and quality and reduce development costs
- Consider the feasibility of modifying fees or opportunities for funding to reduce the costs of developing ADUs.
- Market the ADU program through a dedicated web page on the City's planning website.
- Continue to review state law and periodically amend the City's ADU ordinance to mirror changes made to state law.

Taken together, the RHNA credit for the 2021-2029 housing element is 723 units, with affordability levels as follows: 181 very low-income units, 311 low-income units, 217 moderate-income units, and 14 above moderate-income units. These unit estimates are included in the next section detailing credit for the 2021-2029 RHNA.



HOUSING PIPELINE PROJECTS

The City of Santa Ana has a RHNA of 3,137 units for the 2021–2029 planning period. However, housing projects that have been approved, permitted, or received a certificate of occupancy after June 30, 2021 (pipeline), may be counted toward the current planning cycle. In total, there are 6,914 pipeline housing units. The types of housing units are varied and include single-family detached and attached, duplexes, townhomes, condominiums, apartments, permanent supportive housing, and accessory dwelling units.

The City's housing production record shown in the RHNA credit list also shows that residential projects are being built for a wide variety of household income levels. Of those, the pipeline residential projects are affordable as follows: 443 are for very low-income households, 701 are for low-income households, and 6 are for moderate-income households. These projects target seniors, families, large families, people with disabilities, and formerly homeless individuals and families.

Furthermore, a survey of rental rates of 1,500 recently built multifamily units reveal that housing units in the moderate-income affordability category are being produced without the need of a subsidy or restrictive covenant. Based on the survey results, approximately 4 percent of the units surveyed fall into this category. The survey results reveal that market factors alone are enough to create units in the moderate-income category, with the expectation that this trend will continue. Applying the 4 percent ratio that is drawn from the survey outcome to the total above moderate-income pipeline units (5,764) results in approximately 231 of those units being rented in the moderate-income category.

Collectively, through the projected ADUs, the pipeline housing units, and pipeline moderate-income units, three of the four RHNA allocation categories will be met with only the moderate income (remaining 91 units) remaining. A percentage of the total surplus 650 low-income housing units will be carried over to meet the remaining 91 units in the moderate-income classification. Additionally, Program 43 in the Housing Plan section will monitor ADU and pipeline project permits and affordability every two years to ensure assumptions and trends hold, and take appropriate actions, such as adjusting assumptions or identifying sites to accommodate housing, should they not.

Table C-2 provides a breakdown of the ADU projections and pipeline projects by affordability level by general area of Santa Ana.



**Table C-2
Pipeline Housing Projects**

<i>Projects</i>	<i>Project Status</i>	<i>Expected Completion Date</i>	<i>Affordability Level</i>				<i>Total</i>
			<i>Very Low</i>	<i>Low</i>	<i>Mod</i>	<i>Above Mod.</i>	
Pipeline Projects							
Metro East Mixed Use Overlay (MEMU)							
1. Central Pointe	Entitled	2027				644	644
2. Innovative Housing Opportunities Mixed-Use (South) Development	Project Review	2025		80			80
3. Innovative Housing Opportunities Mixed-Use (North) Development	Project Review	2025		80			80
4. Madison Project	Entitled	2027				260	260
5. AMG East First Apts. / 1st Point One	Under Construction	2022	56	491		5	552
6. Elan Mixed-Use Development	Under Construction	2023				603	603
7. The Westerly	Project Review	2026				86	86
8. Cabrillo Crossing	Project Review	2027			4	31	35
9. Cabrillo Town Center*	Project Review	2024				507	507
Transit Zoning Code (SD-84/TZC)							
10. Crossroads at Washington	Plan Check	2023	85			1	86
11. Midoros LLC Train Station Lofts	Finalized	2021				5	5
12. Legacy Square Mixed-Use Development	Under Construction	2023	75	17		1	93
13. Francis Xavier/ FX Residences	Under Construction	2025	16			1	17
14. 3rd & Broadway	Entitled	2028	19			152	171
15. 4th and Mortimer (Block A)	Entitled	2026				99	99
16. 4th and Mortimer (Block B)	Entitled	2026				70	70
17. First American Mixed-Use Development	Under Construction	2024	11			209	220
18. Lacy Crossing Development	Under Construction	2023				117	117
19. 4th and Grand	Project Review	2025	1			15	16
Harbor Corridor Plan (SP-2)							
20. North Harbor Village	Under Construction	2022	89			2	91
21. City Ventures Townhomes	Project Review	2025				23	23
22. John Le 5-Unit Development	Plan Check	2024				5	5
23. Bewley Townhomes 2	Plan Check	2025				17	17



**Table C-2
Pipeline Housing Projects**

<i>Projects</i>	<i>Project Status</i>	<i>Expected Completion Date</i>	<i>Very Low</i>	<i>Affordability Level</i>			<i>Total</i>
				<i>Low</i>	<i>Mod .</i>	<i>Above Mod.</i>	
24. Hue-Vo Two Unit Development	Project Review	2026				2	2
25. Fifth and Harbor Mixed-use Apartments	Entitled	2026				94	94
26. West Fifth Villas	Entitled	2024				8	8
27. 322 N Harbor	Project Review	2026		4		18	22
Midtown Specific Plan (SP-3)							
28. The Orleans Adaptive Reuse Apartments	Under Construction	2022				24	24
29. Broadway Live/Work Units	Under Construction	2024				3	3
30. WISEPlace	Entitled	2024	28				28
MainPlace Specific Plan (SP-4)							
31. MainPlace Residential Community	Under Construction	2025				309	309
Other Areas							
32. Lam Residential	Plan Check	2024				6	6
33. Civic Center Subdivision	Project Review	2023				6	6
34. Habitat for Humanity	Entitled	2024			2		2
35. Bewley Townhomes	Entitled	2024				10	10
36. Bui Development	Plan Check	2024				8	8
37. 610 Newhope Condos	Under Construction	2022				9	9
38. Nguyen McFadden Duplex Development	Project Review	2026				6	6
39. King Street Subdivision	Under Construction	2022				5	5
40. Westview Housing	Plan Check	2024	63	21		1	85
41. Saint Thomas 3-Lot Subdivision	Under Construction	2025				3	3
42. 2700 Main Street Apartments	Project Review	2028				312	312
43. Dante's North Olive Subdivision	Project Review	2027				4	4
44. One Broadway Plaza	Under Construction	2028				415	415
45. Craftsman Residential Duplex	Plan Check	2024				2	2
46. Haphan Housing	Plan Check	2026				18	18
47. Our Lady of Guadalupe Office/Residence	Plan Check	2024				1	1
48. Redhill/Warner	Entitled	2024				1,100	1,100
49. Legado at the MET	Plan Check	2028				278	278



**Table C-2
Pipeline Housing Projects**

<i>Projects</i>	<i>Project Status</i>	<i>Expected Completion Date</i>	<i>Affordability Level</i>				<i>Total</i>
			<i>Very Low</i>	<i>Low</i>	<i>Mod .</i>	<i>Above Mod.</i>	
50. Legacy Sunflower	Under Construction	2022				226	226
51. Warmington*	Project Review	2024		8		43	51
SUBTOTAL			443	701	6	5,764	6,914
Accessory Dwelling Unit Projection³							
Accessory Dwelling Units/Junior Accessory Dwelling Units - Citywide			181	311	217	14	723
Moderate-Income Pipeline⁴							
Moderate-Income Pipeline Units – Citywide					231		
RHNA Allocation by Affordability Category			606	362	545	1,624	3,137
Balance of RHNA to Accommodate			-18	-650	91	-3,923	-4,500

Source: City of Santa Ana, 2021.

Notes:

1. Pipeline projects include projects approved, permitted, or received a certificate of occupancy after June 30, 2021. Affordability levels for pipeline projects are all based on covenants and affordability restrictions that are part of project application or entitlement.
2. Project Status indicates where in the development process a project is at the time of publishing of this Element. The development project sequence is generally as follows: 1. Development Project Review; 2. Entitlement; 3. Plan Check; 4. Permit Issuance/Under Construction; and 5. Constructed/Finished. Appendix B provides a description of the development process. None of the projects on the list require a zone change or general plan amendment.
3. The total ADU projection is based on the permitted five-year average of 90 (2018-2022; extrapolating quarter year permits for 2022 to a full year) ADUs per year, multiplied by the planning period in number of years. The affordable projections are based on the SCAG study on ADU affordability for Orange County that found the following affordability categories: 25 percent very low; 43% low, 30% moderate-income; and 2 percent above moderate-income.
4. Moderate-income pipeline unit totals taken from total above moderate-income pipeline units and reclassified as moderate income based on survey results. The 231 units that were reclassified appear in the SUBTOTAL for above-moderate-income but do not appear in the above-moderate-income category Balance of RHNA to Accommodate but have been carried over to the moderate-income category.

* Submitted through SB 330 application process.



LAND INVENTORY

The housing element must identify available sites in the city if the Housing Development Credit does not meet or exceed the RHNA allocation. Santa Ana's Housing Development Credit satisfies the 2021-2029 RHNA in its entirety. As such, this section highlights additional development opportunities on vacant and underutilized sites to further housing options in the community, but does not utilize these sites to satisfy the RHNA.

The following discussion identifies sites suitable for residential development, which includes vacant and underutilized land. The land is already zoned and designated to allow for residential development.

The discussion includes all of the following:

- A listing of properties by parcel number or other unique reference
- The size, general plan designation, and zoning of each property
- A general description of any environmental or infrastructure constraints to the development of housing within the jurisdiction
- A map that shows the location of the sites included in the discussion

In addition, the discussion includes determining the capacity of the identified sites and their ability to accommodate affordable housing. To determine capacity, the analysis demonstrates that the identified zone/densities encourage and facilitate the development of housing for lower income households through an evaluation of market demand and trends, financial feasibility, project experience, and adopted density standards that allow at least 30 dwelling units per acre, in line with state law requirements for accommodating lower income households.

For underutilized land, the housing element also includes a description of the existing use of each property, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on the sites.

Lastly, in October 2021, the City conducted a survey of underutilized land with potential for redevelopment. The survey addressed the following four site characteristics (note that this does not apply to vacant land):

- Building maintenance, including the condition of structural elements, roof materials, doors, and windows.



- Building aesthetics, including the types of materials, architectural style, and placement of structures on the lot.
- Site landscaping, including the condition of plants, amount or absence of landscaping, and presence of automatic irrigation.
- Parking lot, including the condition and type of impermeable surface, amount of parking provided, and presence/condition of walls or fences.

The survey ranked each characteristic on a four-point scale: no deterioration (four points); minor deterioration (three points); moderate deterioration (two points); substantial deterioration (one point); and dilapidated conditions (zero points). The values assigned for the four characteristics were then summed and averaged to create a score. In general, sites with an average score of less than 3.0 are considered in need of moderate or substantial rehabilitation and ripe for reinvestment or redevelopment.

The redevelopment potential of each site, however, is influenced by other factors, such as the age of the structure, proximity to other sites in need of rehabilitation, and the I/L ratio. In particular, the age of the structure is an important indicator. Structures built 30 or more years ago are more likely to need significant rehabilitation or structural repairs (e.g., seismic retrofitting). These needs can increase the costs of maintaining and upgrading a site to the point where it can be more profitable to sell and/or redevelop the site.

The following information is presented for each plan area where there exists development opportunities as follows:

- A brief **introduction** of the area and **map** of identified parcels
- A **table** listing key attributes for each parcel (See Table C-3)
- Discussion of the **adequacy** of sites to support residential development
- Analysis of the **capacity and financial feasibility** of the sites
- A description of **environmental or infrastructure** constraints
- A description of **incentives** designed to facilitate housing production



**Table C-3
Vacant and Underutilized Land Summary**

Map Key	Acres	APN	Maximum Permitted Density (du/acre)	Assumed Density (du/acre)	Potential Units ¹	Existing Conditions			Owner ⁴	I/L Ratio ⁵	Existing Zoning/GP
						Site Use	Year Built ²	Site Rating ³			
Harbor Corridor Plan											
1a	1.18	144-311-14	50	30	35	Auto sales services	<1970	2.5	A	0.00	SP2/UN
1b	0.29	144-311-15	50	30	9		1987	2.5	A	0.00	SP2/UN
Total:	1.47	—			44	—	—	—	—	0.00	—
2a	0.15	198-182-17	50	30	5	Auto service	No bldg.	1.25	A	0.03	SP2/UN
2b	0.15	198-182-18	50	30	5		No bldg.	1.5	A	0.03	SP2/UN
2c	0.30	198-182-19	50	30	9	Vacant	No bldg.	—	B	0.01	SP2/DC
2d	0.28	198-182-20	50	30	8	Vacant	1963	—	B	0.19	SP2/DC
2e	0.42	198-182-21	50	30	13	Vacant	1963	—	B	0.02	SP2/DC
2f	0.35	198-182-22	50	30	11	Vacant	1966	—	B	0.10	SP2/DC
2g	0.21	198-182-23	50	30	6	Vacant	<1964	—	B	0.03	SP2/DC
2h	0.12	198-182-24	50	30	4	Auto service	<1960	—	A	0.70	SP2/UN
2i	0.12	198-182-25	50	30	4		1961	1.75	A	0.70	SP2/UN
Total:	2.1	—			63	—	—	—	—	0.20	—
3	0.85	198-081-22	50	30	26	Vacant	No bldg..	—	A	0.00	SP2/DC
Total:	0.85	—			26	—	—	—	—	0.00	—
Transit Zoning Code											
1b	0.16	398-208-01	90	30	5	Parking lot	N/A	—	A	0.00	SD84/DC
1d	2.09	398-101-16	90	30	63	Warehouse/ Prkg Lot	1960	1.75	A	2.83	SD84/DC
Total	2.25	--			68			0.87	—	1.41	—

Source: City of Santa Ana, 2021 (GovClarity).

1. Based on multiplying 30 units per acre by the site acreage. Figures subject to rounding, so potential units by individual lot may not add to total potential units by site.
2. Year built data based on City building permit records.
3. Site conditions based on field survey (September 2021) and aerial evaluation.
4. Each letter corresponds to a distinct owner per site.
5. In the improvement-to-land-value (I/L) ratio column, a hyphen indicates zero improvement value. Values derived from SCAG HELPR 2.0 tool.

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HARBOR MIXED-USE TRANSIT CORRIDOR SPECIFIC PLAN

The Harbor Mixed-Use Transit Corridor Specific Plan (Harbor Corridor Plan) was adopted in 2014. The section of north Harbor Boulevard guided by this specific plan is a gateway to Santa Ana. Orange County's first bus rapid transit service (Bravo! operated by OCTA) opened Route 543 along Harbor Boulevard in June 2013, with two more BRT lines (Bristol/State College and Westminster/17th Street) expected to open in the coming years. A combination of vacant and underutilized land, current and future transit improvements, and nearby freeway access makes Harbor Boulevard ideal for new residential development.

The City has identified a potential of up to 4,600 units that could be built on 305 acres of land along Harbor Boulevard. The plan's focus on transit supports higher-density uses at transit nodes, with lower densities serving as transitions to adjacent existing residential neighborhoods. Figure C-1 depicts opportunity sites within the Harbor Corridor Plan area that could accommodate residential development in the future. Table C-3 provides property characteristics for each site.

Sites Analysis

The City has identified residential/mixed-use potential on vacant and underutilized lands within the specific plan boundaries. The Harbor Corridor Plan allows for a variety of housing types, including live-work, care homes, single dwelling, and multifamily units. Large sites along the corridor contain underused auto and commercial uses and a mobile-home community. Multiple housing developments totaling over 630 units, which included affordable units, were constructed along the corridor during the prior planning cycle, and various projects totaling 262 units are on the pipeline projects list above. Continued interest and development along the corridor is expected. The following sites present development opportunity and could accommodate residential development in the future:

Site 1 is a 1.47-acre site comprising two parcels that are owned by one owner and improved with two small buildings occupied by auto service and sales uses. Consolidation of the parcels does not present a barrier to development because they are owned by the same entity. The majority of the two parcels is being utilized as vehicle storage and is undeveloped. Though this site has been listed as an opportunity site in past planning cycles, it only has been zoned to accommodate housing since 2014. However, current market trends, as indicated by the number of units built in the Harbor Corridor since adoption of the plan, the number of pipeline units along the corridor, and direct communication with



potential developers of the site, all suggest this site presents tremendous opportunity for residential development.

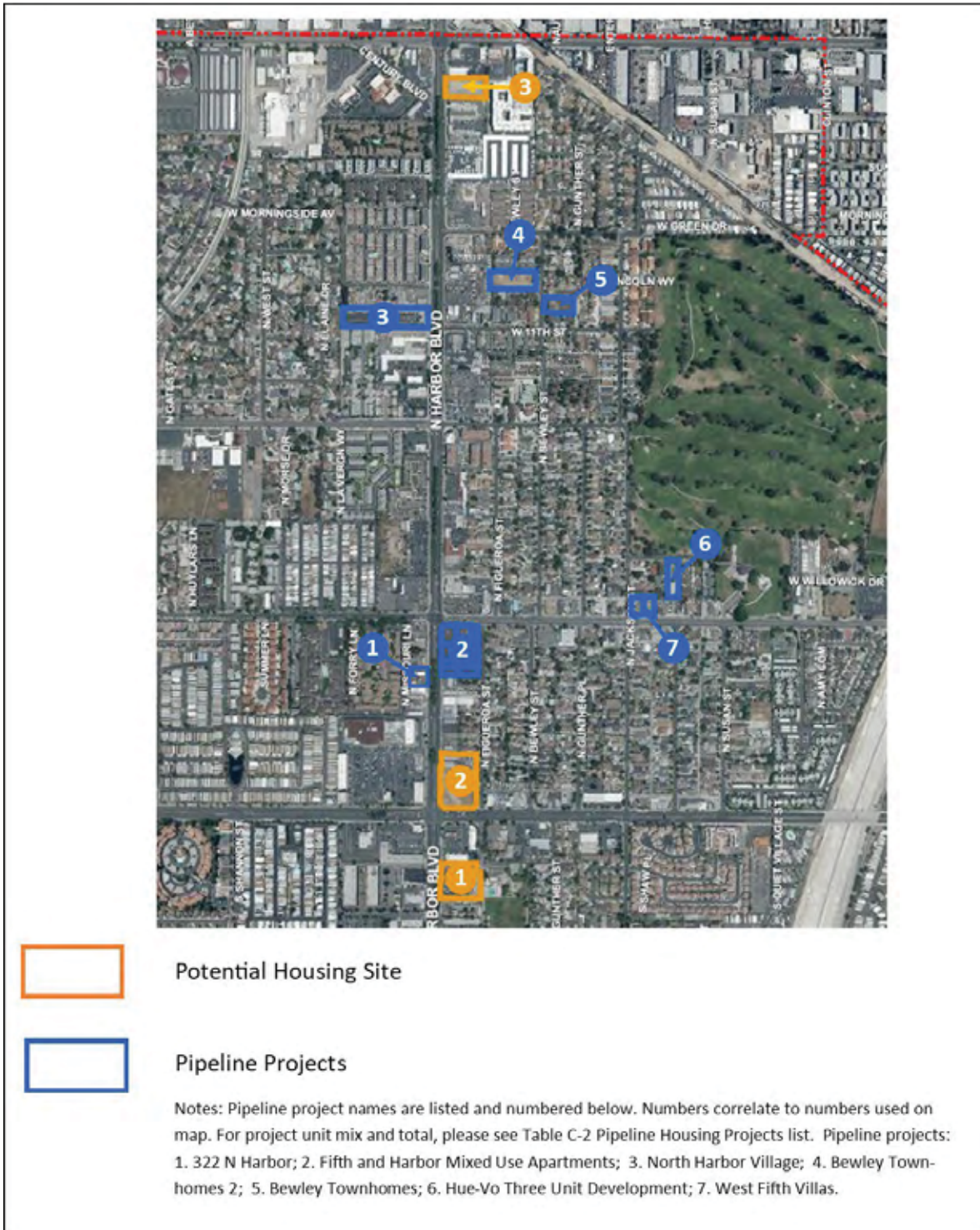
Site 2 is a 2.1-acre site comprising nine parcels. Five of the parcels are vacant. Two parcels are developed with auto service use buildings, and the remaining two are undeveloped and are being used as vehicle storage for the two auto service uses. The site sits at the intersection two major arterial streets and is located half a block from the Fifth and Harbor Mixed-Use Apartments project (94 units) that is on the pipeline projects list and is roughly the same size as Site 2. Like Site 1, Site 2 was previously identified as an opportunity site in past planning cycles. However, because Site 2 is now appropriately zoned to accommodate housing, there has been a tremendous amount of interest from the development community on the site, mirroring the activity along the corridor since the Harbor Corridor Plan took effect.

This site's nine lots are owned by two separate entities. Consolidation of five lots is not a barrier to development as they are owned by one owner and there is precedence on the corridor for multilot sites consolidating and jointly developing, like the Fifth and Harbor Mixed-Use Apartments on nine lots. Consolidating the four lots owned by a separate entity might be a challenge, but there has already been interest from the development community in developing all nine parcels. In the case that the consolidation of all nine lots does not occur, each owner possesses over a half acre of land, which they could develop separately and achieve the same anticipated units based on the permitted densities. However, the fact that a majority of the site is vacant or undeveloped area being used to store vehicles, the low site rating, and its similarity to the Fifth and Harbor site as well as discussions with the owners and potential developers, it can be argued with a high degree of confidence that Site 2 will be jointly redeveloped in the future.

Site 3 is a 0.85-acre site of one vacant parcel that is available for development. The site is in the northern node of the Harbor Corridor Plan, which allows high intensity development of up to 90 dwelling units per acre. The site is also in close proximity to retail and service uses present along Harbor Boulevard and Westminster Avenue. In addition, the site is served by high quality transit service along Harbor Boulevard and one block from the future OC Streetcar station. Proximity to services, transit, and zoning and general plan land use designation that permit by-right housing development all speak to this site presenting a residential developing opportunity in the future.



Figure C-1 Potential Housing Sites along Harbor Boulevard



Environmental and Infrastructure Analysis

The Harbor Corridor Plan is supported by a program EIR. The technical studies prepared in 2013 made the following conclusions about new development under the Plan. Overall, the studies found minimal environmental or infrastructure constraints on new development in the project area. Any improvements identified are relatively small and localized and do not create a significant constraint to the development of new housing as recent activity has proven.

- Existing sewer infrastructure within the Harbor Corridor Plan is deficient based on Orange County Sanitation District depth of flow versus diameter requirements. However, the Harbor Corridor Plan does not generate enough wastewater to pose a significant impact to the existing infrastructure. Calculations have shown that the Harbor Corridor Plan will add an additional 1 to 5 percent to existing flows. A small number of pipes that are over capacity may need to be upsized prior to full buildout of the Harbor Corridor Plan. New development will be responsible for its fair share of infrastructure improvements.
- This EIR concluded that the City will have sufficient water supplies available during normal, single dry, and multiple dry years during a 25-year period to meet all projected water demands associated with its existing and future customers, including the proposed project.
- The Harbor Corridor Plan would add impervious area to the corridor, primarily from developing the vacant lots, that will add an additional 15 percent to existing flows. While this is not a significant impact to the existing storm drain system, a 1993 report (Boyle Engineering Report) concluded that the existing system is deficient and unable to convey the current runoffs. The recommendations made in the Boyle Engineering Report would need to be implemented in order to convey existing runoff as well as additional flows from buildout of the Harbor Corridor Plan. New development will be responsible for its fair share of infrastructure improvements.
- Existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations (Harbor Corridor Plan EIR, p. 5.14-4).
- Existing and/or proposed facilities would be able to accommodate project-generated utility (electricity and natural gas) demands forecast by the Harbor Corridor Plan buildout assumption (Harbor Corridor Plan EIR, p. 5.14-5).



Capacity Analysis

The maximum intensity permitted by the Harbor Corridor Plan is determined by the District Center General Plan land use designation and the Harbor Corridor Plan development standards. Further, the density (units per acre) may vary depending on unit sizes, with the maximum residential density at approximately 50 units per acre. While the development standards in the Harbor Corridor Plan do allow for 100 percent nonresidential development, market trends and recently constructed and proposed developments in the area suggest that such developments are unlikely. Of the 11 projects proposed and/or constructed in the plan area, 10 were nearly entirely residential (residential projects in the Transit Node subzone of the plan are required to have a mixed-use component, while those in the Corridor and Neighborhood Transitional may be stand-alone residential), with only one being a commercial development. Table C-4 provides a summary of the total units and densities achieved at each of those sites.

Table C-4
Units and Densities of Recent Projects in Harbor Corridor Plan (SP2)

<i>Project Name</i>	<i>Zone/GP Designation</i>	<i>Total Units</i>	<i>Density (du/acre)</i>
The Charlie (formerly They Line)	SP2/DC	228	58
Harbor Collection	SP2/UN	38	19
C & C North Harbor Development	SP2/UN	110	14
North Harbor Village (Budget Inn Conversion)	SP2/UN	91	51
Andalucia Apartments	SP2/UN	70	32
West Fifth Villas	SP2/UN	8	18
5th and Harbor Mixed-Use Development	SP2/UN	94	51
C & C Single Family Homes	SP2/UN	35	15
Santa Ana Collection	SP2/UN	79	21
Heroes Landing (Prior Santa Ana Veterans Village)	SP2/NT	76	49

Source: City of Santa Ana, 2022.

The Harbor Corridor Plan area is expected to build out at an average density of 30 units per acre based on building prototypes and the vision in the plan. Notwithstanding the mixed-use requirement for residential projects in the Transit Node subzone, recent developments that have been permitted or are under construction in the Harbor Corridor Plan have been at higher densities, ranging up to nearly 60 dwelling units per acre, indicating that an expected minimum density of 30 units per acre is realistic and feasible.



Financial Feasibility Analysis

Mixed-use and residential development is financially feasible for development along north Harbor Boulevard. The specific plan area could accommodate more than 4,600 units. The plan's development standards allow a variety of housing types and sizes to meet housing needs while providing flexibility to respond to the market—keeping projects financially feasible for developers.

As a part of the Harbor Corridor Plan outreach strategy, the City led a developer roundtable to obtain input from the development community on the feasibility of introducing residential into the project area. Developers cited the combination of available vacant and underutilized land with current and future transit connections as key reasons why affordable and market rate housing could be built along the corridor.

Development within the Harbor Corridor Plan area is subject to the City's Affordable Housing Opportunity and Creation Ordinance (AHOCO). This ordinance requires that at least 5 percent of the units in an eligible ownership project be set aside as affordable to moderate-income households for at least 55 years. For eligible rental projects, at least 15 percent must be affordable to low-income households; or at least 10 percent must be affordable to very low-income households; or 10 percent shall be affordable to lower income households (5 percent to low-income, 3 percent to very low-income, and 2 percent rented to extremely low-income households) for at least 55 years.

Summary Assessment

Given the plan's potential to support up to 4,600 units, the housing development along the corridor during the prior planning cycle and the number of projects in the plan area that are at various stages of entitlement, permitting, and construction, it is reasonable to assume that the identified opportunity sites will be developed in the future and provide additional housing opportunities for Santa Ana residents.

TRANSIT ZONING CODE

The City adopted Specific Development No. 84 (SD-84), known as the Transit Zoning Code (TZC), to encompass 450 acres in the central urban core of Santa Ana. Adopted in 2010 and later amended in 2019, developments in this area highlight the opportunities for both market rate and affordable residential projects. Projects such as the 4th and Mortimer Mixed-Use Development provide 169 new units in the Downtown zone of the TZC. Additionally, the entitled FX Residences project, located in the Urban Neighborhood 2 zone, will add 17 units, with 16 being affordable to very low-income households.



The TZC was also designed to provide the zoning to support the long-term development of a transit program. The integration of the OC Streetcar, slated to be completed in 2022, through the center of the plan area and connecting neighborhoods to Downtown and the Santa Ana Regional Transit Center will strengthen existing neighborhoods and allow for a mix of uses and a variety of housing types. Based on existing buildout, the TZC could accommodate up to 4,075 units.

Sites Analysis

The TZC has the necessary general plan land use designation and zoning to support the development of new housing. Multiple-family housing is permitted by right within all zones covered by the TZC. There is opportunity for redevelopment or recycling of land with Urban Core and Transit Village designations. Some of these parcels are also in an Industrial Overlay Zone. The majority of these underutilized parcels contain industrial and auto storage uses and are viable for development.

The sites identified in the TZC area are suitable for housing at densities ranging up to 90 dwelling units per acre, but are anticipated to range between 25 to 45 dwelling units per acre. As mentioned above, recent residential projects demonstrate the feasibility of both market rate and affordable housing development in the TZC. Additionally, the City's Affordable Housing Opportunity and Creation Ordinance (AHOCO) applies to the properties within the TZC area designated within an Industrial Overlay Zone, which will produce additional affordable units in the plan area and deliver an inclusive mixed-income neighborhood.

Site 1 comprises two parcels owned by the County of Orange. The parcels are improved with a low intensity warehouse and vehicle storage. The parcels are zoned for residential and mixed-use. The site is located in a prime location adjacent to the Santa Ana Regional Transit Center (SARTC). Just north of the site, the County of Orange and the City of Santa Ana partnered to develop two lots into an affordable housing project, the Crossroads at Washington, which is discussed in the RHNA transfer section. Developer interest and market conditions make this area conducive to redevelopment, as demonstrated by the 894 units of pipeline projects listed in Table C-2. Partnership with the County on past projects, good transit and freeway access, the underutilized nature of the sites, proximity to other new development, and proximity to Downtown Santa Ana make this site opportune for housing.

Figure C-2 provides an illustration of the TZC.



Environmental and Infrastructure Analysis

The area of Santa Ana covered under the TZC is in one of the oldest parts of the community. Various infrastructure systems, such as the sewer system, date back to the early 1920s. As part of the technical studies for the TZC, significant infrastructure improvements were identified for the 20-year buildout horizon. As part of the project, the EIR for the Transit Zoning Code (2010) detailed the potential environmental and infrastructure impacts of the project and implementation measures to address the presence of any impacts. The TZC EIR indicates that future development of the code:

- Would not be constrained by any significant biological, seismic, geological, or hazard constraints (TZC EIR, Sections 4.3 and 4.5).
- Could alter the existing drainage pattern and potentially result in increased downstream flooding through the addition of impervious surfaces, or exceed the capacity of existing or planned stormwater drainage systems, and additional mitigation would be necessary (TZC EIR, Sections 4.6).
- Would not require or result in the construction of new water treatment facilities, the expansion of existing water treatment facilities, or the expansion of the existing network of water lines (TZC EIR Sections 4.12.1-4.12.4).
- Would not increase wastewater generation such that treatment facilities would be inadequate to serve the projected demand in addition to the provider's existing commitments (TZC EIR Sections 4.12.5–4.12.9).
- Would not generate solid waste that exceeds the permitted capacity of landfills serving the area (TZC EIR Section 4.12.10).
- Could increase the demand for electricity and gas, but would not require or result in the construction of new energy production or transmission facilities, the construction of which could cause a significant environmental impact (TZC EIR Section 4.12.14).

To address needed improvements and/or replacement of infrastructure, the City requires developers to pay a pro rata share of the costs to improve or replace the infrastructure. This is in addition to the on- and off-site improvements required under the SAMC to serve individual projects. These include rehabilitation of existing asphalt pavement; installation of new water, sewer, and storm drain lines; installation of a fixed-rail system (trolley); and enhanced bicycle and pedestrian routes.



Capacity Analysis

A fundamental goal of the Transit Zoning Code is to facilitate a variety of form-based housing choices that may include lofts, live-work buildings, courtyard housing, rowhouses, and other types of multiple-family housing. While the development standards in the Transit Zoning Code do allow for 100 percent nonresidential development, market trends and recently constructed and proposed developments in the area suggest that such developments are unlikely.

Of the eight recent major projects proposed and/or constructed in the plan area, not one has been 100 percent nonresidential. Conversely, all have been predominantly residential, and projects in the Transit Village, Downtown, Urban Center, and Corridor subzones of the plan area provide small commercial components on the ground floor to satisfy mixed-use requirements (the Urban Neighborhood 1 and Urban Neighborhood 2 subzones of the plan permit stand-alone residential).

This diverse mix of rental and ownership housing in the plan area can provide opportunities for housing affordable to all income levels. Some sites within the plan area are anticipated to be developed with multiple-family projects at up to 90 units per acre, but expected to be closer to 25 to 45 units per acre, with other sites building townhouses and single-family detached products at 7 to 15 units per acre. Overall, based on the trends derived from prior development in the plan area, the density mix will likely average around 30 units per acre.

**Table C-5
Units and Densities of Recent Projects in Transit Zoning Code (SD-84)**

<i>Project Name</i>	<i>Zone/GP Designation</i>	<i>Total Units</i>	<i>Density (du/acre)</i>
3rd & Broadway	SD84/DC	171	213
First American Title Co. Development	SD84/DC	220	154
Legacy Square	SD84/UN	93	53
4th & Mortimer	SD84/DC	169	62
FX Residences	SD84/UN	17	50
Lacy Crossing	SD84/UN	117	17
Crossroads at Washington	SD84/DC	86	37
Train Station Lofts	SD84/DC	5	17

Source: City of Santa Ana, 2022.



Financial Feasibility Analysis

The City has a variety of policies and programs to facilitate affordable housing. City ownership of land can greatly facilitate the production of affordable housing by eliminating the cost of land acquisition and reducing the time needed to obtain and finance loans. Policy HE-2.8 of the Framework directs the City to facilitate affordable housing for very low-income and moderate-income families on Authority-owned properties while keeping the properties under public ownership.

Development with an Industrial Overlay in the TZC area is subject to the City's Affordable Housing Opportunity and Creation Ordinance (AHOCO). This ordinance requires that at least 5 percent of the units in an eligible ownership project be set aside as affordable to moderate-income households for at least 55 years. For eligible rental projects, at least 15 percent must be affordable to low-income households; or at least 10 percent must be affordable to very low-income households; or 10 percent shall be affordable to lower income households (5 percent to low-income, 3 percent to very low-income, and 2 percent to extremely low-income households) for at least 55 years.

Summary Assessment

Given the TZC's potential to support up to 4,075 units and current interest from the development community, it is reasonable to assume that 68 units of new housing at densities around 30 units per acre could be built in the city's central urban core within the planning period. The combination of the code's flexible development standards, streamlined permitting process and by-right development, intense urban vision, recent development interest, and continued development interest make sites within the TZC likely candidates for residential development in the future.



SUMMARY OF 2021-2029 RHNA CREDITS

Santa has made a diligent effort through approving residential projects and creating an expansive ADU program to fully accommodate its 2021-2029 RHNA by income category. The following description summarize the pipeline residential projects, accessory dwelling units, and their applicable credit toward the 2021-2029 RHNA:

- 1) Pipeline projects. As discussed earlier (see Table C-2), the affordability of the pipeline projects is based on a survey of individual projects and entitlements as to the affordability for the various units.
- 2) Accessory dwelling units. The City continues to maintain a robust ADU program. As discussed earlier, the City is estimating the production of 723 ADUs during the 2021-2029 RHNA planning period—below current trends. The affordability of the accessory dwelling units is based upon HCD’s approval of SCAG’s ADU survey and methodology for calculating housing affordability.

Taken together, the City is identifying a surplus of 668 housing units in the lower income affordability category. A percentage of the total surplus lower income housing units will be carried over to meet the remaining need in the moderate-income category. The above-moderate income category also has a surplus of 3,923 units, respectively.

Table C-6 provides a summary of compliance with the RHNA, showing that the City can satisfy its RHNA by income category without the need to rezone sites for housing.

Table C-6
Summary of RHNA and Housing Sites Table

<i>Housing Credits</i>	<i>Housing Affordability Levels</i>			
	<i>Lower</i>	<i>Moderate</i>	<i>Above</i>	<i>Total</i>
RHNA	968	545	1,624	3,137
Pipeline Units	1,144	237	5,533	6,914
Accessory Dwelling Units	492	217	14	723
Sites Rezoning	Not necessary			
Remaining Need	-668	91	-3,923	-4,500

Notes: RHNA totals include 42 units transferred to Santa Ana from the County of Orange.



FINANCIAL RESOURCES FOR HOUSING

Federal, state, and local programs are available to fund and/or subsidize the construction of new housing, preserve existing affordable housing, maintain housing in neighborhoods, and rehabilitate housing. The following summarizes some of the major sources and funds available.

Housing Choice Voucher Programs

The HCV Program is a federal program that provides a rental subsidy to very low-income families, individuals, seniors, and the disabled. Participants pay 30 percent of their adjusted income toward rent. The Housing Authority of the City of Santa Ana pays the balance of rent to property owners and administers the program. Housing vouchers can be used for housing that meets program requirements—it is not limited to units in subsidized housing projects. This program includes project-based vouchers, for which 20 percent of the Annual Contributions Contract (ACC) for the Housing Authority can be used. An additional 10 percent of the ACC can be used for project-based vouchers if awarded to projects for special needs populations. Funds available in 2021/2022 total \$42.7 million.

Community Development Block Grant Program

The CDBG program is a federal entitlement program awarded to Santa Ana on a formula basis. The objectives are to fund housing activities and expand economic opportunities. Projects must benefit low- and moderate-income persons, aid in the prevention or elimination of slums or blight, or meet other urgent needs. Eligible activities include property acquisition, rehabilitation, preservation, economic development, code enforcement, public facilities, and public services. Funds available in 2021/2022 total \$5,640,635.

HOME Investment Partnerships Program

HOME is a federal grant to expand the supply of decent, safe, and sanitary affordable housing. HOME is designed as a partnership program between the federal, state, and local governments; nonprofit; and for-profit housing entities to finance, build, rehabilitate, and manage housing for very low-income and low-income owners and renters. Eligible activities include multiple-family unit acquisition and rehabilitation, single-family unit rehabilitation, and nonprofit affordable housing entity assistance. Funds available in 2021/2022 total \$1,706,231.



Emergency Solutions Grant Program

Each year, the City of Santa Ana receives funding from the U.S. Department of Housing and Urban Development (HUD) for homeless assistance under Emergency Solutions Grant (ESG). ESG funds are available for projects serving people experiencing homelessness. Annual grant funds are allocated on a formula basis to assist with the provision of emergency shelter, rapid rehousing, outreach, and homelessness prevention services. Funds available in 2021/2022 total \$489,141.

Low Income Housing Tax Credits

The federal Low Income Housing Tax Credit (LIHTC) program provides tax credits to individuals and corporations that invest in low-income rental housing. Tax credits are sold to corporations and people with high tax liability, and proceeds are used to create housing. Eligible activities include new construction, rehabilitation, and acquisition of multiple-family rental projects. Many projects in the city have used LIHTCs for rehabilitation purposes. Typically, affordable housing developers seek to secure LIHTCs as the largest source of funding for their projects.

Homeless Housing, Assistance, and Prevention Round 3

The state Homeless Housing, Assistance, and Prevention (HHAP-03) is a \$1 billion state grant that provides local jurisdictions, including federally recognized tribal governments, with flexible funding to continue efforts to end and prevent homelessness in their communities. The Santa Ana, Anaheim/Orange County COC will receive approximately \$10.27 million in funding for a wide variety of projects that address and ameliorate homelessness. The City is developing an expenditure plan for this grant.

Permanent Local Housing Allocation Program

The PLHA program is a state entitlement program awarded on a formula basis based on the collection of a \$75 recording fee on real estate documents. Funding can be used to increase the supply of housing for households at or below 60 percent of area median income; increase assistance to affordable, owner-occupied, workforce housing; assist persons experiencing or at risk of homelessness; facilitate housing affordability, particularly for lower- and moderate-income households; promote projects and programs to meet the local government's unmet share of regional housing needs allocation; and ensure geographic equity in the distribution of funds.



Orange County Housing Finance Trust

The Orange County Housing Finance Trust (OCHFT) was formed in 2019 as a joint powers authority between the County of Orange and the cities throughout the county. OCHFT was created for the purpose of funding housing specifically to assist the homeless population and persons and families with extremely low, very low, and low incomes in the County of Orange. The City has worked with the OCHFT to secure funding for the following projects during 2020-2022:

- Westview House: 85-unit permanent supportive housing project
- Crossroads: 86-unit permanent supportive housing project
- North Harbor Village: 91-unit permanent supportive housing project
- FX Residences: 17-unit permanent supportive housing project

Low- and Moderate-Income Housing Asset Fund

Funding sources for this program are generated from proceeds from the sale of former Redevelopment Agency housing assets, residual receipts from former Redevelopment Agency assets (i.e. loans), and a portion of the loan repayments from the former Redevelopment Agency to the City. Sources are set aside for the purpose of increasing, improving, and preserving the community's supply of low- and moderate-income housing. Program funds can be used to make loans or grants to eligible borrowers who will provide affordable housing, principally for low- and moderate-income households.

Inclusionary Housing Fund

Funding for this program is provided using revenues generated through in-lieu fees from the City of Santa Ana's Affordable Housing Opportunity and Creation (AHOCO) Ordinance. Funds can be used to increase and improve the supply of housing affordable to moderate-income (120 percent AMI), low- (80 percent AMI), very low- (50 percent AMI) and extremely low-income (30 percent AMI) households in the City. Funds can be used to make loans to eligible borrowers to provide affordable housing. Funds are also being used to provided down payment assistance for first time home buyers. The City has used its inclusionary revenues to fund the development of many of its more recent affordable apartment properties.



HOUSING RESOURCES

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Program Evaluation

This chapter describes progress in meeting objectives during the 2014–2021 Housing Element planning period which, in combination with the public outreach appendix, summarizes new initiatives proposed.

OVERVIEW

State law requires that housing elements contain an evaluation of current housing programs and their success in meeting the objectives set forth in the 2014–2021 Housing Element. The purpose is to provide a sound basis for the development of new or modified housing programs for the present housing element that will better address the community's housing needs.

The 2014–2021 Housing Element set forth a housing vision, four goals (following), and supporting policies to guide actions with respect to housing:

- Livable and complete neighborhoods of quality housing conditions, ample parks and community services, well-maintained infrastructure, and public facilities that inspire neighborhood pride and ownership.
- A diversity of quality housing, affordability levels, and living experiences that accommodate Santa Ana's residents and workforce of all household types, income levels, and age groups to foster an inclusive community.
- Increased opportunities for low- and moderate-income individuals and families to find quality housing opportunities and afford a greater choice of rental or homeownership opportunities.
- Adequate rental and ownership housing opportunities and supportive services for seniors, people with disabilities, families with children, and people needing emergency, transitional, or supportive housing.



D

The 2014–2021 Housing Element established the following quantified objectives. Table D-1 below provides a summary of the City’s progress to meet the quantified objectives from 2014-2021:

**Table D-1
Summary of Progress: 2014–2021 Quantified Objectives**

	<i>Total</i>	<i>Affordability Level</i>				
		<i>Ext. Low</i>	<i>Very Low</i>	<i>Low</i>	<i>Moderate</i>	<i>Above</i>
Housing Construction	405	78	78	122	37	90
Accomplishments:	4,907	452		1,116	65	3,274
Housing Rehabilitation	80			80		
Accomplishments:	30	4	10	16		
Acquisition and/or Rehabilitation	50		50			
Accomplishments:	136	98	38			
Preservation of At-Risk Units	50			50		
Accomplishments:	126			126		
Rental Assistance	2,699 ¹	2,699 per year				
Accomplishments:	2,599 average per year					
Homeowner Assistance	80			80		
Accomplishments:	50	0	1	9	40	

Sources: City of Santa Ana, 2021.
1. 2,699 annually for eight years.

This appendix contains a concise description of progress toward each goal and the appropriateness of programs for the 2021–2029 Housing Element. More detailed information can be found in the City’s annual housing reports prepared for the Department of Housing and Community Development (HCD), US Department of Housing and Urban Development (HUD), and other reporting entities.



GOAL 1: HOUSING AND NEIGHBORHOODS

As an established, built-out city, Santa Ana faced significant housing challenges during the 2010s. The substantial increase in rental unit prices as the economy recovered from the Great Recession in 2010 was by far the greatest challenge. Overcrowding, homelessness, and extreme rent burdens were systemic issues that were indicative of the lack of affordable housing in the city.

The 2014–2021 Housing Element set forth the goal to improve housing and neighborhood conditions through a menu of housing construction, rehabilitation, and neighborhood improvement programs. This included single-family homes, apartments, and mobile home units. Moreover, as part of this effort, the City implemented programs to acquire, substantially rehabilitate, and reconfigure multiple-family housing and require long-term affordability covenants.

The following are brief highlights of programs that aimed to rehabilitate housing, ensure compliance with city codes, and preserve neighborhoods. Table D-2 provides a concise program-by-program summary.

HOUSING REHABILITATION

The 2014–2021 Housing Element proposed a menu of housing rehabilitation programs to improve the conditions of housing. From 2014 through 2021, 20 single-family and mobile homes were rehabilitated using funds disbursed through the City's low-interest loan program. All homeowners qualified as low- or very low-income. The City continued to offer very low-interest loans to assist in the rehabilitation of rental properties occupied by lower income and family households throughout the planning period.

Neighborhood Programs

The 2014–2021 Housing Element also proposed a menu of neighborhood programs to help revitalize and stabilize residential neighborhoods. From 2016 through 2020, more than \$22 million dollars were expended to repave, slurry seal, and reconstruct local streets. The City continued to empower neighborhoods through the Communication Linkage Forum and the Neighborhood Initiatives Program, which supported 52 active neighborhood associations and encouraged collaboration and coordination between residents, their volunteer associations, 100+ homeowner associations (HOA), apartment owners, municipal agencies, and hundreds of neighbor-serving, faith-based, and community-based organizations. The City also continued its water and



energy conservation program and promotion of water and energy conservation through the citywide recycling program and education campaign (SA Green).

Code Enforcement

The City continued to implement a multifaceted code enforcement program. The Proactive Rental Enforcement Team and Residential Response Team are the primary programs. The City continued to implement its successful vehicle abatement program. These efforts continued to address property maintenance, substandard housing conditions, and other conditions affecting health, safety, and welfare.



Historic Preservation

City staff continued to work with residents and established neighborhoods to maintain their unique character, architectural integrity, and aesthetic qualities. By applying its citywide design guidelines, Mills Act contracts, adding properties to the historic property registry, or working with the Santa Ana Historical Preservation Society, the City continued to preserve its heritage.



**Table D-2
Progress on Housing Element Goal #1 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
1. Single-Family Home Rehabilitation	<ul style="list-style-type: none"> • Provide low-interest loans to facilitate the rehabilitation of single-family homes for lower income homeowners • Seek to augment funding and program reach by tracking and applying for grants as opportunities arise 	CDA, Housing Division	<p>Accomplishments: The City continued to offer low-interest loans to single-family homeowners; 20 single-family and mobile homes were rehabilitated since 2014.</p> <p>Appropriateness: This program will continue for the 2021–2029 period but will focus on providing grants of up to \$25,000 for repair and rehabilitation instead of loans.</p>
2. Mobile Home Repair	<ul style="list-style-type: none"> • Provide low- or no-interest loans to repair mobile homes annually for lower income households and seniors in the community • Seek to augment funding and program reach by tracking and applying for grants as opportunities arise 	CDA, Housing Division	<p>Accomplishments: The City continued to offers conditional grants to repair mobile homes owned by very low-income seniors; 20 single-family and mobile homes were rehabilitated since 2014.</p> <p>Appropriateness: This program will continue for the 2021–2029 period but will focus on providing grants of up to \$25,000 for repair and rehabilitation instead of loans. It will be merged with program 1.</p>
3. Rental Rehabilitation	<ul style="list-style-type: none"> • Provide low-interest loans to assist in the rehabilitation of rental properties occupied by lower income and family households • Seek to augment funding and program reach by tracking and applying for grants as opportunities arise 	CDA, Housing Division	<p>Accomplishments: The City continued to offer low-interest-rate loans to rehabilitate rental units. The Code Enforcement Department referred eligible property owners to the Housing Division to apply for loans.</p> <p>Appropriateness: This program will continue for the 2021–2029 period but has been changed to target multiple-family rental rehabilitation.</p>
4. Neighborhood Improvement	<ul style="list-style-type: none"> • Continue to assist, create, and support neighborhood associations to collaborate on projects and sponsor and hold annual events • Continue to support the Communication Linkage Forum and the Community Development Resource Network to train and equip residents to be leaders in their neighborhoods 	CDA, Housing Division	<p>Accomplishments: The City continued to have 52 active neighborhood associations and encouraged collaboration and coordination among residents, their associations, and city agencies.</p> <p>Appropriateness: This program will continue for the 2021–2029 period. The Planning and Build Agency will be the responsible agency for the planning cycle.</p>
5. Neighborhood Infrastructure	<ul style="list-style-type: none"> • Continue to complete infrastructure improvements in residential neighborhoods consistent with the City Capital Improvement Plan • Continue to seek additional funds to improve 	PWA PWA	<p>Accomplishments: From 2016 through 2020, the City expended \$35.4 million dollars to repave or slurry seal 124.5 miles of residential and local streets in Santa Ana as part of the capital improvements program. In 2016, the City was awarded \$13 million dollars in ATP funds for three projects—including pedestrian improvements along routes to school. ATP funds were</p>



**Table D-2
Progress on Housing Element Goal #1 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
	infrastructure, including state and federal grants for improvements for health and wellness		<p>also secured for pedestrian improvements along First Street in Downtown and to install protected bike lanes along Willits Street, per downtown and central complete streets studies. The City Council adopted the Safe Mobility Santa Ana (SMSA) Plan in 2016, the first Vision Zero Plan in Southern California. SMSA includes a prioritized list of projects that will address 46% of collisions Citywide as well as education/enforcement recommendations.</p> <p>In 2017, the City began community-based planning efforts to improve walkability/bikeability, including the ATP and Safe Routes to School Plan. Approved in 2019, the ATP evaluated all citywide bicycle and pedestrian networks through an extensive outreach process and includes recommendations based on the community input. The Safe Routes to School Plan identifies goals for walking audits at all public schools in Santa Ana to update the safe walking and biking routes to school maps.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
6. Healthy Neighborhood Initiatives	<ul style="list-style-type: none"> Continue to implement Santa Ana Green program, including tree planting, corridor greenways, build green initiatives, and energy conservation Collaborate with neighborhoods and community organizations to promote Healthy Neighborhood Initiative and safe and active environments 	<p>PWA</p> <p>PRCSA</p>	<p>Accomplishments: Santa Ana continued to implement a Community Forestry Program to maintain and upgrade its urban forest of 50,000 trees. The City continued its recycling, water conservation, waiver of permit and inspection fees for solar energy projects, and its purchase of additional street lights and conversion of all City-owned streetlights to LED. Educational awareness was conducted via the City website, literature, and public events.</p>



**Table D-2
Progress on Housing Element Goal #1 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>Public education activities were delivered to the community through the City’s website, newsletters, and public events. The Pacific Electric Park was completed with exercise and playground amenities, landscape, bike trail, and community garden. The City continued to coordinate with local schools, neighborhood associations, Health Care Agency, Santa Ana Building Healthy Communities, OCTA, Healthy Eating Active Communities, and Southern California Municipal Athletic Federation.</p> <p>Appropriateness: This program will be expanded for the 2021–2029 period.</p>
7. Santa Ana Building Healthy Communities	<ul style="list-style-type: none"> Continue to support the SABHC Initiative by attending meetings and working to achieve mutual goals Work with SABHC leaders and other stakeholders to forge a comprehensive health agenda for the General Plan update 	PBA, Planning Division	<p>Accomplishments: SABHC was an active participant in the development of the draft General Plan Update, providing specific policy and action language that was included. Health is one of the core values in the plan and is present in all elements and sections of the plan.</p> <p>Appropriateness: The endowment period lapsed in 2020, but a modified program building on SBHC will continue for the 2021–2029 period.</p>
8. Building Community Efforts	<ul style="list-style-type: none"> Seek grants and partnership opportunities from local, state, federal, and nonprofit partners to continue and expand strategic investments that build community Continue to make strategic investments in parks, recreation, access to healthy food, safe routes to school, and other capital improvements to improve resident health 	PBA, Planning Division PWA	<p>Accomplishments: The City partnered with an affordable housing developer and it was awarded an Affordable Housing Sustainable Communities Grant for the construction of a 93-unit new affordable housing project with active transportation infrastructure and transit amenities in 2019. The City also partnered with the County to approve a 65-year Ground Lease, Option Agreement for the Ground Lease, Joint Powers Agreement (JPA), and Quitclaims associated with the JPA for the construction of 85 units of affordable housing (Crossroads at Washington).</p> <p>The Active Transportation Plan was approved in June 2019 and looks at citywide bicycle and pedestrian networks through an extensive outreach process and provides recommendations based on the community input. During the planning period, the Safe Routes to School Plan was developed and performed walking audits at all public schools in Santa Ana to update the safe walking and biking routes to school maps.</p>



**Table D-2
Progress on Housing Element Goal #1 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>The City's Garden Program continued to offer youth and their families the training and motivation to adopt healthy food habits. Through a series of workshops and hands-on volunteer work, families learned to work together and create a home-based garden.</p> <p>Appropriateness: This program will be expanded for the 2021–2029 period.</p>
9. Neighborhood Safety	<ul style="list-style-type: none"> Continue to coordinate and support interdepartmental efforts to improve and maintain the health and safety of residential neighborhoods Apply the principles of Crime Prevention Through Environmental Design (CPTED) to enhance safety and security within multi-family residential developments. 	PBA Planning Division	<p>Accomplishments: The Police Department, as identified in the City's 5-year Strategic Plan, continued to hold community-policing forums and gather input to measure the community's perception of community policing and local police services to enhance community safety. During the planning period, the City reintroduced training of best practices in property management, neighborhood safety, and landlord/tenant responsibilities. The City Development Review process continued engaging with the Police Department and City Planners to identify physical design measures that promote safe environments within new and existing development projects through the use of CPTED techniques.</p> <p>Appropriateness: This program will be expanded for the 2021–2029 period.</p>
10. Property Maintenance Standards	<ul style="list-style-type: none"> Evaluate the appropriateness of the new Healthy Housing Standards for applicability to Santa Ana Municipal Codes Incorporate relevant portions into the Municipal Codes to assist City staff in inspecting and enforcing city codes Coordinate with OCHD on how to collaborate on efforts as authorized by Senate Bill 488, including training opportunities for City staff Research best practices to identify Code Enforcement Tools to remedy and expedite compliance with property violations Prepare an annual report for City Council summarizing PREP Program activities and accomplishments 	PBA, Code Enforcement Department CDA Housing Division	<p>Accomplishments: The City continued to apply Healthy Housing Standards along with other codes to promote safe/healthy homes and ensure good property maintenance continues. Enforcement tools to expedite and remedy violations included: Administrative Citations, Notices of Violation, and Notice and Orders. The City's Code Enforcement Division continued to use Administrative Citations and best practices as a tool to expedite and remedy violations. Severely substandard properties that required special attention were handled through the Receivership Program.</p> <p>PREP staff continues providing City Loan Program information to residential property owners when corrective notices are issued. Information on the City Housing Loan Program was made available to property owners by Code Enforcement and Housing staff.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>



**Table D-2
Progress on Housing Element Goal #1 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
	<ul style="list-style-type: none"> Coordinate PREP inspections and City Rehabilitation Loan Program to facilitate improvements 		
11. Proactive Rental Enforcement (PREP)	<ul style="list-style-type: none"> Inspect housing units and bring into compliance with City codes and standards at least 1,600 rental units annually Work with the County Health Department to identify infestation code violations and streamline resolution of violations 	PBA, Planning Division	<p>Accomplishments: Since 2017, through PREP code enforcement efforts, 8,276 rental units were inspected, and collaboration with the County Health Department to identify and abate code violations continued.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
12. Residential Response Team (RRT)	<ul style="list-style-type: none"> Inspect housing units and bring into compliance with City codes and standards at least 2,000 units annually Work with the County Health Department to identify infestation code violations and streamline resolution of violations 	PBA, Planning Division	<p>Accomplishments: Since 2017, 12,960 properties were inspected and 37,525 violations were addressed to bring buildings into City code compliant standards. Collaboration with the County Health Department to identify and abate code violations continued.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
13. Historic Program and Ordinance	<ul style="list-style-type: none"> Continue the implementation of historic preservation program and associated ordinances and incentives, including Mills Act, design review, etc. Continue to identify and list eligible historic residential properties on a voluntary basis and seek opportunities for preservation or adaptive reuse 	PBA, Planning Division	<p>Accomplishments: The Planning Division continued to implement the historic preservation program. Since 2016, over 100 properties were placed on the local historic register and over 100 Mills Act agreements were approved and executed.</p> <p>Appropriateness: This program will continue with modifications for the 2021–2029 period.</p>



**Table D-2
Progress on Housing Element Goal #1 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
14. Historic Home Rehabilitation Incentive	<ul style="list-style-type: none"> • Seek flexible funding sources and other incentives to encourage repair and maintenance of historic homes and complement the Mills Act program • Provide low-interest home loans to assist in the rehabilitation of up to 5 properties occupied by lower income and family households 	PBA, Planning Division CDA, Housing Division	<p>Accomplishments: The City continued to offer the historic home rehabilitation incentive. However, since 2016 no loans under this program were granted.</p> <p>Appropriateness: This program did not prove to be as effective as envisioned. For the next planning period this program will continue but with modifications.</p>
15. Historic Neighborhood Preservation	<ul style="list-style-type: none"> • Explore innovative strategies to preserve residential districts and neighborhoods that have historic value. • Create guidelines identifying the process for neighborhoods to pursue becoming a type of historic district 	PBA, Planning Division	<p>Accomplishments: City staff continued to coordinate with the Heninger Park Neighborhood Association and French Park Neighborhood Association regarding applications for construction in the Historic Districts throughout the planning period. Staff and a Historic Resources Commissioner attended historic preservation training opportunities to support preservation efforts, explore uses for resource evaluations and surveys, and how media and technology can be used to help promote preservation. City staff continued to coordinate with Floral Park Neighborhood Association members to discuss the process of becoming a historic district.</p> <p>Appropriateness: This program will not continue for the 2021–2029 period. Some aspects of the program will be merged with the two other programs that focus on historic structures.</p>



GOAL 2: HOUSING SUPPLY AND DIVERSITY

A central goal of state housing element law is to facilitate the production of new housing to accommodate expected increases in population and employment. Every five years, the Southern California Association of Governments (SCAG) issues housing goals for each city in the region as part of the Regional Housing Needs Assessment (RHNA). Santa Ana was assigned a goal of developing sufficient capacity to accommodate 204 units (divided into four affordability levels) for the 2014-2021 period.

The City of Santa Ana set forth programs to facilitate and encourage the production of and generate capacity for housing commensurate with the 2014–2021 RHNA goals. Table D-3 summarizes progress toward the RHNA goals through actual housing production. This includes affordable housing produced during the period as well as a portion of the acquisition, rehabilitation, and/or preservation of at-risk projects completed to the extent allowed under current state law.

The City far-exceeded its RHNA objectives, building over 4,907 total units distributed over the four affordability levels, meeting each individual affordability category allocation, and also rezoning land to accommodate an additional 2,000 units in the future.



Birch Street Courtyards.



California Palms

Table D-3
Progress on the 2014–2021 RHNA objectives

<i>Type of Project</i>	<i>Affordability Level of Units</i>				<i>Total</i>
	<i>Very Low</i>	<i>Low</i>	<i>Moderate</i>	<i>Above</i>	
Regional Housing Needs Goals	45	32	37	90	204
Total Production Credits	452	1,116	65	3,274	4,907
Total Units Exceeding RHNA Goals	407	1,084	28	3,184	4,703
% Exceeding RHNA Allocation	904%	3,388%	76%	3,538%	2,305%

Provision of quality, affordable housing was one of the primary goals envisioned by the 2014–2021 Housing Element, and great care was taken to identify sites and financing to facilitate that effort. The following discussion highlights major successes since 2014. Table D-4 details progress for action set forth under Goal #2 of the Housing Element.



Housing Sites, Programs, and Incentives

The 2014–2021 Housing Element built on the Land Use Element by setting goals, policies, and actions to facilitate development in District Centers, transit corridors, and the downtown area. During the planning period, the City updated the Transit Zoning Code (TZC), which covers the area formerly known as the Renaissance Specific Plan and downtown, and the Metro East Mixed-Use Overlay (MEMU), which covers the area along First Street and the I-5 and SR-55 freeways. The TZC and MEMU facilitate a range of housing products with varying affordability.

The 2014–2021 Housing Element identified several corridors to accommodate residential development to address its RHNA goals. The City updated the specific plan for Harbor Boulevard (Harbor Mixed-Use Transit Corridor Specific Plan). When completed in 2014, the specific plan planned for a balance of commercial uses, mixed-uses, and transit-oriented developments that can complement the City’s GoLocal Systems and support economic development along the corridor.

In 2011, the City adopted a Housing Opportunity Ordinance. For eligible projects, at least 10 percent of ownership units must be set aside as affordable to moderate-income households or at least 15 percent of rental projects must be affordable to low-income households or 10 percent to very low-income households for at least 55 years. The Housing Opportunity Ordinance is a model for other jurisdictions in Orange County seeking to adopt inclusionary requirements.

After years of work, the City also adopted the Harbor Mixed-Use Transit Corridor Specific Plan (SP2) to provide a transit supportive and pedestrian-oriented environment, opportunities for the integration of new infill development, a range of affordable housing opportunities, and the reuse of existing structures. Higher densities, flexible parking provisions, private open space incentives, and other key features facilitate the project.

Ultimately, the success of housing programs is measured by the number of affordable housing units built, preserved, or rehabilitated. Santa Ana has made tremendous progress in this regard in just the past three years. Key projects during the planning period include the Arts Collaborative. This project includes the adaptive reuse of an office building and new construction, for a total of 57 affordable rental units designated for professional artists. Fifteen units are set aside for permanent supportive housing. The project was funded using \$4.8 million in Inclusionary Housing funds, \$2.6 in HOME funds, and \$500,000 in CDBG funds.



The Harbor Mixed-use Transit Corridor Specific Plan encourages mixed-use, transit-oriented development.



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
Housing Supply and Diversity			
16. Transit Zoning Code	<ul style="list-style-type: none"> Continue to implement the Transit Zoning Code for eligible properties in downtown Santa Ana Facilitate and encourage the development of varied housing types at a mix of affordability levels, including for lower income households using appropriate incentives Manage the development of Housing Authority–owned property with quality sustainable housing, including affordable housing consistent with City goals 	PBA, Planning Division	<p>Accomplishments: The Transit Zoning Code (TZC) was approved by City Council in 2010 and amended by 2019 to implement residential and mixed-use opportunities in the Renaissance project area. The TZC included an extensive multiyear public outreach effort. The City continued to facilitate and encourage a mix of development including mixed-use residential and affordable housing projects. During the planning period, the Housing Authority partnered with the County of Orange to develop permanent supportive housing (Crossroads at Washington) at a site that included a City-owned parcel. The Housing Authority also offered ground leases on two of its sites for a new 16-unit supportive housing project (FX Residences) and a two-unit housing project (Habitat for Humanity) within the TZC.</p> <p>Appropriateness: This program is appropriate for the 2021–2029 period and will continue with modifications.</p>
17. Metro East Mixed-Use Overlay Zond	<ul style="list-style-type: none"> Continue to implement MEMU Overlay Zone policies to facilitate and encourage the development of new housing and the long-term transition of the area. 	PBA, Planning Division CDA, Housing Division	<p>Accomplishments: The City continued to review residential and mixed-use development proposals in the Metro East Mixed-use Overlay Zone (MEMU). Within the MEMU boundary, construction was completed on 418 affordable senior housing units (Metro East Senior). Also, a 603-unit mixed-use development (Elan project) and 552-unit affordable housing development (First Point I and II) pulled permits and started construction during the planning cycle. Additionally, a 650-unit mixed-use development within the overlay zone boundary (Central Pointe) for a site that has remained vacant for a substantial period of time was entitled.</p> <p>Appropriateness: This program is appropriate for the 2021–2029 period and will continue with modifications.</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
18. District Centers	<ul style="list-style-type: none"> Continue to facilitate and encourage the development of mixed-use housing in the various District Centers through the Specific Development Zone or MEMU Overlay Consider the amendment of District Center boundaries to allow for new residential products that meet City housing goals and policies 	PBA, Planning Division	<p>Accomplishments: The City continued to review residential and mixed-use development proposals in the District Center areas, such as the Transit Zoning Code (SD-84), Metro East Mixed-Use Overlay Zone (MEMU), and Harbor Mixed-Use Transit Corridor Specific Plan (SP-2). As part of the General Plan Update underway, the City identified opportunity "Focus Areas" to consider new housing and mixed-use sustainable development. The creation of additional District Center and Urban Neighborhood land use designations are proposed. Lastly, The Redhill/Warner project, approved by City Council in 2020, proposes expanding the District Center boundaries to allow for the development of 1,100 market rate apartments.</p> <p>Appropriateness: With the adoption of the General Plan Update and a new land use plan, this program is no longer appropriate and will not continue for the 2021–2029 period.</p>
19. Harbor Mixed-Use Transit Corridor	<ul style="list-style-type: none"> Adopt the Harbor Mixed-Use Transit Corridor Specific Plan (total residential capacity of approximately 4,600 units) Rezone land for residential/mixed-uses to encompass the 201 units of unmet housing need of the RHNA Require that unmet lower income RHNA be accommodated on at least 10.1 acres designated exclusively for residential use (see Appendix C, Exhibit C-2 and Table C-4). For sites addressing the lower income RHNA, permit owner occupied and rental multifamily uses by right, allow at least 16 units per site, and require a minimum density of 20 du/ac Apply the incentives available in the residential/mixed-use zone to facilitate quality housing opportunities 	<p>PBA, Planning Division</p> <p>PBA</p>	<p>Accomplishments: The Harbor Mixed-Use Transit Corridor Specific Plan was adopted in 2014. In total, 248 acres were rezoned, with potential for 2,000 additional housing units. Incentives along the corridor include a reduced parking rate as well as density bonus and housing opportunity ordinance standards that apply to projects citywide. The project was also successful in contributing to Santa Ana meeting its RHNA and surpassing its allocation several times over.</p> <p>Appropriateness: This program was successful and completed during the planning period. It will be revamped for the 2021–2029 period to continue facilitating and encouraging development of mixed-use housing units along the corridor.</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
20. Comprehensive General Plan Update	<ul style="list-style-type: none"> • Begin outreach to the public, development community, and stakeholders to develop the vision and guiding principles for the general plan • Explore best practices for general plan updates and innovative community engagement • Issue a request for proposal and/or request for qualifications and select a consultant to conduct a comprehensive General Plan update 	PBA, Planning Division	<p>Accomplishments: City staff began a comprehensive update of the General Plan in 2015. The update effort started with rollout of a Community Engagement Plan which included over 50 community meetings and numerous workshops. In 2020, outreach was concluded with 11 environmental justice focused workshops. The comprehensive General Plan update is underway and expected to be completed during the next planning period (2022).</p> <p>Appropriateness: The program was accomplished during the planning period. A revised program that focuses on implementation of the adopted plan will continue for the 2021–2029 period.</p>
21. Zoning Ordinance Update	<ul style="list-style-type: none"> • Issue a request for proposal and/or request for qualifications and select a consultant to conduct a development code update • Coordinate outreach to the public, development community, and stakeholders regarding design and development standards • Review and revise Zoning Ordinance to achieve consistency with the updated general plan land use designations and goals • Address development and design standards to address parking, height, and open space requirements needed to facilitate residential/mixed-use housing • Explore adapting nonresidential zones for live-work units • Explore healthy design ordinance or development concepts that encourage development types that foster active living, health and wellness 		<p>Accomplishments: During the planning period, the City was awarded a grant to partially fund the update of its zoning code. City staff prepared a request for proposal and released it for bid at the closing of the planning period. Selection of a consultant and completion of the update, along with outreach efforts, are planned to take place during the next planning period.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
Building Design			
22. Building Design Guidelines	<ul style="list-style-type: none"> • Create comprehensive design guidelines that are intended to address the unique needs of residential/mixed-use products along major transportation corridors • Create new Active Design Guidelines and accompanying incentives to encourage and foster housing designs that improve health and wellness 	PBA, Planning Division	<p>Accomplishments: There are three design guideline tools to address residential/mixed-use projects along transit ways. These include the Metro East Overlay Zone, the Transit Zoning Code, and the recently updated Harbor Mixed-Use Transit Corridor Specific Plan. Best practices will continue to be monitored for long term refinements to these tools. City staff continues to consider Active Design Guidelines to identify possible enhancements to the Santa Ana Citywide Design Guidelines to promote health and wellness goals</p> <p>Appropriateness: This program will continue for the 2021–2029 period and be heavily tied to the Zoning Code Update program.</p>
23. Green Building	<ul style="list-style-type: none"> • Create a Green building policy that incorporates sustainable concepts into residential and nonresidential uses; support demonstration projects and best practices • Continue to seek partnerships with nonprofit and for-profit organizations and developers that are committed to building green residential projects • Continue to implement provisions of CalGreen to encourage sustainable practices in the development, renovation, and maintenance of structures 	PBA, Planning Division	<p>Accomplishments: The City encouraged the use of sustainable materials and practices in new private development and in City public facilities. City engages in a number of partnerships to encourage green residential projects, including Southern California Edison and other “green” home improvement entities. The City continues to implement applicable state and local codes that encourage sustainable practices. However, a green building policy was not created during the planning period. Recent developments and requirement in the building code have made it so that green building practices are now requirements, precluding the need for additional regulation.</p> <p>Appropriateness: This program will not continue for the 2021–2029 period.</p>
24. Development Review	<ul style="list-style-type: none"> • Continue to provide appropriate residential and mixed-use project review through site plan review, environmental clearance, and mitigation monitoring • Create a checklist of healthy design components based on the adopted Active Design Guidelines to allow implementation healthy community components into new projects. 	PBA, Planning Division	<p>Accomplishments: Weekly Planning Development Review forums offer an opportunity to evaluate residential and mixed-use projects. Planning staff implements site planning and active design best practices on a project-by-project basis. The Active Design Guidelines checklist was not created during the last planning period but is planned to be completed during the next.</p> <p>Appropriateness: A modified version of this program will continue for the 2021–2029 period.</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
Housing Incentives			
25. Affordable Housing Incentives	<ul style="list-style-type: none"> • Provide financial assistance and issue bonds, where feasible, to support the production and/or rehabilitation of affordable housing for lower and moderate-income households • Support state and federal grant applications that providing funding for the production of affordable housing, including housing affordable to extremely low-income households • Continue to work with nonprofit and for-profit organizations that provide affordable housing to households earning extremely low, very low, and low-income households 	<p>PBA, Planning Division</p> <p>CDA, Housing Division</p> <p>PBA, Planning Division</p>	<p>Accomplishments:</p> <p>In 2016, the City supported two successful low-income housing tax credit applications (9% and 4%) submitted by developers seeking to create affordable housing. The City also supported a developer's successful application for the Strategic Growth Council's Affordable Housing and Sustainable Communities Program.</p> <p>The City collaborated with developers to rehab two affordable housing rental projects. The City also worked with a local nonprofit organization to provide homeownership opportunities for qualified lower income households. Another project example is Orangewood Academy Charter High School with eight housing apartments for students and adults.</p> <p>In 2017, the City conducted Tax Equity and Financial Responsibility Act (TEFRA) Hearings for seven affordable housing projects and adopted a resolution approving the issuance of bonds for each project. The City supported three low-income housing tax credit applications (9%) submitted by developers seeking to create affordable housing. One of the three applications was successful in obtaining an award of 9% low-income housing tax credits. The City adopted a resolution to support a developer's application for the Strategic Growth Council's Affordable Housing and Sustainable Communities Program.</p> <p>The City collaborated with developers to construct 69 affordable housing rental units.</p> <p>The City worked with a local nonprofit organization to provide homeownership opportunities for qualified low-income households.</p> <p>In 2018, the City conducted a Tax Equity and Financial Responsibility Act (TEFRA) Hearing for one (Aqua Housing) affordable housing project (and adopted a resolution approving the issuance of bonds for the project). A 68-unit new construction affordable housing project (First Street Apartments) broke ground with financial support from the City.</p> <p>Two affordable housing projects were awarded 9% Low-Income Housing Tax Credits including a 75-unit new construction project for homeless veterans (Santa Ana Veterans Village) and a 51-unit new construction project (Tiny Tim) with financial support from the City. The City worked with nonprofit organizations NeighborhoodWorks and Habitat for Humanity to provide homeownership opportunities for qualified low-income households. The City approved a commitment to resubordinate an amount not to exceed \$8.7 million in current affordable housing loans for the rehabilitation of 126 affordable rental units.</p> <p>In 2019, the City conducted a Tax Equity and Financial Responsibility Act (TEFRA) Hearing for two (Cornerstone</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>Apartments and Legacy Square) affordable housing projects and adopted a resolution approving the issuance of bonds for each project. In 2019, three affordable housing projects (Veterans Village, Aqua Housing, and Tiny Tim) broke ground with financial support from the City. The four projects will develop 274 units of housing for very low-income residents, including 131 units of permanent supportive housing.</p> <p>A 68-unit rental project with City financial support (First Street Apartments) completed construction and leased up.</p> <p>The City resubordinated \$7.2 million in current affordable housing loans for the rehabilitation of 126 affordable rental units at Cornerstone Apartments (also referenced in Goal #38).</p> <p>In 2020, The City conducted a TEFRA Hearing for one affordable housing project (Legacy Square) and adopted a resolution approving the issuance of bonds for the project.</p> <p>One affordable housing project (Westview House) was awarded funding, and three affordable housing projects with City financial support completed construction (Heroes' Landing, Santa Ana Arts Collective, and Casa Querencia). The five new construction projects will develop 364 units of housing for extremely low-, very low-, and low-income residents, including 177 units of permanent supportive housing.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
26. Extremely Low-income Housing	<ul style="list-style-type: none"> Target funding and housing incentive programs (25–33), as feasible, to facilitate and encourage the development of lower and moderate-income housing Work with nonprofit organizations that provide affordable housing to households earning extremely low-income Seek to expand the number of housing choice vouchers provided by the Housing Authority; set aside at least 75% of vouchers for extremely low-income households 	<p>CDA, Housing Division</p> <p>PBA, Planning Division</p> <p>Housing Authority</p>	<p>Accomplishments:</p> <p>In 2016, at the end of 2016, 103.5% of the budget authority from HUD for Housing Choice Vouchers was utilized to provide rental assistance to extremely low-income households.</p> <p>In 2017, the City approved the allocation of \$22,017,500 and 131 project-based vouchers for the development of 307 units of affordable rental housing.</p> <p>The City approved two loan agreements for a total of \$7,494,760 to develop 57 units of affordable housing (included in the above amount)</p> <p>At the end of 2017, 99.6% of the budget authority from HUD for housing choice vouchers was utilized to provide rental assistance to extremely low-income households.</p> <p>In 2018, the City adopted new Affordable Housing Funds Policies and Procedures for the allocation of limited affordable housing funds and land assets. The policies and procedures include the City’s priorities for the award of funding, with highest priority for projects with deep affordability and larger units.</p> <p>The City issued an RFP for affordable housing development. Following the first deadline for the RFP, a review panel recommended the award of \$9,893,644.00 in affordable housing funds, 100 HUD-VASH project-based vouchers, and a 99-year ground lease for 3 Housing Authority–owned properties. The recommendation will lead to the development of 5 affordable housing projects with approximately 200 units of affordable housing, including over 133 units of permanent supportive housing.</p> <p>The City approved one loan agreement for a total of \$8,552,740 to develop 68 units of affordable housing (First Street Apartments), which will include 55 units for very low-income families.</p> <p>At the end of 2018, 102% of the budget authority from HUD for Housing Choice Vouchers was utilized to provide rental assistance to extremely low-income households.</p> <p>In 2019, The City issued an RFP for Affordable housing development. Bonus points were added to the evaluation rating criteria to prioritize projects that provide at least 75% or more of units for extremely low-income families. Following the first deadline for the RFP, four proposals were received (also referenced in Goal #52). At the end of 2019, 95% of the budget authority from HUD for Housing Choice Vouchers was used to provide rental assistance to extremely low-income households. In addition, 95 new vouchers for extremely low-income households (emancipated foster youth and homeless families) were awarded to the SAHA following a competitive application process.</p> <p>In 2020, at the end of 2020, 95.3% of the budget authority from HUD for Housing Choice Vouchers was utilized to provide rental</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			assistance to extremely low-income households. In addition, a total of 130 new vouchers for extremely low-income households (Foster Youth to Independence, Mainstream Vouchers and HUD-VASH Vouchers) were awarded to the Housing Authority following a competitive application process. Appropriateness: This program will continue for the 2021–2029 period.
27. Successor Housing Agency	<ul style="list-style-type: none"> Continue to provide and/or leverage City funds with other sources to support the production, preservation, and/or rehabilitation of housing and economic development 	PBA, Planning Division	Accomplishments: In 2016, the City provided a commitment of \$6,195,000 in Successor Housing Agency funds to a local affordable housing developer for the production of 69 units of affordable housing in the City of Santa Ana. In 2017, the City provided a commitment of \$13,222,740 in Housing Successor Agency funds to two developers for the production of 118 units of affordable housing in (both the amount of funds and number of units are already referenced in Goal # 26). In 2018, the City included four Housing Authority-owned properties' housing assets in a Request for Proposals for the development of affordable housing on the sites. The construction and sale of five homes has been completed by Habitat for Humanity on a site previously transferred to Habitat in FY 2016-17. In 2019, the City included one Housing Authority-owned property housing asset in an RFP for the development of affordable housing on the site. Predevelopment work for two homeownership units for moderate-income households is underway for a site awarded to Habitat for Humanity in the 2018 RFP for Affordable Housing Development (referenced in Goal #41). In 2020, predevelopment work for two homeownership units for moderate-income households was underway for a site awarded to Habitat for Humanity in the 2018 Request for Proposal (RFP) for Affordable Housing Development. Predevelopment work is also underway for two additional sites awarded in the 2018 RFP for construction of 85 units (Crossroads at Washington) and 16 units (FX Residences) of affordable housing. Appropriateness: This program will continue for the 2021–2029 period.
28. Density Bonus Ordinance Update	<ul style="list-style-type: none"> Update and implement the density bonus ordinance in accordance with recent changes to state law to assist in the development of extremely low, very low, and low-income rental units; moderate-income condos; and senior housing 	CDA, Housing Division Economic Develop.	Accomplishments: In 2018, the City approved a Density Bonus Agreement for the development of a 418-unit affordable housing senior project (Metro East Senior Apartments). In 2019, the City approved a Density Bonus Agreement for the development of three projects: a 220-unit mixed-use commercial and residential development with 11 affordable units (First American); a 552-unit affordable rental project (First Point I and II); and a 93-unit affordable rental project (Legacy Square). In 2020, the City approved a Density Bonus Agreement for the development of one project: a 171-unit mixed-use commercial



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			and residential development with 19 affordable units for very low-income households (Third & Broadway). Appropriateness: This program will continue for the 2021–2029 period.
29. Housing Opportunity Ordinance	<ul style="list-style-type: none"> Require eligible housing development projects of 5 or more units to include at least 15% of the units as affordable to lower income households (rental) and at least 15% as affordable to moderate-income households (ownership) Develop policies and procedures for occupancy of units created under the Housing Opportunity Ordinance Incorporate affordable housing opportunity requirements within City initiated zone changes or adaptive reuse projects 	PBA, Planning Division	<p>Accomplishments: In 2017, three inclusionary housing units were sold to qualified moderate-income homebuyers.</p> <p>City Council approved three Inclusionary Housing Plans for residential projects, representing a commitment of \$12,140,168.70 of future in-lieu fees. In addition, a total of \$4,691,341.20 of in-lieu fees was paid to the City in 2017 to support affordable housing programs and new construction</p> <p>In 2018, 12 inclusionary housing units were sold to qualified moderate-income homebuyers.</p> <p>The 15% affordable housing inclusionary requirement was applied to six projects.</p> <p>In 2020, the Housing Opportunity Ordinance was updated by City Council to modify the threshold and lower the in-lieu fee in order to stimulate development activity during the COVID-19 pandemic.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
30. Adaptive Reuse	<ul style="list-style-type: none"> Seek opportunities for adaptive reuse of structures with historic merit or otherwise suitable to be converted to quality residential and mixed-use projects 	PBA, Planning Division	<p>Accomplishments: In 2014, the City adopted an Adaptive Reuse Ordinance allowing existing nonresidential buildings located in Project Incentive Areas to convert to residential or live-work opportunities.</p> <p>In 2016, permits were issued to reuse two buildings with new storage containers to create live-work options near downtown.</p> <p>In 2018, construction began on a 57-unit adaptive reuse affordable housing project (Santa Ana Arts Collective) and in 2020 construction was completed. (57 apartment units).</p> <p>In 2020, construction began on converting a 10-story office building into 146 residential units (888 North Main).</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
31. Specific Development District	<ul style="list-style-type: none"> Continue to facilitate quality development in District Centers and other locales through the implementation of the Specific Development District 	PBA, Planning Division	<p>Accomplishments: The Specific Development zoning district continues to facilitate mixed-use/residential development. During the last planning period, the Specific Development zoning district facilitated the entitlement and development of over 2,000 residential units.</p> <p>Appropriateness: With the adoption of the General Plan Update and a new land use plan, this program is no longer necessary and will not continue for the 2021–2029 period.</p>



**Table D-4
Progress on Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
32. Variety in Household Sizes Program	<ul style="list-style-type: none"> Implement programs to increase opportunities to build new family rental housing (see Program 25), including rental housing for large families Monitor applications for new residential development to track type of products proposed and balance of unit sizes and bedrooms proposed 	PBA, Planning Division	<p>Accomplishments: City staff monitored housing sizes/bedroom numbers throughout the planning period. An annual monitoring system was in place to identify the balance of bedroom numbers citywide, with developments strongly encouraged to provide appropriate mix of sizes to meet community needs.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
33. Parking Study	<ul style="list-style-type: none"> Conduct parking study and, depending on findings, the City will propose a program to mitigate parking constraints along with residential/mixed-use standards 	PBA, Planning Division	<p>Accomplishments: The three form-based code areas (MEMU, TZC, and SP2) all incorporated reduced parking requirements. Parking requirements in these areas did not pose a constraint to development, and that is shown through the volume of units that were permitted during the planning period. City staff is currently working with a vendor to study parking impacts that residents have been experiencing to determine best practices and solutions to reduce parking constraints to new development while assuaging parking issues residents have been experiencing.</p> <p>Appropriateness: This program will continue for the 2021–2029 period, but will be revised to include further analysis of parking problems being created, solutions to curb management, and working with OCTA to promote public transportation options.</p>



GOAL 3. HOUSING ASSISTANCE

Santa Ana's housing vision affirms a socially and economically diverse city of renters and homeowners. Given the income levels and diverse needs of residents, achieving the City's vision underscores the need for an aggressive assistance program. The following are key accomplishments.

RENTAL ASSISTANCE

The Santa Ana Housing Authority (SAHA) administers the Housing Choice Voucher Program. This includes a total of 3,026 housing vouchers, including 2,699 regular vouchers and 650 special purpose vouchers for nonelderly, disabled people experiencing homelessness, homeless veterans, and foster youth.

Table D-5 on the following page describes progress made on individual housing assistance programs.



Table D-5
Progress on Housing Element Goal #3 Objectives

Name of Program	Objective	Responsible Agency	Status
Rental Assistance			
34. Housing Choice Voucher	<ul style="list-style-type: none"> Continue to implement and seek new housing choice vouchers for extremely low and very low-income households 	SAHA	<p>Accomplishments: At the end of 2016, 2,605 households were receiving assistance from the Santa Ana Housing Authority. At the end of 2017, 2,520 households were receiving assistance from the Santa Ana Housing Authority. At the end of 2018, 2,544 households were receiving assistance from the Santa Ana Housing Authority. At the end of 2019, 2,547 households were receiving assistance from the Santa Ana Housing Authority. At the end of 2020, 2,712 households were receiving assistance from the Santa Ana Housing Authority.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
35. Family Self-Sufficiency	<ul style="list-style-type: none"> Continue to implement and seek participants for the Family Self-Sufficiency program; serve 66 clients annually 	SAHA	<p>Accomplishments: In 2016, the Housing Authority served 79 clients through the FSS Program. In 2017, the Housing Authority served 152 clients through the FSS Program. At the end of 2018, the Housing Authority was serving 124 clients through the FSS Program. In addition, 6 families graduated from the program in late 2018. At the end of 2019, the Housing Authority was serving 133 clients through the FSS Program. In addition, 7 families graduated from the program during 2019. At the end of 2020, the Housing Authority was serving 122 clients through the FSS Program. In addition, 7 families graduated from the program during 2020.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
36. HOPWA Tenant Based Rental Assistance	<ul style="list-style-type: none"> Continue to implement and seek participants for the HOPWA Tenant-Based Rental Assistance; serve 50 clients annually 	SAHA	<p>Accomplishments: Effective July 1, 2015, HUD reallocated the HOPWA tenant-based rental assistance funds to the City of Anaheim.</p> <p>Appropriateness: This program will not continue for the 2021-2029 period.</p>
Housing Preservation			
37. Preservation of At-Risk Housing	<ul style="list-style-type: none"> Provide outreach to property owners to keep up to date with status of properties Seek funding and financing mechanisms to preserve existing affordability covenants Advocate for state legislative action to allow greater flexibility to satisfy the regional housing needs goals Assist in preserving the Wycliffe Towers senior apartment project by issuing bond 	CDA, Housing Division	<p>Accomplishments: The City continued to monitor housing at risk of converting to market rate and continued to outreach to those property owners to identify financial incentives that will enable owners to maintain their properties as affordable housing. The City continued to monitor legislative initiatives that may impact its ability to meet its affordable housing goals.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>



Table D-5
Progress on Housing Element Goal #3 Objectives

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
38. Multiple-Family Housing Acquisition and Rehabilitation	<ul style="list-style-type: none"> Work with supporting nonprofit partners to acquire, rehabilitate, and deed restrict apartment projects as funding and partners are available. 	CDA, Housing Division	<p>Accomplishments: In 2016, after issuing two separate RFPs, the City awarded 71 project-based vouchers and \$1.2 million in HOME loan funds to a developer to acquire and rehabilitate a motel that will be deed restricted as affordable housing for chronically homeless individuals. The project will include 71 units of permanent supportive housing with wrap-around supportive services. The low-income housing tax credit financing for a 69-unit affordable housing project closed and the project had its ground-breaking ceremony in August 2016. In 2017, the low-income housing tax credit financing for a 57-unit affordable housing project closed in 2017. In 2019, the City consolidated 43 existing loans into two amended and restated loan agreements, and resubordinated \$7.2 million in current affordable housing loans for the rehabilitation of 126-unit Cornerstone Apartments.</p> <p>Appropriateness: This program will continue for the 2021-2029 period but will be merged with other programs that have similar goals.</p>
39. Neighborhood Stabilization	<ul style="list-style-type: none"> Implement the Neighborhood Stabilization Program and work with intermediary to provide services to implement the NSP 1, 2, and 3 grants. 		<p>Accomplishments: In 2016-2017, the City implemented its three remaining NSP awards. In 2016, one project was awarded funds and is under construction. This year, one development was completed, yielding 69 affordable housing units. In 2018, the City issued an RFP for Affordable Housing Development that includes the remaining NSP funds. The review panel for the RFP is recommending award of NSP funds to a new affordable housing project (# of units to be determined). In 2019, the City awarded \$963,951 in NSP funds to support development of a new 85-unit rental project (Crossroads at Washington). All of the units will be affordable for extremely low-income households, and 43 units will be set aside for permanent supportive housing.</p> <p>Appropriateness: This program will not continue for the 2021–2029 period.</p>



**Table D-5
Progress on Housing Element Goal #3 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
Homeownership Assistance			
40. Down Payment Assistance	<ul style="list-style-type: none"> Evaluate options to restructure the homeownership program as the market and prices stabilize Assist low and moderate-income households with down payment assistance through loans up to \$40,000 	CDA, Housing Division	<p>Accomplishments: In 2018, the City updated the guidelines for the Down Payment Assistance Program to increase the amount of down payment assistance available to low-income families from \$40,000 to \$80,000 and to begin providing up to \$40,000 in down payment assistance available to moderate-income families using the City's Inclusionary Housing Fund. Since 2014, a total of 50 families received Down Payment Assistance to purchase a home, including buyers of inclusionary housing units and units built by Habitat for Humanity.</p> <p>Appropriateness: This program will be revised and continue for the 2021-2029 period.</p>
41. Homeownership Partners	<ul style="list-style-type: none"> Support nonprofit and for-profit organizations to educate homeowners, administer programs, and expand homeownership opportunities Work with nonprofit organizations to provide homeownership opportunities for families 	CDA, Housing Division	<p>Accomplishments: In 2016, Habitat built two homes and sold the homes to qualified homebuyers. In 2017, Habitat built five homes and sold the homes to qualified homebuyers in 2018. (also referenced in Goal #27) In 2019, the City awarded a ground lease agreement for a Housing Authority land asset to Habitat for Humanity for the construction of two single-family home ownership units serving moderate-income households (also referenced in Goal #27). In 2020, Inclusionary Grant Documents and a Ground Lease Agreement for a Housing Authority-owned land asset awarded to Habitat for Humanity were approved for the construction of two single-family ownership units serving moderate-income households. The City continued its working relationship with local nonprofits to expand homeownership opportunities for low-income households. The City has conducted quarterly Down Payment Assistance Program workshops with the local partners since 2018.</p> <p>Appropriateness: This program will not continue for the 2021-2029 period. Goals set forth in this program will be merged with like programs for the 2021-2029 period.</p>



Table D-5
Progress on Housing Element Goal #3 Objectives

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
42. Homeownership Preservation Assistance	<ul style="list-style-type: none"> Participate in the Orange County collaborative to prevent or lessen the impact of foreclosures Advocate for state and federal legislation to address the foreclosure and lending crisis 	CDA, Housing Division	<p>Accomplishments: In late 2019, the City launched two new programs for home preservation. The Mobile Home Rental Assistance Program (\$25,000) assists mobile homeowners experiencing high increases in space rents. Eligible residents included those experiencing rent increases as high as 34.5% or those who are on the list for Section 8 housing assistance, which is currently unavailable. 32 households received a one-month rental subsidy of \$751–\$799 in 2020. The Safely Home in Santa Ana program launched on October 1, 2019, in partnership with Catholic Charities and the Salvation Army, and kept 278 Santa Ana residents, including 107 children, safely in their homes after facing a financial crisis that threatened their ability to pay rent and remain housed. The City continued to monitor legislative initiatives and programs to address foreclosure impacts and rent increases.</p> <p>Appropriateness: This program will not continue for the 2021–2029 period as foreclosures caused by the Great Recession have eased.</p>
People with Disabilities			
43. Care Facilities	<ul style="list-style-type: none"> Amend Municipal Code to define community care facilities, permitting process, and standards, and make changes to ensure consistency with state law Amend Municipal Code to define facilities not regulated under the Community Care Facilities Act and specify permit process consistent with state law 	PBA, Planning Division	<p>Accomplishments: While the City began the research and planning phase of amending the Municipal Code, this action was not completed during the planning period. The SAMC was not updated to ensure consistency with state law.</p> <p>Appropriateness: A revised version of this program will continue for the 2021–2029 period.</p>
44. Housing for People with Disabilities, including Developmental	<ul style="list-style-type: none"> Work with service providers to support the development or provision of housing suitable for people with disabilities, including developmental disabilities Seek and/or support grants, where feasible, to facilitate the production of new housing or appropriate services for disabled people 	PBA, Planning Division CDA, Housing Division	<p>Accomplishments: The City allocated Emergency Solutions Grant Program funds to assist in the housing and support of persons with disabilities and special needs. In 2015, the conversion of a motel to a 72-bed apartment /care home was approved to serve veterans. In late 2018, a 71-unit rehabilitation project for chronically homeless individuals was completed (Orchard). In mid-2018, a 69-unit new construction project with 10 permanent supportive housing units for chronically homeless individuals was completed (Depot at Santiago). In mid-2018, the City issued an RFP for Affordable Housing Development which included 100 HUD-Veterans Affairs Supportive Housing project-based vouchers for chronically homeless veterans. In 2019, the City awarded funds for the development of three projects (FX Residences, North Harbor Village, and Crossroads at Washington) with 192 units, including 148 units of permanent supportive housing.</p>



Table D-5
Progress on Housing Element Goal #3 Objectives

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
45. Accessible Housing	<ul style="list-style-type: none"> Investigate opportunities for providing incentives or amending codes to encourage the accessibility components in the development of new housing Implement the reasonable accommodation ordinance to allow for modifications in land use, building, zoning, and other codes to facilitate access to existing housing 	PBA, Planning Division	<p>Appropriateness: This program will continue for the 2021–2029 period.</p> <p>Accomplishments: City’s reasonable accommodation ordinance is posted on the City website and available in print version at the public counter for reference for modifications. The City continues to process these types of applications making accommodations to allow equal enjoyment of housing for those covered under the acts.</p> <p>Appropriateness: A revised and update version of this program will continue for the 2021–2029 period.</p>



GOAL 4. SPECIAL NEEDS

The City of Santa Ana is unique in Orange County, containing a diversity of people of all backgrounds, family types, lifestyles, and income levels. As a large urban city, Santa Ana is home to a population of residents from all walks of life. Adding to the richness of the Santa Ana community are many residents with special housing needs. Many of these special needs affect all types of people, and others mainly affect people of certain ages, incomes, or other factor.

Over the past several years, special needs projects have been built or proposed for each group. Family projects were shown under Goal #2 and Goal #3 discussions. Highlights of accomplishments are described below:

- **Santa Ana Veterans Village.** This was a newly constructed project on a previously vacant site consisting of 75 permanent supportive housing units for homeless veterans. The project was awarded 75 project-based vouchers and HOME Program funds (\$477,346). Wrap-around supportive services for the residents are provided by Step Up on Second, Goodwill of Orange County's Tierney Center, Veterans Legal Institute, Strength in Support, and the Veterans Affairs Long Beach Healthcare System.
- **Casa Querencia.** This project included the demolition of a former motel and the construction of a new development that yielded 56 affordable permanent supportive housing units with wrap-around supportive services for chronically homeless individuals and a manager's unit. The project received 56 project-based vouchers.
- **North Harbor Village.** During the planning period, this project was entitled, received permits, and began construction of 89 permanent supportive housing units. The development is rehabilitating a former motel utilizing CDBG (\$1,687,047) and 89 project-based vouchers (34 HUD-VASH and 55 non-HUD-VASH). Construction of the project is expected to be completed October 2022.

The following page and Table D-6 provide concise descriptions of each program's progress.



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
People Who Are Homeless			
46. Emergency Shelters and Transitional Housing	<ul style="list-style-type: none"> Continue to provide funding for providers of emergency shelter, transitional housing, and permanent supportive housing for people who are homeless Collaborate with the Salvation Army and other Orange County jurisdictions to create a model emergency shelter management and operational plan based on best practices Establish Emergency Shelter Overlay Zone to accommodate the City's estimated unsheltered homeless population. Amend Municipal Code to revise separation criteria to comply with state law 	PBA, Planning Division	<p>Accomplishments:</p> <p>In 2016, the City provided Emergency Solutions Grant (ESG) program funds to 11 organizations for 15 programs. Six programs provided shelter; three programs targeted street outreach for people who are homeless; three programs provided homelessness prevention; one program provided data collection; and two programs provided rapid rehousing.</p> <p>The City passed a resolution to request the County of Orange to open a transitional homeless shelter at the former Santa Ana Transit Terminal. The County of Orange opened the transitional homeless shelter on October 6, 2016.</p> <p>The City continues to work with the County of Orange to create a 200-bed homeless multiservice center in Santa Ana and a check-in center.</p> <p>The City issued an RFP for 100 units of project-based vouchers for permanent supportive housing for homeless individuals and families, of which 75 will be for homeless veterans.</p> <p>Construction was completed on Hospitality House, a 75-bed facility provided by the Salvation Army, available to serve homeless men. A management and operational plan was approved to include "good neighbor" and best practices of mutual agreement with the Salvation Army service provider and the City.</p> <p>Currently, emergency shelters are permitted by right in industrial zones, with sufficient acres to accommodate Santa Ana's estimated homeless need. In conjunction with the proposed County 200-bed emergency shelter, the community has voiced a desire to amend the municipal code utilizing a zoning overlay tool to refine allowable zoning locations.</p> <p>This amendment will include modifying the municipal code to remove references to separation criteria to comply with state law.</p> <p>In 2017, the City provided Emergency Solutions Grant (ESG) program funds to eight organizations providing twelve different programs. Four programs provided shelter; three programs targeted street outreach for people who are homeless; two programs provided homelessness prevention; one program provided data collection; and two programs provided rapid rehousing.</p> <p>The County of Orange operated a transitional homeless shelter at the former Santa Ana Transit Terminal.</p> <p>The City held an outreach and engagement fair in the Santa Ana Civic Center, collaborating with nine nonprofits</p>



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>and faith-based providers. The fair offered housing referrals, job placement, legal assistance, behavioral health services, and veteran health services. The event proved to be successful and the City will continue to host similar events in the future.</p> <p>The City encouraged positive law enforcement engagement efforts by creating the Homeless Evaluation Assessment Response Team (HEART). HEART exists to oversee Citywide homeless outreach needs, safety, and security as well as mental health conditions.</p> <p>The City enacted a new section to the Santa Ana Municipal Code to improve health and safety conditions in the Civic Center.</p> <p>The City hired a full-time dedicated Homeless Services Manager to coordinate and collaborate with the Continuum of Care, other municipalities, and other constituents to optimize the delivery of homeless services.</p> <p>The City awarded 100 units of project-based vouchers for permanent supportive housing for homeless individuals and families, of which 75 will be for homeless veterans.</p> <p>The City worked with two developers to apply for \$5 million in Mental Health Services Act Special Needs Housing Program funds to finance the development of 131 permanent supportive housing units (also referenced in Goal # 26). Currently, emergency shelters are permitted by right in industrial zones, with sufficient acres to accommodate Santa Ana’s estimated homeless need. The community has voiced a desire to amend the Municipal Code utilizing a zoning overlay tool to refine allowable zoning locations. This amendment will include modifying the municipal code to remove references to separation criteria to comply with state law.</p> <p>In 2018, the City provided Emergency Solutions Grant (ESG) program funds to seven organizations, providing eleven different programs. Three programs provided shelter; three programs targeted street outreach for people who are homeless; two programs provided homelessness prevention; one program provided data collection; and two programs provided rapid re-housing</p> <p>The County of Orange operates a transitional homeless shelter at the former Santa Ana Transit Terminal and a new shelter for women only at WISEPlace for many individuals from the Civic Center. City Council approved a Memorandum of Agreement with the County of Orange to transition the 425-bed Courtyard Emergency Shelter to a new location with 600 beds in order to expand the number of emergency shelter beds for the City of Santa Ana. The City opened an Interim Emergency Homeless Shelter (The Link) with 200 beds and supportive services</p>



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>for individuals experiencing homelessness. The City received an award of \$3.6 million in Homeless Emergency Aid Program funds from the State of California to address homelessness. The City Homeless Evaluation Assessment Response Team (HEART) program oversees citywide homeless outreach needs, safety, and security. The team works closely with the Orange County Health Care Agency. The City hired a full-time dedicated Homeless Services Manager to coordinate and collaborate with the Orange County Continuum of Care, other cities, and constituents to optimize delivery of homeless services.</p> <p>Through the RFP for Affordable Housing, a review panel is recommending an award of 100 units of HUD-VASH project-based vouchers for permanent supportive housing for homeless veterans. The Santa Ana Veterans Village project has just broken ground (also reference Goal #44). In 2018, the City applied for a NOFA for the 2017 Mainstream Voucher program to serve nonelderly, disabled homeless individuals and families. The City was awarded 50 Mainstream Vouchers to serve this target population.</p> <p>Currently, emergency shelters are permitted by right in industrial zones, with sufficient acres to accommodate Santa Ana's estimated homeless need. City staff will be evaluating amendments to the emergency shelter ordinance, including removing references to separation criteria to comply with state law.</p> <p>In 2019, The City provided Emergency Solutions Grant program funds to five organizations providing seven different programs. Two programs provided shelter; one program targeted street outreach for people who are homeless; one program provided homelessness prevention; one program provided data collection; and two programs provided rapid rehousing. The County of Orange operates a transitional homeless shelter and a new shelter for women only at WISEPlace. The City continues to fund the Interim 200 bed Emergency Homeless Shelter with supportive services that opened in November of 2018. The City Homeless Evaluation Assessment Response Team program oversees citywide outreach needs, safety, and security.</p> <p>In 2020, the City provided Emergency Solutions Grant program funds to seven organizations providing eight different programs. Two programs provided shelter; one program provided employment services for shelter residents; one program targeted street outreach for people who are homeless; one program provided homelessness prevention; one program provided data collection; and two programs provided rapid rehousing. The County of Orange operates a transitional homeless shelter that is transitioning to a permanent shelter that will include space for women only from WISEPlace. The</p>



Table D-6
Progress on Housing Element Goal #4 Objectives

Name of Program	Objective	Responsible Agency	Status
			<p>City continues to fund the Interim 200 bed Emergency Homeless Shelter with supportive services that opened in November of 2018 as well as start-up costs for the new permanent shelter. The City's Homeless Evaluation Assessment Response Team (HEART) program oversees citywide homeless outreach needs, safety, and security.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
47. Rapid Rehousing	<ul style="list-style-type: none"> Continue to provide funding and technical assistance to support the provision of prevention, outreach, and supportive services aligned with the 10 Year Plan to End Homelessness 	PBA, Planning Division	<p>Accomplishments: In 2016, the City provided ESG funding to eleven different organizations which included 15 programs to support the provision of homelessness prevention, shelter, outreach and supportive services that align with the 10-Year Plan to End Homelessness. Two organizations provided rapid rehousing programs. In 2016, the City provided ESG funding to one organization to hire a housing navigator to expand landlord/property manager participation in all available rental assistance programs with a goal of significantly increasing the number of units available for placement of chronically homeless individuals from the Civic Center. In 2017, the City provided ESG funding to eight different organizations providing twelve different programs to support the provision of homelessness prevention, shelter, outreach, and supportive services that align with the 10-Year Plan to End Homelessness. Two organizations provided rapid rehousing programs. In 2017, the City created a pilot program with Illumination Foundation to house individuals in micro-community shared housing environments with the goal of long-term housing stabilization. Individuals from the Santa Ana Civic Center are targeted for this program. In 2018, the City provided ESG funding to seven different organizations providing eleven different programs to support the provision of homelessness prevention, shelter, outreach, and supportive services that align with the 10-Year Plan to End Homelessness. Two organizations provided rapid rehousing services (also referenced in Goal # 46). In 2018, the City worked with the OC Health Care Agency (HCA) to complete assessments of all homeless individuals residing in the Civic Center. The County provided referrals and shelter options and connections to services, and there are no longer homeless individuals residing in the Santa Ana Civic Center. In 2018, Santa Ana's first Permanent Supportive Housing project opened (the Orchard). The project provides 71 permanent supportive housing units with wrap-around supportive services for chronically homeless individuals.</p>



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>In 2018, a new construction project with 75 permanent supportive housing units for homeless veterans closed on their financing (Santa Ana Veterans Village). The project includes 70 one-bedroom and 5 two-bedroom units with wrap-around supportive services</p> <p>In 2019, the City provided ESG funding to five different organizations providing seven different programs to support the provision of homelessness prevention, shelter, outreach, and supportive services that align with the 10-Year Plan to End Homelessness. One organization provided rapid rehousing services (also referenced in Goal # 46).</p> <p>In 2020, the City provided ESG funding to seven different organizations providing eight different programs to support the provision of homelessness prevention, shelter, outreach, and supportive services that align with the 10-Year Plan to End Homelessness. Two organizations provided rapid rehousing services.</p> <p>Appropriateness: This program will not continue for the 2021–2029 period. Goals of the program will be merged with like programs for the 2021-2029 period.</p>



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
48. Supportive Services	<ul style="list-style-type: none"> Assist and work with service organizations to provide supportive services for current and formerly homeless people Encourage nonprofit and volunteer organizations to improve the coordination and efficiency of food distribution for the homeless and at risk in the Civic Center area 	PBA, Planning Division	<p>Accomplishments: The Emergency Solutions Grant administered by the City provided funds to nonprofit homeless service providers to provide supportive services. The City encouraged nonprofit and volunteer organizations to work with the City's Interim Emergency Homeless shelter (the Link) in place of distributing items in the Civic Center. A nonprofit homeless service provider managed the Link and worked with other service organizations in the community to coordinate supportive services.</p> <p>Appropriateness: A revised and updated version of this program will continue for the 2021–2029 period.</p>
Senior Housing			
49. Housing Facilities	<ul style="list-style-type: none"> Continue to offer development incentives and density bonuses to incentivize senior housing Work with nonprofit and for-profit agencies that propose the construction of senior housing 	PBA, Planning Division CDA, Housing Division and Admin	<p>Accomplishments: The City continued to offer density bonus incentives for affordable housing, including senior living. In 2017, the City approved the site plan for a 418-unit affordable senior rental project and in 2018, approved a density bonus agreement (Metro East Senior). In 2019, the City approved a density bonus agreement for three projects: a 220-unit mixed-use development with 11 affordable units (First American); a 552-unit affordable rental project (First Point I and II); and a 93-unit affordable rental project (Legacy Square). In 2020, the City approved a density bonus agreement for a 171-unit mixed-use development with 19 affordable units (3rd & Broadway).</p> <p>Appropriateness: This program will not continue for the 2021–2029 period.</p>
50. Senior Life Care Facilities	<ul style="list-style-type: none"> Continue to offer development incentives and density bonuses to incentivize life care facilities Work with nonprofit and for-profit agencies that propose the construction of senior housing 	CDA, Housing Division	<p>Accomplishments: Density bonus incentives continued to apply to senior housing facilities.</p> <p>Appropriateness: This program will not continue for the 2021–2029 period. Elements of this program will be merged with like programs for the 2021-2029 period.</p>
51. Senior Services	<ul style="list-style-type: none"> Support food distribution programs and similar senior services Support private and nonprofit entities to match seniors in house sharing arrangements 	PRCSA CDA, Admin	<p>Accomplishments: The City continues to operate a daily lunch and food distribution program at each senior center. In addition, physical fitness classes are common weekly. City is researching best practices regarding feasible successful house sharing programs for seniors.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
52. Family Housing	<ul style="list-style-type: none"> Continue to allocate Section 8 Housing Choice Vouchers to very low-income families Continue to offer homeownership assistance for qualified lower and moderate-income families Acquire, rehabilitate, and reconfigure apartments to support low-income family households 	PBA, Planning Division	<p>Accomplishments: In 2016, the City approved \$8,795,000 for a developer to build 69 units of affordable housing, in which there will be 6 four-bedroom units, 28 three-bedroom units, and 35 two-bedroom units for families. In 2018, the City issued an RFP for affordable housing development. A review panel recommended an award of \$9,893,644.00 in affordable housing funds, 100 HUD-VASH project-based vouchers, and a 99-year ground lease for three Housing Authority-owned properties. The recommendation will lead to the development of 5 affordable housing projects with 200 units of affordable housing, including over 100 two- and three-bedroom units for families (also referenced in Goal #s 25 to 27). In 2019, the City issued an RFP for affordable housing development. Bonus points were added to the evaluation rating criteria to prioritize projects that provide at least 75% or more units for extremely low-income families (also referenced in Goal #26). In 2020, a total of 130 new vouchers for extremely low-income households were awarded to the Housing Authority following a competitive application process. The City continued to offer down payment assistance for lower and moderate-income families.</p> <p>Appropriateness: A revised and updated version of this program will continue for the 2021–2029 period.</p>
Housing for Families			
53. Child Care Options	<ul style="list-style-type: none"> Review Zoning Code to ensure day/childcare provisions are consistent with state laws; consider incentives for co-locating childcare facilities in affordable housing projects Continue funding organizations that help address and meet the supportive service needs of Santa Ana’s children 	PBA, Planning Division	<p>Accomplishments: In 2015-2020, the City funded programs that serve low-income youth in Santa Ana, including recreation programs, music education, internships, after-school tutoring, and neighborhood park enhancements. In 2018, a mixed-use residential project (Depot at Santiago) was completed and includes a dance and education studio serving underserved local youth.</p> <p>Appropriateness: A revised and updated version of this program will continue for the 2021–2029 period.</p>



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
54. Multi-Generational Housing	<ul style="list-style-type: none"> Explore crafting development standards and site designs, offering incentives, or including additional flexibility to promote innovative models of multigenerational housing 	PRCSA	<p>Accomplishments: City staff continued to review projects during the project review process to evaluate floor plans to ensure they meet City development standards, serve resident needs, and provide and promote quality housing. In 2018, the City adopted a new ordinance which included flexible development standards to allow the creation of accessory dwelling units, and will allow for the creation of more housing options and multigenerational housing opportunities</p> <p>Appropriateness: This program will continue for the 2021–2029 period but will focus on increasing ADU production options.</p>
Fair Housing Services			
55. Fair Housing	<ul style="list-style-type: none"> Continue to fund a fair housing organization to discourage unlawful practices, resolve tenant/ landlord disputes, provide education, and further equal housing opportunities Periodically prepare the Analysis of Impediments to Fair Housing Choice to identify, remove and/or mitigate potential impediments to fair housing in Santa Ana. 	SAHA CDA, Housing Division	<p>Accomplishments: The City continued a contract with the Fair Housing Council of Orange County to discourage unlawful practices, resolve tenant/landlord disputes, provide education, and further equal housing opportunities</p> <p>A mandatory training was provided to the City's Housing Division by the Fair Housing Council of Orange County in every year from 2015 to 2021.</p> <p>In 2015, the City updated its Analysis of Impediments to Fair Housing Choice (AI) to identify, remove, and/ or mitigate potential impediments to fair housing in Santa Ana. In 2019-20, the City participated in a countywide regional effort to update the AI. The updated AI was completed in 2020.</p> <p>Appropriateness: This program will continue for the 2014–2021 period.</p>
56. Reducing Second-Hand Smoke	<ul style="list-style-type: none"> Conduct education effort in concert with stakeholders in the community. Pursue preparation of a smoke free ordinance in multifamily unit housing in Santa Ana. 	PBA, Planning Division CDA, Admin	<p>Accomplishments: America OnTrack and other CBOs attend a variety of Santa Ana community events to educate the public on the health benefits of smoke-free environments. In 2015, America OnTrack provided educational information at Neighborhood Association meetings, Santa Ana Street/Health Fairs, school safety fairs, and Santa Ana Youth Summit. Owners of recently built multifamily housing have decided to require smoke-free environments. Conversations continue regarding the feasibility of a smoke-free ordinance citywide for multifamily housing.</p> <p>Appropriateness: This program will continue for the 2014–2021 period.</p>

Source: City of Santa Ana, 2021.

Funding:

Agency:



**Table D-6
Progress on Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
GF:	General Fund	CDA:	Community Development Agency
CDBG:	Community Development Block Grant	PBA:	Planning and Building Agency
HOME:	HOME Partnership Funding	SAHA:	Santa Ana Housing Authority
LIHTC:	Low income Housing Tax Credits	PWA:	Public Works Agency
ESG:	Emergency Solutions Grant	PRCSA:	Parks, Recreation, and Community Services Agency
HOPWA:	Housing Opportunities for Persons with AIDS	TCE:	The California Endowment
NSP:	Neighborhood Stabilization Funds		



Assessment of Fair Housing

This section addresses the fair housing requirements for housing elements. It begins with an overview of key requirements, describes outreach efforts to date, then provides the requisite analysis. A summary of the programs to address concerns is provided in this section, and these programs are further detailed in the Housing Plan.

OVERVIEW

One of the most significant trends in state housing element law has been in the arena of fair housing. With the passage of AB 686 in 2019, all housing elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of 2015. The goal of this assessment is to ensure that people have fair housing choice. The AFFH Act has two main purposes—prevent discrimination and reverse housing segregation.

To affirmatively further fair housing means “taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws” (Government Code § 8899.50(a)).

California HCD has issued specific requirements for incorporating AB 686 for fair housing into the update of the housing element. The following AFH conforms to these requirements, including its structure to address three primary areas required by the State.

- Fair Housing Assessment. A summary of fair housing issues, patterns of segregation or other barriers to fair housing, and prioritization of contributing factors.



- Pipeline Projects Inventory. The identification of pipeline housing projects to accommodate all income levels of the city's Regional Housing Needs Allocation (RHNA) that also further integrated and balanced living patterns.
- Housing Programs. Programs that affirmatively further fair housing, promote housing choice for protected classes, and address contributing factors identified in the AFH.

The City of Santa Ana is an entitlement jurisdiction and receives its HOME and Community Development Block Grant (CDBG) funds directly from the State. As such, the City is required to prepare an Analysis of Impediments (AI) to Fair Housing Choice, which provides an overview of law, regulations, conditions, and other possible obstacles that may affect an individual's or household's access to housing in Santa Ana for a five-year period. The Department of Housing and Urban Development (HUD) has developed a series of indices for completing the AFH and informing communities about disparities in access to opportunity. The AFH analysis will be consistent with the AI. The AI is a collaborative effort between 22 jurisdictions within Orange County. Although it is a countywide AI, there are jurisdiction-specific versions that include goals specific to Santa Ana.

This FHA also includes local data and knowledge gathered in consultation with the City's Neighborhood Initiatives Program (NIP) staff. NIP is a section within the City's Planning Division works directly with the community to promote capacity building through civic engagement, leadership trainings, recognition programs, and assistance with grant writing and community event support. Due to the level of trust NIP staff have garnered through years of collaboration, they are often the first point of contact for community members and act as community liaisons with the City. As such, NIP staff has an extensive knowledge base related to factors that contribute to fair housing issues that Santa Ana residents experience. Information provided by NIP is included in the analysis in this FHA and was used to inform the development of the programs in the Housing Plan.

Additionally, this FHA analysis includes local data and knowledge gathered through the community outreach phase of the Housing Element Update, which included four roundtable meetings, three community workshops, two Planning Commission workshops, and an online survey. Every effort was made to ensure all segments of the community were able to participate by holding meetings at various times and days of the week, holding in-person and virtual meetings, promoting events in three languages (English, Spanish, and Vietnamese), and providing live interpretation in Spanish and



Vietnamese. A deliberate effort to use the synergy between workshops held for the General Plan Update was made to gather local knowledge from community to inform both the General Plan and this analysis. Specifically, 10 community forums that focused on environmental justice provided meaningful engagement opportunities and local knowledge found in this FHA. The various outreach efforts informed and helped identify the issues discussed in this analysis and the development of the programs in the Housing Plan. A detailed summary of the outreach efforts and timeline can be found in Appendix F.

Before discussing fair housing issues in accordance with AB 686, the following provides a brief history that has shaped the community and housing opportunities of the city.

SANTA ANA HISTORY

Santa Ana has a rich history that has shaped its development and the housing opportunities for residents. Governmental and institutional land ownership patterns as the county seat, development of the economy, race and ethnic change, and discriminatory practices have individually and collectively resulted in unique fair housing challenges today.

Historic Housing Events

Incorporated in 1886, the City of Santa Ana has a rich historical and cultural heritage. The City of Santa Ana is the county seat and boasts an eclectic urban environment, burgeoning employment centers, transit hub, historic neighborhoods, and a rich history dating back to the mid-1800s.

In terms of housing-related issues in Santa Ana's past, the history is equally as complex and rich. Santa Ana was the setting of the 1967 *Reitman v. Mulkey* Supreme Court case. At that time, Dorothy Mulkey and her husband, Lincoln, were looking for housing. The couple found an apartment in Santa Ana, which was a segregated community at the time. The couple sought to rent the apartment but were refused by the landlord because they were African-American. The Mulkeys decided to challenge the landlord's refusal. With the support of the American Civil Liberties Union (ACLU) and the OC Fair Housing Council, they sought redress in court. The United States Supreme Court decided in favor of the Mulkeys, declaring racial discrimination in the sale and rental of housing illegal and unconstitutional, and confirmed that no landlords could refuse to rent to people based on their skin color, race or ethnicity, or religion.



Equally important in the history of housing rights in Santa Ana was the 1985 Tenant Strike. Residents, mostly undocumented immigrants, rose up in protest against their landlords due to unsafe housing conditions and lack of maintenance of their housing units. Santa Ana tenants ceased paying rent and initiated a tenant and landlord battle for fair housing. With the assistance of Hermandad Mexicana Nacional and the Immigration Reform and Control Act making its rounds through legislation, tenants received support and assurance that their immigration status would not come into question. Tenants filed suit against their landlords and came out victorious, receiving court-ordered monetary compensation and repairs to their homes.

Land Patterns

The City of Santa Ana has seen significant changes in its housing market and housing conditions during the last decade. Housing prices tripled from 1998 to 2007, significantly declined during the Great Recession, and have been on an upward trend for the past several years, mirroring patterns in the region. Housing and apartment rents have increased steadily during this time.

Many of the city's land use characteristics are directly related to its historical position as one of Orange County's earliest pioneer settlements. Since Santa Ana was founded in the 19th century, its primary settlement period was before the automobile age. Unlike many of its Orange County neighbors, the city's land use patterns mirror both its rich history as well as its more recent growth.

Key land use characteristics include limited vacant land available for development (most new development involves recycling and redevelopment of previously improved land). The city also serves as the county seat and hosts a number of governmental uses and buildings. A total of 58 percent of city's land area is devoted to residential development. The City has adopted a number of specific plans and specific developments (SD) to provide greater direction and consistently high quality development standards for projects. The city is served by five freeways: the Santa Ana Freeway (I-5), the Garden Grove Freeway (SR-22), the Costa Mesa Freeway (SR-55), the San Diego Freeway (I-405), and the Orange Freeway (SR-57). Furthering mobility access, there are numerous transit lines that traverse the city, including limited and express transit service and connections to the regional transit system through the Santa Ana Regional Transit Center (SARTC) train station. Moreover, Santa Ana is the centerpiece of the Orange County Transportation Authority (OCTA) system.



FAIR HOUSING ENFORCEMENT AND OUTREACH

Federal fair housing laws prohibit discrimination based on race, color, religion, national origin, sex/gender, handicap/disability, and familial status. Specific federal legislation and court rulings include:

- **The Civil Rights Act of 1866** covers only race and was the first legislation of its kind.
- **The Federal Fair Housing Act 1968** covers refusal to rent, sell, or finance.
- **The Fair Housing Amendment Act of 1988** added the protected classes of handicap and familial status.
- **The Americans with Disabilities Act (ADA)** covers public accommodations in both businesses and in multifamily housing developments.
- ***Shelly v. Kramer* 1948** made it unconstitutional to use deed restrictions to exclude individuals from housing.
- ***Jones v. Mayer* 1968** made restrictive covenants illegal and unenforceable.

California state fair housing laws protect the same classes as the federal laws, with the addition of marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination. Specific State legislation and regulations include:

- **Unruh Civil Rights Act** extends to businesses and covers age and arbitrary discrimination.
- **California Fair Employment and Housing Act (Rumford Act)** covers the area of employment and housing, with the exception of single-family houses with no more than one roomer/boarder.
- **California Civil Code Section 53** takes measures against restrictive covenants.
- **Department of Real Estate Commissioner's Regulations 2780 to 2782** define disciplinary actions for discrimination, prohibit panic selling, and affirm the broker's duty to supervise.
- **Business and Professions Code** covers people who hold licenses, including real estate agents, brokers, and loan officers.



Santa Ana residents have access to information about fair housing enforcement, outreach capacity, and resources available to them. First, the California Department of Fair Employment and Housing (DFEH) accepts, investigates, conciliates, mediates, and prosecutes complaints under state and federal law. DFEH investigates complaints of employment and housing discrimination based on protected class. The program provides California's tenants, landlords, and property owners and managers with a means of resolving housing discrimination cases in a fair, confidential, and cost-effective manner.

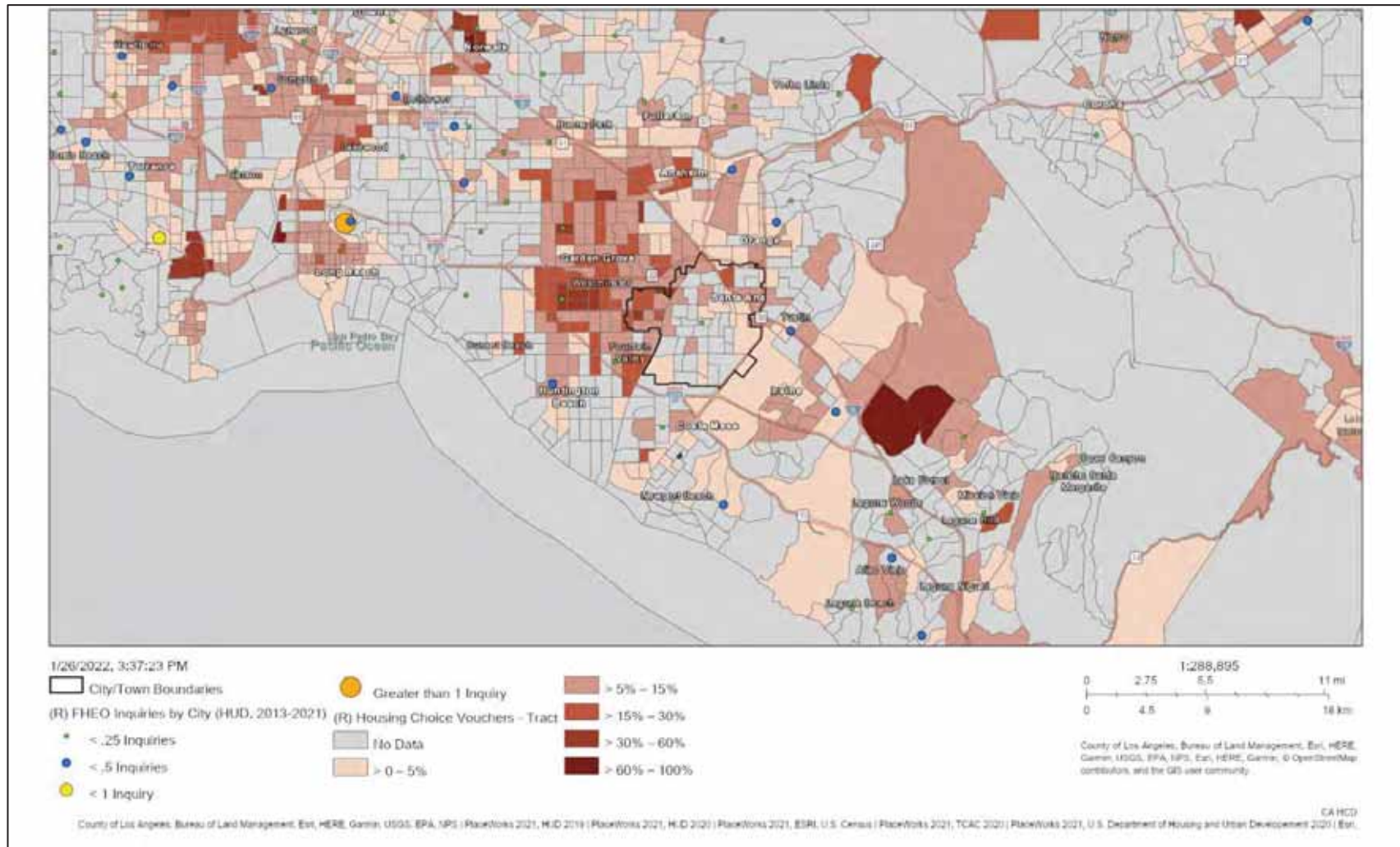
Community Legal Aid SoCal serves low-income people in Orange County with direct representation and engages in policy advocacy and impact litigation. Legal Aid provides legal assistance across a broad range of fair housing issues, including eviction, federally or otherwise publicly subsidized housing, substandard housing, landlord/tenant issues, homeownership issues, homeowners association issues, housing discrimination, and predatory lending practices. The main office is in Santa Ana, with additional offices in Southern California. Community Legal Aid SoCal is funded by the Legal Services Corporation, which carries restrictions against representing undocumented clients.

Locally, the Fair Housing Council of Orange County provides a variety of services, including community outreach and education, homebuyer education, mortgage default counseling, landlord-tenant mediation, and limited low-cost advocacy. Their services are provided in English, Spanish, and Vietnamese. The Fair Housing Council also investigates claims of housing discrimination and assists with referrals to DFEH. The Council may also occasionally assist with or be part of litigation challenging housing practices. Santa Ana provides funding annually to the Council each year with CDBG funds. In Quarter 1 of FY 2021-2022, 1,053 residents were served with fair housing services.

Fair Housing Inquiries (FHEO) by City and housing voucher recipients are shown in Figure E-1. FHEOs are not official cases but show how many residents have had a concern regarding possible discrimination in housing. Since 2013, there have been 65 FHEO inquiries in Santa Ana. A majority were related to discrimination based on a disability. Complaints that have been processed by the Fair Housing Assistance Program and HUD also show that disability is the most prevalent type of discrimination complaint. Out of 33 complaints filed between 2013 and 2021, 15 were based on discrimination. There is no additional discrimination complaint or case data available for Santa Ana.



Figure E-1 FHEO Inquiries by City, and Housing Choice Vouchers by Tract



Source: HCD AFFH Data Viewer; HUD 2013-2021, 2021.

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PATTERNS OF INTEGRATION AND SEGREGATION

To inform priorities, policies, and actions, this section includes an analysis of integration and segregation, including patterns and trends, related to people with protected characteristics. Importantly, the analysis addresses both integration and segregation to holistically evaluate the patterns and practices and better identify and prioritize contributing factors to fair housing issues.

RACE AND ETHNICITY

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.

Dissimilarity indices can be used to measure the evenness of distribution between two groups in an area. Dissimilarity indices are commonly used to measure segregation. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40–54: Moderate Segregation
- >55: High Segregation

The following analysis of racial/ethnic segregation also includes racial/ethnic minority population trends, maps of minority concentrated areas over time, and an analysis of the City's pipeline projects inventory as it relates to minority (non-White) concentrated areas.

Regional Trend

As shown in Table E-1, racial/ethnic minority groups make up 59 percent of the Orange County population. Just over 34 percent of the Orange County population is Hispanic/Latino, 40.6 percent of the population is White, 20.3 percent is Asian, and 1.6 percent is Black/African American. Santa Ana and the neighboring cities of Anaheim, Tustin, and Garden Grove have larger populations of racial/ethnic minority (non-White) populations compared to the County.



Table E-1
Racial/Ethnic Composition: Orange County, Santa Ana, and Neighboring Cities

<i>Race/Ethnicity</i>	<i>Santa Ana</i>	<i>Anahelm</i>	<i>Tustin</i>	<i>Costa Mesa</i>	<i>Garden Grove</i>	<i>Irvine</i>	<i>Orange County</i>
Hispanic or Latino (of any race)	76.8%	54.3%	40.0%	35.6%	36.4%	10.3%	34.1%
Not Hispanic or Latino	23.2%	45.7%	60.0%	64.4%	63.6%	89.7%	65.9%
White alone	9.4%	24.2%	31.9%	50.1%	19.5%	40.3%	40.6%
Black or African American alone	1.0%	2.5%	2.4%	1.8%	0.9%	1.6%	1.6%
American Indian and Alaska Native alone	0.1%	0.2%	0.1%	0.2%	0.3%	0.1%	0.2%
Asian alone	11.6%	16.6%	22.2%	8.4%	41.1%	42.9%	20.3%
Native Hawaiian, Other Pacific Islander alone	0.2%	0.4%	0.1%	0.7%	0.3%	0.2%	0.3%
Some other race alone	0.2%	0.1%	0.1%	0.4%	0.1%	0.2%	0.2%
Two or more races	0.8%	1.8%	3.2%	2.9%	1.5%	4.3%	2.8%

Source: 2015-2019 American Community Survey (ACS), 5-Year Estimates.

As discussed previously, HUD’s dissimilarity indices can be used to estimate segregation levels over time. Dissimilarity indices for Orange County and Santa Ana are shown in Table E-2. Dissimilarity indices between non-White and White groups indicate that the county has stayed relatively the same with regard to segregation since 1990. Segregation between Black and White communities has decreased, but segregation between Hispanic and Asian/Pacific Islander communities and White communities has increased.

Table E-2
Racial/Ethnic Dissimilarity Trends: Orange County and Santa Ana

	<i>1990</i>	<i>2000</i>	<i>2010</i>	<i>Current</i>
Orange County				
Non-White/White	55.32	55.50	54.64	56.94
Black/White	72.75	68.12	65.22	68.85
Hispanic/White	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	43.46	46.02	45.77	49.78
Santa Ana				
Non-White/White	47.77	49.28	46.49	47.97
Black/White	36.53	27.91	25.15	33.97
Hispanic/White	53.09	53.61	50.00	51.40
Asian or Pacific Islander/White	43.10	46.77	46.87	48.78

Source: U.S. Department of Housing and Urban Development (HUD) Affirmatively Furthering Fair Housing (AFFH) Database, 2020.



Figure E-2 shows that most central areas in Orange County have high concentrations of racial/ethnic minorities. Coastal cities, including Huntington Beach and Costa Mesa, and the areas east and southeast of Interstate 5 generally have smaller non-White populations. Most block groups inland, including Westminster, Garden Grove, Anaheim, and some parts of Irvine have majority racial/ethnic minority populations. Santa Ana's racial/ethnic minority populations are comparable to the immediately surrounding jurisdictions. Coastal communities west and south of Santa Ana tend to have smaller racial/ethnic minority populations, and communities directly surrounding Santa Ana, such as Garden Grove and Westminster, have larger concentrations of racial/ethnic minorities.

Local Trend

According to the 2015-2019 ACS, about 77 percent of the Santa Ana population identifies as being Hispanic or Latino of any race. In comparison, only 34.1 percent of Orange County residents identify the same. The City has a smaller population of White-alone residents compared to neighboring jurisdictions.

The Asian-alone population in Santa Ana (11.6 percent) is smaller than in surrounding cities (Anaheim, 16.6 percent; Tustin, 22.2 percent; and Garden Grove, 41.1 percent). However, the census tracts in the western part of Santa Ana, in the Riverview West neighborhood, have large concentrations of Asian residents. As discussed in Appendix A, the Asian population increased by 11 percent between the 2010 and 2020 census, the majority of which was Vietnamese. The concentration of Vietnamese residents in Santa Ana can be tied to the growing Vietnamese community of Little Saigon that was historically located in Westminster and now encompasses sizable communities in Garden Grove and west Santa Ana.

Santa Ana also has smaller population of Black- or African-American-alone residents (1 percent) compared to many neighboring jurisdictions (Anaheim, 2.5 percent; Tustin, 2.4 percent; and Irvine, 1.6 percent). However, that was not always the case. The Central City neighborhood, roughly bounded by Bristol Street, McFadden Avenue, Raitt Street, and Santa Ana Boulevard, was once home to a thriving African-American population. Many community members served on military bases in Orange County and eventually settled in Santa Ana. However, many African-American families began to move out of Santa Ana during the late 1970s and 80s, with many relocating to the Inland Empire. Some religious institutions and businesses that served this community are still present in the neighborhood today.



Dissimilarity indices between non-White and White groups indicate that the city has also stayed almost the same with regard to segregation since 1990. Segregation between Black and White Hispanic communities has decreased, and segregation between Asian/Pacific Islander communities and White communities has increased.

Figure E-3 and Figure E-4 compare racial or ethnic minority concentrations in Santa Ana in 2010 and 2018. The entire city and many of the immediately surrounding areas have greatly increased in minority concentration.

Pipeline Projects Inventory

To assess the City's pipeline housing projects inventory used to meet the 2021-2029 RHNA, the distribution of units by income category and non-White block group population are shown in Figure E-4 and Table E-3. Most units are in block groups where 61 to 80 percent of the population belongs to a racial/ethnic minority group, including 66 percent of moderate-income units from pipeline projects. The majority of the units for lower income are also in block groups, with 61 to 80 percent of the population belonging to a racial/ethnic minority group. As shown in Figure E-4, a majority of pipeline projects are located in the central and northern parts of the City where existing general plan land use designations and zoning districts that permit multi-family development are located. These areas are also served by high quality transit, such as rapid transit bus lines, the OC Streetcar, and the Santa Ana Regional Transportation center (SARTC), which connects to the broader Metrolink system. The locations of the pipeline projects are dispersed throughout a large geographic area and will not exacerbate existing conditions, rather will disperse any potential negative externalities caused by overconcentration. Moreover, the locations of the pipeline projects have the potential to improve existing conditions through increased investment and provision of new services that will not only benefit new residents but improve the quality of life for all segments of the community, especially existing residents.



Table E-3
Distribution of RHNA Units by Racial/Ethnic Minority Population: Pipeline Projects

<i>Racial/Ethnic Minority Population (Block Group)</i>	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Above Moderate</i>	<i>Total</i>
<= 20%	0.0%	0.0%	0.0%	0.0%
21–40%	0.0%	0.0%	0.0%	0.0%
41–60%	0.0%	0.0%	0.0%	0.0%
61–80%	61.8%	66.7%	52.3%	54.0%
> 81%	38.2%	33.3%	47.7%	46.0%
Total	1,144	6	5,764	6,914

DISABILITY

Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.

Regional Trend

According to the 2015-2019 ACS, 8.5 percent of Orange County residents experience a disability. Only 7.2 percent of the Santa Ana population experiences a disability. Santa Ana has a smaller population of persons with disabilities compared to Anaheim (8.5 percent) and Costa Mesa (8.3 percent) but larger than Irvine (5.6 percent) and Tustin (6.6 percent).

As shown in Figure E-5, less than 20 percent of the population in most tracts in Orange County experiences a disability. Tracts with disabled populations exceeding 20 percent are not concentrated in one specific area of the county. Santa Ana and areas to the east have the smallest concentration of persons with disabilities. The concentration of persons with disabilities in Santa Ana is comparable to neighboring cities.

Local Trend

Most tracts in Santa Ana have populations of persons with disabilities below 10 percent (see Figure E-6). Two census tracts in the northern part of the city have a higher percentage of persons with disabilities. These tracts are home to a higher proportion of senior-headed households and residential-care facilities. Independent living and cognitive difficulties are the most common disability type in Santa Ana; 2.7 percent of the population experiences an independent living difficulty, 2.6 percent experiences a cognitive difficulty, 2.5 percent experiences an ambulatory difficulty, 2.2 percent experiences a hearing difficulty, 1.1 percent experiences a vision difficulty, and 0.9 percent experiences a self-care difficulty.



All pipeline projects used for the 2021-2029 RHNA are in tracts where less than 10 percent of residents experience one or more disabilities.

FAMILIAL STATUS

Familial status refers to the presence of children under the age of 18 without regard to whether the child is biologically related to the head of household and the marital status of the head of household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments (e.g., limiting the number of children in a complex or confining to a specific location) violate fair housing law. Single-parent households are also protected by fair housing law.

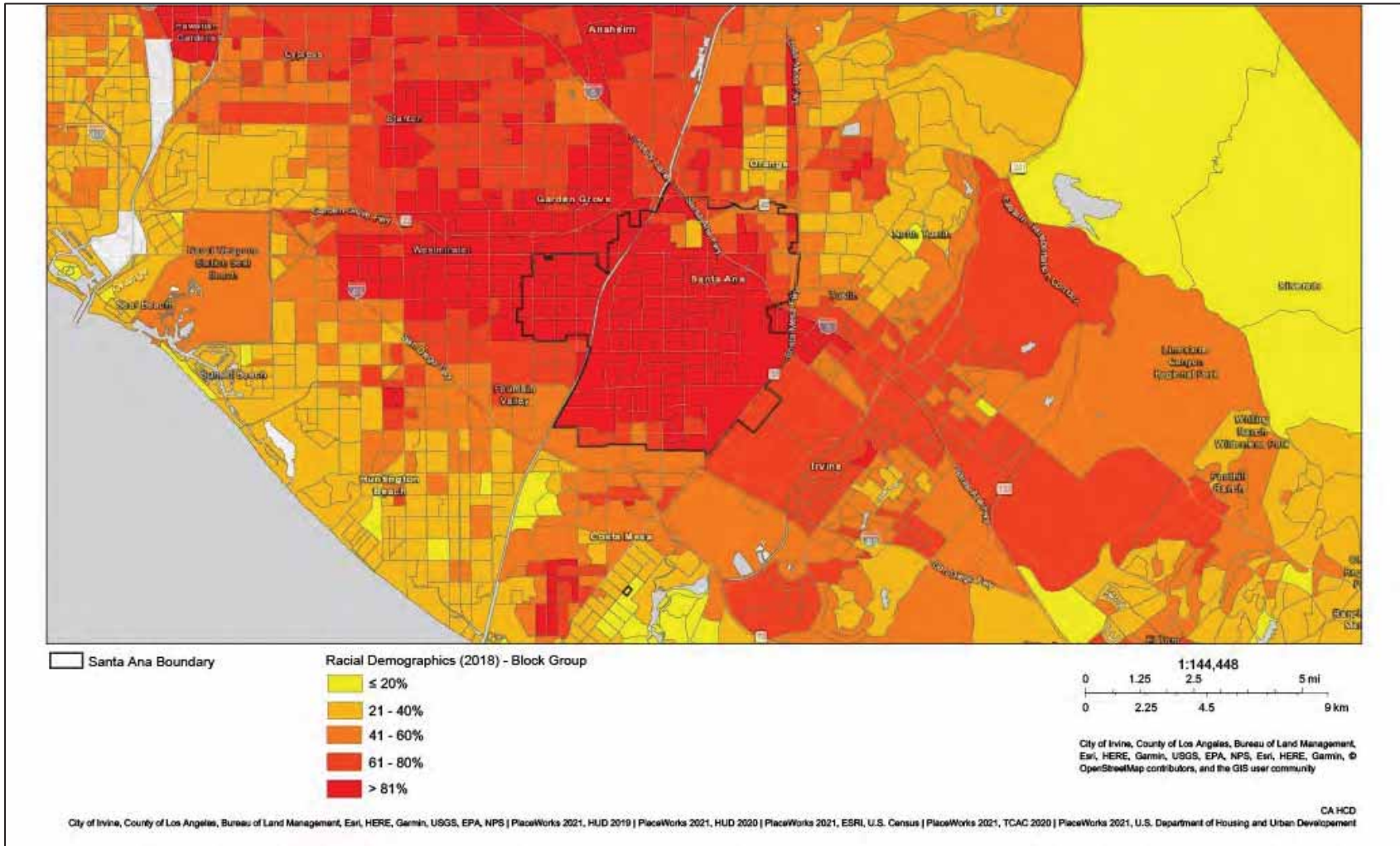
Regional Trend

Approximately 55 percent of Santa Ana households are families with a married couple. Out of those couples, 36 percent have children. The city's share of households with a married couple is larger than the county's share and the shares of the neighboring cities of Anaheim, Costa Mesa, Garden Grove, Irvine, and Tustin (see Figure E-7). Of the selected jurisdictions, Costa Mesa has the largest proportion of single-adult households, which represent 47.3 percent of all households in the City.

More than 60 percent of children in most areas around Huntington Beach, Tustin, Irvine, and Costa Mesa live in married-couple households (Figure E-8). Figure E-9 shows the percentage of children in single-parent, female-headed households by tract. Children in female-headed households are most concentrated in areas west and north of Santa Ana, including Westminster and Anaheim. In general, there are more children in female-headed households in the central Orange County areas, and this could be based on housing types available to them.

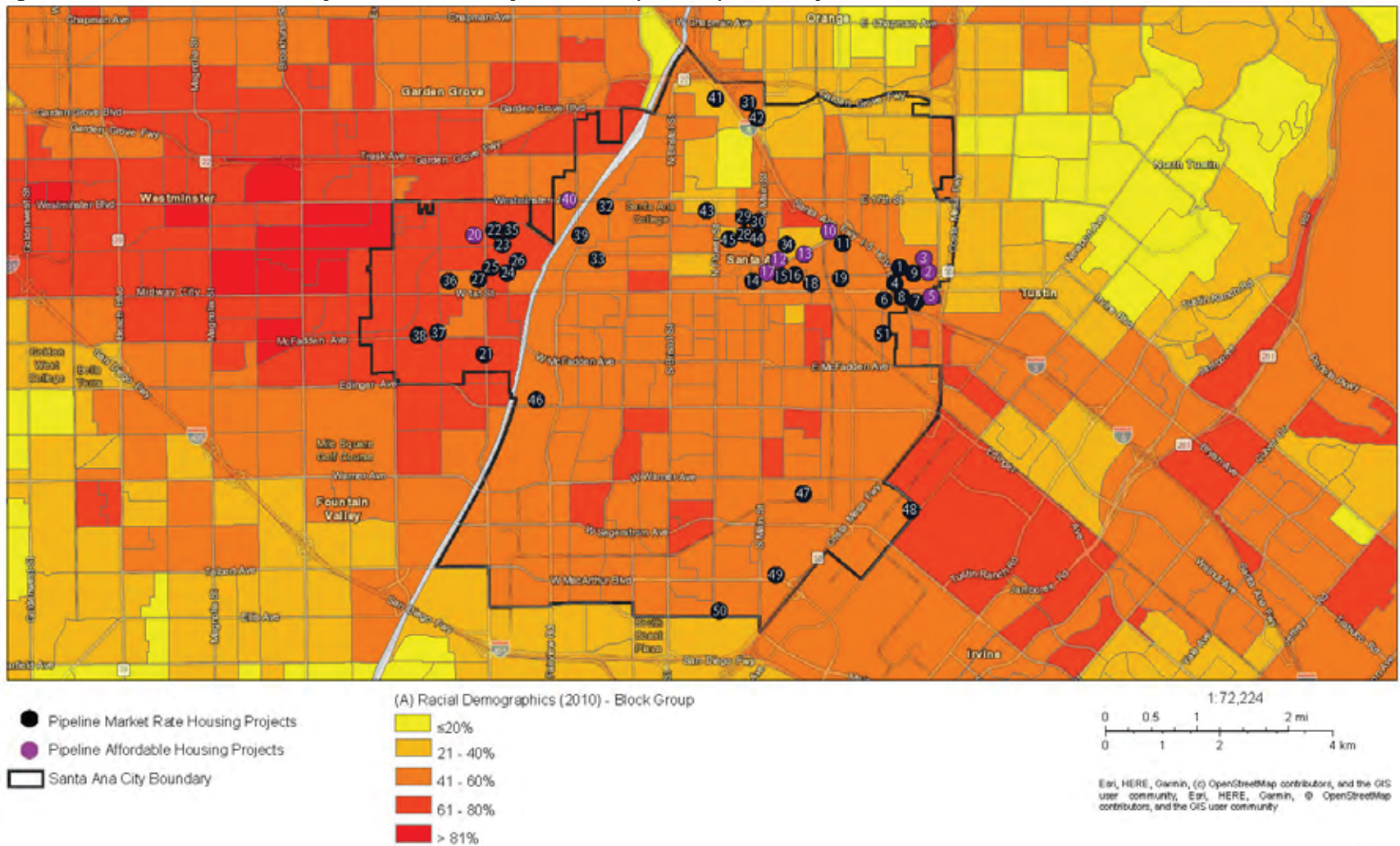


Figure E-2 Regional Racial/Ethnic Minority Concentrations by Block Group (2018)



Source: HCD AFFH Data Viewer (2018), 2021.

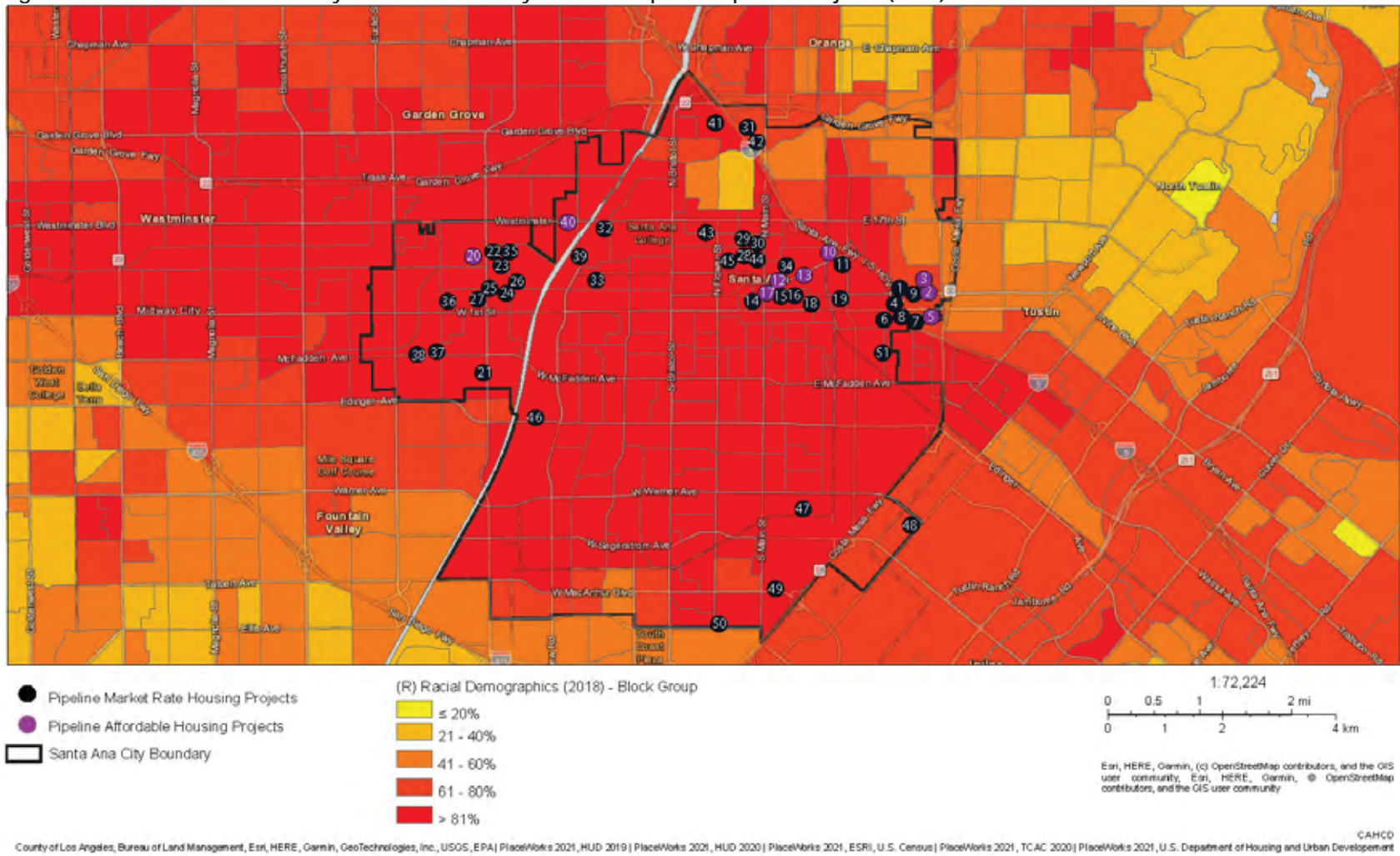
Figure E-3 Racial/Ethnic Minority Concentrations by Block Group and Pipeline Projects (2010)



Source: HCD AFFH Data Viewer (2010), 2021.

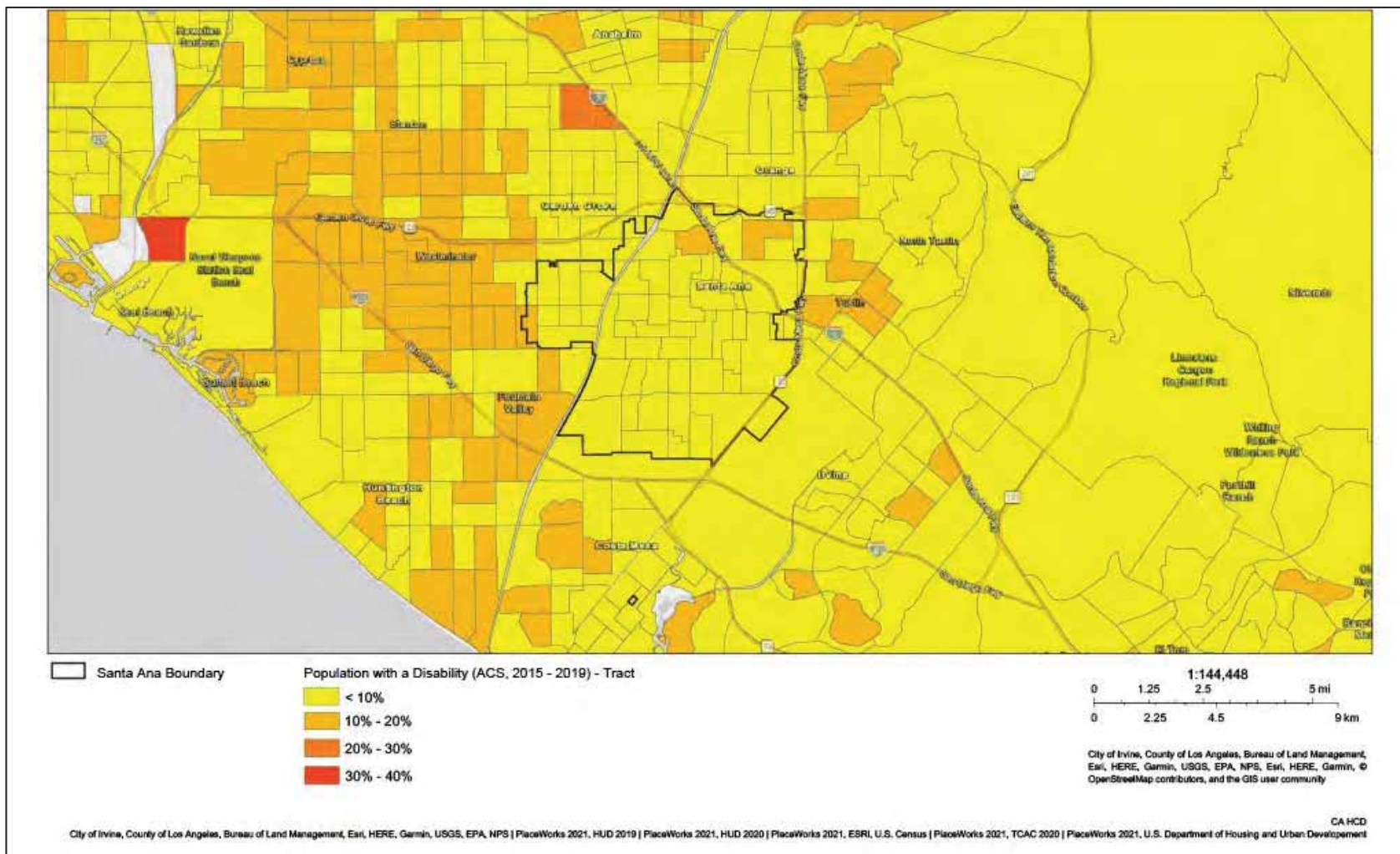
Note: Pipeline project numbers correlate to project list in Table C-2 of Appendix C.

Figure E-4 Racial/Ethnic Minority Concentrations by Block Group and Pipeline Projects (2018)



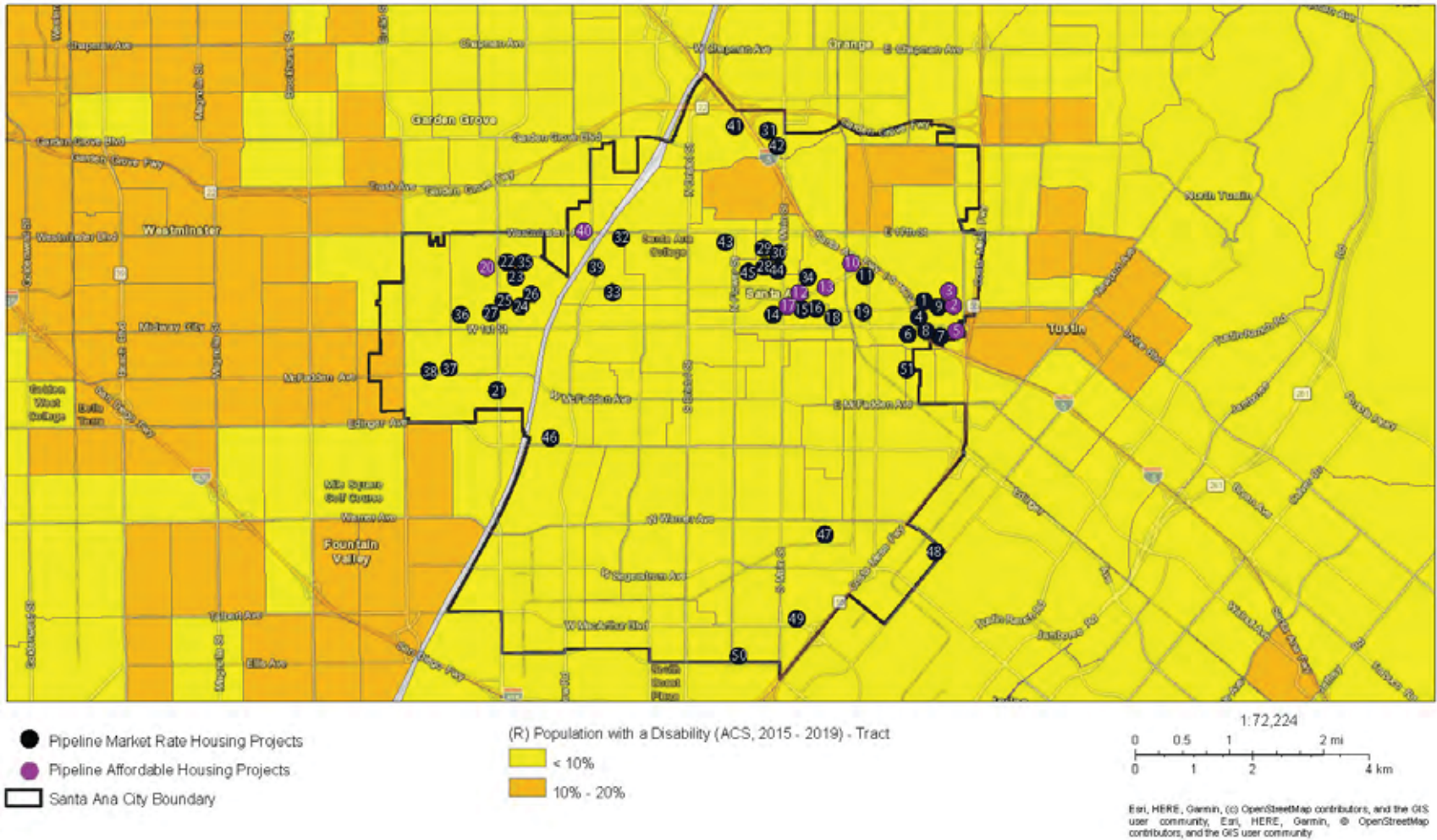
Source: HCD AFFH Data Viewer (2010-2018), 2021.
 Note: Pipeline project numbers correlate to project list in Table C-2 of Appendix C.

Figure E-5 Regional Concentrations of Persons with Disabilities by Tract



Source: HCD AFFH Data Viewer; 2015-2019 ACS, 2021.

Figure E-6 Concentrations of Persons with Disabilities by Tract and Pipeline Projects

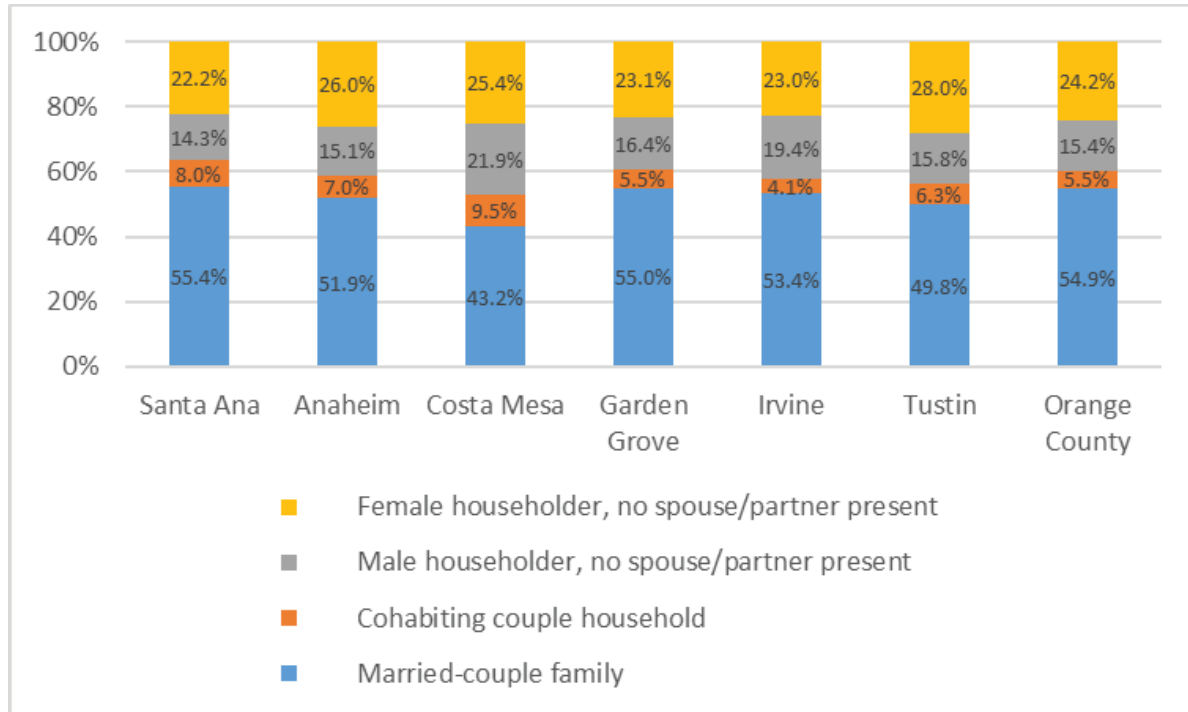


County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development

Note: Pipeline project numbers correlate to project list found on Table C-2 in Appendix C.
Source: HCD AFFH Data Viewer; 2015-2019 ACS, 2021.

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Figure E-7 Households in Orange County, Santa Ana, and Neighboring Cities



Source: 2015-2019 ACS (5-Year Estimates).

Local Trend

Santa Ana has seen a decrease in households with children since 2010. During the 2006-2010 ACS, 47 percent of households had children. The most recent 2015-2019 ACS estimates that now only 40 percent of households have children in Santa Ana, representing 13 percent decrease. According to the 2014-2018 ACS, approximately 12 percent of Santa Ana households are single parents with children, and 72 percent of those are female headed. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services.

As shown in Figure E-10 and Figure E-11, there are tracts in downtown Santa Ana that have a higher proportion of female-headed households with children.



Pipeline Projects

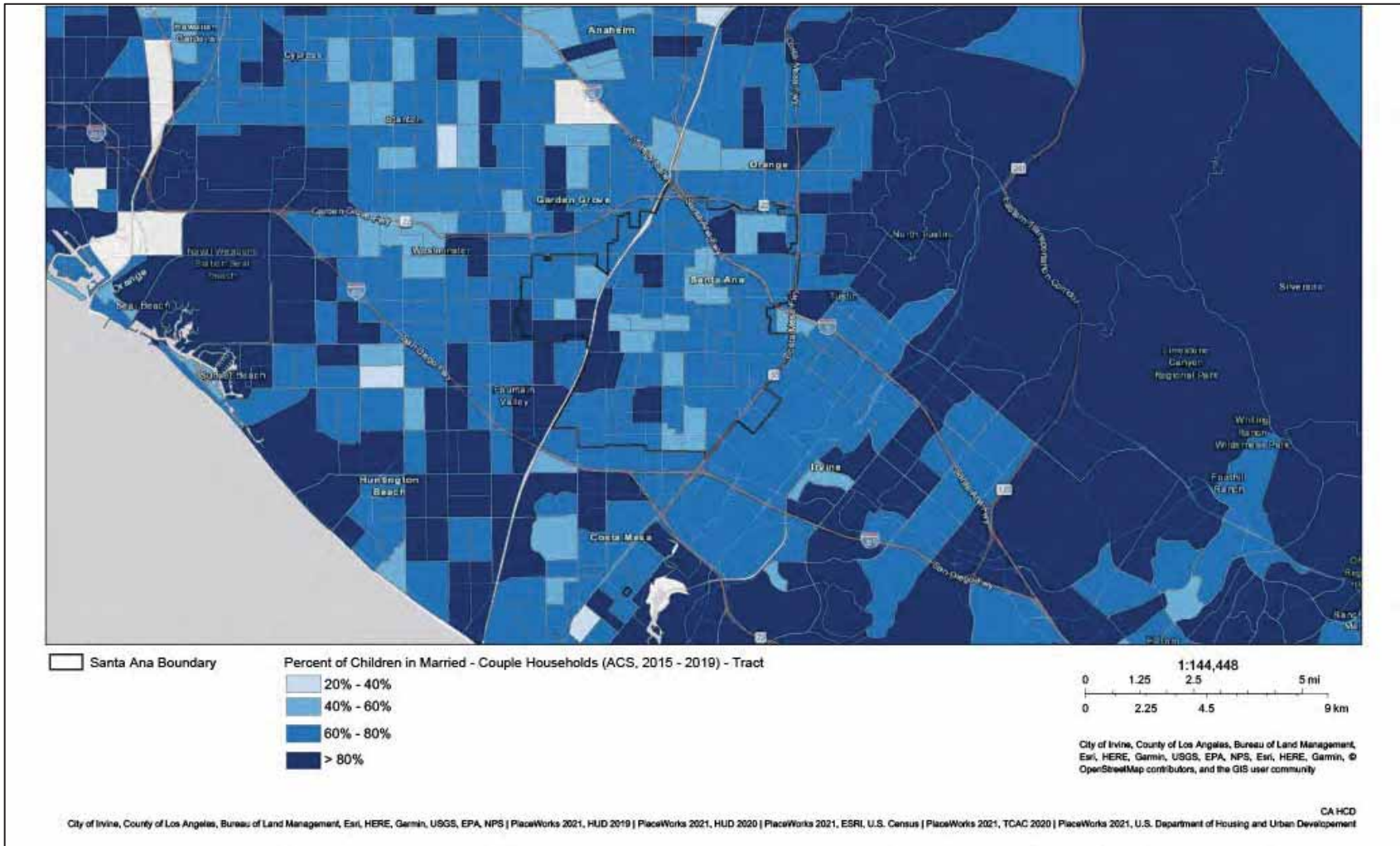
In Santa Ana a majority of the City’s RHNA units are in tracts where 60 to 80 percent of households are married couple households with children (see Table E-4). This is also where a majority of the lower income units are located. The location of the units are consistent with the makeup of the city. The locations of the pipeline projects do not exacerbate existing conditions. They are dispersed throughout a large geographic area and will disperse any potential negative externalities caused by overconcentration. Moreover, the locations of the pipeline projects have the potential to improve existing conditions through providing additional housing opportunities for families with children in areas where they established social networks and capital. Table E-4

Distribution of RHNA Units by Children in Married Couple Households: Pipeline Projects

	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Above Moderate</i>	<i>Total</i>
< 20%	0.0%	0.0%	0.0%	0.0%
20%–40%	0.0%	0.0%	0.0%	0.0%
40%–60%	13.1%	0.0%	25.5%	23.3%
60%–80%	86.9%	100.0%	73.6%	76.0%
> 80%	0.0%	0.0%	0.9%	0.7%
Total	1,144	6	5,764	6,914

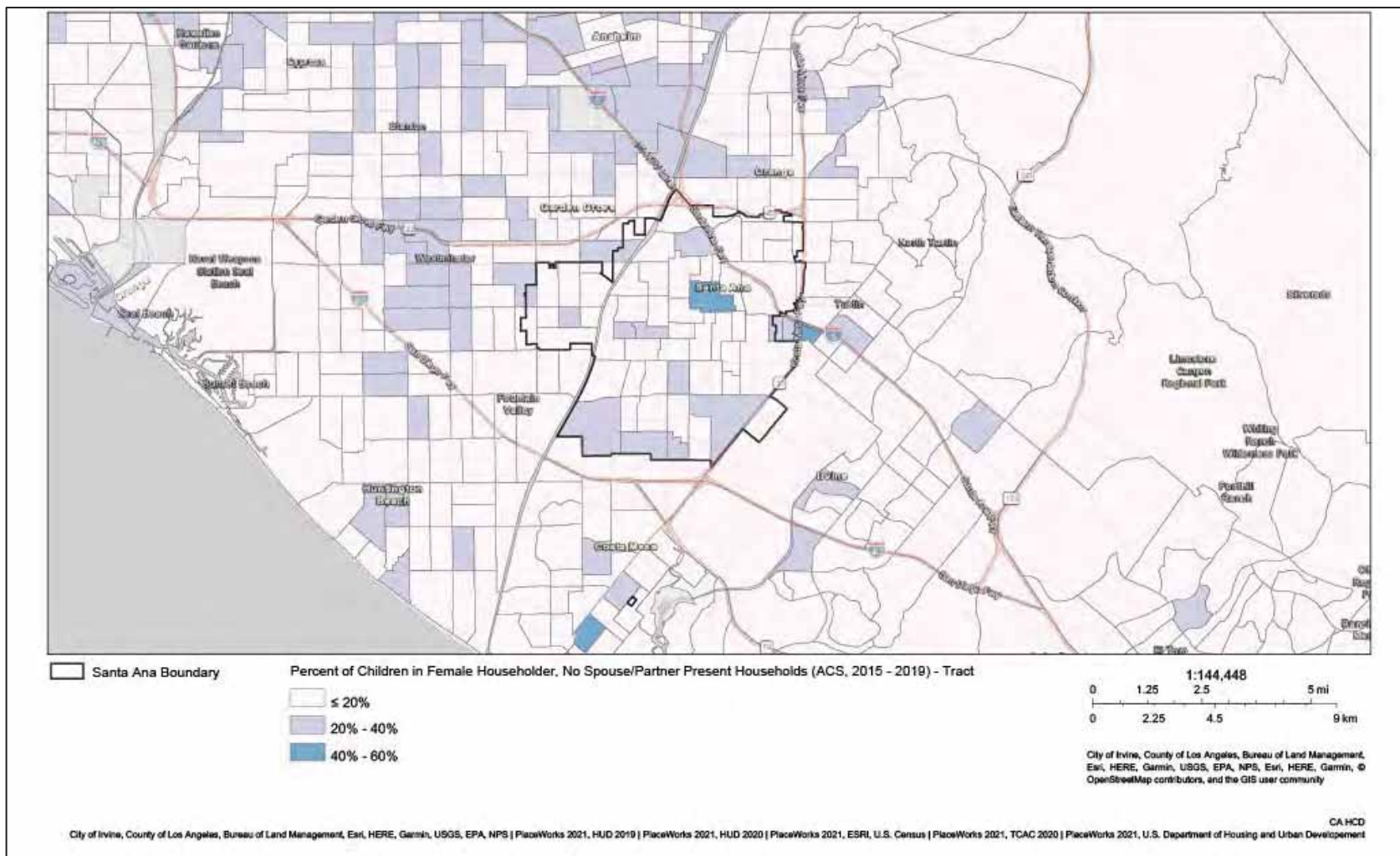


Figure E-8 Regional Percent of Children in Married Couple Households by Tract



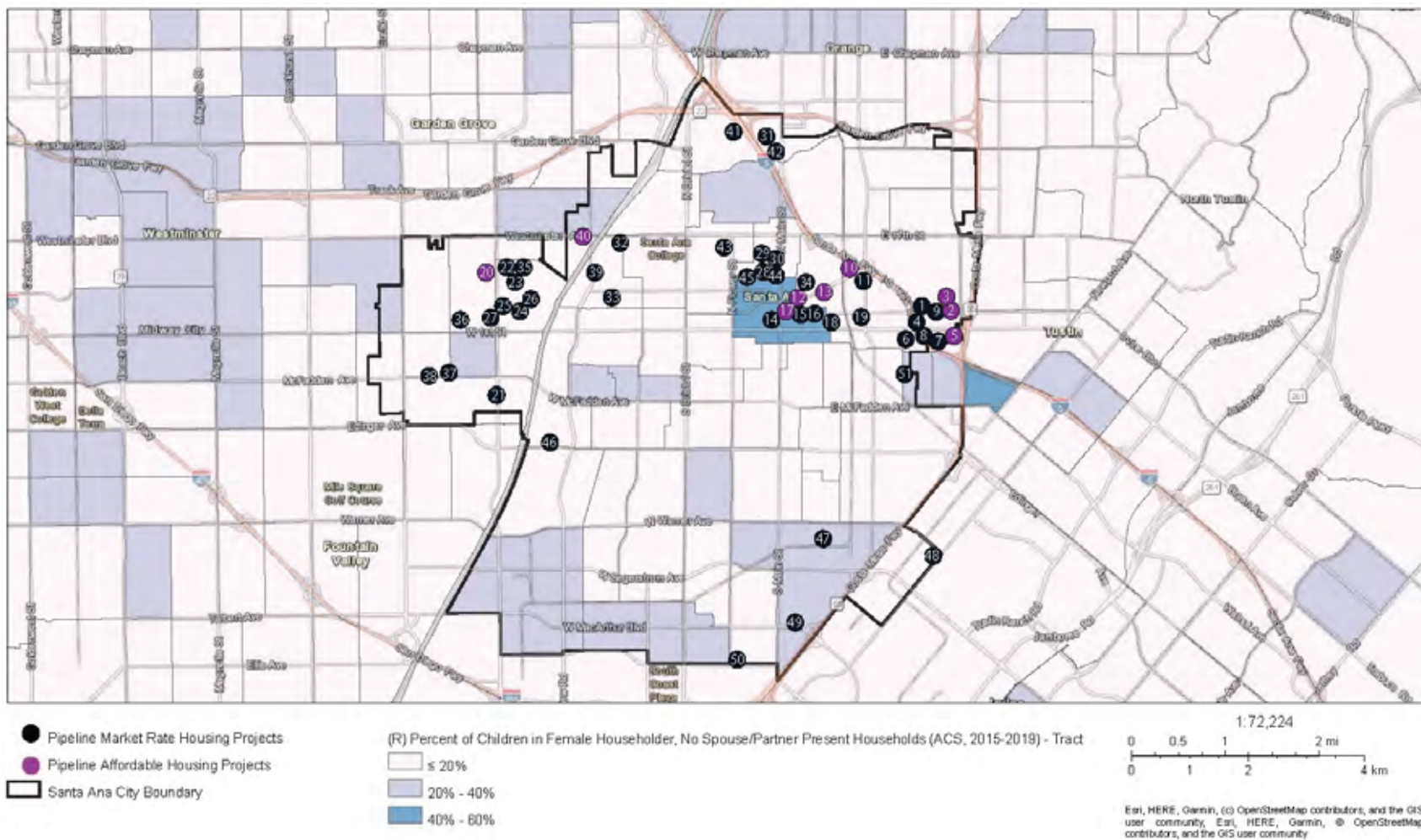
Source: HCD AFFH Data Viewer; 2015-2019 ACS, 2021.

Figure E-9 Regional Percent of Children in Female-Headed Households by Tract



Source: HCD AFFH Data Viewer; 2015-2019 ACS, 2021.

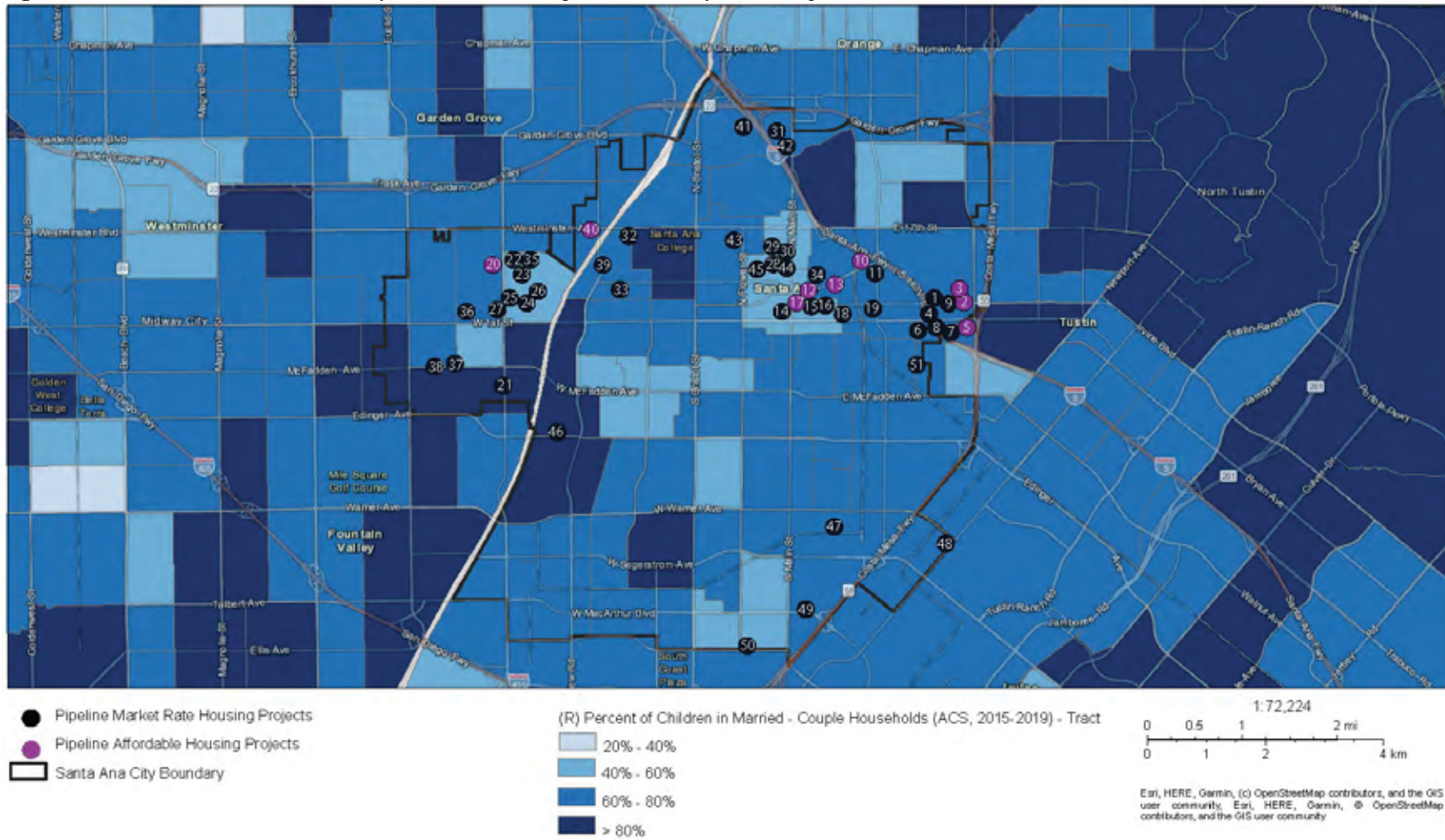
Figure E-10 Children in Female-Headed Households by Tract and Pipeline Projects



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USOS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development

Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.
 Note: Pipeline project numbers correlate to project list in Table C-2 of Appendix C.

Figure E-11 Children in Married Couple Households by Tract and Pipeline Projects



CAMCO
 County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA | PlaceNiks 2021, HUD 2019 | PlaceNiks 2021, HUD 2020 | PlaceNiks 2021, ESRI, U.S. Census | PlaceNiks 2021, TCAC 2020 | PlaceNiks 2021, U.S. Department of Housing and Urban Development

Source: HCD AFFH Data Viewer; 2015-2019 ACS, 2021.
 Note: Pipeline project numbers correlate to project list found on Table C-2 in Appendix C.

INCOME

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI (based on HUD’s income definition of up to 80 percent of the AMI).

Regional Trend

Table E-5 shows that 56.4 percent of Santa Ana households earn 80 percent or less than the AMI and are considered lower income, compared to 40.5 percent countywide. According to the 2015-2019 ACS, the median household income in Santa Ana is \$66,145, significantly lower than \$90,234 countywide. Santa Ana also has a lower median income than the nearby cities of Tustin (\$84,697), Irvine (\$105,126) and Anaheim (\$71,763).

Table E-5
Income Level Distribution

<i>Income Category</i>	<i>Santa Ana</i>		<i>Orange County</i>	
	<i>Households</i>	<i>Percent</i>	<i>Households</i>	<i>Percent</i>
Very Low Income (<50% AMI)	25,989	34.2%	252,051	24.6%
Low Income (50-80% AMI)	16,848	22.2%	163,078	15.9%
Moderate Income (80-120% AMI)	14,624	19.2%	182,380	17.8%
Above Moderate Income (>120% AMI)	18,519	24.4%	427,467	41.7%
Total Households	75,980		1,024,976	

Source: Southern California Association of Governments (SCAG) Final RHNA Data Appendix, 2020.
Note: AMI = Area Median Income.

Figure E-12 shows LMI areas regionally. Coastal cities from Seal Beach to Costa Mesa as well as the southern end of Irvine have low concentrations of LMI households. In these areas, less than 25 percent or 25 to 50 percent of the population is LMI in most tracts. LMI households are most concentrated in the central Orange County region around Santa Ana. There are smaller concentrations of LMI households in and around the cities of Garden Grove and Anaheim. Santa Ana has LMI household concentrations that are most similar with the cities immediately surrounding the city boundaries.



Local Trend

As discussed above, more than half of Santa Ana households are in the low or moderate income categories. Figure E-13 shows LMI concentrations by block group in the city. According to HUD’s definition, there are many LMI areas in Santa Ana, especially concentrated in downtown and the west side of the city.

Pipeline Projects

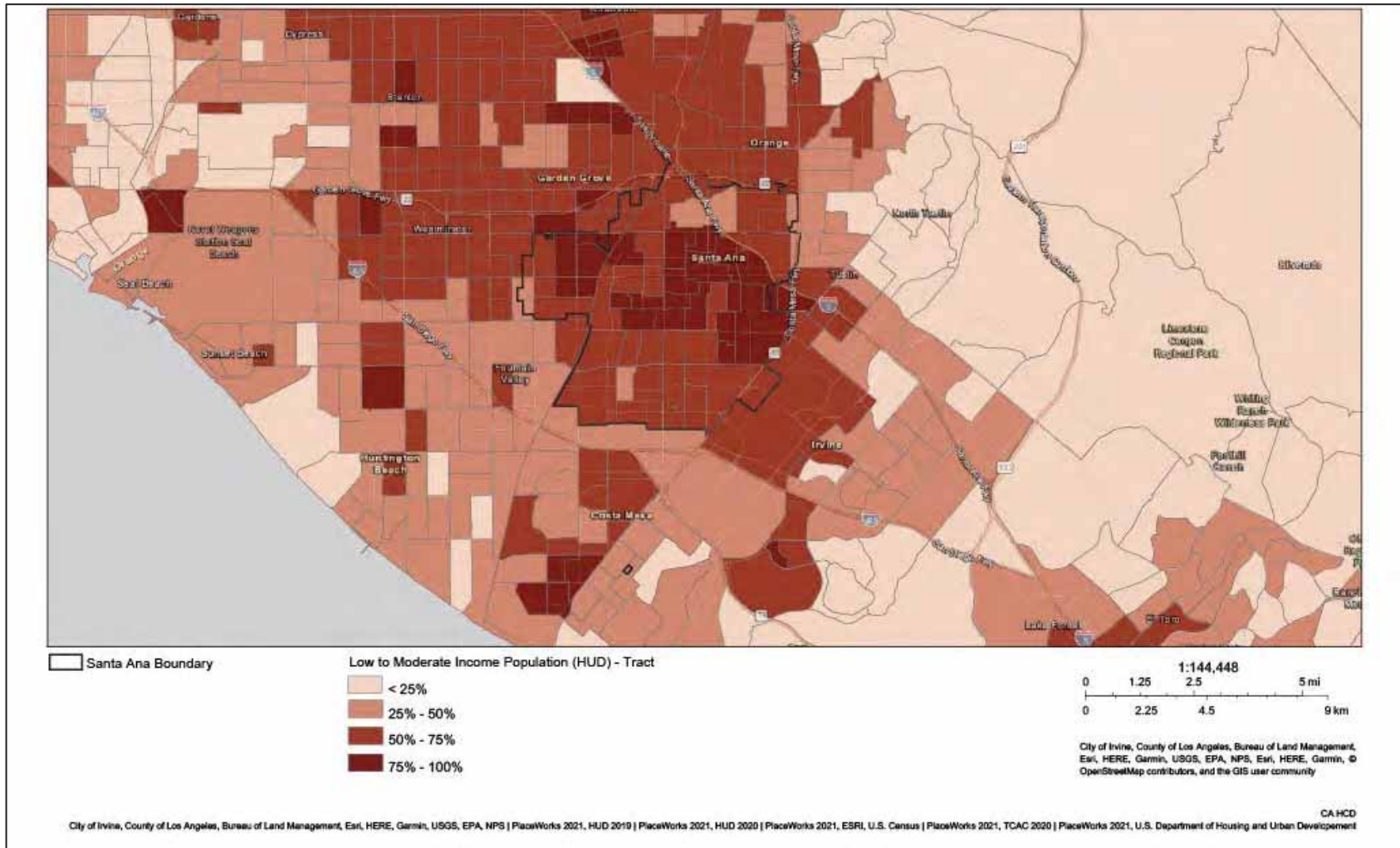
Figure E-13 also shows the pipeline projects used to meet the 2021-2029 RHNA. Most of the pipeline projects are in LMI areas where more than 50 percent of households are low or moderate income (see Table E-6). The majority of the city’s lower income RHNA units are in tracts with 50 to 75 percent of households being low or moderate income. The locations of the pipeline projects do not exacerbate existing conditions as they do not displace any local employers that provide living wages and are dispersed throughout a large geographic area that avoid potential negative externalities caused by overconcentration of poverty. Moreover, the locations of the pipeline projects have the potential to improve existing conditions through providing additional job opportunities, housing options, and potentially creating new social networks and capital that lead to increased economic mobility through creating a more socioeconomically diverse community.

Table E-6
Distribution of RHNA Units by Concentration of LMI Households: Pipeline Projects

<i>Concentration of LMI Households (Block Group)</i>	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Above Moderate</i>	<i>Total</i>
< 25%	0.0%	0.0%	0.0%	0.0%
25%–50%	0.0%	0.0%	0.0%	0.0%
50%–75%	61.8%	66.7%	63.1%	62.9%
75%–100%	38.2%	33.3%	36.9%	37.1%
Total	1,144	6	5,764	6,914

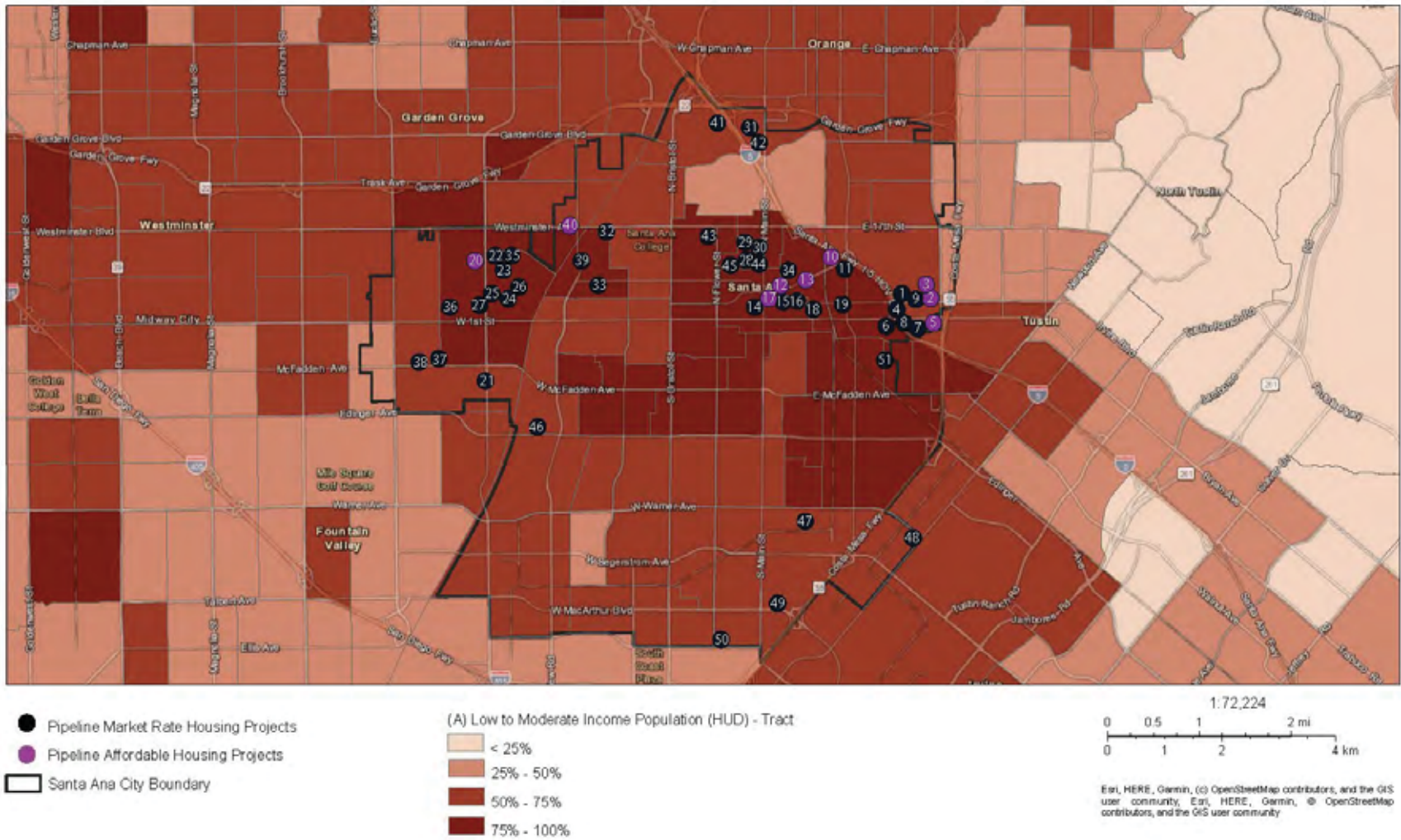


Figure E-12 Regional LMI Household Concentrations by Tract



Source: HCD AFFH Data Viewer; HUD LMI database (based on 2011-2015 ACS), 2021

Figure E-13 LMI Household Concentrations by Block Group and Pipeline Projects



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnology, Inc., USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2025, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development CAHCD

Source: HCD AFFH Data Viewer; HUD LMI database (based on 2011-2015 ACS), 2021.
 Note: Pipeline project numbers correlate to project list in Table C-2 of Appendix C.

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD identified census tracts with a majority non-White population with 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. HCD and the California Tax Credit Allocation Committee (TCAC) convened a Fair Housing Task Force to create opportunity maps that also identify areas of high segregation and poverty. TCAC Opportunity Maps are discussed in more detail in the following section of this fair housing assessment.

Regional Trend

Black/African American, American Indian/Alaska Native, persons of a race not listed (“Some other race”), Native Hawaiian/Other Pacific Islanders, and Hispanic/Latino populations all experience poverty at a higher rate than the average countywide (Table E-7). The proportion of non-Hispanic White residents under the poverty level is the lowest compared to other racial/ethnic groups in the county. Overall, 10.9 percent of all people are below the poverty level.

Table E-7
Poverty Status by Race/Ethnicity

	<i>Percent Below Poverty Level</i>	
	<i>Santa Ana</i>	<i>Orange County</i>
White alone	13.8%	9.5%
Black or African American alone	13.9%	13.8%
American Indian and Alaska Native alone	18.2%	13.2%
Asian alone	16.1%	11.2%
Native Hawaiian and Other Pacific Islander alone	3.8%	14.7%
Some other race alone	17.5%	17.9%
Two or more races	10.8%	7.5%
Hispanic or Latino origin (of any race)	16.5%	15.2%
White alone, not Hispanic or Latino	8.6%	7.1%

Source: 2015-2019 ACS (5-Year Estimates).

Figure E-14 shows R/ECAPs, TCAC-designated areas of high segregation and poverty, and poverty status in the Orange County region. R/ECAPs and areas of high segregation and poverty are concentrated in central county around Santa Ana. Areas of high segregation and poverty have also been identified in tracts north and south of Santa Ana in Anaheim



and Costa Mesa/Newport Beach. Tracts with larger populations of persons experiencing poverty are also concentrated in these areas.

Local Trend

As presented earlier, 15.7 percent of the Santa Ana population is below the poverty level, higher than the rate countywide. American Indian and Alaska Native residents experienced poverty at the highest rate. Nearly 18 percent the American Indian and Alaska Native population, 17.5 percent of the population belonging to a race not listed (“some other race”), and 16.5 percent of the Hispanic or Latino population is below the poverty level. There are R/ECAPs and TCAC-designated areas of high segregation and poverty in the city, and they are mainly concentrated in and around the downtown area.

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF AFFLUENCE

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAA) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD Policy Paper defines racially concentrated areas of affluence as affluent, White communities.¹ According to this report, Whites are the most racially segregated group in the United States and “in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.” Based on this research, HCD defines RCAAs 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 median household income in 2016).

Regional Trend

Figure E-15 shows racial/ethnic minority populations and median income by block group in the Orange County region. Jurisdictions along the coast, including Huntington Beach and Costa Mesa, have higher median incomes and smaller racial/ethnic minority populations. Cities west and north of Santa Ana, such as Garden Grove, Anaheim, and Orange, have higher concentrations of racial/ethnic minorities and median income. There is one RCAA in North Tustin, a block group with

¹ Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) “Racially Concentrated Areas of Affluence: A Preliminary Investigation.” Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in *Cityscape: A Journal of Policy Development and Research* 21 (1): 99–124.



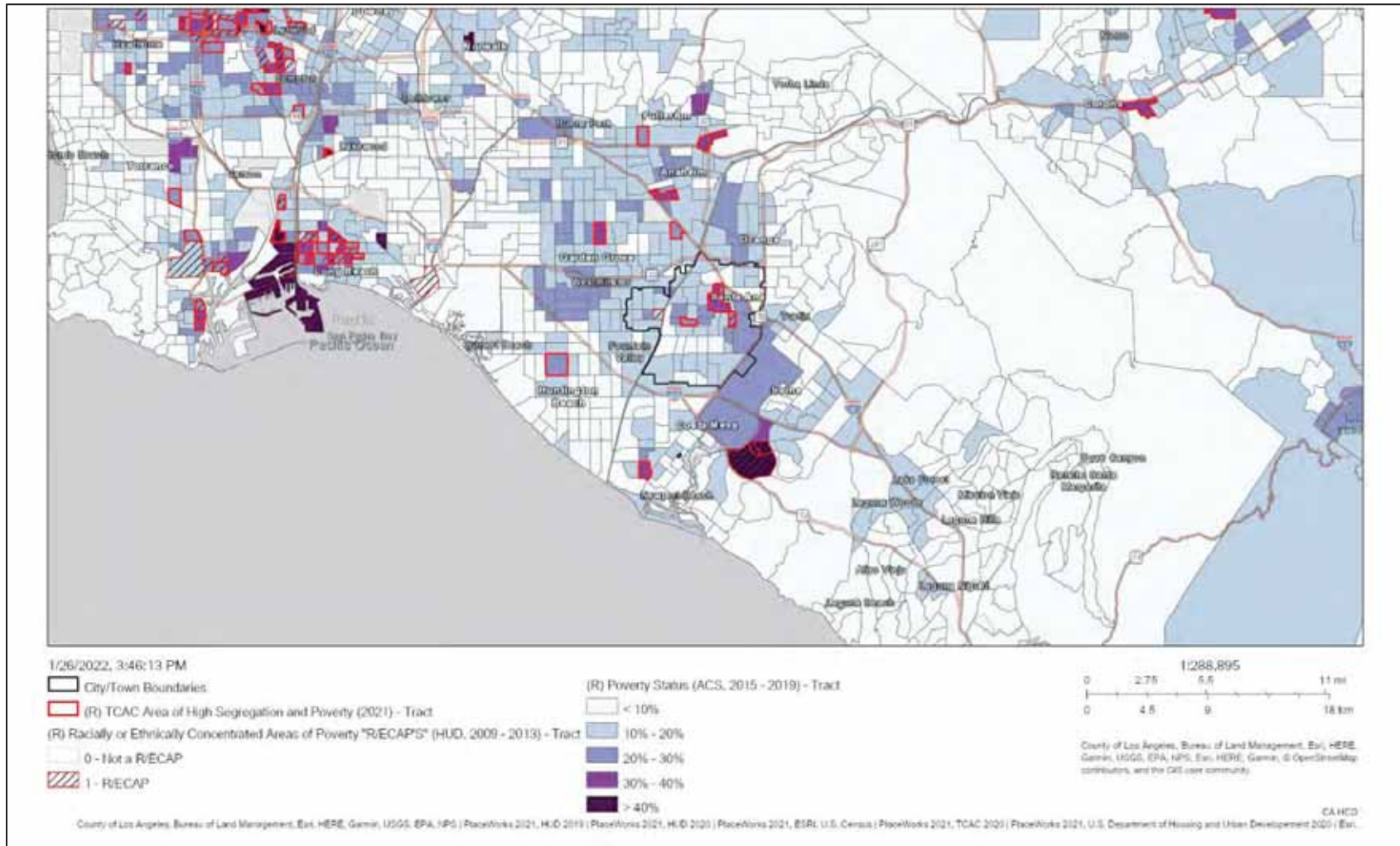
median income exceeding \$125,000 and racial/ethnic minority population below 20 percent.

Local Trend

Racial/ethnic minority populations and median income by Santa Ana block group are presented in Figure E-16. Of the block groups in the city, scattered block groups have median incomes exceeding \$125,000, but a majority of the block groups have incomes at or below the median. There are no block groups in the city where racial/ethnic minorities make up less than 20 percent of the population; therefore, there are no RCAAs in Santa Ana.

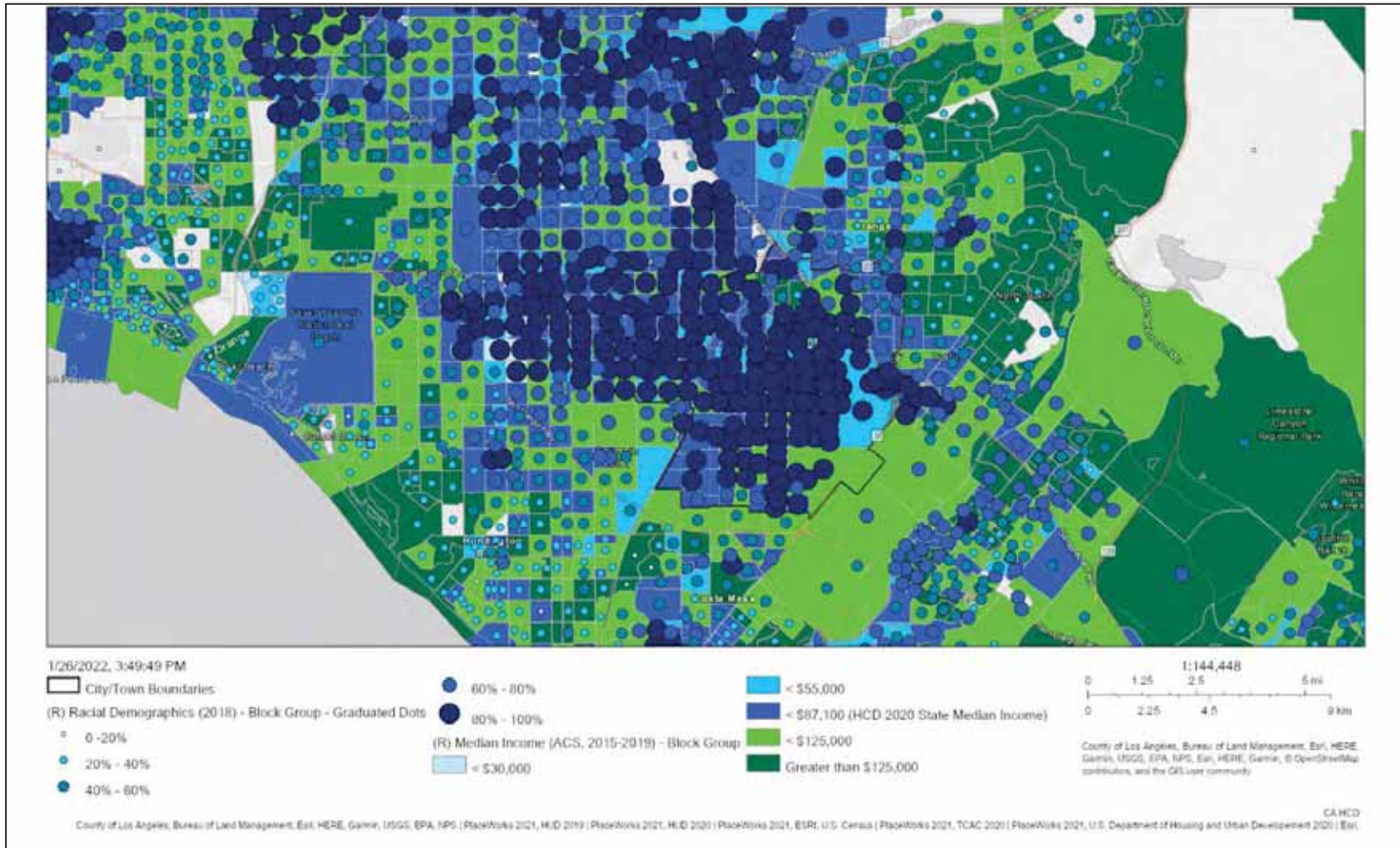


Figure E-14 R/ECAPs, TCAC Areas of High Segregation and Poverty, and Poverty Status by Tract



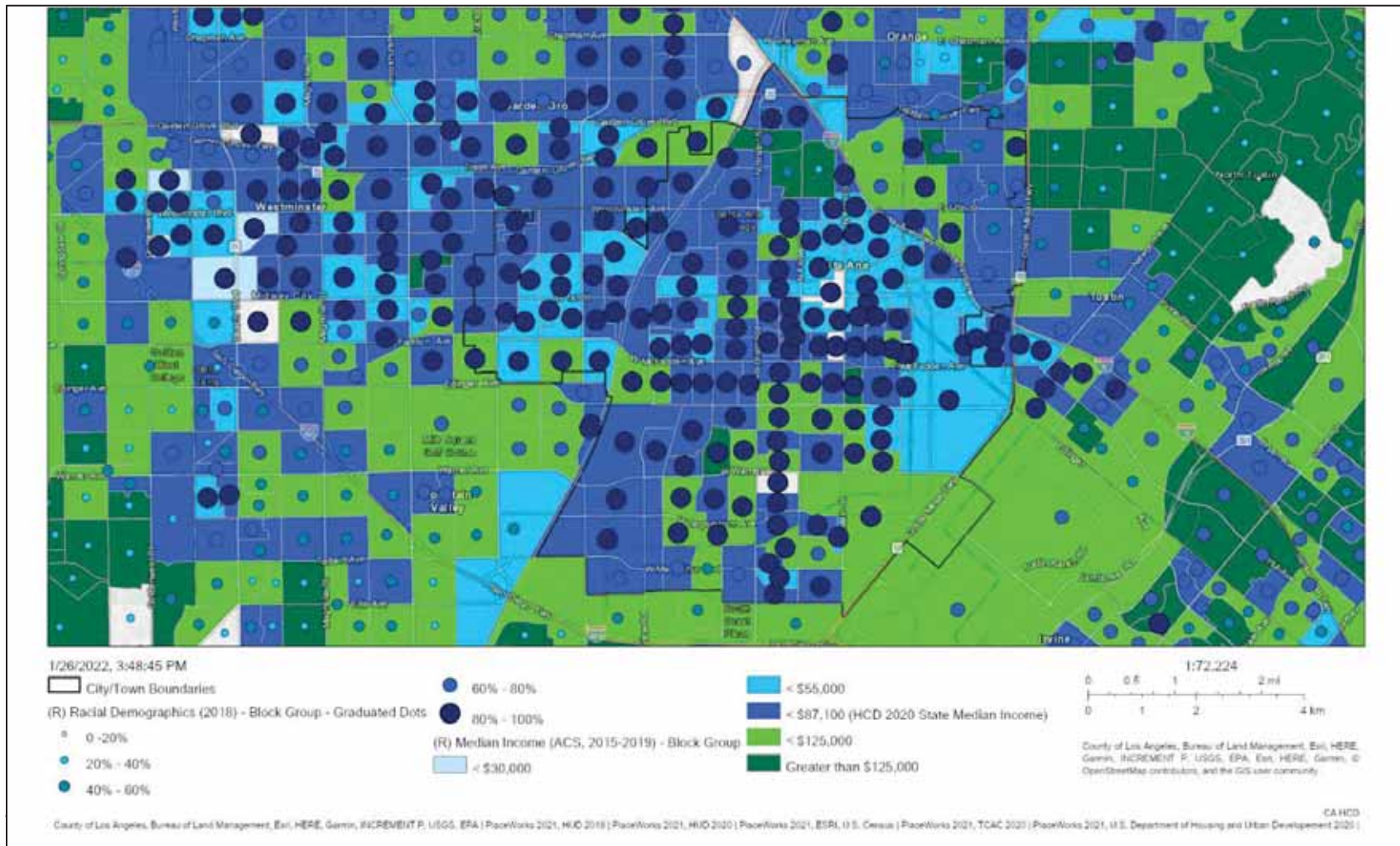
Source: HCD AFFH Data Viewer; HUD 2009-2013 R/ECAP database; TCAC 2021; 2015-2019 ACS, 2021.

Figure E-15 Regional Racial/Ethnic Minority Populations and Median Income by Block Group



Source: HCD AFFH Data Viewer; 2015-2019 ACS, 2021.

Figure E-16 Racial/Ethnic Minority Populations and Median Income by Block Group



ACCESS TO OPPORTUNITIES

To assess fair access to opportunities regionally and locally, this analysis uses HUD Opportunity Indicators and TCAC Opportunity Area Maps. This section also specifically addresses economic, education, environmental, and transportation opportunities.

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. Index scores are based on the following opportunity indicator indices (values range from 0 to 100):

- ***Low Poverty Index:*** The higher the score, the less exposure to poverty in a neighborhood.
- ***School Proficiency Index:*** The higher the score, the higher the school system quality is in a neighborhood.
- ***Labor Market Engagement Index:*** The higher the score, the higher the labor force participation and human capital in a neighborhood.
- ***Transit Trips Index:*** The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.
- ***Low Transportation Cost Index:*** The higher the index, the lower the cost of transportation in that neighborhood.
- ***Jobs Proximity Index:*** The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- ***Environmental Health Index:*** The higher the value, the better environmental quality of a neighborhood.

To assist in this analysis, HCD and the California TCAC convened the California Fair Housing Task Force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The task force created “opportunity maps” to identify resource levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9 percent Low Income Housing Tax Credits (LIHTCs).” These opportunity maps are made from composite scores of three different domains made up of a set of indicators related to economic, environmental, and educational opportunities and poverty and racial segregation. Based on these domain scores, tracts are



categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. Table E 8 shows the full list of indicators.

**Table E-8
Domains and List of Indicators for Opportunity Maps**

<i>Domain</i>	<i>Indicator</i>
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
Poverty and Racial Segregation	Poverty: tracts with at least 30% 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

Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.

REGIONAL TREND

HUD Opportunity Indicator scores for Orange County are shown in Table E-9. For the county, the White population, including the population below the federal poverty line, received the highest scores in low poverty, school proficiency, labor market participation, jobs proximity, and environmental health. Hispanic communities scored the lowest in low poverty, school proficiency, and labor market participation. Asian or Pacific Islander (non-Hispanic) communities scored the lowest in environmental health and jobs proximity, and was most likely to use public transit.



Table E-9
HUD Opportunity Indicators by Race/Ethnicity: Santa Ana/Orange County

	<i>Low Poverty</i>	<i>School Prof.</i>	<i>Labor Market</i>	<i>Transit</i>	<i>Low Transp. Cost</i>	<i>Jobs Prox.</i>	<i>Env. Health</i>
Santa Ana - Total Population							
White, non-Hispanic	43.58	40.95	48.31	92.62	80.95	74.89	10.29
Black, non-Hispanic	37.22	34.86	40.19	92.78	81.04	67.18	10.60
Hispanic	27.34	28.45	33.05	92.92	80.41	62.17	11.06
Asian or Pacific Islander, non-Hispanic	37.32	41.90	37.03	92.43	79.82	52.24	10.44
Native American, non-Hispanic	30.92	33.84	37.35	92.65	79.81	61.51	
Santa Ana - Population below federal poverty line							
White, non-Hispanic	36.59	35.69	45.31	92.55	81.75	72.63	10.59
Black, non-Hispanic	30.40	34.66	39.64	91.94	82.25	76.57	10.44
Hispanic	22.21	27.00	30.56	93.36	82.18	60.87	10.98
Asian or Pacific Islander, non-Hispanic	36.22	40.88	35.66	92.11	80.53	46.13	10.05
Native American, non-Hispanic	22.28	21.56	35.82	93.35	79.06	60.67	11.72
Orange County - Total Population							
White, non-Hispanic	76.48	81.89	74.59	60.92	67.05	46.96	24.39
Black, non-Hispanic	69.50	75.53	68.16	74.64	71.50	44.07	15.23
Hispanic	58.20	67.52	59.65	75.35	73.08	45.50	15.65
Asian or Pacific Islander, non-Hispanic	69.64	76.68	67.46	77.05	70.10	43.85	13.93
Native American, non-Hispanic	68.87	73.43	68.92	69.65	69.78	46.01	19.49
Orange County - Population below federal poverty line							
White, non-Hispanic	68.31	77.99	69.03	62.05	71.85	49.98	24.26
Black, non-Hispanic	57.08	70.54	60.65	74.14	71.46	42.77	13.74
Hispanic	40.26	56.48	46.97	79.38	77.74	45.63	12.87
Asian or Pacific Islander, non-Hispanic	59.82	72.84	58.95	82.14	75.35	40.98	10.57
Native American, Non-Hispanic	59.71	78.50	58.72	80.71	75.06	48.72	12.85

Source: HUD AFFH Database – Opportunity Indicators, 2020.

Opportunity map scores for Orange County census tracts are presented in Figure E-17. The central Orange County areas around Santa Ana comprise mostly low and moderate resource tracts and areas of high segregation and poverty. The central Orange County area, including Anaheim and Garden Grove, also has concentrations of low resource areas and some areas of high segregation and poverty. High and highest resource areas are most concentrated in coastal communities from Seal Beach and Huntington Beach to Newport Beach and in the unincorporated community of North Tustin.



LOCAL TREND

The HUD Opportunity Indicator scores for Santa Ana are found in Table E-9. Similar to the county data, the White population in Santa Ana, including the population below the federal poverty line, received the highest scores in low poverty and labor market participation. However, Asian or Pacific Islander (non-Hispanic) communities, including the population below the federal poverty line, received the highest scores for school proficiency and in environmental health for populations below the federal poverty line. Hispanic communities above the federal poverty line scored the lowest in low poverty, school proficiency, and labor market participation. Asian or Pacific Islander (non-Hispanic) communities scored the lowest in jobs proximity.

Opportunity map scores for Santa Ana census tracts are presented in Figure E-18 along with the City's pipeline projects. A majority of the industrial uses in the city are in the southeastern and southwestern areas.

Most of the tracts in the city are low resource tracts, with slightly higher resource tracts in the moderate resource category along the city's periphery. There are no tracts in the high or highest resource category in Santa Ana. There are five tracts in the city near the downtown area that are classified as areas of high segregation and poverty. Opportunity map categorization and domain scores for Santa Ana census tracts are shown in Table E-10.



**Table E-10
Opportunity Map Scores and Categorization**

<i>Census Tract</i>	<i>Economic Score</i>	<i>Environmental Score</i>	<i>Education Score</i>	<i>Composite Score</i>	<i>Final Category</i>
06059074003	0.4	0.01	0.06	-0.93	Low Resource
06059074004	0.31	0.41	0.08	-0.52	Low Resource
06059074005	0.23	0.56	0.08	-0.53	Low Resource
06059074006	0.35	0.55	0.22	-0.3	Moderate Resource
06059074102	0.28	0.53	0.13	-0.43	Low Resource
06059074103	0.24	0.58	0.1	-0.47	Low Resource
06059074106	0.26	0.06	0.42	-0.37	Low Resource
06059074107	0.61	0.58	0.36	-0.02	Moderate Resource
06059074108	0.19	0.26	0.11	-0.6	Low Resource
06059074109	0.26	0.56	0.17	-0.39	Low Resource
06059074110	0.2	0.69	0.36	-0.23	Moderate Resource
06059074111	0.47	0.62	0.32	-0.12	Moderate Resource (Rapidly Changing)
06059074200	0.1	0.42	0.02	-0.75	Low Resource
06059074300	0.1	0.06	0.02	-0.94	Low Resource
06059074403	0.05	0.03	0.03	-1.03	Low Resource
06059074405	0.06	0.04	0.08	-0.93	Low Resource
06059074406	0.06	0.04	0.01	-1.06	Low Resource
06059074407	0.12	0.02	0.06	-0.94	Low Resource
06059074501	0.05	0.17	0.03	0	High Segregation & Poverty
06059074502	0.08	0.19	0.04	-0.82	Low Resource
06059074601	0.15	0.56	0.03	-0.65	Low Resource
06059074602	0.13	0.29	0.13	-0.61	Low Resource
06059074701	0.06	0.59	0.13	-0.58	Low Resource
06059074702	0.07	0.68	0.04	-0.67	Low Resource
06059074801	0.31	0.41	0.08	-0.52	Low Resource
06059074802	0.05	0.32	0.05	-0.78	Low Resource
06059074803	0.2	0.48	0.11	-0.52	Low Resource
06059074805	0.07	0.71	0.1	-0.58	Low Resource
06059074806	0.01	0.66	0.03	0	High Segregation & Poverty
06059074901	0.02	0.59	0.03	-0.76	Low Resource
06059074902	0.04	0.72	0.02	-0.73	Low Resource
06059075002	0.03	0.23	0.02	0	High Segregation & Poverty



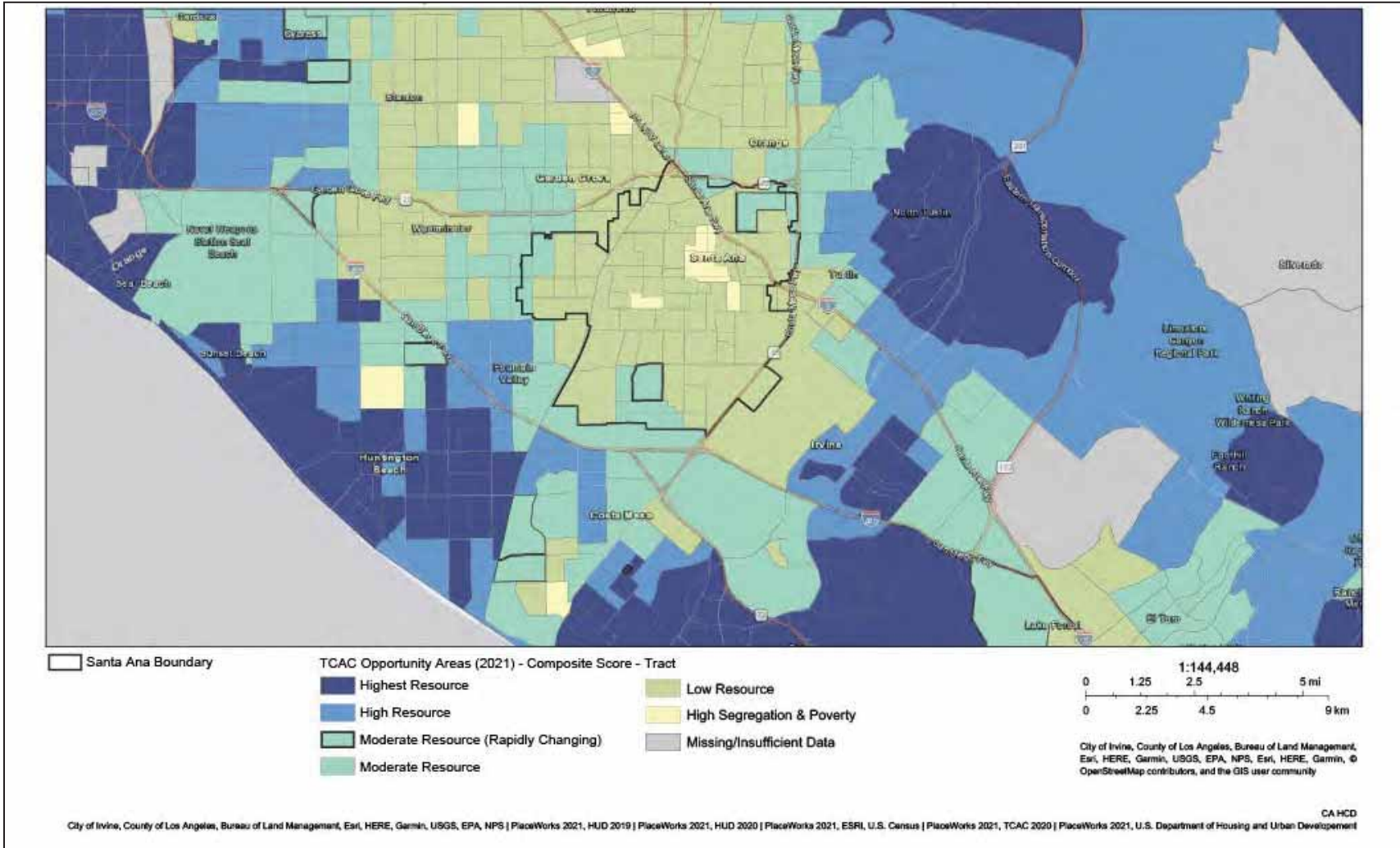
**Table E-10
Opportunity Map Scores and Categorization**

<i>Census Tract</i>	<i>Economic Score</i>	<i>Environmental Score</i>	<i>Education Score</i>	<i>Composite Score</i>	<i>Final Category</i>
06059075003	0.01	0.63	0.3	0	High Segregation & Poverty
06059075004	0.03	0.24	0.2	0	High Segregation & Poverty
06059075100	0.21	0.56	0.15	-0.44	Low Resource
06059075201	0.1	0.39	0.21	-0.53	Low Resource
06059075202	0.26	0.45	0.23	-0.37	Low Resource
06059075301	0.34	0.12	0.25	-0.46	Low Resource
06059075302	0.32	0.66	0.18	-0.34	Low Resource
06059075303	0.73	0.18	0.18	-0.31	Low Resource
06059075401	0.66	0.14	0.14	-0.39	Low Resource
06059075403	0.53	0.06	0.09	-0.57	Low Resource
06059075404	0.78	0.31	0.34	-0.08	Moderate Resource (Rapidly Changing)
06059075405	0.31	0.3	0.15	-0.46	Low Resource
06059075504	0.7	0.2	0.35	-0.14	Moderate Resource
06059075505	0.62	0.22	0.07	-0.46	Low Resource
06059075515	0.45	0.01	0.24	-0.84	Low Resource
06059075701	0.78	0.16	0.43	-0.03	Moderate Resource
06059075806	0.66	0.06	0.32	-0.3	Moderate Resource
06059075902	0.37	0.19	0.29	-0.34	Low Resource
06059076000	0.67	0.08	0.3	-0.29	Moderate Resource
06059088903	0.15	0.42	0.51	-0.14	Moderate Resource
06059089001	0.11	0.47	0.42	-0.25	Moderate Resource
06059089004	0.11	0.47	0.3	-0.4	Low Resource
06059089102	0.21	0.45	0.22	-0.41	Low Resource
06059089104	0.11	0.55	0.18	-0.5	Low Resource
06059089105	0.08	0.59	0.15	-0.53	Low Resource
06059089107	0.4	0.29	0.22	-0.35	Low Resource
06059099202	0.2	0.69	0.13	-0.44	Low Resource
06059099203	0.16	0.52	0.36	-0.29	Moderate Resource
06059099247	0.19	0.56	0.2	-0.41	Low Resource
06059099248	0.12	0.68	0.1	-0.54	Low Resource
06059099249	0.04	0.66	0.09	-0.65	Low Resource

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020.

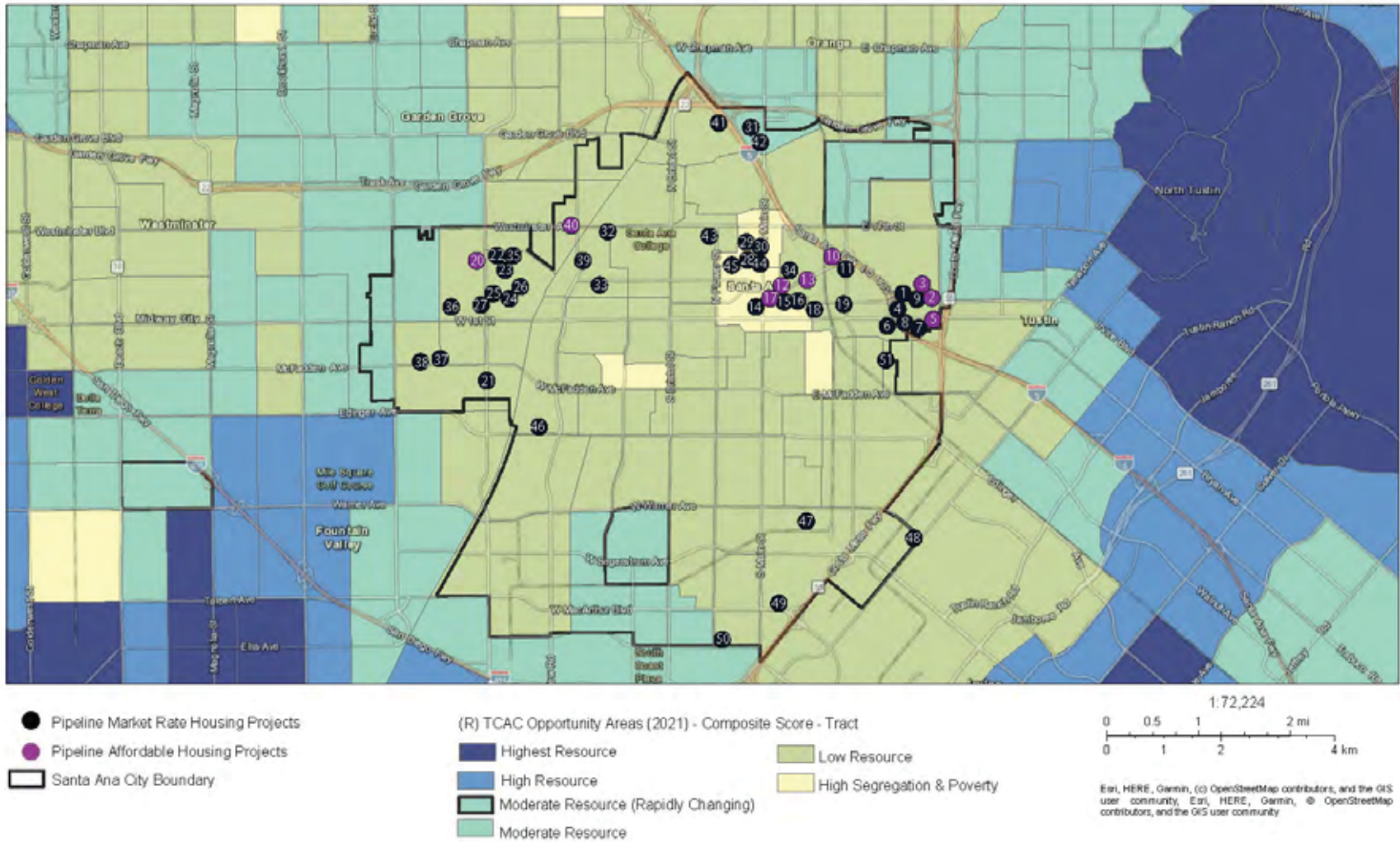


Figure E-17 Regional TCAC Opportunity Areas by Tract



Source: HCD AFFH Data Viewer, TCAC 2021, 2021.

Figure E-18 TCAC Opportunity Areas by Tract and Pipeline Projects



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, GeoTechnologies, Inc., USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development

Source: HCD AFFH Data Viewer, TCAC 2021, 2021.
 Note: Pipeline project numbers correlate to project list found on Table C-2 in Appendix C.

ECONOMIC

As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. See Table E-8 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend

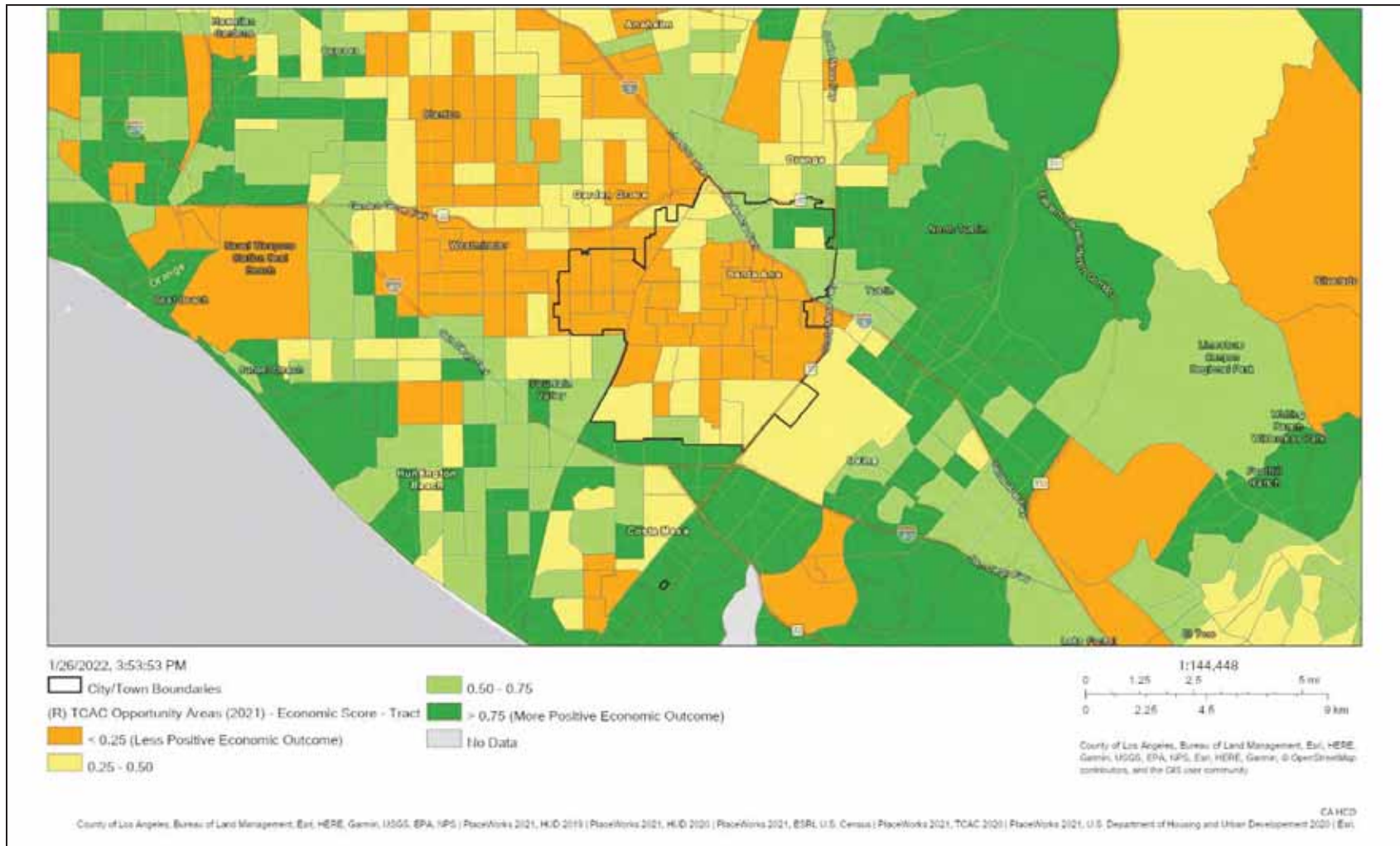
As presented in Table E-9, in Orange County, White residents have the highest labor market participation, and Hispanic residents have the lowest labor market participation. Figure E-19 shows TCAC Opportunity Map economic scores in the Orange County region by tract. Consistent with final TCAC categories, tracts with the highest economic scores are concentrated in coastal communities from the Seal Beach and Huntington Beach to Newport Beach, areas around Irvine, and the unincorporated community of North Tustin. Tracts with economic scores in the lowest quartile are concentrated in central Orange County areas in cities such as Santa Ana, Garden Grove, Westminster, Stanton, and Anaheim.

Local Trend

As presented in Figure E-20, the northeastern corner of the city, northeast of I-5, holds the tracts with the highest economic scores, in the third and fourth highest quartiles. As discussed previously, the tracts along the southeastern and southwestern city boundaries consist of mostly industrial and scored in the second lowest quartile for economic opportunity. The block groups along the central and western parts of the city have high concentrations of racial/ethnic minorities, exceeding 81 percent (see Figure E-4), and scored in the lowest quartile for economic opportunity (see Figure E-20).

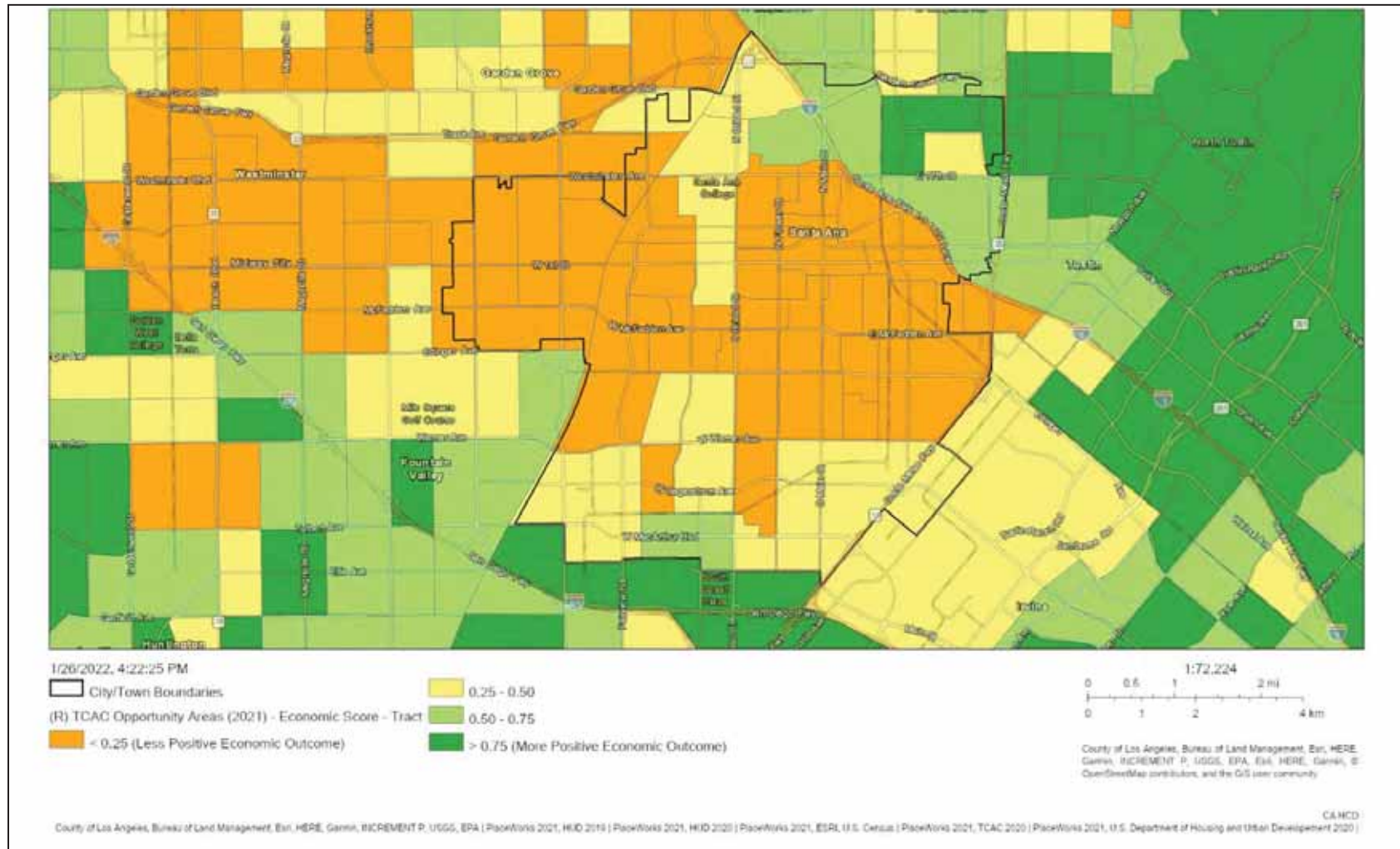


Figure E-19 Regional TCAC Opportunity Area Economic Scores by Tract



Source: HCD AFFH Data Viewer; TCAC 2021, 2021.

Figure E-20 TCAC Opportunity Area Economic Scores by Tract



Source: HCD AFFH Data Viewer; TCAC 2021, 2021.

EDUCATION

As described above, the Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. See Table E-8 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend

As presented in Table E-9, White Orange County communities are located closest to the highest quality school systems, and Hispanic communities are typically located near lower quality school systems. TCAC Opportunity Map education scores for the region are shown in Figure E 21. The central county areas, namely the cities of Santa Ana, Garden Grove, Anaheim, and Stanton, have the highest concentration of tracts with education scores in the lowest percentile. There is also a concentration of tracts with low education scores in Costa Mesa and some scattered tracts in Westminster and Huntington Beach. Coastal communities and areas near Irvine and the unincorporated community of North Tustin have the highest education scores.

Local Trend

Figure E-22 shows TCAC education scores for Santa Ana tracts. Tracts in Santa Ana generally received education scores consistent with economic scores discussed above. A majority of the residential tracts in the city scored in the lowest quartile (scores below 0.25), while the northwestern corner of the city, where tracts received higher economic opportunity scores, only scored slightly better, with education scores in the second lowest education score quartile. However, tracts along the western city boundary were also slightly better, with scores in the second lowest education quartile and one tract scoring in the second highest quartile (scores of 0.50 to 0.75), which is the highest scoring tract in the city.

According to NIP, community members have continually expressed that two primary factors directly affect their children's ability to learn and excel in school—overcrowding and lack of youth-targeted community spaces and programs. Overcrowding was cited as affecting youth education through there not being the physical space needed within the home for a child to concentrate and do their work. Often unpermitted subdivisions of common living areas in units are constructed to accommodate additional family members, leaving little to no space for a child to sit and study. Community members expressed that the lack of community spaces and programs further put those children that reside in overcrowded households at a disadvantage by not providing spaces where youth can study and engage in enrichment programs. According

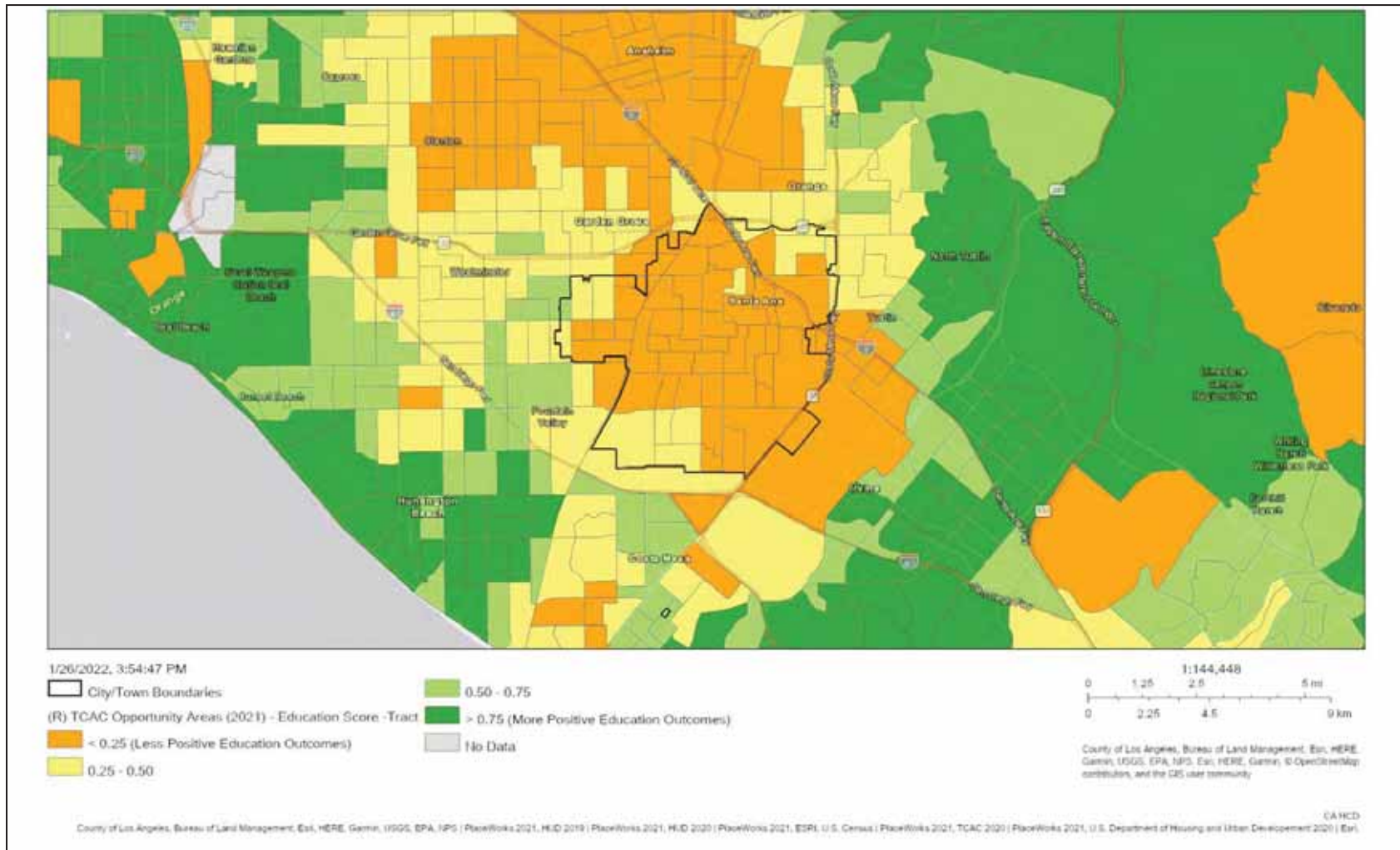


to residents, neighborhoods such as Cedar Evergreen, Townsend-Raitt, and Willard, where there is a strong gang presence, would benefit from providing spaces for youth, after-school programs, and strategies to keep students from dropping out.

The correlation between overcrowding and less positive education outcomes that was voiced by the community can be observed when comparing Figure E-22, TCAC Opportunity Area Education Scores by Tract, and Figure E-36, Overcrowded Households by Tract. The areas with less positive education outcome scores in Santa Ana are generally the same areas that have higher percentages of overcrowded households. Similarly, the tracts in the northwestern corner of the city and tracts along the western boundary, where education outcome scores are higher, are the same tracts where there are less overcrowded households.

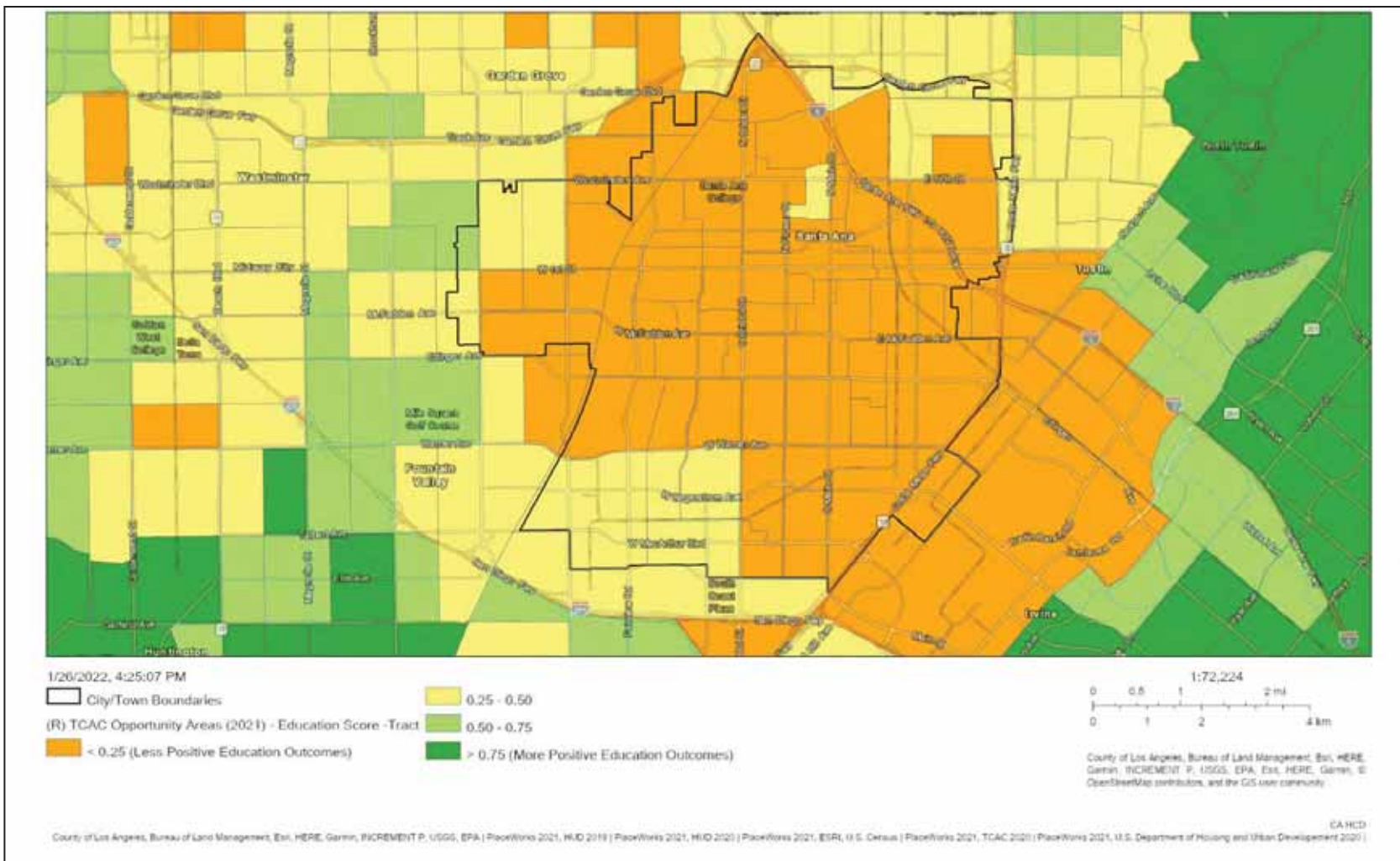


Figure E-21 Regional TCAC Opportunity Area Education Scores by Tract



Source: HCD AFFH Data Viewer; TCAC 2021, 2021.

Figure E-22 TCAC Opportunity Area Education Scores by Tract



Source: HCD AFFH Data Viewer; TCAC 2021, 2021.

ENVIRONMENTAL

TCAC environmental health scores are determined by the Fair Housing Task Force based on 12 of the indicators that are used in the California Office of Environmental Health Hazard Assessment's (OEHHA) CalEnviroScreen 3.0 tool under the "exposures" and "environmental effect" subcomponents of the "pollution burden" domain. The CalEnviroScreen tool considers (1) environmental factors such as pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure and (2) sensitive receptors, including seniors, children, persons with asthma, and low birth weight infants. Socioeconomic factors include educational attainment, linguistic isolation, poverty, and unemployment. Based on the environmental pollution and population indicators, the CalEnviroScreen ranks census tracts on a statewide level. A community or area that ranks in the 75th percentile statewide (25 percent worst) or above is considered a "disadvantaged community." Disadvantaged or "EJ" communities have been identified as communities that are disproportionately burdened by multiple sources of pollution.

Regional Trend

Asian or Pacific Islanders (non-Hispanic) residents countywide are most likely to experience adverse environmental health conditions, while White residents are the least likely. The central part of the county, in the areas generally around I-5 and SR-55 have the lowest environmental TCAC scores (see Figure E-23). The central Orange County cities of Santa Ana, Orange, and Anaheim all have concentrations of tracts with environmental scores in the lowest quartile. Tracts with the highest environmental scores are in western parts of the county (i.e., Cypress and west Anaheim), coastal cities (i.e., Seal Beach, Huntington Beach, and Newport Beach), and around the inland community of El Toro. CalEnviroScreen scores for the county generally follow a similar pattern to the TCAC scores, with the central Orange County cities having census tracts with greater environmental burdens and then coastal areas (Figure E-25).

Local Trend

TCAC environmental scores by tract in Santa Ana are shown in Figure E-24. Tracts in the central and western parts of the City received environmental scores in the second and third highest quartiles, while the tracts located along or in close proximity to the freeways (I-5, I-405, and SR-55) that traverse the city, generally along the eastern and southern boundaries, received scores in the lowest quartile. No tracts in the city received an environmental score in the highest quartile.



According to CalEnviroScreen, 24 census tracts in Santa Ana are in the top 75th percentile and are considered EJ communities (Figure E-26). These tracts or EJ communities are located in the southeastern part of the city along an industrial corridor that parallels the SR-55, around the downtown area south of the I-5, in the city's central core going westward to its boundary, and in the southwestern part of the city, which also has a large industrial land use base.

The location of EJ census tracts closely follows the historic development pattern of the city, proximity to freeways, and adjacency to industrial uses. The oldest portions of the city, located in and around the downtown area, that were developed when planning and environmental laws were not what they are today, tend to suffer from a disproportionate burden of environmental pollution. For example, the Logan neighborhood, the City's earliest Mexican and Mexican-American neighborhood located northeast of downtown, is currently bounded by railroad tracks, the I-5 freeway, and industrial uses. While the railroad lines facilitated the initial growth of the neighborhood in the late 1800s, they also physically split the community from the rest of Santa Ana and encouraged past City officials to designate Logan for industrial uses despite opposition from residents. The construction of the I-5 freeway in the 1950s removed a number of single-family homes in the northeastern portion of the neighborhood and created a barrier between the community and the formerly open orchards. A 1970s proposal to bulldoze the neighborhood in order to expand an arterial highway along Civic Center Drive would have bisected and destroyed the community. Neighborhood leaders were successful in opposing this proposal and saved what was left of the neighborhood. Today, due to the proximity of the I-5 freeway, the railroad tracks, and the lasting legacy of industrial uses, Logan is within a census tract with one of the highest CalEnviroScreen scores in Santa Ana. Community members voiced concerns stemming from air pollution from the freeway, industrial uses, cemetery, and soil lead contamination most likely stemming from historical leaded-gasoline use and lead-based paint.

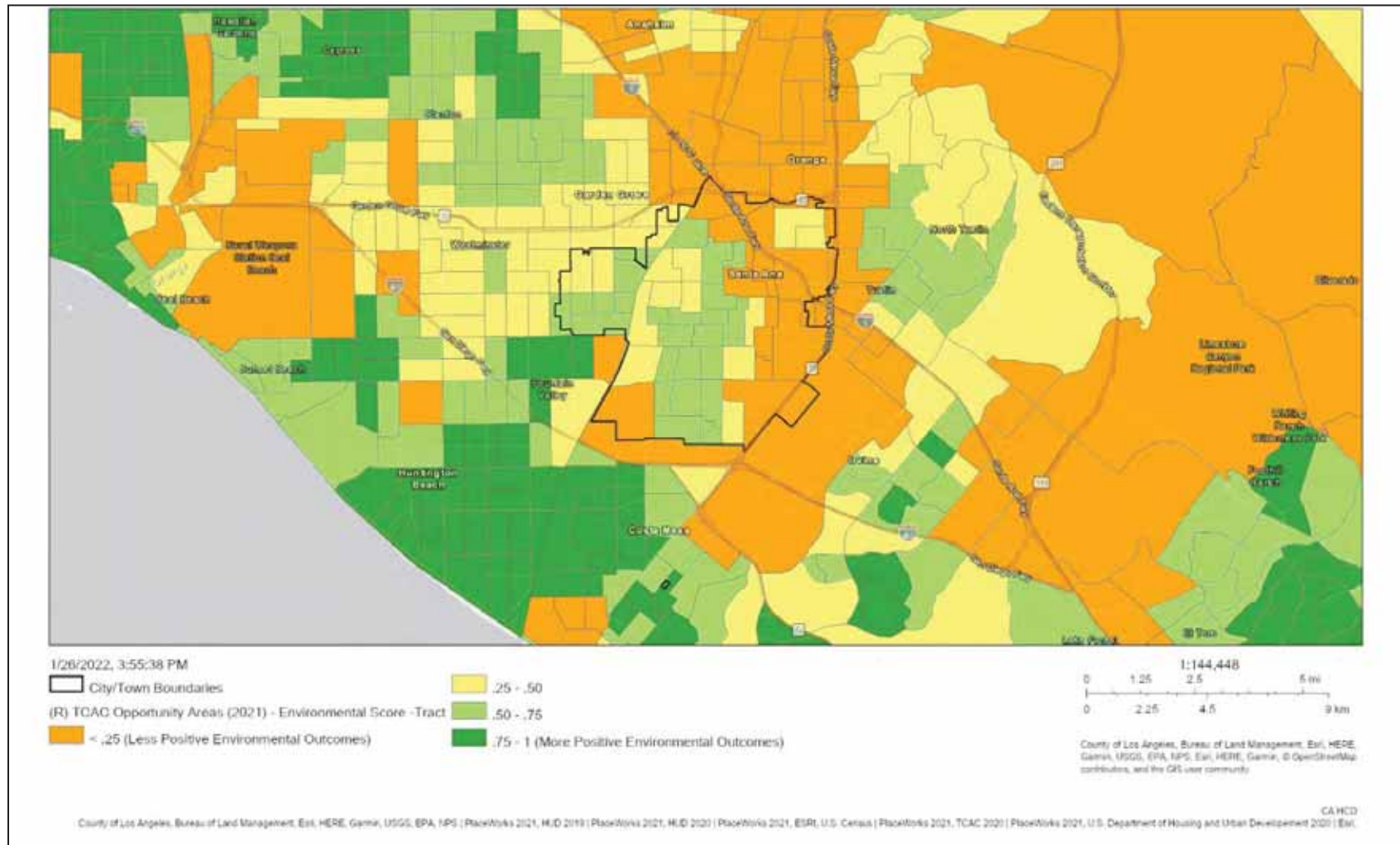
The disproportionate burden of environmental pollution facing certain communities in Santa Ana is being addressed in the City's General Plan Update (<https://www.santa-ana.org/general-plan-documents/>). The City undertook a multiyear effort to engage EJ communities and listen to their experiences and issues regarding environmental health and quality of life. Planning staff facilitated a multifaceted outreach campaign culminating with a series of workshops in the Spring of 2021 (January through May). The campaign consisted of numerous community meetings, a multilingual EJ Survey (electronic and hard copy), and 10 virtual and 1 in-person community forums, each focusing



on a specific EJ area in the city. Feedback received during the outreach campaign can be generally grouped into the following categories: improving air and water quality; improving public city facilities; improving infrastructure; providing healthy food options; providing safe and sanitary housing; increasing physical activity; and fostering civic engagement. The City has documented these environmental impacts to ensure alignment of mitigating policies, require appropriate remediation with other State agencies (e.g., Department of Toxic Control Substances), and direct investments to burdened communities as part of the new policies in the comprehensive General Plan Update. In total, 78 actions spread throughout the 11 elements in the General Plan Update will directly lead to working with the community, neighborhood associations, advocacy groups, and community leaders to address environmental justice issues facing the Santa Ana community.

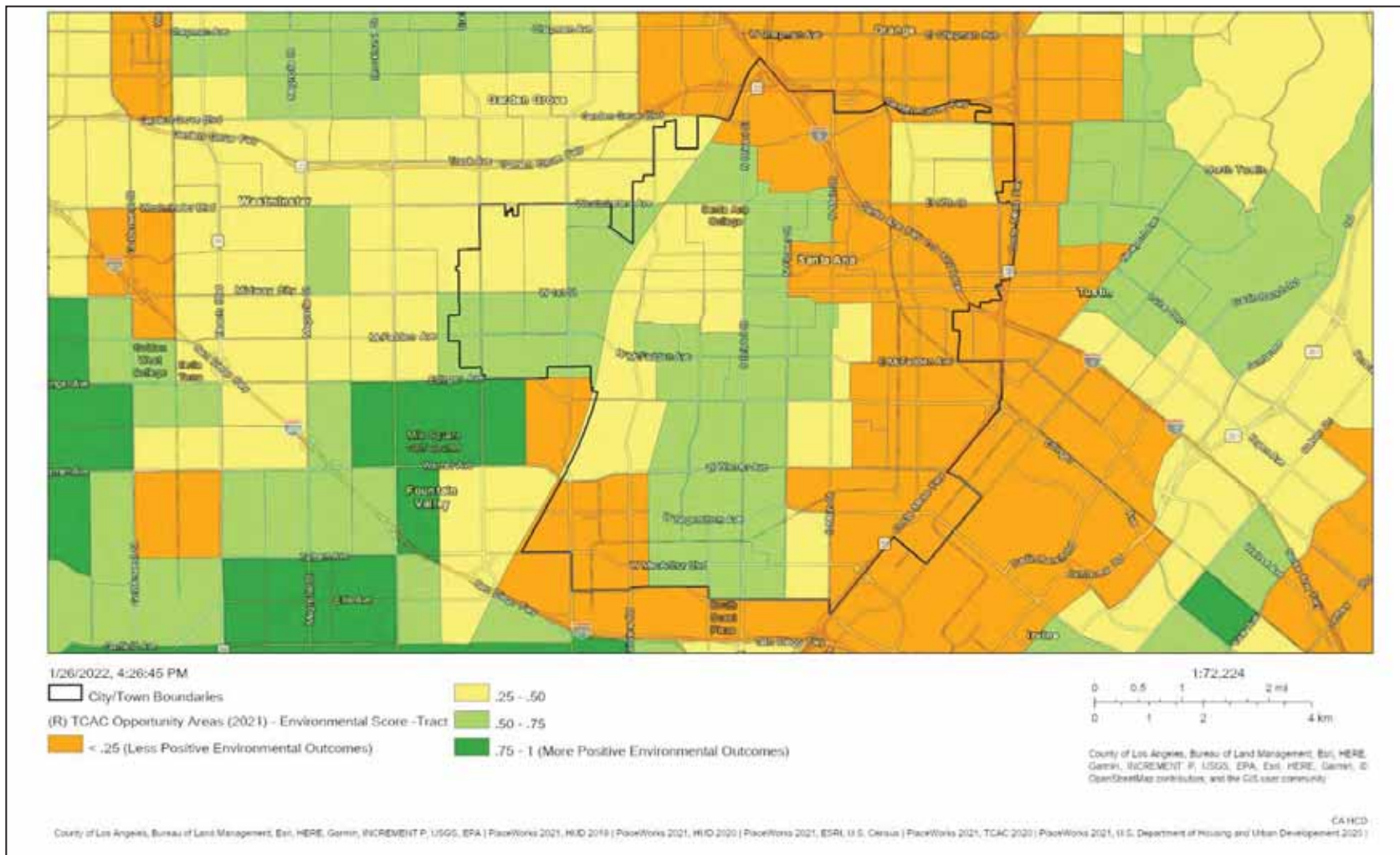


Figure E-23 Regional TCAC Opportunity Area Environmental Scores by Tract



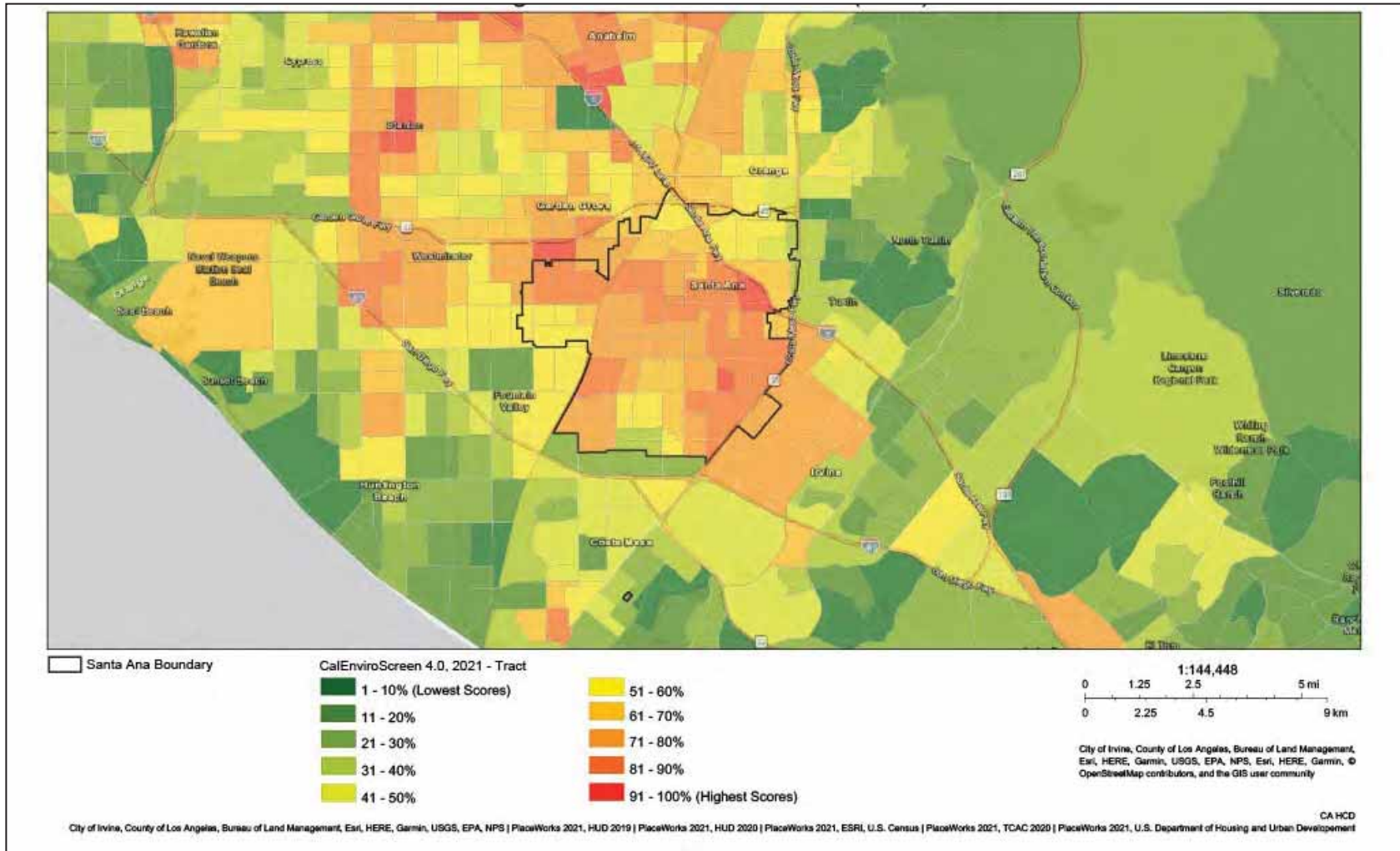
Source: HCD AFFH Data Viewer; TCAC 2021, 2021.

Figure E-24 TCAC Opportunity Area Environmental Scores by Tract



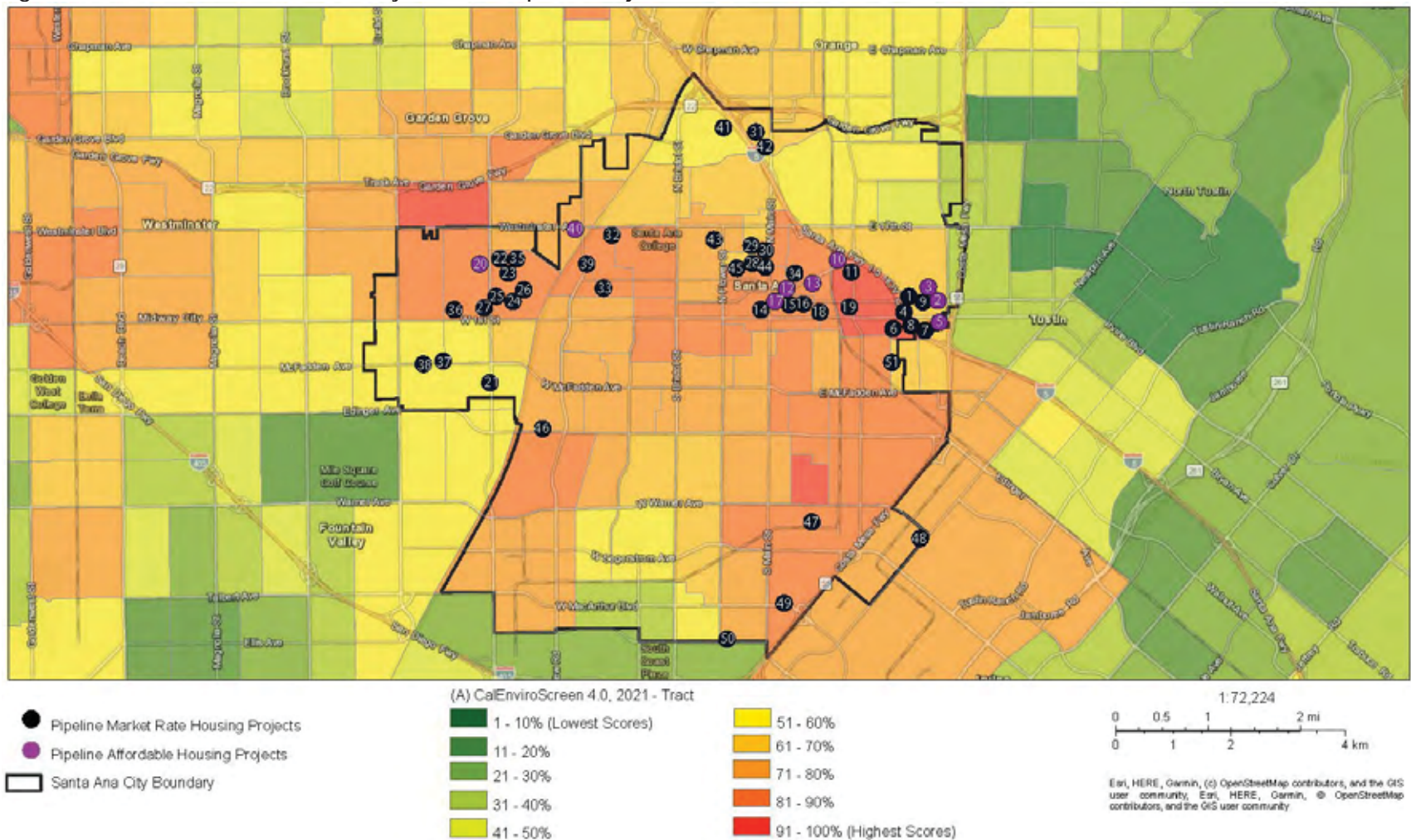
Source: HCD AFFH Data Viewer; TCAC 2021, 2021.

Figure E-25 Regional CalEnviroScreen Scores by Tract



Source: HCD AFFH Data Viewer; CalEnviroScreen, 4.01, 2021.

Figure E-26 CalEnviroScreen Scores by Tract and Pipeline Projects



Source: HCD AFFH Data Viewer; CalEnviroScreen, 2021.

Note: Pipeline project numbers correlate to project list in Table C-2 of Appendix C.

TRANSPORTATION

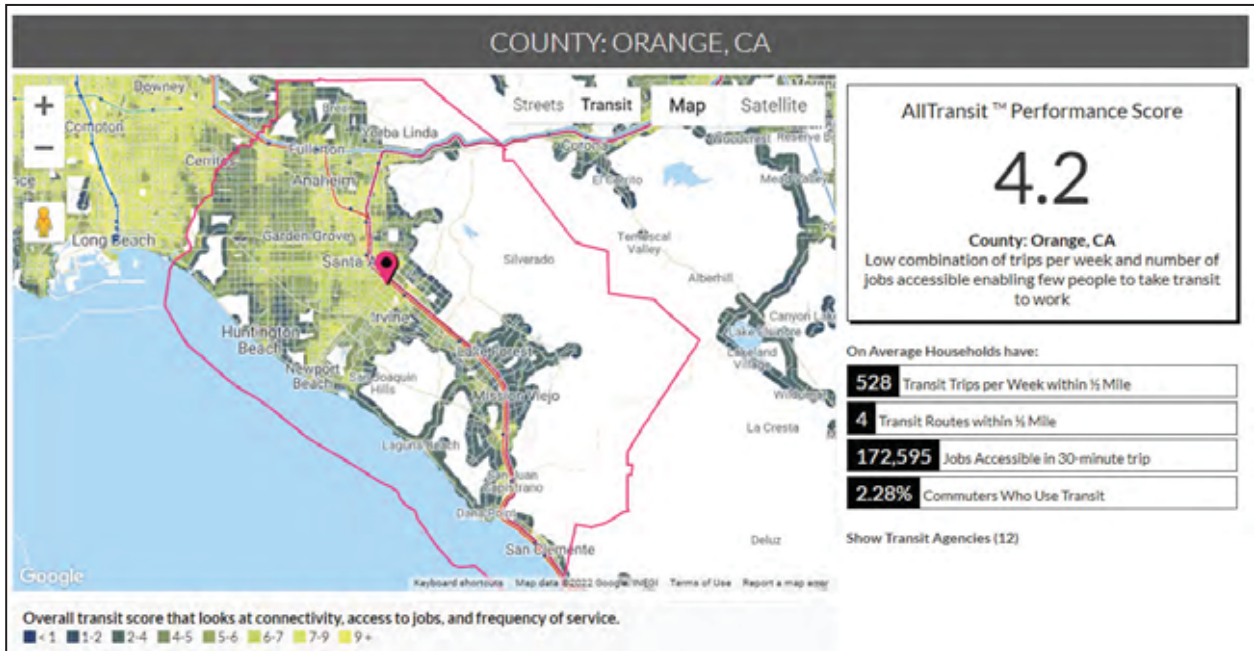
HUD's Job Proximity Index, shown in Table E-8, can be used to show transportation need geographically. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation. Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. SCAG developed a mapping tool for High Quality Transit Areas (HOTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HOTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. This section also utilizes All Transit metrics to identify transportation opportunities in Orange County and Santa Ana.

Regional Trend

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. Orange County's All Transit Performance score is 4.2, compared to the cities of Orange (5.1), Garden Grove (5.5), Anaheim (4.9), Tustin (4.8), and Costa Mesa (5.4). Orange County All Transit metrics are shown in Figure E-27. Areas in central Orange County (Santa Ana [see Figure E-28], Garden Grove, and Anaheim) have the highest scores. The County's All Transit score indicates a low combination of trips per week and number of jobs accessible, enabling few people to take transit to work. All Transit estimates 99.0 percent of jobs and 87.4 percent of workers in Orange County are located within ½ a mile from transit.



Figure E-27 Orange County All Transit Metrics



Source: All Transit Metrics: All Transit Performance Score – Orange County, 2019.

As shown in Figure E-29, block groups around southern and eastern Santa Ana, northern Costa Mesa, Irvine, Newport Beach, and Orange have the highest jobs proximity index scores, indicating employment opportunities are most accessible in these areas. Central county areas, from central to western Santa Ana, Garden Grove, Westminster, Stanton, and parts of Huntington Beach have the lowest jobs proximity index scores. Additionally, Figure E-29 indicates that most of the central county areas are considered HQTAs.

Local Trend

All Transit metrics for Santa Ana are shown in Figure E-28. Santa Ana received an All Transit Performance Score of 6.6, indicating a moderate combination of trips per week and number of jobs accessible by transit. Santa Ana’s score is higher than the county as a whole and is or near the highest in the county. All Transit estimates that 100 percent of jobs and 99.9 percent of workers in Santa Ana are within 1/2 a mile from transit.



Figure E-28 Santa Ana All Transit Metrics

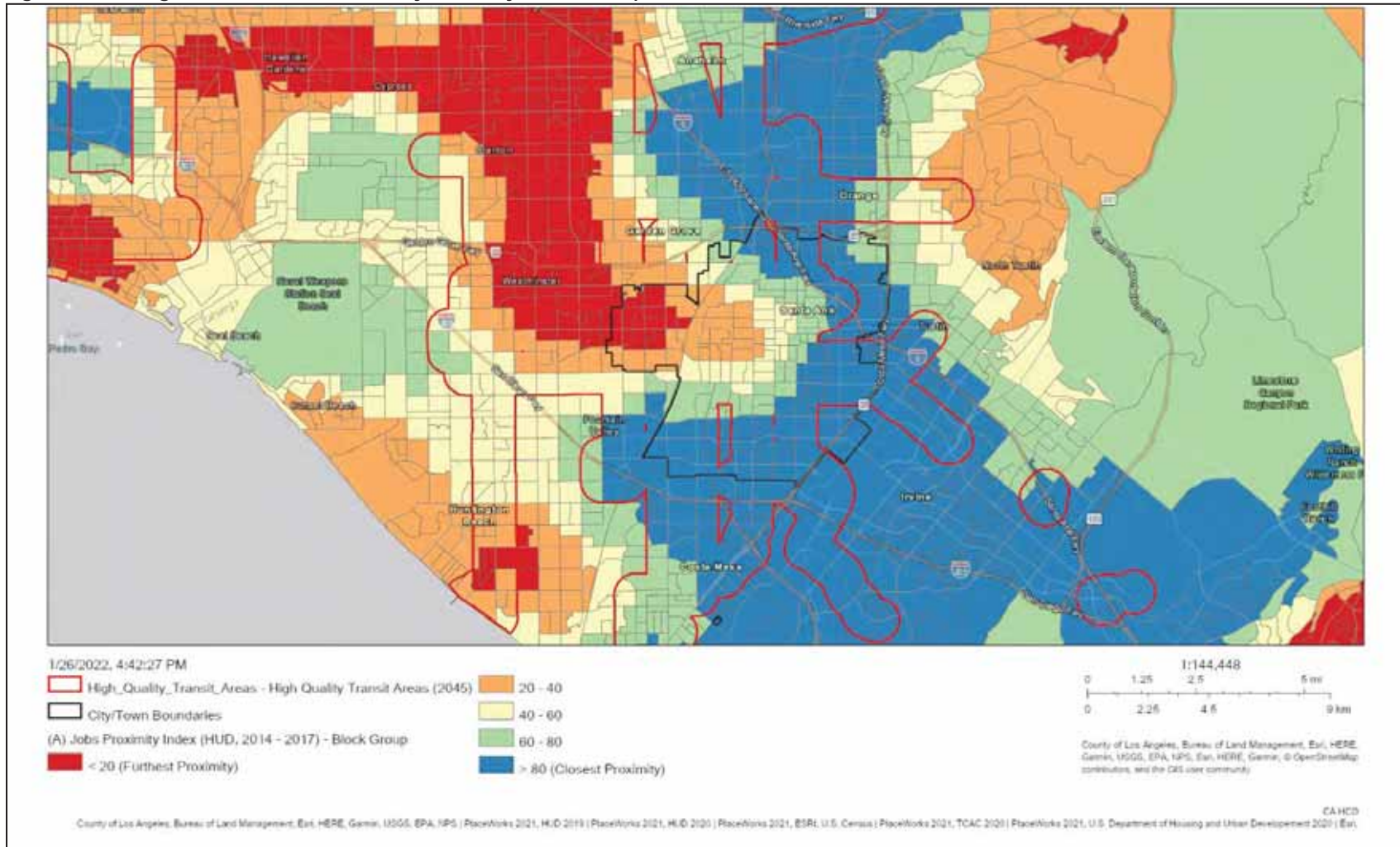


Source: All Transit Metrics: All Transit Performance Score – Santa Ana, 2019.

As shown in Figure E-30, census blocks in the southern, eastern, and northern parts of Santa Ana received the highest jobs proximity index scores, exceeding 80, indicating that employment opportunities are very accessible in large parts of the city, with the exceptions being the central and western parts of the city, which scored in the lowest and second lowest quartiles. Additionally, nearly all of Santa Ana, with a few exceptions, is considered an HQTA (Figure E-29).

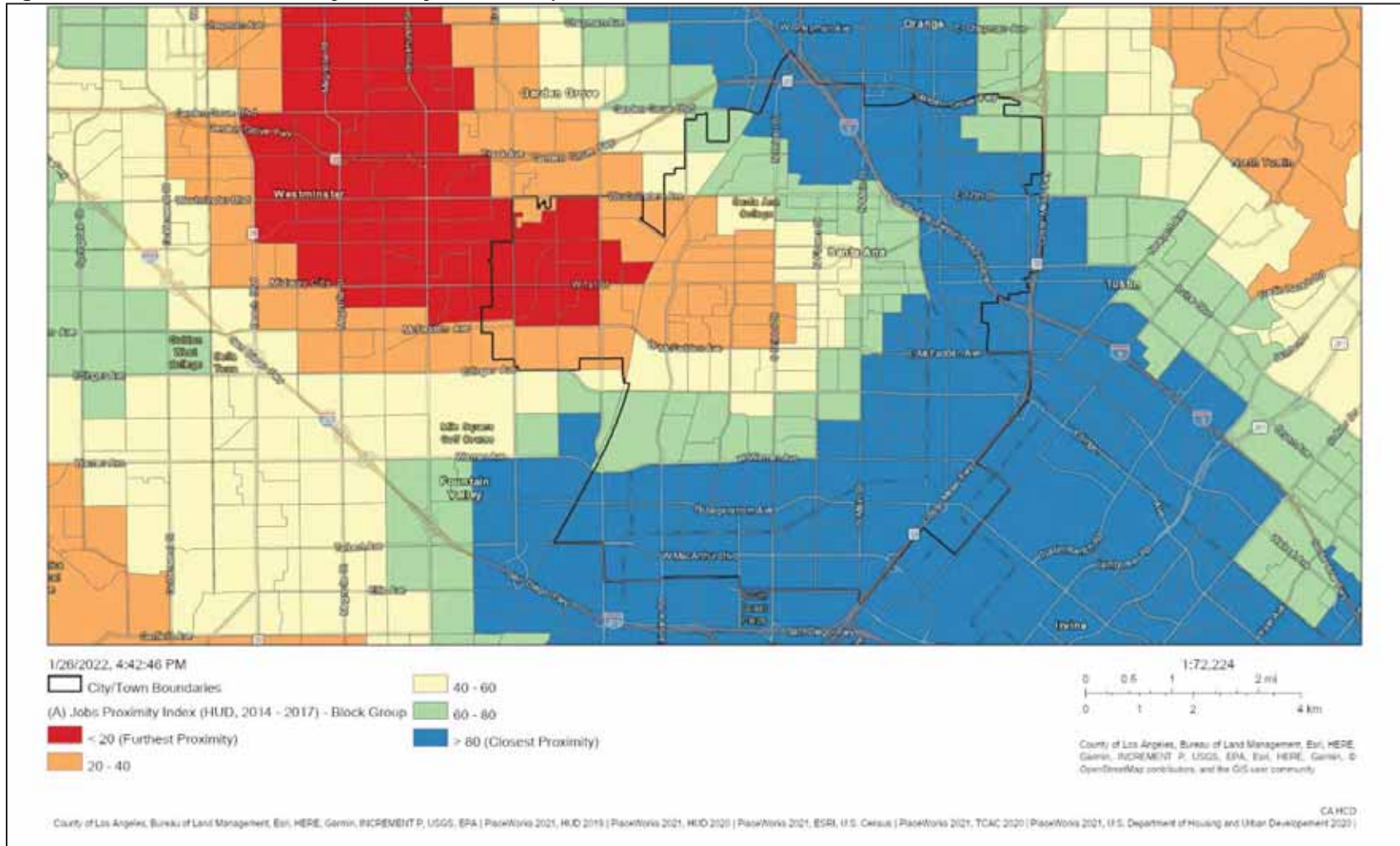


Figure E-29 Regional HUD Jobs Proximity Index by Block Group and HQTAs



Source: HCD AFFH Data Viewer; HUD 2014-2017, 2021.

Figure E-30 HUD Jobs Proximity Index by Block Group



Source: HCD AFFH Data Viewer; HUD 2014-2017, 2021.

DISPROPORTIONATE HOUSING NEEDS

Housing problems in Santa Ana were calculated using HUD's 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS. Table E-11 breaks down households by race, ethnicity, and presence of housing problems for Santa Ana and Orange County households. The following conditions are considered housing problems:

- Substandard Housing (measured by incomplete plumbing or kitchen facilities)
- Overcrowding (more than 1 person per room)
- Cost burden (housing costs greater than 30 percent)

In Santa Ana, 21.1 percent of owner-occupied households and 41.6 percent of renter households have one or more housing problems. The city has a larger proportion of owner and renter households with a housing problem compared to the county, where 19.6 percent of owner households experience a housing problem, and 25.6 percent of renter households experience a housing problem. In Santa Ana, 69 of 70 American Indian renter households experience a housing problem. However, it should be noted that due to the small sample size, the margin of error may be high and not present an accurate count. Hispanic and Asian owner households experience housing problems at a higher rate than the city average. Hispanic and American Indian renter households also experience housing problems at a higher rate than the city average.

Table E-11
Housing Problems by Race/Ethnicity

	<i>Santa Ana</i>		<i>Orange County</i>	
	<i>Owner</i>	<i>Renter</i>	<i>Owner</i>	<i>Renter</i>
White	2,045	2,915	108,370	95,605
Black	220	245	1,975	6,095
Asian	2,820	2,760	42,735	43,745
American Indian	--	69	325	705
Pacific Islander	10	80	270	840
Hispanic	10,870	25,365	44,310	109,950
Other	125	230	3,655	5,895
All	34,470	41,510	588,550	436,425

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.
Note: -- = 0 households in category.



COST BURDEN

Households are considered cost burdened if housing costs exceed 30 percent of their gross income for housing and severely cost burdened if housing costs exceed 50 percent of their gross income. Cost burden in Santa Ana and Orange County is assessed using 2020 HUD CHAS data (based on 2013-2017 ACS estimates) and the HCD Data Viewer (based on 2010-2014 and 2015-2019 ACS estimates).

Regional Trend

Cost burden by tenure and race/ethnicity for Orange County is shown in. Approximately 41 percent of Orange County households are cost burdened, including 31.4 percent of owner-occupied households and 52.9 percent of renter-occupied households. Hispanic renter households have the highest rate of cost burden—59.8 percent. Non-Hispanic American Indian and non-Hispanic Pacific Islander owner households have the lowest rate of cost burden, 23.3 percent and 27.8 percent, respectively. Cost burden is more common among renter households than owner households regardless of race or ethnicity.

Table E-12
Cost Burden by Race/Ethnicity and Tenure: Orange County

	<i>Cost Burdened (>30%)</i>	<i>Severely Cost Burdened (>50%)</i>	<i>Total Households</i>
Owner-Occupied			
White, non-Hispanic	105,810	46,150	357,295
Black, non-Hispanic	1,845	740	5,475
Asian, non-Hispanic	38,240	16,240	116,570
American Indian, non-Hispanic	260	130	1,115
Pacific Islander, non-Hispanic	275	90	990
Hispanic	34,955	14,520	96,310
Other	3,445	1,390	10,790
Renter-Occupied			
White, non-Hispanic	90,415	45,950	186,170
Black, non-Hispanic	5,580	3,025	11,510
Asian, non-Hispanic	38,065	21,215	75,195
American Indian, non-Hispanic	630	295	1,160
Pacific Islander, non-Hispanic	720	265	1,390
Hispanic	89,975	45,050	150,540
Other	5,340	2,850	10,460

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.



Figure E-28 and Figure E-29 show concentrations of cost burdened owners and renters by tract for the region. Tracts with high concentrations of cost burdened owners are generally dispersed throughout the county. However, there is a higher prevalence of tracts with higher percentages of cost burdened owners and renters in central Orange County compared to the coastal areas. In most tracts in coastal areas from Seal Beach to Newport Beach, 20 percent to 60 percent of owners are cost burdened. Tracts where more than 60 percent of renters are cost burdened are most concentrated in the central county areas around Santa Ana, Garden Grove, and Stanton.

Local Trend

Cost burden by tenure in Santa Ana based on HUD CHAS data is shown in Table E-13. Approximately 48.1 percent of households in the city are cost burdened, including 32.5 percent of owner-occupied households and 61 percent of renter-occupied households. Further, 22.3 percent of households in Santa Ana are severely cost burdened. The owner-occupied rate is similar to the county as a whole, but the renter-occupied rate is nearly 10 percentage points higher. Non-Hispanic American Indian and Hispanic renter-occupied households have the highest rate of cost burden in the city at 100 percent and 64.2 percent, respectively. Like the county as a whole, cost burden is more common in renter households. Non-Hispanic American Indian and non-Hispanic White households have the lowest rate of owner-occupied cost burden at 0 percent and 26 percent, respectively. More households as a percentage are cost burdened in Santa Ana compared to the county.



Table E-13
Cost Burden by Race/Ethnicity and Tenure, Santa Ana

	<i>Cost Burdened (>30%)</i>	<i>Severely Cost Burdened (>50%)</i>	<i>Total Households</i>
Owner-Occupied			
White, non-Hispanic	1,960	815	7,525
Black, non-Hispanic	220	110	535
Asian, non-Hispanic	2,110	930	5,820
American Indian, non-Hispanic	0	0	65
Pacific Islander, non-Hispanic	10	10	35
Hispanic	6,800	2,820	20,185
Other	105	40	305
Renter-Occupied			
White, non-Hispanic	2,730	1,320	5,400
Black, non-Hispanic	240	95	440
Asian, non-Hispanic	2,350	1,260	4,470
American Indian, non-Hispanic	70	10	70
Pacific Islander, non-Hispanic	80	30	135
Hispanic	19,645	9,455	30,590
Other	215	45	405

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Figure E-31 and Figure E-32 show concentrations of cost burden by tract in Santa Ana. Concentrations of both owner- and renter-occupied tracts are located around the downtown area and southeast of the downtown in the vicinity of the intersection of Grand and Edinger Avenues. While large portions of that area are industrial, there are residential uses in the census tracts along the western edge of the concentration of cost burden. Another area of cost burden concentration is along the southern boundary, north of the South Coast Plaza regional mall in Costa Mesa. Owner-occupied cost burdened tracts are more dispersed throughout the city, but tracts near the downtown and around the Grand and Edinger Avenues intersection have high concentrations of renter and owner cost burdened households.

As discussed in Appendix A, Santa Ana has a large population of foreign-born residents—45 percent of the city's population is foreign born compared to 30 percent countywide (2014-2018 ACS). Research shows that many immigrant households, particularly those with limited English skills, earn lower incomes than later generations. This increases the difficulty of finding adequate and affordable housing and exacerbates cost burden. Community members have expressed that difficulty in finding adequate and affordable housing is compounded for



residents who are undocumented because many housing assistance programs require proof of legal residency.

Pipeline Projects

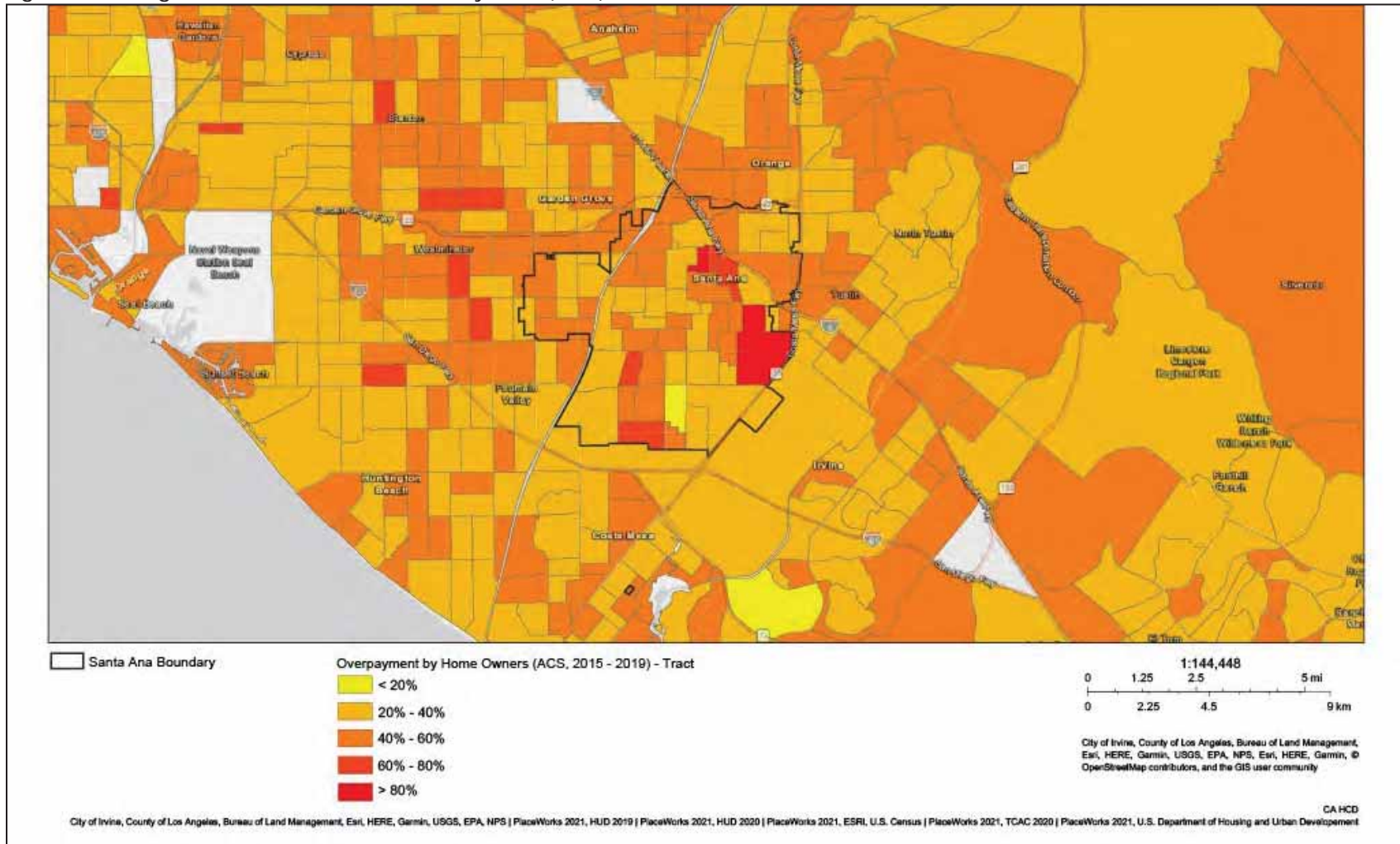
As discussed above, approximately 48.1 percent of households overpay for housing in all Santa Ana tracts. Figure E-33 shows where cost burdened owners are in relation to pipeline projects. The distribution of RHNA units for the pipeline projects by cost burdened renters is shown in Table E-14. A majority of the RHNA units are in tracts where 40 percent to 60 percent of renters overpay for housing, including having the higher percentage of lower income units located in the tracts. As shown in Figure E-34, between 40 percent and 80 percent of renters are cost burdened in a majority of the City. The locations of the pipeline projects do not exacerbate existing conditions as they do not demolish any existing units and are dispersed throughout a large geographic area that avoid potential negative externalities that may cause rent increases. Moreover, the locations of the pipeline projects have the potential to improve existing conditions through providing additional housing options at all affordability levels, and driving rents down as more options become available to renters and owners alike.

**Table E-14
Distribution of RHNA Units by Percent of Cost Burdened Renters: Pipeline Projects**

<i>Percent of Cost Burdened Renters (Tract)</i>	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Above Mod. Income</i>	<i>Total</i>
20-40%	0.0%	0.0%	0.0%	0.0%
40-60%	90.5%	0.0%	80.8%	82.5%
60-80%	1.5%	100.0%	19.0%	15.9%
80-100%	8.1%	0.0%	0.2%	1.6%
Total	1,144	6	5,764	6,914

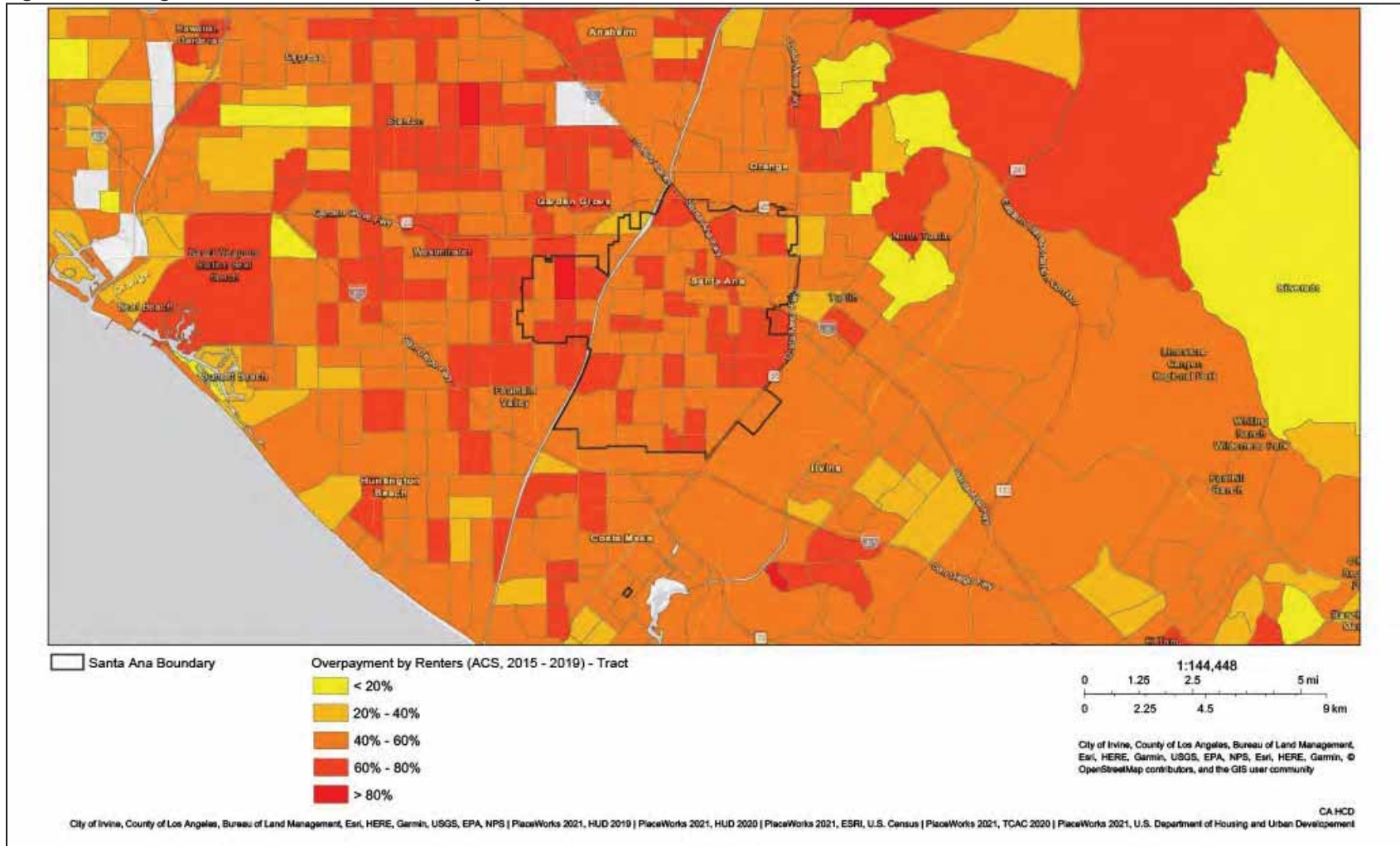


Figure E-31 Regional Cost Burdened Owners by Tract (2019)



Source: HCD AFFH Data Viewer; 2010-2014 ACS, 2021.

Figure E-32 Regional Cost Burdened Renters by Tract (2019)



Source: HCD AFFH Data Viewer; 2010-2014 ACS, 2021.

Figure E-33 Cost Burdened Owners by Tract and Pipeline Projects (2019)

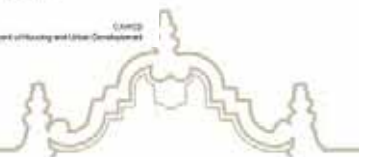


Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.
 Note: Pipeline project numbers correlate to project list found in Table C-2 in Appendix C.

Figure E-34 Cost Burdened Renters by Tract and Pipeline Projects (2019)



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.
 Note: Pipeline project numbers correlate to project list found in Table C-2 in Appendix C.



OVERCROWDING

A household is considered overcrowded if there is more than one person per room and severely overcrowded if there is more than 1.5 persons per room. HUD CHAS data based on the 2013-2017 ACS and the HCD AFFH Data Viewer (2015-2019 ACS) are used to show overcrowding in Santa Ana and Orange County.

Regional Trend

As shown in Table E-15, 3.7 percent of owner-occupied households and 16.0 percent of renter-occupied households in the county are overcrowded. Severe overcrowding is slightly less of an issue in the county. Approximately 1 percent of owner households and 5.9 percent of renter households are severely overcrowded.

Table E-15
Overcrowding by Tenure

	<i>Overcrowded (>1 person per room)</i>		<i>Severely Overcrowded (>1.5 persons per room)</i>		<i>Total Households</i>
	<i>Households</i>	<i>Percent</i>	<i>Households</i>	<i>Percent</i>	
Santa Ana					
Owner-Occupied	6,525	18.9%	2,205	6.4%	34,470
Renter-Occupied	17,415	42.0%	8,325	20.1%	41,510
Orange County					
Owner-Occupied	21,775	3.7%	5,955	1.0%	588,550
Renter-Occupied	69,705	16.0%	25,830	5.9%	436,425

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Figure E-35 shows concentrations of overcrowded households by tract regionally. Overcrowded households are most concentrated in the central county areas, including the cities of Santa Ana, Garden Grove, Westminster, Anaheim, and Stanton. Additionally, there are some dispersed tracts with high percentages of households experiencing overcrowding in Costa Mesa and Huntington Beach. Areas northeast, south, and west of Santa Ana have concentrations of overcrowded households below the State average.

Local Trend

As presented in Table E-15, a larger share of households in Santa Ana are overcrowded compared to the countywide average. Nearly 19 percent of owner-occupied households and 42 percent of renter-occupied households in the city have more than one person per room, which is significantly higher than surrounding areas in the county. Moreover, 6.4



percent of owner households and 20.1 percent of renter households are severely overcrowded, with more than 1.5 persons per room.

Figure E-36 shows overcrowding by tract in the city. A majority of tracts have 20 or more percent of households experiencing overcrowding. The northeast part of the city has census tracts with slightly less overcrowding. Overall, there are only two census tracts in the city with percentages of overcrowded households at or below the statewide average of 8.2 percent.

Overcrowding is a common concern voiced in community meetings and to NIP staff. Residents have expressed a form of overcrowding known as “doubling up”—where a family co-resides with other family members or friends for economic reasons—as being prevalent and underreported due to fear stemming from legal status, language barriers, and retaliatory tactics from landlords. Community members have also expressed that due to the legal status of income earners, establishing credit worthiness is challenging and forces some residents to live with family members, creating or compounding overcrowded households.

Pipeline Projects

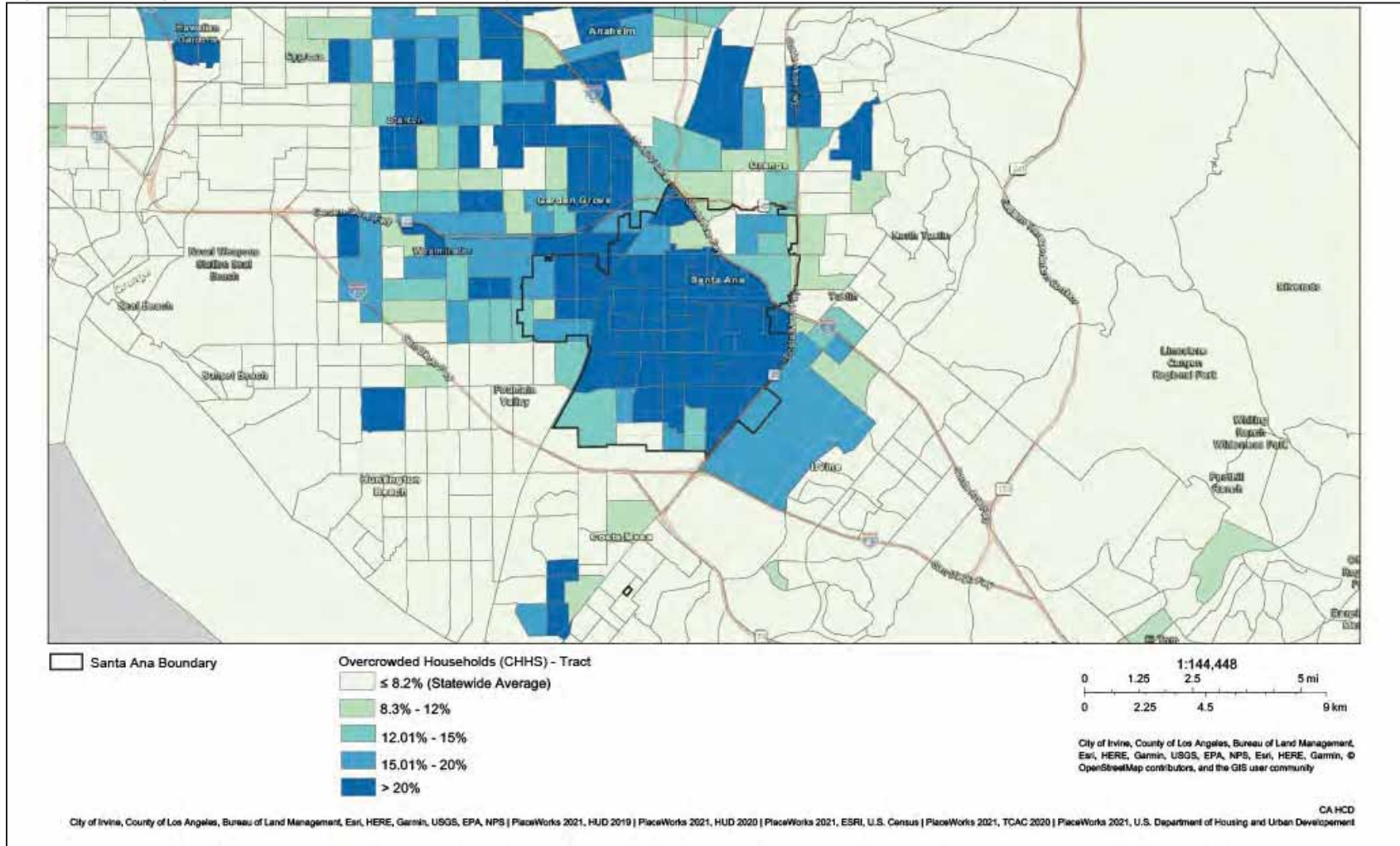
With only two census tracts in the city with less than the statewide average for overcrowded households, none of the City’s RHNA units are in these tracts. The majority of the City’s RHNA units are in tracts with 12 percent to 15 percent overcrowded households or more than 20 percent. The location of the RHNA units does not exacerbate conditions and provides for units of all income levels in different areas of overcrowded household concentrations. The locations of the pipeline projects do not exacerbate existing conditions as the projects do not include demolition of any existing units and are geographically dispersed over a large area. Rather, the locations of the pipeline projects have the potential to improve existing conditions through providing additional housing at all income levels and creating options for families that may be doubling up or need larger units.

Table E-16
Distribution of RHNA Units by Percent of Overcrowded Households: Pipeline Projects

<i>Percent of Overcrowded Households (Tract)</i>	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Above Mod. Income</i>	<i>Total</i>
<= 8.2% (Statewide Average)	0.0%	0.0%	0.0%	0.0%
8.3-12%	0.0%	0.0%	12.1%	9.9%
12-15%	61.8%	66.7%	23.8%	30.6%
15-20%	0.0%	0.0%	21.4%	17.5%
> 20%	38.2%	33.3%	42.7%	41.9%
Total	1,144	6	5,764	6,914

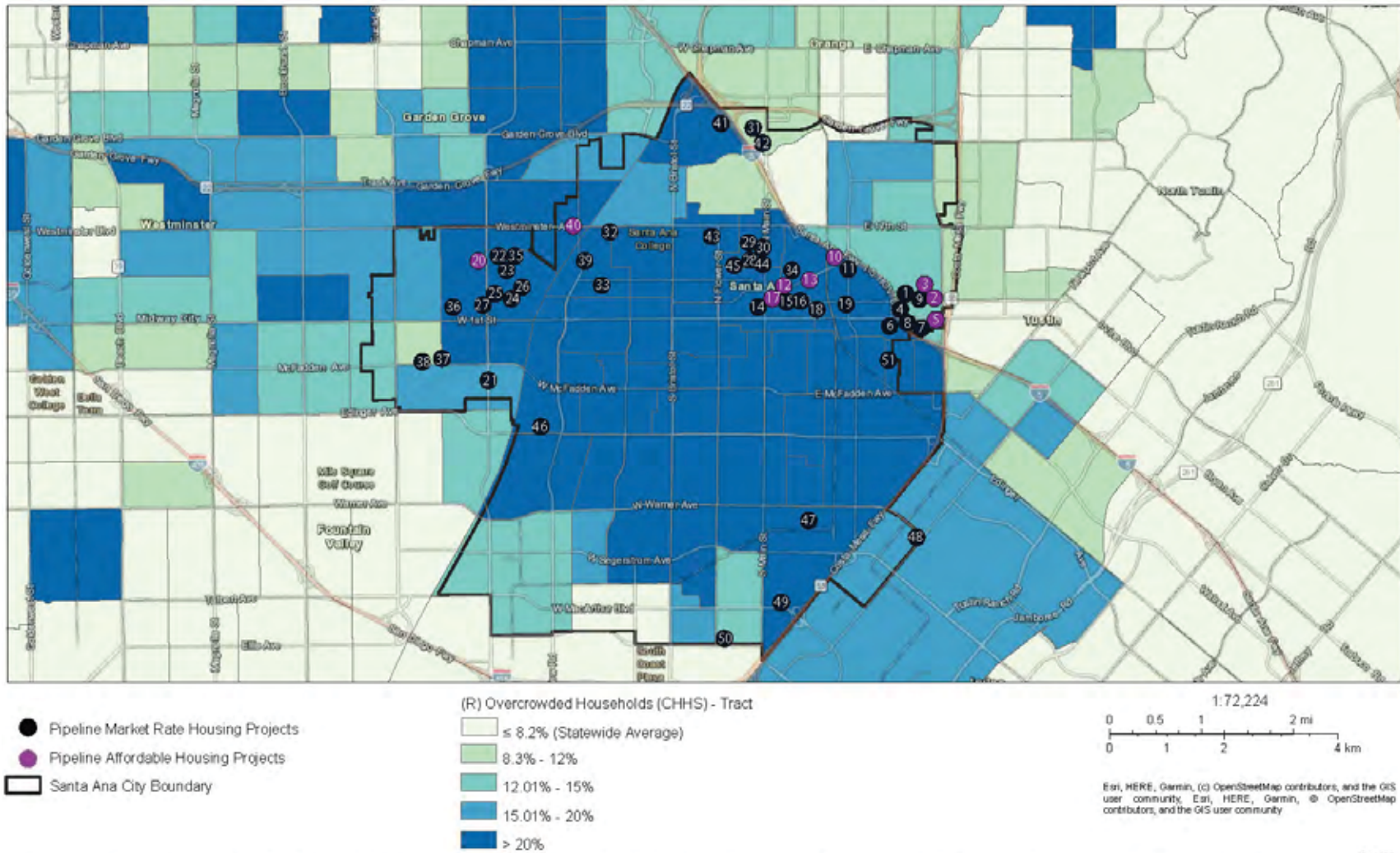


Figure E-35 Regional Overcrowded Households by Tract



Source: HCD AFFH Data Viewer; 2020 HUD CHAS data, 2021.

Figure E-36 Overcrowded Households by Tract and Pipeline Projects



Note: Pipeline project numbers correlate to project list found on Table C-2 in Appendix C.

SUBSTANDARD HOUSING

Incomplete plumbing or kitchen facilities and housing stock age can be used to measure substandard housing conditions. Incomplete facilities and housing age are based on the HUD CHAS data (based on 2013-2017 ACS).

Regional Trend

Approximately 1 percent of households in the county lack complete plumbing or kitchen facilities. Incomplete facilities are more common among renter-occupied households. Only 0.4 percent of owner households lack complete plumbing or kitchen facilities compared to 2.6 percent of renters (Table E-17).

**Table E-17
Incomplete Facilities**

	<i>Lacking Complete Plumbing or Kitchen Facilities</i>		<i>Total Households</i>
	<i>Households</i>	<i>Percent</i>	
Santa Ana			
Owner-Occupied	218	0.6%	34,470
Renter-Occupied	590	1.4%	41,510
Total	808	1.1%	75,980
Orange County			
Owner-Occupied	2,135	0.4%	588,550
Renter-Occupied	11,135	2.6%	436,425
Total	13,270	1.3%	102,4975

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. 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. In the county, 75.3 percent of the housing stock was built prior to 1990, including 37.1 percent built prior to 1970.

Local Trend

Less than 1 percent of owner-occupied households in Santa Ana lacks complete plumbing or kitchen facilities (Table E-17). A slightly larger proportion of renter-occupied units compared to the share of owner-occupied units lack complete facilities. Overall, the percentages of owner-occupied households that lack complete facilities in Santa Ana (0.6 percent) is similar to the county rate (0.4 percent), and Santa Ana's



rate for renter units of 1.4 percent is less than the countywide rate of 2.6 percent.

Nearly 90 percent of the city's housing stock was built prior to 1990, with the biggest construction boom happening between 1950 and 1979 as the city was being built out (see Table E-18). Units produced during that construction boom make up 64.5 percent of the housing stock in the city. Units built prior to 1970 make up 56.4 percent of the housing stock. In general, the housing stock in Santa Ana is older than that of the county as a whole, and the rate of construction in recent years has lagged that of the county. Housing that is 30 or more years old often requires some form of moderate or major rehabilitation.

The Code Enforcement Division enforces ordinances pertaining to property maintenance, building conditions, and other housing and neighborhood issues. Evidence stemming from the quantity and types of code enforcement cases suggests that housing requiring rehabilitation is disproportionately concentrated in the central parts of the city, generally bounded by Seventeenth Street and Warner Avenue (north and south) and Grand Avenue to Harbor Boulevard (east and west). The census tracts with the highest percentage of poverty are in this area. The area also has high levels of overcrowded households, which exacerbates wear and tear and maintenance needs.

Table E-18
Santa Ana Housing Stock, Year Structure Built

<i>Year Built</i>	<i>Santa Ana</i>	<i>Orange County</i>
	<i>Number of Units</i>	<i>Number of Units</i>
2014 or later	682	29,369
2010 to 2013	549	22,261
2000 to 2009	2,606	91,455
1990 to 1999	4,076	128,774
1980 to 1989	7,983	163,803
1970 to 1979	18,533	256,739
1960 to 1969	16,961	214,045
1950 to 1959	15,472	143,431
1940 to 1949	6,006	23,121
1939 or earlier	6,156	27,451
Total:	79,024	1,100,449

Source: 2015-2019 ACS (5-Year Estimate).

*Data sets for each year period have distinct margins.



HOMELESSNESS

This housing element contains an extensive analysis of homelessness and city efforts to address it. The element contains an analysis of the prevalence of homelessness (Appendix A), analyzes the city's municipal codes regarding provisions of housing (Appendix B), highlights pipeline projects that will address the unmet need for housing (Appendix C), and includes proactive programs (Framework). This section builds upon the prior analysis and focuses on fair housing.



Proposed Adaptive Reuse WisePlace development

The County of Orange has long had a significant homeless population that has gradually increased due to increases in rents and changes in the economy. Between 2009 and 2019, the county's homeless population increased 20 percent from 6,860 to 8,333, and the city's share grew from 1,804 to 1,769 homeless residents. Prior to 2018, many historically resided along the Santa Ana River or around the Civic Center near county offices, but today the homeless are dispersed throughout the city along major corridors. While the city's homeless population has remained relatively constant, surrounding cities have experienced significant increases in the number of homeless people within their jurisdiction.

In 2016-2017, many Orange County cities began to adopt anticamping ordinances to displace homeless people, resulting in homeless encampments springing up along the Santa Ana River. In 2018, a federal court ruled that the County could not prohibit homeless people from camping in public places unless they had adequate shelter available. When County officials began to discuss options for clearing the growing encampments along the river and other locations, the Orange County Catholic Workers sued 21 cities in Orange County.

Anticamping codes have a direct displacement effect on homeless people. In 2019, a federal judge ruled that Orange County police may enforce anticamping laws in county parks and libraries, flood control channels, and wildfire-prone nature areas only pursuant with a settlement agreement. Individual cities were required to provide a mix of funding and new housing opportunities to address long-standing



unmet needs. Many of the cities, including Santa Ana, reached settlement agreements.

Countywide, there has been a significant increase in funding and local actions directed at addressing the unmet shelter and support needs for homeless people. Santa Ana also signed on as a cross-complainant, contending that surrounding cities were not doing enough to meet their fair share of the homelessness issues countywide. The intent of these efforts was to mitigate the displacement effects of local ordinances that displaced homeless people from their temporary accommodations.

Locally, the City has continued to facilitate and encourage the development of housing opportunities for homeless people along with undertaking other actions to address its local need. Actions include:

- In 2020, the City passed Police Department Policy 426, clarifying the procedure for all contacts with homeless people and ensuring the humane and respectful treatment of residents.
- The City approved and financed 10 new permanent supportive housing projects and a new 200+ bed emergency shelter that has had a significant impact on reducing its unmet need.
- The City publishes an online homeless dashboard that provides information and progress in meeting local goals. The website link is: <https://www.santa-ana.org/homeless-dashboard/>
- The City received \$10 million in Homeless Housing Assistance and Prevention Grant (HHAP-03), which will help the City further address the housing and service needs of its homeless residents.
- In 2020, Santa Ana formed SMART (Santa Ana Multi-Disciplinary Response Teams) which, along with its partner CityNet, will help provide trauma-informed care services.
- The Housing Plan contains a program to amend municipal codes with respect to low barrier navigation centers, emergency shelters, and transitional housing to address state legislation.

The City has worked diligently and has successfully fulfilled the requirements in the settlement agreement with the Orange County Catholic Workers. Through its diligent efforts, the City continues to make meaningful and significant progress in significantly reducing its unmet need for housing and providing services for its homeless residents. Programs 37, 38, and 39 in the Housing Plan detail how the City will address homelessness during the 2021-2029 planning period.



DISPLACEMENT RISK

Displacement is a term often used to describe any involuntary household move caused by landlord action, market changes, or other disruptions. Factors contributing to displacement might include: 1) increasing overpayment and overcrowding due to housing costs; 2) significant investment or disinvestment in housing, transportation, jobs, or physical infrastructure; or 3) other local market- or demographic-related change.

Many different definitions of household displacement have been offered. However, the Urban Displacement project has developed a hierarchy of communities at risk of displacement based on multiple criteria. The stages of vulnerability/gentrification/displacement are:

- Low-income susceptible to displacement
- Ongoing displacement of low income households
- At risk of gentrification
- Early/ongoing gentrification
- Advanced gentrification
- Stable/moderate/mixed income
- At risk of becoming exclusive
- Becoming exclusive
- Stable/advanced exclusive

Regional Trend

Regionally, as shown in Figure E-37, Santa Ana borders eastern Orange County, a more rural area fronting the Cleveland National Forest that is generally considered stable and at a level of advanced exclusivity. In addition, coastal cities to the southeast, including the cities of Irvine, Newport Beach, Mission Viejo, and others, are similarly exclusive, as reflected by their median incomes and very high housing prices. Vulnerable communities, which are characterized by higher levels of immigration, are most concentrated in the central county areas around the cities of Santa Ana, Garden Grove, Westminster, Anaheim, and Stanton. There are also smaller concentrations of vulnerable communities in Costa Mesa, Tustin, and Huntington Beach. Figure E-38 shows the risk of displacement in Santa Ana.



Local Trend

The Urban Displacement Project developed a neighborhood-change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego Counties, with gentrification and sociodemographic indicators based on 2015 data from the American Community Survey. It shows whether a census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods; or exhibited characteristics of a “disadvantaged” tract that did not gentrify between 1990 and 2015.

Based on this neighborhood change database, the Urban Displacement Project team found that the number of gentrified census tracts Orange County the greatest share of neighborhoods that were considered “disadvantaged” and potentially susceptible to gentrification (~43 percent). Figure E-39 shows the displacement levels for Santa Ana. A majority of census tracts in the southern and northern parts of the city are categorized Stable Moderate/Mixed Income or At Risk of Becoming Exclusive. Census tracts in and around the downtown, such as Willard, French Court, French Park, Lacy, and Pico-Lowell neighborhoods, are categorized as Low-Income/Susceptible to Displacement.

In addition, the city's housing market is expected to experience change around the downtown, corridors, and specific plan areas. As the county seat, Santa Ana's downtown and other activity areas are intensifying, and this is expected to continue into the future as the new general plan is adopted and developers redevelop existing underutilized nonresidential uses. These efforts are anticipated to add significant new housing, including affordable housing, either through the application for density bonuses or through the City's Housing Opportunities Ordinance, discussed later. So while land uses are being recycled for market rate housing, the City is also seeing the addition of new affordable housing.

To combat displacement risk, the City of Santa Ana has a variety of programs in place to address housing preservation and security.

- **Housing Preservation.** The City has approximately 40 deed-restricted affordable housing projects offering 3,200 units of affordable to lower income households.
- **Housing Security.** The City has 340 mobile home parks that offer almost 4,000 market rate units that are affordable to lower income households and are also rent stabilized.



- **Housing Production.** The City has about 10 development projects in the pipeline that, when complete, will add 1,800 new housing units affordable to lower income households.
- **Renter Protections.** The City adopted its Just Cause Eviction in December 2021. The ordinance is consistent with California Civil Code Section 1946.2 and provides additional tenant protections to those provided under State law, pursuant to AB 1482.
- **Rent Stabilization.** In December 2021, the City adopted a Rent Stabilization Ordinance, which prohibits rent increases that exceed 3 percent annually or 80 percent of the change in consumer price index, whichever is less, within the City.
- **Other Local Policies.** The City is enhancing its local preference program for residents working and living in Santa Ana who are seeking affordable housing and will also explore the creation of a right-of-first-refusal ordinance for mobile home parks and publicly supported multifamily residential properties to minimize tenant displacement and preserve affordable housing.

The City's Housing Plan provides a wide menu of programs to address displacement, including Affordable Housing Opportunity and Creation Ordinance (AHOCO) (Program 25), preservation of At-Risk Housing (Program 31), implementation of a citywide rent stabilization and just cause eviction ordinances (Program 32), and several others.

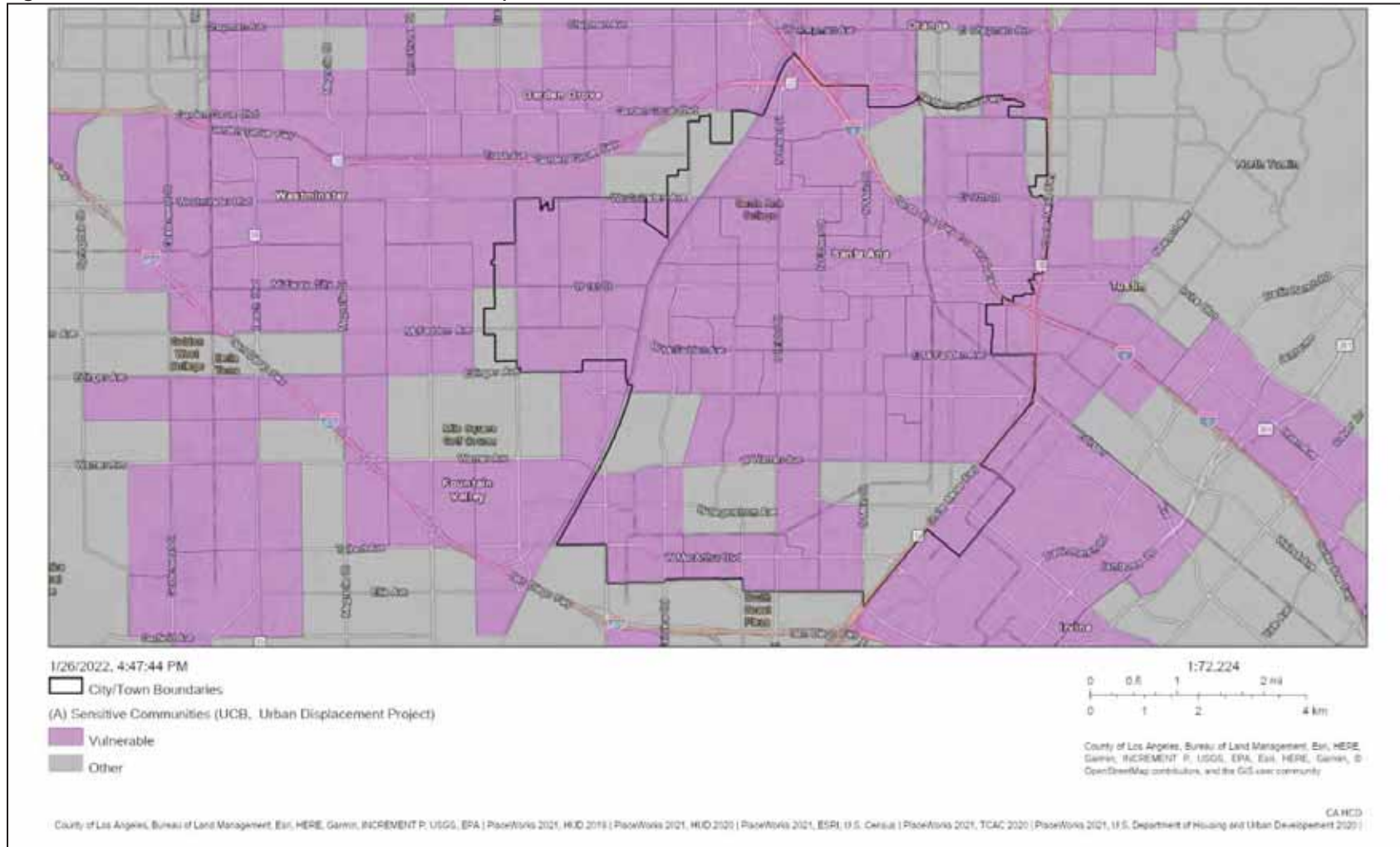


Figure E-37 Regional Sensitive Communities At Risk of Displacement



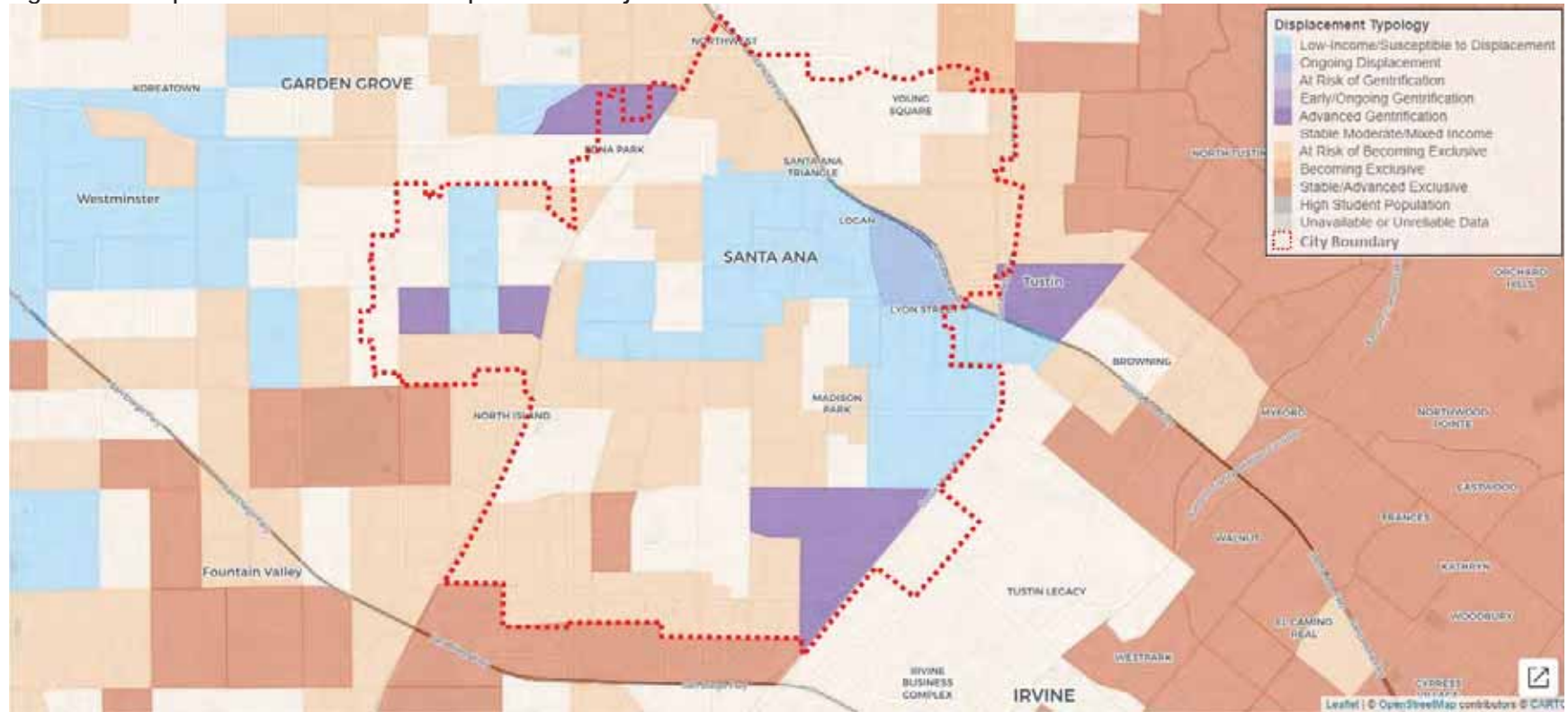
Source: HCD AFFH Data Viewer; 2020 Urban Displacement Project, 2021.

Figure E-38 Sensitive Communities At Risk of Displacement



Source: HCD AFFH Data Viewer; 2020 Urban Displacement Project, 2021.

Figure E-39 Displacement Risk—Urban Displacement Project



Source: <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/>.

CONTRIBUTING FACTORS

The housing element must include an identification and prioritization of significant contributing factors that impede fair housing and/or result in disproportionate housing needs. Through discussions with stakeholders and fair housing advocates, community feedback received during the survey and workshops, and this assessment of fair housing issues, the City identified factors that contribute to fair housing issues.

ISSUE 1: DISPLACEMENT RISK

Santa Ana, much like the Southern California region as a whole, has experienced increasing land values and rental rates since the nadir of the Great Recession. This period in Santa Ana can be characterized by an influx of development in the city, particularly development that includes housing. While more housing opportunities are coming online, many residents have expressed that there is a lack of affordable housing options that threatens displacement or that may cause homelessness. As demonstrated by Figures E-33 and E-34, considerable percentages of owners and renters in the city are overpaying for housing, and overpaying among renters is more acute. Moreover, as shown in Figure E-38, a majority of census tracts in Santa Ana are designated sensitive communities at risk of displacement.

To address the housing overpayment/burden and the risk of displacement or homelessness that new development and overpaying for housing may cause, the City employs four strategies: stabilizing rents, updating the AHOCO, instituting a local preference program, and providing shelter and services for those experiencing or that are at risk of experiencing homelessness. The Housing Plan provides programs for:

- **Housing Stabilization.** Implement the rent stabilization and just cause eviction ordinances to preserve affordable housing through regulating rent increases and establishing just cause eviction regulations (e.g., Program 33).
- **Housing Opportunity Ordinance.** Require eligible rental and ownership housing projects to include affordable units (e.g., Program 25).
- **Housing Priority.** Administer local preference for affordable housing created under the AHOCO or with City funding (e.g., Program 32).
- **Community Land Trusts and Collective Ownership.** Partner with community-based organizations to support a community land



trust program and pursue collective ownership models to promote ownership options and opportunities (e.g., programs 32 and 34).

- **Shelters and Support Services.** Provide funding for creation and/or the provision of shelters, permanent supportive housing, and services for those experiencing homelessness or that are at risk of becoming homeless (e.g., programs 37, 38, and 39).

ISSUE 2: SAFE AND SANITARY HOUSING

Safe, sound, and healthy housing conditions are essential to fair housing opportunity for all Santa Ana residents. Due to the age of the housing stock in the city, much of it is in need of repair (Table E-18). Many areas with lower median incomes are the same areas with older housing stock requiring rehabilitation. This means that renters may not have the housing mobility, due to lower income levels, to seek out housing units that are in better condition, and owners may lack the finances to regularly maintain and rehabilitate their homes. Additionally, those experiencing homelessness are most acutely affected by the lack of safe and sanitary housing.

To address the issues of safe and sanitary housing, the City employs the following strategies: education, enforcement, and capital allocation. The Housing Plan provides programs for:

- **Tenant Protections.** Provide resources to residential tenants regarding landlord-tenant laws and responsibilities to ensure units are being maintained and up to code, and if not, tenants are aware of their rights and options for recourse (e.g., Program 44).
- **Code Enforcement.** Enforce building and property maintenance standards and remove blight and unhealthy or dangerous housing conditions, and work with County Health Department to identify violations and streamline resolutions (e.g., programs 9 and 10).
- **Home Rehabilitation Grant Program.** Provide grants to assist in the repair and rehabilitation of single- and multifamily homes as well as mobile homes for lower-income households (e.g., programs 1 and 2).
- **Emergency and Transitional Housing.** Continue providing funding and services for providers of emergency shelters, permanent supportive housing, and support services for those at risk of becoming homeless (e.g., programs 37, 38, and 39).



ISSUE 3: HOUSING OVERCROWDING

Housing overcrowding refers to situations where a home has more than one person per habitable room. As shown in Table E-15, nearly 19 percent of owner-occupied households and 42 percent of renter-occupied households in the city are considered overcrowded. In addition, during the workshops and community feedback opportunities, many residents described a form of residential overcrowding known as "doubling up"—where a family co-resides with family members or friends for economic reasons—as also being prevalent and undercounted in Santa Ana. As was discussed above and depicted in Figure E-36, a majority of census tracts in Santa Ana have greater than 20 percent of households experiencing overcrowding, and four tracts have overcrowding exceeding 60 percent. This issue is also correlated with *Issue 2: Safe and Sanitary Housing*, as overcrowding accelerates the wear and tear on housing.

To address the housing overcrowding issue, the City employs the following strategies: promote construction of accessory dwelling units, permit diverse housing types, and create additional affordable housing. The Housing Plan provides programs for:

- **Overcrowding Conditions.** Facilitate development of accessory dwelling units and additions to existing homes to alleviate overcrowded housing conditions (e.g., Program 43).
- **Diverse Housing Types.** Facilitate diverse types, prices, and sizes of housing for the different needs in the community (e.g., Program 27).
- **Affordable Component.** Continue applying AHOCO to include affordable units as part of new housing developments (e.g., Program 25).

ISSUE 4: HOUSEHOLD INCOME

Since the housing market is not a closed system, assessing income groups in Santa Ana in relation to neighboring cities and the county as a whole is a critical component for evaluating housing access and affordability. According to the 2015-2019 ACS 5-year estimates, the city's median household income was approximately \$66,145, considerably below the county's median income. Among neighboring cities, the median household incomes ranged from a low of \$69,278 in Garden Grove to a high of \$105,126 in Irvine. This issue is directly correlated with *Issue 1: Displacement Risk*, since lower-earning households in Santa Ana are vying for housing units in a highly competitive housing market and



competing with higher-earning individuals looking to locate in a jobs-rich region.

To address the issues in housing access and affordability created by lower household incomes, the City employs the following strategies: promote construction of affordable housing, implement rent stabilization and just cause eviction ordinances, fund homeownership opportunities, and provide services to those at risk of becoming homeless to keep them housed. The Housing Plan has programs for:

- **Affordable Housing Production.** Provide financial assistance to support the production and/or rehabilitation of affordable housing for extremely low-, very low-, and low-income families (e.g., Program 21).
- **Rent Stabilization and Just Cause Eviction.** Adopt a rent stabilization ordinance(s) to preserve affordable housing through regulating rent increases and establishing just cause eviction regulations (e.g., Program 33).
- **Down Payment Assistance.** Assist low-income households with down payment assistance loans to facilitate ownership opportunities (e.g., Program 34).
- **Supportive Services.** Allocate funding to agencies that provide services to people experiencing homelessness or that are at risk of becoming homeless (e.g., programs 37, 38, and 39).

ISSUE 5: ENVIRONMENTAL JUSTICE AREAS

An environmental justice community is an area of the city where residents have the highest risk of exposure to pollution in the air, water, and soil. Residents in these areas also tend to be burdened by socioeconomic and health issues, such as higher rates of language barriers, poverty, and asthma. Such areas also tend to experience lower rates of investment and improvements from individuals, private companies, and public agencies. All of these factors can lead to unequal opportunities to lead a healthy and prosperous life. There are 24 census tracts in the city that are considered disadvantaged or environmental justice (EJ) areas (Figure E-25).

To address EJ issues, the City underwent an extensive multiyear engagement effort as part of its comprehensive General Plan update, with the last year focusing on engaging EJ communities and listening to their experiences and issues regarding environmental health and quality of life. The campaign consisted of a multilingual EJ Survey (electronic and hard copy) and 10 virtual and 1 in-person community forums, each



focusing on a specific EJ area in the city. Feedback can be generally grouped into the following categories: improving air and water quality; improving public city facilities; improving infrastructure; providing healthy food options; providing safe and sanitary housing; increasing physical activity; and fostering civic engagement.

The City has developed over 75 policies and over 70 programs that are informed by the feedback received from the community and that address pollution and population variables in the CalEnviroScreen model that are in the upper quartile rank in the identified EJ areas. With the completion of the General Plan, the City will begin the process of addressing the disproportionate environmental burden that residents in these communities have experienced.

ISSUE 6: EDUCATION AND WORKFORCE DEVELOPMENT

As stated in *Issue 4: Household Income*, median incomes in Santa Ana lag behind the county. Moreover, as discussed above, more than half of Santa Ana households are in the low or moderate income categories (Figure E-13). This is despite Santa Ana residents being in closer proximity to jobs compared to the county as a whole and having more access to those jobs through transit connections (Figure 28). This suggests that access to jobs is not an issue; rather, the issue lies in access to higher paying jobs. Higher paying jobs often require higher levels of job skills and educational attainment. However, nearly all of Santa Ana tracts scored in the lowest TCAC education quartile score. Additionally, a majority of the tracts in the city, with a noticeable concentration in the central city area, scored in the lowest TCAC economic opportunity quartile score.

To address educational and economic opportunity barriers that lead to housing and affordability issues, the City is including an Economic Prosperity Element in the updated General Plan. The element includes programs for workforce development, small business creation and retention, and incentives to hire local. In addition, the updated General Plan includes an element called the Community Element. The Community Element includes numerous policies and programs to directly address the education and jobs training issue. For example, there are policies and programs to support parent participation programs to increase high school and college graduation rates, expanding access to libraries and learning centers, promoting skill-based education programs, and investing in lifelong learning programs.



FAIR HOUSING ISSUES AND MEANINGFUL ACTIONS

Given the variety of fair housing issues, contributing factors, and strategies in the Housing Element to address them, the City has conducted analysis to determine key, overarching, meaningful actions, with metrics to measure the progress and effectiveness of the overall effort and the combined impact of programs to improve fair housing in Santa Ana. Table E-19 provides the action area, programs or other activities in the element that will address the action areas, specific commitment, timelines, and metrics for all the Fair Housing Strategies.



**Table E-19
Fair Housing Issues, Contributing Factors, and Meaningful Actions**

<i>Action Area</i>	<i>HE Programs or Other Activities</i>	<i>Specific Commitment</i>	<i>Timeline</i>	<i>Geographic Targeting</i>	<i>Metrics</i>
Fair Housing Outreach and Enforcement	HE Program 44: Fair Housing	Ensure all City programs and activities relating to housing and community development are administered in a manner that affirmatively furthers fair housing.	Ongoing	Citywide	Remove barrier to housing
		Hold annual small apartment managers' workshop to train and educate property owners, HOAs, property managers, and tenants about best practices in property management, neighborhood safety, and landlord/tenant responsibilities.	Ongoing	Citywide	Assist 50 persons annually
		Periodically prepare the Analysis of Impediments to Fair Housing Choice to identify, remove, and/or mitigate potential impediments to fair housing in Santa Ana.	Annually	Citywide	Remove barrier to housing
		Partner with legal assistance organizations to provide legal clinics for tenants on tenants' rights and recourse for intimidation and unjust evictions.	2023	Citywide	Assist 50 persons annually
		Implement residential rent stabilization, just cause eviction, and other protections for tenants facing housing instability, including ongoing outreach and education, a program monitor system, and a schedule of penalties that may be imposed for noncompliance.	Annually	Citywide	Apply to all buildings built on or before February 1, 1995.
Housing Mobility	HE Program 43: Multi-Generational Housing and Accessory Dwelling Units	Publish preapproved ADU plans and publicize ADU program through dedicated web page in various languages to facilitate ADU construction.	2022	Single-family neighborhoods	723 ADUs over 8 years

Table E-19
Fair Housing Issues, Contributing Factors, and Meaningful Actions

<i>Action Area</i>	<i>HE Programs or Other Activities</i>	<i>Specific Commitment</i>	<i>Timeline</i>	<i>Geographic Targeting</i>	<i>Metrics</i>
	HE Program 29: Housing Production Actions	Provide housing assistance payments to eligible households who are participating in the Housing Choice Voucher Program, and adhere to policies and procedures in the federal regulations and in the Housing Choice Voucher Program Administrative Plan. Administer 100 percent of the funding provided to the Housing Authority on an annual basis for eligible households. This includes Special Purpose Vouchers including the Veterans Affairs Supportive Housing Program; Mainstream Voucher Program; Foster Youth to Independence Program; and Emergency Housing Voucher Program. The objectives are to: 1) Utilize 100 percent of the Annual Budget Authority provided by HUD for each CY; 2) Apply for new funding opportunities for additional vouchers; 3) Retain High Performer SEMAP status; 4) Communicate on a regular basis with active landlords by providing information on key program updates.	Ongoing	Citywide	Utilization of 100 percent of Annual Budget
	HE Program 25: Affordable Housing Opportunity and Creation Ordinance	Enforce the City's inclusionary housing ordinance, known as the Affordable Housing Opportunity & Creation Ordinance (AHOCO), to require eligible housing development projects of five or more units, including condominium conversions, to include at least 15 percent of the units as affordable to low-income households; or 10 percent of the units affordable to very low-income households; or 5 percent to extremely low-income households; or a minimum of 10 percent available	Ongoing	Citywide	Facilitate creation of affordable units

**Table E-19
Fair Housing Issues, Contributing Factors, and Meaningful Actions**

<i>Action Area</i>	<i>HE Programs or Other Activities</i>	<i>Specific Commitment</i>	<i>Timeline</i>	<i>Geographic Targeting</i>	<i>Metrics</i>
		affordable households with five (5) 5 percent to low-income, 3 percent to very low-income, and 2 percent to extremely low-income households, for rental housing. Require 5 percent of the units as affordable to moderate-income households for for-sale housing.			
	HE Program 27: Variety in Household Sizes	Establish guidelines as part of the Comprehensive Zoning Code Update for new housing development projects to include a variety of unit sizes, including units for large families, that are affordable to extremely low-, very low-, and low-income families.	Dec. 2023	Citywide	Creation of three- and four-bedroom units in quantities that are above historical trend
	HE Program 31: Preservation of At-Risk Housing	Annually monitor the status of at-risk housing projects, specifically the Warwick Square, Highland Manor, and other projects that may come due. Contact owners of properties at risk of conversion within one year of expiration to discuss City's desire to preserve projects as affordable housing.	Annually	Citywide	Preserve 512 units that are at risk within the planning period
	HE Program 34: Down Payment Assistance	Assist low-income households with down payment assistance loans of up to \$120,000 and moderate-income households with loans of up to \$80,000	Ongoing	Citywide	Assist 10 applicants per year.
New Opportunities in Higher Opportunity Areas	HE Program 25: Affordable Housing Opportunity & Creation Ordinance	Enforce the City's inclusionary housing ordinance, known as the Affordable Housing Opportunity & Creation Ordinance (AHOCO), to require eligible housing development projects of five or more units, including condominium conversions, to include at least 15 percent of the units as affordable to low-income	Ongoing	Citywide	Facilitate development affordable units or collection of in-lieu fees to fund development

Table E-19
Fair Housing Issues, Contributing Factors, and Meaningful Actions

<i>Action Area</i>	<i>HE Programs or Other Activities</i>	<i>Specific Commitment</i>	<i>Timeline</i>	<i>Geographic Targeting</i>	<i>Metrics</i>
		households; or 10 percent of the units as affordable to very low-income households; or 5 percent to extremely low-income households; or a minimum of 10 percent available affordable households, of which 5 percent to low-income, 3 percent to very low-income, and 2 percent to extremely low-income households, for rental housing. Require 5 percent of the units as affordable to moderate-income households for for-sale housing.			
	HE Program 1: Single-Family and Mobile Home Rehabilitation	Contract with a local nonprofit organization (currently Habitat for Humanity) to implement the City's Residential Rehabilitation Grant Program. Provide grants of up to \$25,000 to 25 households per year until 2024—after 2024 dependent on funding—for the repair and rehabilitation of single-family and mobile homes, prioritizing applicants in R/ECAP and TCAC census tracts and low-income households.	Ongoing	R/ECAP and TCAC	25 households per year
	HE Program 3: Neighborhood Improvement	Create, assist, and support neighborhood associations, especially in R/ECAP and TCAC census tracts, to collaborate on projects and sponsor and hold annual events.	Annually	R/ECAP and TACA	Hold at least one event in areas per year
	HE Program 4: Neighborhood Infrastructure	Complete infrastructure improvements in residential neighborhoods consistent with the City's Capital Improvement Plan.	Ongoing	Citywide	Completion of projects in accordance with CIP schedule
	HE Program 14: Transit Zoning Code	Through the City's RFP process for Affordable Housing Development (see program 2), facilitate and encourage the development	Annually	TZC Area	

**Table E-19
Fair Housing Issues, Contributing Factors, and Meaningful Actions**

<i>Action Area</i>	<i>HE Programs or Other Activities</i>	<i>Specific Commitment</i>	<i>Timeline</i>	<i>Geographic Targeting</i>	<i>Metrics</i>
		in the Transit Zoning Code plan area of varied housing types at a mix of affordability levels, including for lower income households using appropriate incentives, such as awarding bonus points to developers whose projects provide at least 75% or more for the units for extremely low-income families at 30% Area Median Income.			
Tenant Protection and Anti-displacement	HE Program 32: Anti-Displacement and Local Housing Preservation	Enhance local preferences program for residents working and living in Santa Ana who are seeking affordable housing.	Ongoing	Citywide	Establishment and implementation of programs
		Explore a right-of-first-refusal ordinance for mobile home parks and publicly supported multifamily residential properties to minimize tenant displacement and preserve affordable housing stock.			
		Implement a just cause eviction ordinance that was adopted in October 2021 to provide tenant protections beyond state mandates.			
		Evaluate and pursue collective ownership models for mobile home parks as a tool to prevent displacement			
HE Program 33. Rent Stabilization and Just Cause Eviction		Implement the rent stabilization ordinance that was adopted in October 2021 to preserve affordable housing through regulating rent increases.	Dec. 2023 and Ongoing	Citywide	Apply to all buildings built on or before February 1, 1995.
		Implement the just cause eviction ordinance that was adopted in October 2021 to	Feb. 2022		

**Table E-19
Fair Housing Issues, Contributing Factors, and Meaningful Actions**

<i>Action Area</i>	<i>HE Programs or Other Activities</i>	<i>Specific Commitment</i>	<i>Timeline</i>	<i>Geographic Targeting</i>	<i>Metrics</i>
		provide tenant protections beyond state mandates.			
		Identify and implement regulatory framework and administrative infrastructure necessary to implement residential rent stabilization, just cause eviction, and other protections for tenants facing housing instability,	Dec. 2022		

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Public Outreach

This chapter describes the public outreach process that was the foundation of the Housing Element update, the City's Housing Vision, and programs.

OVERVIEW

The California Government Code Section 65583(c)(6) requires that a diligent effort be made to achieve public participation from all groups in the development of the housing element. As part of the Housing Element update, the City held four Housing Element Roundtable meetings and three citywide workshops, and made an online housing survey available to provide opportunities for residents, businesses, stakeholders, advocates, civic leaders, and other parties to participate in the process.

The public outreach program for the Housing Element was designed with several overarching goals in mind:

- **Facilitate Equal Opportunity and Access.** The purpose was to provide venues that would allow all stakeholders equal access and opportunity to participate. To facilitate this, multilingual advertising and translation services were provided at community workshop forums. Meetings were held at different times of the day and week, and the facilities were accessible to people of all abilities.
- **Allow a Broad Range of Discussion.** The City capitalized on the ongoing comprehensive General Plan Update planning effort and activities to reach the largest audience possible. For instance, eleven workshops focusing on Environmental Justice for the General Plan Update were held in 2021. Several of the indicators used to measure Environmental Justice areas, such as housing burden, poverty, linguistic isolation, and lead risk from housing, have a direct correlation to the goals and policies in the Housing Element. As such, community feedback received during the eleven workshops shaped the update of this element as well as the goals, policies, and actions.



- Community Engagement. As part of the Housing Element update, a trilingual English, Spanish, and Vietnamese survey solicited additional community feedback regarding housing, health, and wellness. The survey was available electronically through the City's website, and hard copies were available for distribution as needed.

Finally, it is understood that achievement of Santa Ana's housing planning goals is fundamentally a process that will unfold over the planning period. Given the strong implementation program provided, the City will continue to offer significant opportunities for public participation in influencing and further refining the programs in the Housing Element.

OUTREACH EVENTS AND PARTICIPATION

Recognizing the importance of public participation in shaping the priorities of the community, the City of Santa Ana held at a number of events for members of the public, elected officials, stakeholders, businesses, and/or other interested parties to participate in the update of the Housing Element. These events include the following:

- Environmental Justice Community Forums (March 30 to August 28, 2021)
- Housing Element Roundtable #1 (June 2, 2021)
- Housing Element Roundtable #2 (June 9, 2021)
- Housing Element Roundtable #3 (June 16, 2021)
- Housing Element Roundtable #4 (June 30, 2021)
- Planning Commission Workshop #1 (September 27, 2021)
- Planning Commission Workshop #2 (October 11, 2021)
- Housing Element Workshop #1 (October 18, 2021)
- Housing Element Workshop #2 (October 26, 2021)
- Housing Element Workshop #3 (November 6, 2021)
- Planning Commission Public Hearing (December 20, 2021)
- City Council Public Hearing (July 19, 2022)

The City advertised the workshops and public outreach opportunities through a variety of means. City staff created public notices and flyers for the community workshops in three languages—English, Spanish, and Vietnamese (see attached flyers). Flyers were distributed at recreation centers, City facilities, and through the various social media platforms the City utilizes. Articles encouraging community



engagement were also published in the *COSAS* City Manager's newsletter. An electronic distribution was also made to a database of residents, neighborhood leaders, community organizations, and interest groups. Table F-2 at the end of this chapter identifies the various stakeholders that participated in the Housing Element roundtables and workshops.

A unique feature of the advertising campaign for the Housing Element update was the sharing of event notices at the Community Linkages Forum, a monthly forum for reaching all of the more than 60 neighborhood organizations in Santa Ana. The City's website also provided notices of the key housing workshops. Community outreach was done with adherence to COVID-19 guidelines and restrictions.

The remainder of this chapter discusses results of the public outreach process. The chapter is divided into three sections: 1) a summary of themes heard at the various workshops organized by topic; 2) survey results; and 3) a compendium of select advertising and outreach materials.

GENERAL PLAN UPDATE OUTREACH

Outreach conducted as part of the General Plan Update, which was ongoing at the time, included reaching out to residents, local leaders, and community stakeholders to participate in the development of the draft plan. The feedback received formed the basis for the draft goals, policies, and actions in the plan. Outreach efforts began in November 2015 and concluded in August of 2021. During that time, over 50 community workshops, in-person and virtual; 2 surveys in multiple languages; and over 15 focus group meetings were held to solicit feedback regarding the community's vision for the future of Santa Ana and policies that would improve residents' quality of life.

In addition, through an iterative process of reviewing the feedback gathered during the initial community outreach phase, a 17-member group composed of youth and planning commissioners, business owners, community advocacy leaders, and residents, called the General Plan Advisory Group (GPAG), identified the following five principles, or "core values," which emerged as the highest priorities of the Santa Ana community: Health, Equity, Sustainability, Culture, and Education.

Health: The people of Santa Ana value a physical environment that encourages healthy lifestyles, a planning process that ensures that health impacts are considered, and a community that actively pursues policies and practices that improve the health of our residents.



Equity: Our residents value taking all necessary steps to ensure equitable outcomes, expanding access to the tools and resources that residents need, and to balance competing interests in an open and democratic manner.

Sustainability: Santa Ana values land use decisions that benefit future generations, plans for the impacts of climate change, and incorporates sustainable design practices at all levels of the planning process.

Culture: Our community values efforts that celebrate our differences as a source of strength, preserve and build upon existing cultural resources, and nurture a citywide culture of empowered residents.

Education: We are a city that values the creation of lifelong learners, the importance of opening up educational opportunities to all residents and investing in educational programs that advance our residents' economic well-being.

These core values were discussed and expressed throughout each of the draft elements and sections of the comprehensive General Plan Update and were deemed key principles to guide the City's policy framework and future decision-making.

To further provide Santa Ana's disadvantaged, or "environmental justice (EJ) communities" an opportunity to share their experiences and issues regarding environmental health and quality of life, Planning staff facilitated a multifaceted outreach campaign in the Spring of 2021 (January through May). The campaign began with the gathering of a General Plan Outreach Roundtable, with representatives and local stakeholders providing ideas and feedback on tools and strategies that could be used to effectively engage as many community members as possible. The overall EJ Community Outreach Campaign consisted of a multilingual EJ Survey (electronic and hard copy), which was publicized on various social media platforms and hard copies distributed by neighborhood leaders; and 10 virtual community forums, each focusing in on listening to the lived experiences of residents, property owners, and community stakeholders within specific geographic areas in the city that are categorized as "EJ communities"; and one in-person forum. Feedback received during this phase of the outreach can be generally grouped into the following categories: improving air and water quality; improving public city facilities; improving infrastructure; providing healthy food options; providing safe and sanitary housing; increasing physical activity; and fostering civic engagement.

The feedback received and the development of the core values directly impacts and has influenced the development of the Housing Element



Update. The feedback received is key to understanding the issues facing Santa Ana residents and, spatially, where these issues persist. Through understanding these issues, policies and actions to address them were more effectively crafted. Additionally, the core values directly speak to what the community values and how the City should steer its decisions moving forward. They are also salient topics because they touch on the most important issues residents are facing, thus, why they became central or core values. These issues include poor health outcomes (health), disparities in access to opportunities and resources (equity and education, respectively), effects of past short-sighted land use decision (sustainability), and fear of displacement or losing community (culture). By utilizing the feedback received as part of the overall General Plan Update and its core values to inform the 2021-2029 Housing Element, the vision and values of a broad segment of the community will have been achieved, and components related to affirmatively furthering fair housing addressed.

MAJOR THEMES

This section synthesizes major comments received at outreach meetings. Highlights and presentation materials can be viewed at <https://www.santa-ana.org/housing-element-update-2021>.

OUR HOUSING

Participants acknowledged the challenge with regard to providing housing for people of all economic, age, and family categories. They agreed that Santa Ana needs to provide more housing choices for seniors, large families, veterans, artists, and those with special needs, but ensure that housing is affordable, well designed, and maintained. Common themes were:

- **Housing Choices.** Many workshop participants stated that more housing in the lower affordability levels were needed to meet demand and assuage overcrowding, regardless of lower RHNA number. Though some residents strongly oppose the continued densification and the impacts it has caused, others expressed support, stating that housing is a right and that such projects are needed to address the community's needs. Residents favored new mixed-use developments as a positive change.
- **Special Needs.** Residents mentioned the need for special-needs housing for the most vulnerable residents. Seniors need affordable housing, as do those with disabilities. Participants also cited the



diversity of the homeless population and the need for a permanent emergency shelter for homeless people.

- **Housing Rehabilitation.** In many areas, older housing or homes built without quality designs now require significant repair. Additionally, some lower income homeowners lack the wherewithal to perform regular maintenance on their houses. Participants felt that funding for housing rehabilitation programs help improve the existing housing stock.
- **Homeownership.** Participants strongly favored programs that promote housing security, such as increasing opportunities for home ownership.
- **Affordable Housing.** Given the high cost of housing compared to the wages, many residents are cost burdened. Participants favored strengthening the Housing Opportunity Ordinance to help provide affordable housing. Participants also suggested establishing a rent control ordinance to keep housing affordable, especially since rents have increased faster than inflation.
- **Family Housing.** Participants voiced their support for units with larger number of bedrooms to accommodate families residing in Santa Ana. Incentives or standards to produce such units should be explored.

OUR NEIGHBORHOODS

Santa Ana is distinguished by its established neighborhoods. The City has more than 60 residential neighborhoods, each differentiated by its history and culture, architecture, housing types and prices, demographics, and other characteristics. Comments regarding neighborhoods are summarized below:

- **Parks and Open Space.** Participants noted a need for parks and recreational areas, especially in areas that are underserved and/or in Environmental Justice areas. The lack of parks is particularly noticeable in denser neighborhoods that consist primarily of multiple-family housing. Others desired community gardens and street landscaping.
- **Overcrowding.** Overcrowding and housing density is seen as a problem in Santa Ana and is viewed as a contributing factor to the City's decaying housing stock and quality of neighborhoods.
- **Neighborhood Preservation.** Neighborhood preservation can stifle development of new housing units and can lead to costlier permits for owners of such buildings. Incentives or reduced permit costs for low-income owners of such structures should be explored to facilitate routine maintenance and rehabilitation. The City should explore



strategies to preserve residential districts/neighborhoods while not deterring construction of affordable housing.

- **Crime and Safety.** In certain neighborhoods, public safety is a concern for many residents. Specific areas of concern included gangs and graffiti. Some participants perceived that certain types of development either cause or contribute to higher levels of crime, which again affects the quality of life in neighborhoods.
- **Infrastructure.** Residents cited that a common issue was the need to repair infrastructure—sidewalks, potholes, etc.—in neighborhoods and citywide. Poorly maintained infrastructure is not only a safety issue, but also presents a negative image of the city to residents, visitors, and the business community.
- **Healthy Neighborhoods.** Living a healthy lifestyle is important to many Santa Ana residents. Feedback received through the outreach workshops included a desire to have increased access to fresh food and open space, improved living conditions, a sense of community, and quality places for children to play.

OUR COMMUNITY

Although the focus of the workshop was on housing, residents felt there were additional ways to make Santa Ana a better community to live and work. Comments were made on education, congestion and transportation options, a health community, and many other concerns. Participants actively commented on how to make Santa Ana the best place to live. Common themes were:

- **Density.** Housing density continues to be a concern. It was mentioned at the project level (blighted projects) and the neighborhood level. There was a concern that higher density housing has been allowed to change the character and quality of life in neighborhoods. Others felt that the City must build more housing to reduce overcrowding.
- **Healthy Community.** The City should promote a healthier community. The idea means different things to different people: a city with ample parks and recreational centers; better and safer routes for people to walk or to bicycle from neighborhoods to places of interest; a smoke-free environment; and integration of public health planning into land use decisions.
- **Family Housing.** Various individuals and groups emphasized the need to prioritize family housing. Many families earn lower incomes, pay too much for housing, and live in overcrowded conditions. Affordable family housing is needed.



OUR ECONOMY

During the outreach process, concern was voiced that many of Santa Ana's current residents cannot afford to purchase or rent housing in the city. It is also important to have affordable housing for Santa Ana's workforce. Key comments offered include:

- **Workforce Needs.** Young adults with good employment skills cannot afford to stay local. What can be done to be more proactive? Looking closely at the needs of the workforce and understanding the densities that work best to produce affordable housing were encouraged.
- **Land Banking/Trusts.** Land banking or land trusts was mentioned as a model that should be looked into to acquire land, place long-term covenants on affordable housing that run with the land, and guarantee housing affordability in perpetuity. Drops in land and housing values should be looked at as opportunities increase assets.
- **Public Education.** A challenge to advancing the affordable housing agenda is neighborhood concerns and resistance. Prior negative concepts of "affordable" housing need to be replaced through public education. A broader understanding of the value of affordable housing to the community is also needed.
- **Big Ideas.** Solutions to workforce and affordable housing require big ideas. Employers and the City will need to contribute. Ultimately, the City Council will evaluate housing policy alternatives and set housing policy direction. These policies need to be shaped into a well-articulated vision for Santa Ana's housing future. Incentives are also needed to promote more affordable housing.
- **Funding Projects.** The City should leverage monies with other funding sources like state bonds and tax credits to produce more affordable housing. Advocating for the federal government programs that benefit affordable housing efforts and advancing more use of tax credits for entities would help to provide affordable housing.

SURVEY RESULTS

The City's efforts to engage the public about the Housing Element update included a trilingual survey (English, Spanish, and Vietnamese) developed to solicit input about Santa Ana's housing needs and community preferences. An electronic survey was made available and publicized on the City's social media platforms, on the City Manager's newsletter, and at community centers, parks, and civic buildings. In addition, paper copies of the survey were made available upon request. Responses were collected between August 19 and September 09, 2021.



There were 556 surveys submitted during the outreach period: 419 in English, 134 in Spanish, and 3 in Vietnamese. Eighty seven percent of respondents were Santa Ana residents, with only 13 percent reporting that they are stakeholders (i.e., nonprofit members, students, local government officials, etc.). The majority of the respondents were long-term residents that have lived in Santa Ana for 10 or more years (73 percent). Respondents selected Santa Ana as their home for a number of reasons; the top three reasons being they grew up in the city (45 percent), proximity to work (33 percent), and its affordability (30 percent). Most respondents reside in the 92701 (28 percent), 92704 (16 percent), 92707 (16 percent), and 92703 (15 percent) zip code areas.

Respondents were asked questions related to existing housing conditions. When asked what housing type they reside in, the most common response was single-family homes (42 percent) and apartments (29 percent), and the most common household reported is a couple living with children (25 percent). When asked about their level of satisfaction with their current housing situation, most responses ranged from somewhat satisfied to dissatisfied; the majority being somewhat satisfied (36 percent). When asked about reasons for their last change in housing or move, the top three reasons were housing needs changing (21 percent), unaffordability (19 percent), and circumstances improving (18 percent). When asked about how much they spend on housing, over half of the respondents (71 percent) said they spend more than one-third of their household income on housing. These respondents are considered cost burdened; the Department of Housing and Urban Development defines this as households spending more than one-third of their income on housing alone.

Respondents were also asked about challenges to providing housing and addressing homelessness. When asked about the main housing challenges in Santa Ana, respondents cite affordability (55 percent) as the predominant challenge Santa Ana faces. This is consistent with the high rate of survey respondents that report spending more than one-third of their income on housing. Other challenges identified were overcrowding (48 percent)—household with multiple families that exceed 2 persons per bedroom—and homelessness (40 percent). When asked about the best way to help people who are experiencing homelessness, the most popular method reported among survey respondents was providing homeless shelters with a connection to services and permanent housing (66 percent). Other popular methods identified by respondents include providing affordable housing with on-site support services (56 percent) and increasing the affordable housing supply (43 percent).



When asked for prospective housing-related programs and/or activities that the City should concentrate on, the most popular responses were to continue to support local nonprofits/organizations that provide social services for special needs populations (senior, low-income, youth, etc.) (51 percent), expand affordable housing inventory (49 percent), and promote fair housing (41 percent).

When asked for feedback about important issues the City could address to create a safer and more accessible Santa Ana, respondents were able to provide written comment. The most pressing issues respondents provided are homelessness (22 percent), the need for low-income, affordable housing (22 percent), and improving public safety and law enforcement (20 percent). When it came to housing, respondents described the need for accessible affordable housing (21 percent), stabilizing rent prices (14 percent), and support to purchase a home (6 percent). Many responses to this question revolved around the need to invest in the community (6 percent), including youth programs, educational and employment programs, parks and open space, and public safety.

When asked about future housing opportunities and what type of housing developments respondents want to see in Santa Ana, the following three types were most often selected: single-family homes (53 percent), townhomes (29 percent), and apartments/multifamily housing (29 percent). In addition, the survey sought insight from respondents about where they believe new housing units could be added. Many respondents described observing various vacant and underutilized parcels that could be used for new housing developments. Respondents provided specific areas they see fit for new development, including areas along the corridors of Bristol Street, 17th Street, 1st Street, Main Street, or Fairview Street. In this section of the survey, many respondents stressed the need for accessible and low-income housing, but this conflicted with a good number of responses concerning overcrowding and the city being built out.

Bringing housing units online at rates that Santa Ana residents can afford can at times be challenging due to the different political, regulatory, and economic constraints. From a selection of options, the survey asked respondents to identify the top three barriers to affordable housing in Santa Ana. Respondents selected renters cannot afford new rental housing (56 percent), homebuyers cannot afford new owner-occupied housing (41 percent), and the cost of development (31 percent) as the top barriers to affordable housing in the city. When asked about what type of affordable rental housing is most needed in the community, respondents felt that more affordable rental housing for large families (29 percent), the elderly (65+) (20 percent), and people experiencing homelessness (11 percent) were needed to balance the city's existing housing stock.



In conclusion, 556 surveys were completed, and the feedback they provided was a key and necessary component of the plan to address housing issues for this planning period. Survey respondents provided important insights for different housing topics, such as housing challenges, homelessness, affordable housing, and the future of housing in Santa Ana. Respondents stressed the importance of addressing the issues of homelessness, housing affordability, and the need for community-centered solutions that reflect the housing needs of Santa Ana residents.

To engage elected officials and the community on the selection of Housing Opportunity Areas, the City held a Planning Commission meeting on September 27, 2021 focused on the areas of the city that should be considered to meet the City's Regional Housing Needs Allocation (RHNA) obligations. The City has worked very hard to create housing opportunities through the adoption of several Specific Plans that currently have zoning in place to accommodate the City's RHNA. Planning Commission was supportive of City staff's recommendation and approach to the site selection process.

Prior to sending the Housing Element draft to the State Department of Housing and Community Development (HCD) for review, the Draft Housing Element was made available to the public starting October 8, 2021. A hard copy of the Housing Element was made available at City Hall, and a link to the draft document was provided via email to stakeholder groups on the City's website (<https://www.santa-ana.org/housing-element-update-2021>) and on the City's social media pages (Facebook, Instagram, and Nixle). The Housing Element website, with draft document, will remain available for members of the public to submit comments on the draft during HCD's review period. For additional comments received prior to the adoption of the element, Staff will incorporate comments as appropriate and correspond with the commenter. Any revised versions of the Housing Element and comments received from HCD will be posted on the City's Housing Element website.

After HCD has reviewed the Draft Element, the Planning Commission and City Council will hold a public hearing to consider the Housing Element Update and to receive additional comments from the public. Notification for these hearings will be published in the newspaper, posted in prominent public facilities, posted on social media, and provided on the City's website in advance of each meeting.



RESPONSES TO PUBLIC COMMENTS

The City received public comments throughout the Housing Element preparation and public review periods via workshops, surveys, public hearings, and written communications.

This section provides the comprehensive list of written comments received and the City's response to those comments. Comment letters and specific comments within the letters are given letters and numbers for reference purposes.

Table F-1 is a list of organizations and persons that submitted comments on the draft Housing Element.

**Table F-1
Written Comments Received on the Housing Element Update**

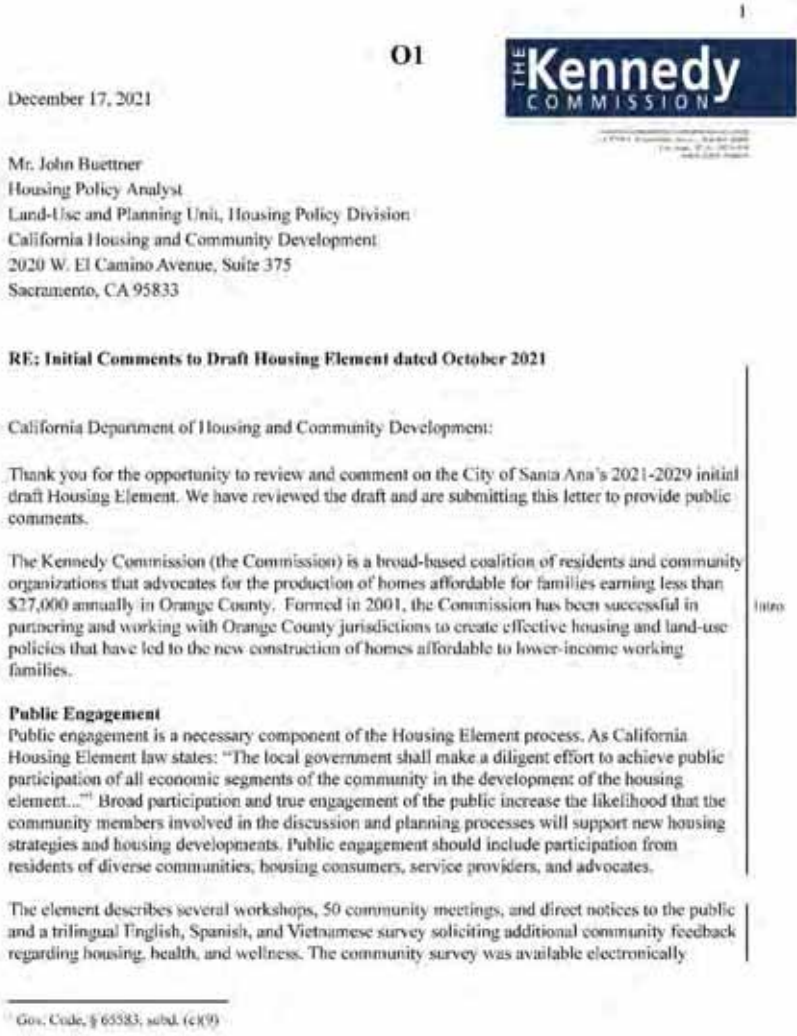
<i>Number Reference</i>	<i>Commenting Person/Agency</i>	<i>Date of Comment</i>	<i>Page No.</i>
Organizations			
01	The Kennedy Commission	December 17, 2021	F-13
02	THRIVE Santa Ana	January 6, 2022	F-29
03	Disability Rights California	February 24, 2022	F-38
04	YIMBY Law	February 28, 2022	F-105
05	Californians for Homeownership	March 24, 2022	F-113
Individuals			
I1	Tim Rush	October 25, 2021	F-117
I2	Dale Helvig	December 20, 2021	F-118

RESPONSES TO COMMENT LETTERS

This section includes all comment letters received on the draft Housing Element. Following each comment letter are the City's responses to each comment.



Letter O1 – The Kennedy Commission (11 pages)



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through the City’s website, and hard copies were available for distribution as needed. However, it fails to say how these hard copies were distributed.

We would like to commend the City of Santa Ana for its commitment to keeping residents engaged and involved in the Housing Element development process. With various outreach strategies, stakeholder meetings and public meetings, the City provided multiple opportunities for community members to participate and be a part of the dialogue. As the city moves forward with drafts and revisions, it needs to continue to engage community stakeholders and residents in the evaluation and creation of policies, goals, programs and sites for affordable housing development, especially low income and special needs residents who are the most vulnerable to the housing crisis.

01-1

Community Needs

The City of Santa Ana is a renter majority city with 53.8% percent of residents being renters. According to SCAG’s pre-certified housing data, there are a total of 41,200 renter households in Santa Ana, with 25,210 or 61.2% of those households spending thirty percent or more of gross income on housing costs.² Additionally, 11,923 or 28.9% renter households are extremely rent burdened and are paying fifty percent or more of gross income on housing costs. During the initial wave of the COVID-19 pandemic, Santa Ana’s unemployment rate rose from 2.8% in February 2020 to 15.1% by May 2020.³ Although Santa Ana’s economy is slowly recovering, many renters are still struggling to make ends meet and find affordable housing options.

SCAG’s pre-certified data tables (Spending on Rent and Spending on Rent by Income) show that the vast majority of job salaries in the City of Santa Ana employment industries fall into the lower-income categories. The most common employment sectors include Manufacturing, Art, Entertainment and Recreation, Education and Social Services, and Retail Trade. Compared to other cities in the County, the City of Santa Ana holds one of the lowest median household incomes at \$61,774 meaning that the majority of Santa Ana residents fall in the extremely low and very low income categories. According to HCD’s 2021 State income limits, a family of four falls within the extremely low income level if they make less than \$40,350 and very low if they make less than \$67,250. The average rent for 1-bedroom apartments in the City is \$1,732, for 2-bedrooms \$2,287, and for 3-bedrooms \$2,476. This is out of reach for the majority of residents in Santa Ana. With renters paying over half of their income on housing, they must forgo essential necessities such as medical treatment and childcare.

01-2

Although Table A-6 in the element shows an increase of households earning \$150,000 or more and a decrease in lower income households from 2010 to 2018, it clearly shows the wave of gentrification that has grown over the past decade. Higher earning families are moving into the City while local residents, especially large low income families, are facing higher housing costs and displacement.

² SCAG Pre-Certified Housing Data for the City of Santa Ana, April 2021

³ City of Santa Ana 2021-2029 Housing Element, p. A-9



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Current renter demographics show that nearly 21% of Santa Ana households consist of 6 or more. At an average household size of 4.37, Santa Ana holds the highest average in the County and 18th highest average in the state. From 2010 to 2021, large families with five or more members also increased in number by 11.3%, from 24,289 families to 27,021 families. Only 4% of multi-family developments offer 3 or more bedrooms to meet the needs of large family households. The severe deficit of large family housing and rising housing costs has led to many families having to double- or triple-up in overcrowded and unsafe conditions. The 2014-2018 ACS reports that 23,845, or 31% of households in Santa Ana are overcrowded, with lower income households being impacted severely.

3
01-2
confd

Based on the results of the community survey more than half of the respondents (59 percent) said they spend more than one-third of their household income on housing every month. Major housing challenges identified by residents were affordability, overcrowding, and homelessness. The City of Santa Ana should take into account its local economy and community needs and offer healthy and affordable housing options that the current market-rate housing development is not offering families.

5th Cycle RHNA Performance

During the current 5th cycle planning period the City had a total Regional Housing Needs Assessment (RHNA) of 45 at very low-income, 32 at low-income, 37 at moderate and 90 at above moderate.

To date, the City has approved 65 units at moderate and 3,274 at above moderate.⁴ At very-low income the City has approved 452 units and 1,116 at low-income. Although the City had exceeded 5th Cycle targets for very low and low, there is an unbalanced production of moderate and above moderate units. The number of moderate and above moderate units approved in the last seven years was 2 times more than those at low and very low income.

01-3

5th Cycle Identified Opportunity Sites:

In the 5th cycle Housing Element, the City identified housing opportunity sites for very low and low exclusively in the Harbor Boulevard Mixed Use Transit Corridor, Fifth Street, and First Street areas.⁵ The City also implemented the Transit Zoning Code to facilitate development at all income levels in the downtown area.

During the 5th Cycle planning period the City was able to develop a permanent supportive housing project, Crossroads at Washington, on a city-owned site with the assistance of the Transit Zoning Code. The MEMU area also successfully facilitated the development of 1,125 affordable units. Overall, the City was able to successfully meet and exceed its lower income RHNA due to the Housing Opportunity Ordinance. The City should strengthen the HOO to ensure that the needs of large, low income families are met (see recommendations below).

⁴ Santa Ana 2020 Housing Element Annual Progress Report, Table B
⁵ City of Santa Ana 2021-2029 Housing Element, p. 30



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Constraints:

Localities must identify and analyze potential and actual governmental constraints that might hinder the maintenance, improvement, or development of housing at all income levels. The locality must also demonstrate local efforts to address these constraints. The element describes market factors, governmental factors, and environmental factors that constrain Santa Ana's ability to meet its housing goals. Of these three factors, the City is able to influence governmental constraints. Manufactured housing is identified as an opportunity for affordable housing at the extremely low, very low, and low income levels. Apart from allowing mobile home parts in the R-3 zone, the City only offers to continue a single grant program for repairs. The City should identify additional programs and specific outreach strategies to assist low income residents living in mobile home parks.

O1-4

Housing Policies to Increase Affordable Housing

The City must "review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element."⁶

As the 5th Cycle Housing Element Annual Progress Report indicates, the City's Housing Opportunity Ordinance has successfully encouraged the development of affordable housing in the City. Even at the current level of production, lower income housing is still developing at a pace slower than market-rate housing. As the City reviews the proposed housing policies and opportunity sites, we recommend that it implement affordable housing policies that can be effective on proposed sites while considering all development standards, zoning and past development.

O1-5

Incentivizing Affordable Housing in the 6th Cycle Housing Element:

To ensure that affordable housing is incentivized on the sites identified in the 6th Cycle, the City needs to include policies and programs that will create affordable housing.

The element provides the following programs to support the production of affordable housing and affirmatively furthering fair housing:

• **Program 1-3 Single-Family Home Rehabilitation, Mobile Home Repair, Multiple-Family Rental Rehabilitation**

Recommendation: The City should include more information on resident outreach and how it aims to make the application process more accessible. The City must also indicate how many families have been reached and assisted with this program over the housing period. The City must also provide ways in which the City will facilitate the use of these resources and measurable goals throughout the planning period.

O1-6

• **Program 10-12: Property Maintenance Standards (Healthy Housing), Proactive Rental Enforcement, Residential Response Team**

Recommendation: The City must include a program where the use of code enforcement will not inadvertently contribute to the displacement of families. While many families live in

O1-7

⁶ Gov. Code § 65588 (a) and (b)



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unsafe housing conditions, many may feel less inclined to file complaints for safety hazards with no other safe and permanent housing alternative. 5
01-7
cont'd

- Program 28 Housing Opportunities Ordinance:**
 Recommendation: The Housing Opportunity Ordinance is a key policy in the development of affordable housing in the City of Santa Ana. While the City has met its RHNA numbers among low and very low income, the City's need for affordable housing is still high. Of the 41,200 renter households in Santa Ana, 25,210 (61.2%) spend thirty percent or more of gross income on housing costs. Additionally, 11,923 renter households in Santa Ana (28.9%) spend fifty percent or more of gross income on housing costs. And while it has facilitated the development of affordable housing throughout the City, there is still an imbalance in the prioritization of above-moderate units. 01-8

The Commission encourages the City to strengthen the Housing Opportunity Ordinance (HOO). The City must ensure that affordable units are built on new housing developments or allow for developers to pay their fair share of funds to provide Santa Ana residents with affordable housing options in new development in the City. The Commission recommends an increase in the on site affordable housing requirement, an increase in the HOO in-lieu fees, and the application of this policy to all residential developments in the City.

- Program 29 Adaptive Reuse:**
 Recommendation: The City must prioritize the use of vacant or underutilized land or buildings for affordable housing. The city's first successful adaptive reuse development was the Santa Ana Arts Collaborative, an affordable housing development. 01-9

- Program 32 Parking Study:**
 Recommendation: The program should include a more comprehensive analysis of how parking needs and issues directly correlates with overcrowding (in existing multifamily housing) due to housing affordability. Parking changes must take into account the impact it could have on these families who must have multiple earners in one household to afford to stay housed. The parking study should also analyze how parking requirement concessions and incentives can facilitate new affordable housing development. 01-10

- Program 33 Housing Choice Voucher Program:**
 Recommendation: The City must describe how they will encourage property owners to participate in the Section 8 Housing Choice Vouchers program. Provide information on the number of extremely low and very low-income households that were referred to the Orange County Housing Authority during the planning period, and how many of those soliciting housing choice vouchers in Santa Ana were able to obtain a voucher and a house. In addition, the city should continue to prioritize project based vouchers as a way to increase new affordable housing options for extremely low income families in Santa Ana. 01-11



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01-12

• **Program 35 Preservation of At-Risk Housing:**
 Recommendation: The City should describe how they will encourage owners of the at risk projects to preserve housing affordability for Santa Ana families.
- 01-13

• **Program 38-39 Down Payment Assistance Program, Homeownership Partners:**
 Recommendation: The City should include more information on the implementation of these programs in the 5th Cycle and its effectiveness in creating homeownership. The program should describe how many households were assisted by the programs.

Housing Element Opportunity Sites Inventory

As part of the analysis of adequate sites, the City has identified opportunity sites for lower-income households on the Metro East Mixed Use Overlay area (MEMU), the Transit Zoning Code zoning district (SD-84), and the Harbor Mixed Use Transit Corridor specific plan (Harbor Corridor). The sites identified for residential development to meet the City's are predominantly identified based on default densities for lower income units, rezoning, and inclusion in the housing overlays. As evident from the City's overproduction of market rate housing in the 5th Cycle, relying solely on these factors without implementing specific policies does not produce affordable housing. Instead, it gives market-rate projects larger densities and land use permission without incentivizing the inclusion of affordable units.

01-14

Suitability of Non-vacant Sites:

The element must include an analysis demonstrating the potential for redevelopment of non-vacant sites. To address this requirement, the element should describe and support the potential for additional development in the planning period and consider additional factors such as the age of structure, presence of expiring leases, condition of the structure, and expressed interest in development. If the element relies on non-vacant sites for more than 50% of the lower-income RHNA (637/968), it must make findings of substantial evidence that the existing use does not constitute an impediment to development, and that the existing use is likely to discontinue. All the majority of sites the City identified to meet the lower income RHNA are non-vacant sites and, thus, require a more thorough analysis.

01-15

The following are the Commissions concerns with the identified sites and the information provided on the sites inventory provided by the City:

- 01-16

• **Metro East Mixed Use Overlay (MEMU):** The MEMU identifies 14.6 acres that are currently developed as office space for a potential development capacity of 637 units. Even though the City identified that these potential sites are underutilized, additional site analysis is required to understand the feasibility of these sites and how proposed densities can be achieved in each of the identified sites.

 - The City must ensure that affordable housing development sites are not simply identified on default densities for lower income RHNA. The analysis must include potential incentives and programs to increase the likelihood and ensure that affordable housing is developed on these sites. In addition, the City should conduct



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analysis on potential environmental constraints based on the site's location and past uses.

7
O1-16
conf'd

- Site #3 MEMU: The City states that this property is a large site that does not require consolidation but does not indicate additional analysis or any conversations with owners on interest in redevelopment during the 6th Cycle.
- MEMU sites appear to have been listed in the 5th Cycle and should discuss the by-right affordable housing requirements.

- **Harbor Mixed Use Transit Corridor Specific Plan (Harbor Corridor):** The 305 acres of land along Harbor have been identified with a potential of up to 4,600 units. The sites identified are largely underutilized auto and commercial sites. The City must ensure again that affordable housing development sites are not clustered in certain areas of the City. Because of the proximity to the mobile-home community, it is important to understand how developments can affect the community. Furthermore, the City needs to ensure that sites currently used for auto service uses are safe for residential use or provide a plan for environmental remediation of the land if they are not. Additional site analysis is required to understand the feasibility of these sites and how proposed densities can be achieved for each of the identified areas.

O1-17

- Site #1 - #3 Harbor Corridor: The City does not indicate additional analysis or any conversations with owners on interest in redevelopment during the 6th Cycle.
- Harbor Corridor sites appear to have been listed in the 5th Cycle and should discuss the by-right and affordable housing requirements.
- For site #2, which consists of nine parcels that seem to have multiple owners, it is important to assess if all owners are interested in developing their properties within the 6th Cycle. The City needs to also ensure that site #2 is safe for residential use given that there are two auto service businesses on the site and, if it is not, the City needs to provide a plan for environmental remediation of the land if they are not.

- **Transit Zoning Code Zoning District (TZC):** The 20.8 acres of land identified in the TZC area have a potential of up to 612 units. The City does not indicate whether the owners are interested in redevelopment during the 6th Cycle. Furthermore, these properties are owned by the County of Orange and the City needs to provide information on whether or not these properties are subject to the California Surplus Land Act. As public land, these sites need to be wholly prioritized for housing at the very low and low income levels. Additional site analysis is required to understand the feasibility of these sites and how proposed densities can be achieved for each of the identified areas.

O1-18

- The City must ensure that affordable housing development sites are not simply identified on default densities for affordable housing RHNA. The analysis must include potential incentives and programs to increase the likelihood and ensure that affordable housing is developed on these sites. In addition, the city should conduct



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- analysis on potential environmental constraints based on the site's location and past uses.
- TZC District sites appear to have been listed in the 5th Cycle and should discuss the by-right and affordable housing requirements.

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01-18
cont'd

Traditional Funding for Affordable Housing:

Identified affordable housing sites should also be evaluated for their viability to compete for traditional funding to create affordable housing. These funding sources prioritize development sites that promote access to community resources and services, such as schools, public transportation, medical services and access to parks. The City should take advantage of available funding from the State of California's housing programs such as Project HomeKey funds, Low Income Housing Tax Credits (LIHTC), and federal government American Rescue Plan Act funds to provide essential funding needed to provide affordable housing.

01-19

No Net Loss:

The City will also have to consider No Net Loss when it identifies opportunity sites. It is crucial that affordable housing moves along with market-rate housing given the limited sites that are available. Considering the state's No Net Loss requirements, if the sites identified for affordable housing are developed for market-rate housing, the City will have to rezone new sites for the appropriate density.⁷

01-20

For the reasons stated above, the City needs to identify affordable housing policies and programs that will equitably facilitate and incorporate affordable housing at the extremely low, very low and low-income categories on these sites. The MEMU and Harbor Corridor focus area sites should have further evaluation on Affirmatively Furthering Fair Housing and challenges with compatibility with existing uses while contemplating developing for affordable housing.

ADUs

The element states that ADU development in the City will be encouraged by pre-approved ADU plans expected to be released in 2022 and potential exploration of an ADU amnesty program. We commend the City for these initiatives, but recommend providing additional mechanisms that will ensure ADUs are affordable, especially at the very low income levels. In addition to providing affordability incentives, the City should implement a monitoring program to track the creation and affordability of ADUs and commit to a mid-cycle review if ADU production is not meeting projected affordability targets.

01-21

Affirmatively Furthering Fair Housing

The element, among other things, must include outreach, an assessment of fair housing, identification, and prioritization of contributing factors to fair housing issues and goals and actions

01-22

⁷ Government Code § 65863



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sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. The following is required:

- The preparation, adoption, and implementation of a housing element requires a diligent effort to include all economic segments of the community.
- Assessment of Fair Housing in Santa Ana: Summary of Issues and Analysis of Patterns, Trends, and Disproportionate Housing Needs.
- A summary of fair housing issues in Santa Ana and an assessment of the jurisdiction's fair housing enforcement and outreach capacity.
- An analysis and summary of fair housing issues utilizing available federal, state, and local data and knowledge. The analysis must include a variety of factors, such as trends and patterns within the locality and in comparison, to the broader region.
- The analysis must address: Integration and segregation; Racially or ethnically concentrated areas of poverty; Disparities in access to opportunity, including for persons with disabilities.
- Disproportionate housing needs (this may include things like overpayment, overcrowding, housing conditions disproportionately affecting protected classes), including displacement risk.
- Identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.
- Identification and Prioritization of Fair Housing Contributing Factors
- Programs with a schedule of actions with timelines and specific commitment to have a "beneficial impact" within the planning period to achieve the goals and objectives of addressing contributing factors to Fair housing issues.⁹

01-22
cont'd

Per the City's Affirmatively Furthering Fair Housing analysis the majority of census tracts in Santa Ana have over 20% of households experiencing overcrowding. Specifically in the Santa Ana Triangle, French Court, and French Park neighborhood areas, over 70% of households are experiencing overcrowding. The median household income for these neighborhoods range from \$43,000 to \$45,000 which is significantly lower than the County. Although there are block groups within the City with median household incomes greater than \$125,000 annually, there are also several block groups that contain Census tracts with median incomes of less than \$40,000. The City should have targeted programs to address the income disparity in these neighborhoods.

01-23

The analysis also indicates that there are five census tracts within the City that are classified as "High Segregation & Poverty". These census tracts include the Downtown, Lady, Willard, French Park, French Court, and Santa Ana Triangle neighborhoods and portions of Cornerstone Village, Central City, and Bella Vista neighborhoods. Although the City plans on providing investment and employment strategies in the Economic Prosperity Element, the City should also provide strategies to increase access to opportunities in these low resource areas and facilitate housing mobility of lower income residents in the Housing Element.

01-24

⁹ Gov. Code, § 65583, subd. (c)(1)(A)



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The City has identified housing sites primarily in low income areas, but does not identify housing sites in high opportunity areas north of the I-5 Freeway. The location of the housing sites does not address patterns of segregation present in the City. We ask that the City prioritize the housing needs of large families of low, very low and extremely low income, who face overcrowding, environmental justice issues, and displacement as it finalizes its site inventory.

01-24
cont'd

As the City revises its draft Housing Element, the Commission urges the City to support the development of affordable homes. We have provided the following affordable housing policies and programs that the City should consider to provide development incentives and collaborative opportunities for the production of affordable homes:

1. **Housing Opportunities Ordinance (HOO)** - Given the urgent need of residents for low-income housing, the Commission strongly recommends the City strengthen the Housing Opportunities Ordinance within the next year to ensure that identified sites are truly feasible and effectively provide affordable housing in a balanced manner. We recommend that the ordinance include a 5% increase of on-site requirements (currently 15%) at extremely low, very low- and low-income categories and that it apply to all residential projects. The city should amend the HOO to increase the applicability to all to all housing developments and revert the in-lieu fee to \$15 per s.f. ft.
2. **Congregational Housing Overlay** - A Congregational Housing Overlay Zone provides an opportunity for the development of affordable housing on religious sites while retaining the existing religious use or creating mixed use opportunities. The overlay would facilitate developments that are 100% affordable units on congregational sites, with a focus on extremely low-, very low- and low-income categories.
3. **Community Land Trust** - The City should consider developing a Community Land Trust that would allow the City to retain ownership of land (either donated or purchased) and lease the land to the owner of the improvements for community benefit and the creation of 100 % affordable housing.
4. **Incentivizing 100% Affordable Housing** - Regulatory, zoning and administrative requirements can contribute to high construction costs, and negatively affect the feasibility of producing affordable housing. The City should develop a program that incentivizes 100% affordable developments and reevaluate the current zoning code to eliminate barriers and create incentives for affordable housing developments. Incentives could include reducing or eliminating permitting fees, offering additional by-right incentives beyond density bonus, reduced parking standards, and alternative development standards. The City should work with affordable housing advocates and nonprofit developers to determine appropriate regulatory incentives.
5. **City Owned Sites and Surplus Property** - The City should prioritize city owned sites and surplus land to be developed exclusively for 100% affordable housing for low-, very low-

01-25

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01-29



Kennedy Commission Comments
October 2021 Santa Ana Initial HE Draft

and extremely low-income families. The City must be proactive and implement a program that markets and prioritizes available surplus land to affordable housing developers.

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01-29
conf/d

The Commission looks forward to partnering with the City of Santa Ana to create opportunities to increase affordable homes for lower income households in the City. If you have any questions, please feel free to contact me at (949) 250-0909 or cesare@kennedycommission.org.

Sincerely,



Cesar Covarrubias
Executive Director



O1. Response to Comments from The Kennedy Commission, dated December 17, 2021.

Intro This comment describes the mission statement of The Kennedy Commission, which is to advocate for the production of homes affordable for families earning less than \$27,000 annually in Orange County. The comment also provides a description of what public engagement is and what broad participation is supposed to achieve. No further response required.

O1-1 This comment commends the City of Santa Ana on its engagement efforts in the Housing Element Update process, and recommends that approach continue. No further response is required.

O1-2 This comment provides a summary of housing demographics in the City, including how many households are renter occupied, median household incomes, changes in household earnings, and percentage of families that are housing cost burdened. It recommends that the City take the local economy and community needs into consideration and offer affordable housing options that the current market-rate housing development is not offering families. A concerted effort is being made to provide affordable housing options to residents. As noted in Table C-2 in Appendix C, housing development that fulfills all affordability categories is being built in the City and is already meeting RHNA goals. If trend continues, housing production in the City will far exceed the RHNA. Additionally, a number of programs described in detail in the Housing Plan aim to provide additional affordable housing options for residents, create ownership opportunities, and continue to collaborate with affordable housing developers and fund the creation of affordable units in the City.

O1-3 This comment states that the number of market rate units produced during the 5th Cycle Planning Period far outpaced the number of affordable units in the City. It recommends that the City strengthen its inclusionary housing ordinance to ensure the needs of large, low-income families are met. The inclusionary housing ordinance, known locally as the Affordable Housing Opportunity and Creation Ordinance (AHOCO), has been a powerful tool in creating and funding affordable housing projects. The City revised the ordinance April of 2022 to be more responsive to community needs and



concerns. The ordinance requirements, as well as the potential constraints to development that the new ordinance may present, area discussed in Appendix B.

- O1-4 This comment describes required analysis related to constraints to maintenance, improvement, or development of housing at all income levels that local government agencies are required to conduct as part of housing elements. It recommends that the City expand programs related to assisting low income residents living in mobile home parks. Program 1 in the Housing Plan includes three actions related to assisting low income residents of mobile home parks, which include providing grants of up to \$25,000 for repair and rehabilitation and developing a targeted outreach campaign that targets mobile home residents to promote grant and services opportunities to the 30 mobile home parks in the City. Additionally, Program 32 in the Housing Plan includes a commitment to explore establishing a right-of-first refusal ordinance for mobile home parks and publicly funded multi-family residential properties to minimize displacement. Program 32 also commits to pursuing collective ownership models for mobile home parks as a tool to prevent displacement.
- O1-5 Comment states that while 5th Cycle Planning Period housing production met the RHNA, lower income units were being produced at slower pace than market-rate units. The comment recommends implementation of policies that can be effective in creation of affordable units on the sites identified in the sites inventory. Creation of affordable housing is important in providing housing opportunities to Santa Ana residents. As discussed in Appendix C, units being created through the pipeline projects and ADU projections have met the RHNA. Opportunity sites included in Appendix C further demonstrates that there are additional opportunities to further housing options for residents.
- O1-6 Comment recommends that programs 1-3 in the Housing Plan be revised to include quantifiable metrics and reporting. Comment is noted and programs have been revised.
- O1-7 Comment states that programs 10-12 should include language to prevent code enforcement activities from inadvertently contributing to displacement of families.



Programs related to proactive code enforcement activity have been revised to correlate to housing rehabilitation programs to prevent displacement where feasible.

O1-8 Comment encourages the City to strengthen the inclusionary housing ordinance, known as the Affordable Housing Opportunity and Creation Ordinance (AHOCO), by increasing the number of affordable housing units required under the ordinance, and increase the fees for those development that opt to pay an in-lieu fee. The City revised the ordinance April of 2022 to be more responsive to community needs and concerns. The ordinance requirements, as well as the potential constraints to development that the new ordinance may present, are discussed in Appendix B.

O1-9 The comment states that the City must prioritize the use of vacant or underutilized land or buildings for affordable housing, such as the adaptive reuse of a buildings (e.g., Santa Ana Arts Collective affordable housing development). The comment is noted. Program 26 has been revised to consider expanding the adaptive reuse building and area eligibility.

O1-10 The comment recommends that Program 32, which includes conducting parking studies to remedy the parking issues that are prevalent in certain neighborhoods, include a comprehensive analysis of parking needs and correlations to overcrowding, housing affordability, and multiple income earners residing in single units to afford to stay housed. Program 32 has been revised since the comment was received. It now includes actions to identify programs to mitigate parking constraints on affordable housing and developing pilot programs to partner with commercial property owners to utilize parking at center adjacent to residential neighborhoods that are parking impacted. The program is now listed Program 29.

O1-11 The comment states that the City should include language explaining how it will encourage property owners to participate in the Section 8 Housing Choice Vouchers program, provide information related to how many extremely low- and very low-income households that were referred to the Housing Authority during the planning period, and recommends that the City continue to prioritize



project based vouchers as a way to increase new affordable housing.

- O1-12 The comment states that the City should explain how it will encourage owners of at-risk projects to preserve housing affordability for Santa Ana families.
- O1-13 The comment recommends including language stating how programs 38 and 39 will be implemented and how many were assisted during the 5th Planning Cycle. Program summaries for the 5th Planning Cycle are included in Appendix D.
- O1-14 The comment states that without specific policies to require affordable housing on sites identified in sites inventory, production of affordable housing units will not keep pace with production of market rate. The element does not rely on sites to meet the City's RHNA, rather, as described in Appendix C, utilizes pipeline projects and ADU projections. The pipeline projects and ADU projections meet the City's RHNA, with a surplus in the lower income categories, without the need to identify sites.
- O1-15 The comment states that additional analysis is required for non-vacant sites identified in the site inventory. As indicated above, the element does not rely on sites to meet the City's RHNA, rather, as described in Appendix C, utilizes pipeline projects and ADU projections. The pipeline projects and ADU projections meet the City's RHNA, with a surplus in the lower income categories, without the need to identify sites.
- O1-16 See response O1-15.
- O1-17 See response O1-15.
- O1-18 See response O1-15.
- O1-19 See response O1-15.
- O1-20 See response O1-15.
- O1-21 The comment states that mechanisms that will ensure ADUs are affordable be included, such as incentives and monitoring programs. The comment is noted and Program 51 in the Housing Plan has been revised to include actions including publishing pre-approved ADUs plans and



exploring reduced plan review fees to make units more affordable. The actions also include implementing a monitoring programs to ensure projection are met and actions taken should they fall short. The program is now listed as Program 43.

O1-22 The comment states what is types of analyses are required in the assessment of fair housing (AFH). The comment is noted and the AFH in Appendix E has been revised to provide a complete affirmatively furthering fair housing (AFFH) analysis.

O1-23 The comment states that the city should have targeted programs in the Santa Ana Triangle, French Court, and French Park neighborhoods, where over 70 percent of households are experiencing overcrowding.

O1-24 See response O1-15.

O1-25 The comment recommends the inclusionary housing ordinance, known locally as the Affordable Housing Opportunity and Creation Ordinance (AHOCO) be revised to require more affordable units and higher in-lieu fees. The City revised the ordinance April of 2022 to be more responsive to community needs and concerns. The ordinance requirements, as well as the potential constraints to development that the new ordinance may present, area discussed in Appendix B.

O1-26 The comment recommends creation of a congregational housing overlay to facilitate additional affordable housing. As indicated above, the element does not rely on sites to meet the City's RHNA, rather, as described in Appendix C, utilizes pipeline projects and ADU projections. The pipeline projects and ADU projections meet the City's RHNA, with a surplus in the lower income categories, without the need to identify sites.

O1-27 The comment suggest the City develop a community land trust and lease the land to the owner of the improvements for a community benefit and creation of affordable housing. Program 34 in the Housing Plan commits the City to identifying funding and partnering with community based organizations to support a community land trust (CLT) program.



- O1-28 The comment states that the City should clear administrative hurdles such as fees and zoning code regulations to facilitate the construction of 100 percent affordable developments. As indicated in Appendix B, the City does not differentiate between affordable and market rate units in terms of applicable development standards and fees. Moreover, Appendix B highlights the many incentives and waivers applicable to affordable housing developments through density bonus waivers and reductions.
- O1-29 The comment states that the City should prioritize City owned surplus land for the creation of affordable housing. The City is in compliance with the Surplus Land Act and has proactively sold off properties for housing development, such as the remnant parcels located along South Bristol and Warner where grant funds utilized for property acquisition permitted.



Letter O2 – THRIVE Santa Ana (7 pages)



City of Santa Ana
Planning Commission
City Council

O2

CC:
State of California
Housing and Community Development Agency

January 6, 2021

Dear City of Santa Ana Staff and City Council,

THRIVE Santa Ana is a nonprofit community organization dedicated to promoting economic development that builds community wealth, multigenerational resident leadership, and ensures permanent and access to affordable, healthy neighborhoods. The Housing Element is a vital roadmap for the City of Santa Ana, a public entity, to address the severe housing crisis in our city. We appreciate the opportunity to comment on the draft Housing Element for the City.

THRIVE participated in the City's Housing Element Roundtable during the Summer of 2021, and in community outreach around housing and economic development as far back as 2015. Founders of THRIVE have been engaging Santa Ana residents around local needs since 1993. Below THRIVE summarizes comments and recommendations put forth for consideration by City staff, Commissioners, and Councilmembers. Also, attached is a broad analysis of the Housing Element offered by THRIVE (Appendix A), which includes comments and suggestions on the City's Housing Plan.

Community Land Trusts

Community Land Trusts (CLTs) are the foremost strategy nationwide for the creation of permanently affordable housing. This strategy was named repeatedly throughout the Housing Element Roundtable. Language to support CLT strategies in the Housing Element could be included as follows:

(Page 8)

HE- 1.11 Community ownership. Increase opportunities for local ownership and stewardship of housing including a robust tenant opportunity to purchase program, community land trusts, housing cooperatives, and other strategies to increase local ownership and affordability of land and housing.

(Page 13)

HE-3.3 Housing Preservation. Initiate and support collaborative partnerships, identify state and federal funding, subordinate existing loans, and offer technical assistance to preserve the affordability of publicly subsidized affordable housing at risk of conversion. [A growing resource for the provision of new and preservation of existing affordable housing are community land trusts. The community land trust model can leverage public subsidies to provide permanent affordability beyond traditional time-limited deed restrictions. Specifically, the City shall consider partnerships with nonprofit organizations whose mission it is to expand and preserve permanently affordable rental and ownership housing for low and moderate-income housing such as community land trusts.]



Tenant Protections

HE- 1.9 Tenant Protections. Provide information and resources to residential tenants regarding landlord-tenant laws that provide protection against unjust evictions [, and excessive rent increases. Enact local protections for renters against displacement due to new development or rehabilitation projects including tenant opportunities to purchase, right of first refusal, and others.] O2-2

Lastly, the City might consider adoption of the language below, in particular for transit corridors in the City where development will be concentrated in low income neighborhoods.

"No net loss of low income households [(X number of HH earning less than \$50,000 living in 1/2 mile in 2014)]" O2-3

Thank you in advance for your consideration of these important policy solutions. Please feel free to contact us with any questions or further assistance needed.

Sincerely,

THRIVE Santa Ana
(714)987-2009
thrivesantaana@gmail.com



Appendix A - THRIVE Santa Ana Housing Element Analysis

As specified in the THRIVE Santa Ana January 6, 2021 letter addressed to City of Santa Ana Staff and City Council, below you will find a page-by-page analysis of the Santa Ana Housing Element. Through this Appendix A, we hope to provide City Staff and City Council with our suggestions on both content and policies. Please find housing element language in **black** and THRIVE's suggested changes and comments in **blue** below:

- **Page 1**
 "Downtown Orange County"
 • Comment: Why is the City still using this motto? This concept dates back to attempts by ex-mayor Miguel Pulido, in conjunction with property owners and developers in the downtown Santa Ana area, to promote the establishment of new bars and restaurants in the downtown. This economic strategy has since been demonstrated largely misguided; prioritizing accommodations for outside and "weekend" clientele and investors over the needs and economic contributions of local residents. (See staff reports) Looking further back, it is sad to remember that the City adopted the "downtown orange county" motto over the previous "Education First." 02-4
- **Page 5**
Section: Policy Framework
 Santa Ana residents have an equal right and opportunity to find suitable housing in quality residential neighborhoods that allow themselves, their families, and neighbors to live the fullest lives. We support an inclusive community that is multigenerational, culturally diverse, healthy, sustainable, and economically broad. The City will facilitate the production, rehabilitation, and improvement of rental and homeownership opportunities at different affordability levels consistent with [the population of Santa Ana]. 02-5
- **Page 7**
Subsection: Housing and Neighborhoods
 Goal 1 - Livable and affordable neighborhoods with healthy and safe housing conditions, community services, well-maintained infrastructure, and public facilities that inspire neighborhood pride and ownership.
 ○ Comment: This is a positive goal. However, which of the proposed Policies under this goal provide for increased affordability in Santa Ana neighborhoods? 02-6

HE-1.6 - Proactive Code Enforcement, Enforce building and property maintenance standards by proactively conducting property inspections, educating landlords and tenants, and removing blight, unhealthy or dangerous housing conditions. [Allow for code enforcement that holds property owners accountable for safe and dignified living conditions, without criminalizing low-income residents.]
- **Page 8**
 HE- 1.9 Tenant Protections. Provide information and resources to residential tenants regarding landlord-tenant laws that provide protection against unjust evictions [, and excessive rent increases. Enact local protections for renters against displacement due to new development or rehabilitation projects including tenant opportunities to purchase, right of first refusal, and others.] 02-7

New Policy: HE- 1.11 Community ownership. Increase opportunities for local ownership and stewardship of housing including a robust tenant opportunity to



- purchase program, community land trusts, housing cooperatives, and other strategies to increase local ownership and affordability of land and housing. 02-7
cont'd
- **Page 9**
 "Providing affordable housing will help foster an inclusive community that welcomes people of all ages and income levels."
 - Comment: Much of the language around housing affordability levels implies inviting new residents to move into Santa Ana, instead of housing for Santa Ana's existing residents. 02-8

Picture Caption - "Santa Ana is [at the] forefront [of] creating attractive and unique housing options"
 - Comment: Please correct grammatical error.

 - **Page 11**
 HE-2.7 Affordable Component. Pursuant to the Housing Opportunity Ordinance, require eligible rental and ownership housing projects to include at least 15 percent of the rental housing units as affordable for low-income households, 10 percent of the rental units for very low-income households, and 10 percent of the for sale units affordable to moderate income households. [Utilize various strategies including community land trusts, inclusive housing ordinance (HOO), tenant opportunities to purchase, and others, to ensure a wide array of affordable options for Santa Ana residents to purchase or rent housing in their neighborhoods, or within the City.] 02-9

 - **Page 13**
 HE-3.2 Homeownership. Expand homeownership opportunities for low and moderate-income residents and employees working in Santa Ana through the provision of financial assistance, education, and collaborative partnerships [including community land trusts and tenant opportunities to purchase] d

 HE-3.3 Housing Preservation. Initiate and support collaborative partnerships, identify state and federal funding, subordinate existing loans, and offer technical assistance to preserve the affordability of publicly subsidized affordable housing at risk of conversion. [A growing resource for the provision of new and preservation of existing affordable housing are community land trusts. The community land trust model can leverage public subsidies to provide permanent affordability beyond traditional time-limited deed restrictions. Specifically, the City shall consider partnerships with nonprofit organizations whose mission it is to expand and preserve permanently affordable rental and ownership housing for low and moderate-income housing such as community land trusts.] 02-10

 HE-3.4 Supportive Services. Support the provision of employment training, childcare services, rental assistance, youth services, and other community services that enable households to attain the greatest level of self-sufficiency and independence.
 - Comment: THRIVE is in full support of this program. Please keep.
 HE-3.5 Collaborative Partnerships. Collaborate with nonprofit organizations, developers, and other government agencies to develop and provide affordable housing for residents.
 - Comment: Please add language that specifies CLTs are included in this program.



HE-3.6 Homeownership Preservation. Educate residents on foreclosure prevention assistance available through the state or federal government.

- Comment: Homeownership programs can be combined with CLTs to make homeownership accessible for many lower income families and workers who might otherwise not access ownership opportunities.

HE-3.7 Workforce Housing. Explore opportunities for creating workforce housing, including for teachers, artists, and other residents working in Santa Ana.

- Comment: THRIVE is in full support of this program. Please keep.

HE-3.8 Affordable Housing. Support the preservation of mobile home parks as affordable housing.

- Comment: We support this program, but would like to see more language on how the City can support mobile home tenants to pursue more responsive land ownership models. CLTs can be used here as well.

02-10
cont'd

HE-3.9 Housing Stabilization. Support measures that address impacts related to private and public development which may result in displacement from existing affordable housing. [Implement policies and leverage resources that empower local residents to compete with or collaborate with outside investors and developers].

HE-3.10 Prevent Displacement. Prevent and avoid displacement of low-income households and ensure that where necessary it is carried out in an equitable manner and a priority preference for displaced families in affordable projects financed with City funds is given. [Create a city-wide Right of First Refusal policy, such that displaced tenants obtain the right to return to new units.]

• Page 19

Section: Housing Plan

- Comment: More than half of the proposed units are at Above-Moderate level. I understand the City of Santa Ana obtained more favorable (less affordability) RHNA numbers due to its status as a "disadvantaged community." This may be helpful to the completion of RHNA objectives, but does not accurately represent the interests or reality of Santa Ana residents. Can we look at actual income levels in the city and base our housing plan off of that? Note that in lower-income neighborhoods, door-to-door research has revealed income levels lower than previously documented.

02-11

• Page 20 - 38

List of strategies and initiatives

- Comment: Why aren't CLTs on here?

02-12

• Page 22

7. Santa Ana Building Healthy Community Initiative

02-13



In 2009, Central Santa Ana was selected as one of the 14 sites in California to participate in The California Endowment's Building Healthy Communities. This \$10 million and 10-year initiative made strides to improve resident health and achieve the Endowment's healthy community outcomes by intentionally addressing social determinants of health—at the individual, housing, block, and neighborhood level. The initiative has also worked to influence and shape public policy at all levels in the community, including the City's comprehensive general plan, safe routes to schools, business community, parks and recreation opportunities in neighborhoods, and even at home. While Santa Ana Building Healthy Communities (SABHC) is in the process of assessing its mission and organizational future, it is anticipated that they will continue to affect system change and to sustain a healthier and prosperous community for the current and future generations of residents living in Santa Ana. The City will continue to provide support to this transformative community building initiative.

02-13
conf'd

- Comment: This is wonderful. How will the City continue to support the initiative?

• **Page 32**

36. Multiple-Family Acquisition and Rehabilitation

Santa Ana has many deteriorated apartment projects characterized by lesser quality construction, overcrowding, and absentee ownership. Left unattended, deteriorated apartments depress the values of surrounding properties and negatively influence the quality of life in neighborhoods. To stabilize neighborhoods and provide affordable housing, the City financially supports nonprofit and for-profit organizations to acquire and rehabilitate projects. When feasible, housing units are reconfigured to meet the housing needs of larger families. The City will continue to acquire and rehabilitate multiple-family housing, encourage size-appropriate units, extend affordability controls, and improve residential neighborhoods.

02-14

- Comment: This is great. Please add language that specifies this will be in collaboration with existing residents.

• **Pages 39 - 48**

Housing Plan Table 2

Subsection: Housing Preservation

- Comment: Protecting tenants from displacement is a form of housing preservation; therefore the City should add a new program for Right of First Refusal / Tenant Opportunity to Purchase under the Housing Preservation subsection of the Housing Plan Table. The objectives within this program shall include the adoption of an ordinance.
- Comment: Despite mobile homes providing residents with a type of affordable housing and ownership, mobile home owners continue to struggle with the burden of renting a space, which can be unaffordable and unpredictable; therefore, the City should add a new program for Mobile Home Park Resident Ownership under the Housing Preservation subsection of the Housing Plan Table. The objectives within this program shall include funding support for mobile home park residents to acquire the land, such as applying for HCD's Mobilehome Park Rehabilitation and Resident Ownership Program (MPRRP). The City could also add an objective that includes subsidies or a match program for a resident collective purchase of the mobilehome park.

02-15



- Comment: With the creation of the State's Housing Accountability Unit, THRIVE foresees that the City will face additional oversight and scrutiny on the implementation of all the programs and objectives in the Housing Element. In order to help the City implement these programs in a way that benefits our community, and to facilitate the City's outreach, THRIVE suggests the creation of a new subsection in the Housing Plan Table. This subsection should call for the creation of a Housing Element Community Implementation Committee to allow for the City and residents to collaborate in the implementation of these housing programs. It is imperative that the City make satisfactory progress towards not only RHNA, but also these programs to avoid loss of local control.
- Comment: One of the biggest challenges in building affordable housing is land availability. With the adoption of the Surplus Land Act, local public lands shall be prioritized for affordable housing development. The City should add a subsection in the Housing Plan Table regarding Surplus Land. This subsection should call for the exclusive use of public land for the development of affordable housing. The objectives within this program should include the donation of land to affordable housing developers and CLTs for the development of affordable housing, open space, housing coops, and limited equity housing cooperatives.

O2-15
cont'd

- **Page 45**

Item 39. CLTs mentioned under Homeownership Partners

- Comment: THRIVE fully supports the inclusion of CLTs in this item.
- Comment: The first few items on the table include specific amounts for supportive grants. Could we use this same approach, perhaps these same funding sources, for CLT projects or tenant acquisitions? The City should also consider the use of Surplus Land for CLT projects.

O2-16



O2. Response to Comments from THRIVE Santa Ana, dated January 6, 2022.

- Intro This comment describes the mission statement of THRIVE Santa Ana, which is a nonprofit community organization dedicated to promoting economic development that builds community wealth, multigenerational resident leadership, and ensures permanent and access to affordable, healthy neighborhoods.
- O2-1 The comment states that community land trusts (CLTs) are the foremost strategy for creation of permanently affordable housing. It provides recommended language to include in two polices in the Policy Framework. Both policies were evaluated and revised based on subsequent meetings with THRIVE.
- O2-2 The comment provides recommended language to include in Policy HE-1.9. Policy HE-1.9 has been revised to incorporate the recommend language.
- O2-3 The comment recommends a policy to address “No Net Loss of Low Income Households” within transit corridors planned in low income neighborhoods. To address this comment, the Housing Plan include an Anti-Displacement and Local Housing Preservation program. The program will enhance local preference program as well as explore the establishment of a right-of-first refusal for mobile home parks and publicly supported multi-family residential properties to minimize displacement and preserve affordable housing.
- O2-4 The comment addresses concerns regarding the use of the “Downtown Orange County” motto.
- O2-5 The comment provided recommended language to include within the City’s overall housing vision. The housing vision has been updated to incorporate the suggested language.
- O2-6 The comment questions if policies addressing for the increased affordability in Santa Ana neighborhoods have been incorporated into the element and provided recommend language to be included into Policy HE-1.6. Policies 1.9, 1.11, 2.4, 2.5, 2.8, 2.9, 3.1, 3.2, 4.8, and 5.1, encourage the development of affordable housing for Santa



Ana residents. Policy HE-1.6 has been modified to include recommend language.

- O2-7 The comment recommends a new policy to increase opportunities for local ownership and stewardship of housing such tenant opportunity purchase program, community land trusts to increase local ownership and affordability of land and housing. Policy HE-1.11 and 3.2 address this comment.
- O2-8 The comment addresses concerns regarding used language for Goal 2 that implies inviting new residents to move into Santa Ana and grammatical errors. Goal 2 has been revised to address this comment and all grammar typos have been corrected.
- O2-9 The comment recommends language to be added to policy HE-2.7 regarding the utilization of various strategies including community land trusts, inclusive housing ordinances, tenant opportunities to purchase, and other programs to ensure a wide array of affordable options for Santa Ana residents to purchase or rent housing.
- O2-10 The comment recommends various language changes to policies HE-3.2 HE-3.3, HE-3.4, HE-3.5, HE-3.6, HE-3.7, HE-3.8, HE-3.9, and HE-3.10 relating to community land trusts. Recommend language has been included as appropriate.
- O2-11 The comment notes that the City should use actual income levels based on local needs rather than regional needs and base the housing projections based on local needs.
- O2-12 The comment recommends adding additional language pertaining to community land trusts.
- O2-13 Comment applauds Program 7.
- O2-14 Comment recommends language to be included in Program 36. The program has been modified to include recommended language.
- O2-15 Comment recommends language to be included into various housing programs under Table 2: Housing Implementation Summary. Table 2 has been modified to include the recommended language as appropriate.



- O2.16 Comment recommends the use of the Surplus Land Act for community land trust projects.



Letter O3 – Disability Rights California (64 pages)



O3

LEGAL ADVOCACY UNIT
350 S. Bixel St., Ste. 290
Los Angeles, CA 90017
Tel: (213) 213-8000
Fax: (213) 213-8001
TTY: (800) 719-5798
Intake Line: (800) 776-5746
www.disabilityrightsca.org

February 24, 2022

Via E-mail: SAHousingElement2021@santa-ana.org

City of Santa Ana
Attn: Planning Division
20 Civic Center Plaza
P.O. Box 1988
Santa Ana, California 92702

cc: Stephen A. McEwen: smcewen@bwslaw.com;
Mark J. Austin: maustin@bwslaw.com

**Re: City of Santa Ana Housing Element 2021-2029 Draft Comments;
Santa Ana's Duty to Affirmatively Further Fair Housing**

Disability Rights California ("DRC") submit comments on the 2021-2029 City of Santa Ana Housing Element Draft ("Housing Element Draft" or "Draft"). DRC is a state-wide, non-profit disability rights organization federally mandated to advance and protect the human and legal rights of Californians with disabilities. Our comments focus on parts of the Draft that pertain to people experiencing homelessness, people with disabilities, and the mandate to promote and affirmatively further fair housing (AFFH) opportunities. They also relate to intersectional issues and concerns that impact unhoused individuals with disabilities and the City's general obligation to AFFH. These comments are submitted on behalf of Kathleen Bagley (aka Kathleen Paulo), Rosalie Carranza, and Lunyea Willis, three unhoused and formerly unhoused individuals with mental health disabilities, who live or receive services in Santa Ana.

O3-1



**Re: City of Santa Ana Housing Element 2021-2029 Draft Comments;
Santa Ana's Duty to Affirmatively Further Fair Housing**
Page 2 of 11

Santa Ana's Duty To Affirmatively Further Fair Housing (AFFH)

The City of Santa Ana ("the City") must administer its programs in a way that affirmatively furthers fair housing for members of a protected class and take no action inconsistent with that obligation. Gov. Code, § 8899.50(b)(12). These requirements exist to combat discrimination, overcome patterns of segregation, and foster inclusive communities. This duty extends to all the City's activities and programs relating to housing and community development. An agency's name does not need to explicitly bear the words "housing," "community," or "development" for its activities and programs to fall under the duty to AFFH. California Department of Housing and Community Development, Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements, April 2021 (Attachment A) at 17. Community development should be considered broadly as any processes or issues relating to community members or social and physical surroundings. *Id.* The duty to AFFH also applies to programs and activities related to land use or access to opportunity. *Id.*

03-1
conf/d

Persons with disabilities, including unhoused folks with disabilities, are members of a protected class. Thus, the City must administer its programs in a way that AFFH for this group and take no action inconsistent with that obligation.

Incomplete Assessment Of Fair Housing In The Sixth Cycle Draft Element

While a local jurisdiction's duty to AFFH goes beyond the drafting and approval of the Housing Element, the General Plan demonstrates the City's plan and is a covenant with its residents to AFFH. State law requires that all housing elements promote and affirmatively further fair housing opportunities in their communities for all persons in a protected class. Gov. Code § 65583. It specifically requires that elements include a full assessment of fair housing in the jurisdiction. *Id.* at subds. (b)(1), (c)(10).

03-2

As of today, the City does not have a compliant Housing Element. The Department of Housing and Community Development (HCD) found that the City has not completed the Housing Element process for the sixth cycle, and that the fifth cycle element no longer satisfies statutory



**Re: City of Santa Ana Housing Element 2021-2029 Draft Comments;
Santa Ana's Duty to Affirmatively Further Fair Housing**

Page 3 of 11

requirements.¹ The City revised its Draft and plans to submit the Revised Draft to HCD. The Revised Draft adds a fair housing assessment but still fails to address the following major concerns related to AFFH noted by HCD:

1. Enforcement and Outreach: The analysis must describe compliance with existing fair housing laws and regulations, including information on fair housing outreach capacity, and discuss any past or current fair housing lawsuits, findings, settlements, judgments, or complaints.
2. Regional Analysis and Patterns and Trends: The local patterns and trends must also analyze the disproportionate housing needs of the City's population.
3. Local Data and Knowledge, and Other Relevant Factors: The element must discuss and analyze any unique attributes about the City related to fair housing issues.
4. Contributing Factors: The element mentions fair housing issues and goals and priorities from the City's Analysis of Impediments. However, these issues and goals do not appear to be rooted in any analysis related to Santa Ana and do not appear adequate to facilitate the formulation of meaningful action to affirmatively further fair housing (AFFH). The element should re-assess contributing factors upon completion of analysis and make revisions as appropriate.
5. Goals, Priorities, Metrics, and Milestones: Goals and actions must create meaningful impact to overcome contributing factors to fair housing issues. Currently, programs are not sufficient to facilitate meaningful change and address AFFH requirements. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics, and milestones as appropriate.
6. Reasonable Accommodations: The City should provide further analysis on Item 8 on Page B-37 and analyze this item as a potential

01-2
cont'd

¹ <https://www.hcd.ca.gov/commission-development/housing-element/docs/santasanaadraft0122021.pdf>



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constraint to requests for reasonable accommodation. Requiring an assessment of a property's compliance with existing laws and regulations and then requiring existing violations be corrected as part of the request for a reasonable accommodation goes beyond typical findings for approval and could act to hinder requests.

03-2
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7. Analysis on special housing needs for people experiencing

homelessness: The element provides basic data on services for the homeless population but does not offer a complete analysis on what actions the City takes to address housing this population group. The analysis should include population subgroups, including individuals with disabilities, served.

Demographic Data Do Not Demonstrate A Fully Integrated And Inclusive Community In Santa Ana

The City estimates approximately 1,769 people experiencing homelessness in Santa Ana as of 2019. February 2022 Revised Draft Element ("Revised Draft") at A-33. The Orange County 2019 Point in Time survey shows the following disability subcategory data for these individuals: 36% are considered chronically homeless, 21% experience mental health issues, and 9% have a developmental disability. Id. at A-34. The Revised Draft Element does not analyze this data in its fair housing assessment, so it's unclear whether the City's unsheltered, disabled population is concentrated in a particular area or areas of the City and whether there is disproportionate access to opportunities for this population based on location.

03-3

As to the disability population in general, two census tracts in the northern part of the City have a higher concentration of persons with disabilities. Id. at E-19. These tracts are near the TCAC-designated areas of high segregation and poverty in the City. Id. at E-33.

Current dissimilarity indices between non-white and white groups in Orange County and Santa Ana show that the City has stayed relatively the same in regards to segregation since 1990. Id. at E-11. The current dissimilarity between non-white and white groups show a high level of segregation. Id. at E-9 – E-11. While our comments focus on unsheltered individuals with disabilities, there are significant disparities by race within



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the disability population and unhoused population, so data must be analyzed by considering housing needs based on intersections of these identities (e.g. mental health disability and race)

03-3
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This data collectively demonstrate that the City must take significant actions to reverse racial, economic segregation and isolation of individuals with disabilities.

The City Fails To Administer Its Programs In A Manner That AFFH

The City must both take proactive and meaningful actions to AFFH and take no action inconsistent with its obligation to AFFH. Only by vigilantly doing both would the City have any chance of overcoming segregation and discrimination.

The City launched several nuisance-related enforcement actions and civil lawsuits in the hopes that collectively, they would rid the City of unhoused individuals. One of the City's targets is MHA OC, a mental health service center that provides services to unhoused individuals with a mental health disability. The City filed a public nuisance lawsuit against MHA OC that is still ongoing, and Disability Rights California is involved in that litigation. *City of Santa Ana v. MHA OC* Complaint (Attachment B). The City also filed public nuisance lawsuits against Red Roof Inn and Union Pacific Railroad to rid individuals experiencing homelessness from their respective properties.² The City also initiated an abatement action against El Centro Cultural de Mexico to clear out unhoused individuals on El Centro's property.³ These collective, concerted actions show that the City is using nuisance law to banish unhoused folks from its boundaries. They demonstrate the City's unwillingness to administer its programs in a manner that AFFH and take no action inconsistent with that obligation.

03-4

² <https://www.citizensjournal.us/santa-ana-sues-the-red-roof-inn-calling-motel-a-public-nuisance/>

³ <https://voiceofoc.org/2021/05/santa-ana-could-now-go-its-own-route-to-remove-el-centro-homeless-encampment-amid-finer-printing/>



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1. The City Engages In No Meaningful Actions To Increase Housing Access

One of the many proactive and meaningful actions local jurisdictions need to take to AFFH is to zone for a variety of housing types, particularly those that may be lacking in the community or neighborhood, including low-barrier navigation centers. Attachment A at 15. Low-barrier navigation centers provide various types of services that help unhoused individuals transition to permanent housing. These services are critical for unhoused individuals, especially unhoused individuals with disabilities.

The City must amend its zoning ordinance to address laws pertaining to low-barrier navigation centers as a by-right use. Revised Draft at 25. The City currently has only one shelter operating, the Yale Shelter, and it requires a referral from a Police Department.⁴ Thus, there is a gap in services available to the unhoused population in Santa Ana. There are organizations in the City that help fill this gap by providing wrap-around services, such as housing navigation services. MHA OC is one of these organizations and specializes in providing critical services to unhoused individuals with mental health disabilities. The City has committed to partnering with homeless service providers like MHA OC to provide services for people experiencing homelessness. Revised Draft at 15. But, the City is instead actively trying to push MHA OC, its members (who all have a mental health disability), and unhoused individuals in general out of its borders via nuisance lawsuits. See section on the City's use of nuisance law below. The City should not only amend its zoning ordinance to facilitate services for unhoused individuals with disabilities, but it should also ensure that already-existing services that help unhoused folks transition into permanent housing stay and thrive in the City.

O3-4
conf'd

2. The City Has No Meaningful Reasonable Accommodation Process and Procedure

An effective reasonable accommodation process can provide exceptions to policies that impact housing choice and livability for persons with disabilities. Attachment A at 38. It can remove prominent zoning and housing barriers.

⁴ <https://www.211ca.org/detail/767ServiceAllocation=2116/anmc=72355633&location=8user>



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The City of Santa Ana has no meaningful reasonable accommodation process and procedure. While its municipal code describes a reasonable accommodation process, it is unclear from the Revised Draft and its current practice whether the process has successfully AFFH or caused any barriers or constraints to individuals with disabilities. In fact, HCD notes that one of the factors the City considers to grant or deny a request can be a constraint.

In a deposition related to the MHA OC nuisance lawsuit, the principal planner for the City testified that the planning division does not process any reasonable accommodation requests that do not come through its formal planning application process. Ali Pezeshkpour Deposition Transcript (Attachment C) at 57-58. Having multiple and flexible methods of receiving and processing reasonable accommodation requests is critical to provide meaningful access to the City's reasonable accommodation procedure. For example, if folks are unable to write or complete a form due to their disability, they should be able to verbally make a request in a simple and efficient manner. Mr. Pezeshkpour also testified that he has never processed a reasonable accommodation in the 11 years that he's been employed at the planning department. Id. at 11, 75. This indicates that the City's planning department rarely, if ever, processes reasonable accommodation requests. The City should analyze whether this is due to its process being unknown or inaccessible and take affirmative and meaningful actions to make this process accessible.

O3-4
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Incidentally, some unhoused, disabled members of the community made a reasonable accommodation request to the City, requesting the City ensure that vital services be continually provided to unhoused individuals with disabilities. Reasonable Accommodation Request, March 3, 2020 (Attachment D). This request was ignored.

The City Engages In Actions Inconsistent With Their Obligation to AFFH

In its public nuisance lawsuit against MHA OC, the City alleges that MHA OC is a public nuisance for two reasons. First, the City alleges that MHA OC causes a disproportionate number of police and fire calls for service to be dispatched to MHA OC. Attachment B at 12-13. Second, the

O3-5



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City alleges that MHA OC is engaging in public nuisance *per se* because it is violating the City's municipal code by operating in an unpermitted zoning district. Id. at 14-15. The City also alleges facts related to neighbor complaints about MHA OC. Id. at 11-12. But even prior to this lawsuit, the City engaged in activities and actions against MHA OC related to code enforcement, nuisance abatement, and response to neighbor complaints. Additionally, the City has broadly used nuisance-related actions, enforcement, and allegations to eliminate unhoused individuals from its borders. These actions, especially against MHA OC members who all have a mental health disability, are concerning, given that the City views that individuals "who suffer from . . . mental illness inhibit . . . their ability to operate as productive members or make rational decisions. . . ." And for the reasons below, the City's collective actions are inconsistent with its duty to AFFH.

O3-5
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1. The City's Activities Cause Displacement

Local jurisdictions must ensure that code enforcement activities do not cause displacement, so that there are no disparities in access to housing and opportunity. Attachment A at 15. Santa Ana has done the opposite. The City uses code and zoning enforcement to intentionally displace unhoused individuals, inconsistent with its duty to AFFH. The fact that unhoused folks do not have a permanent home does not mean that they do not have a right to exist in a location that provides access to a potential home, shelter, and services. The location of affordable housing, accessible housing, opportunity, services, employers, education, and health care are factors to fair housing issues. Attachment A at 68-70.

MHA OC has been operating at the same site in Santa Ana since 2001. And MHA OC has been providing substantially the same services since its occupancy. Nonetheless, the City has cited MHA OC multiple times for failure to retain a conditional use permit, even though that matter was previously resolved between the City and MHA OC. It also cited MHA OC for other code violations and collected fines after neighbors had complained about unhoused individuals in the surrounding area. These consistent enforcement actions culminating in a public nuisance lawsuit demonstrate that the City uses its enforcement powers to preclude MHA OC from providing services to unhoused individuals with disabilities in the



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City and ultimately banish both MHA OC and its members from its jurisdiction. Disabled folks who receive services at MHA OC will have nowhere to go and may be forced to leave the City or not receive any services.

It is clear from the total evidence collected in the public nuisance lawsuit that the City believes that MHA OC, due to the nature of its services, attracts unhoused individuals, and that these individuals – all of whom have mental health disabilities – are a nuisance. The City has also used similar code enforcement and nuisance allegation tactics to clear encampments and displace unhoused individuals in other areas of the City. The City should not be using its code and zoning enforcement authority to cause displacement. Rather, it should ensure, as part of its obligation to AFFH, that such activities do not cause displacement.

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2. Use of Nuisance Law, Including Prohibiting Excessive Use of City Services, Creates a Barrier to AFFH

Examples of common barriers to AFFH include nuisance or crime free ordinances or programs and ordinances prohibiting excessive use of city services. Attachment A at 26. The City claims that MHA OC has violated its zoning ordinance and thus causing a nuisance *per se*. Attachment B. The City uses a broad section of its municipal code that states any violation of its municipal code constitutes a nuisance *per se* to seek relief in court and cease vital services to unhoused individuals with disabilities in its jurisdiction.

The City also punishes MHA OC and its members for what they deem as excessive use of their police and fire services and resources. This is the crux of the City's first public nuisance cause of action in its lawsuit against MHA OC. *Id.* The City's facts used to support this first cause of action includes instances where unhoused individuals were experiencing a mental health or other medical crisis. *Id.* The use of emergency services to deem a nuisance punishes 1) people more likely to be subject to law enforcement interaction, which has several biases based on protected class (e.g. race, gender, disability); and 2) people with disabilities who might have more medical emergencies or mental health crises.



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The City's broad nuisance *per se* ordinance, broad use of nuisance law, and its use of the number of calls for police and fire service to deem MHA OC a nuisance are actions inconsistent with their duty to AFFH. The City has also used nuisance law and enforcement broadly as a strategy to remove unhoused individuals from the City.

3. The City Perpetuates Disparities in Access to Opportunity for Persons with Disabilities

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. – appropriate community-based housing with appropriate supports is critical. There are significant disparities by race within the population of disabilities, so jurisdictions should engage in intersectional analyses of needs. Any fair housing assessment should consider the unique needs and barriers faced by persons with disabilities and whether persons with disabilities are able to access services in an integrated community-based setting. Government Code Section 65583(a)(5)-(7); (c)(3)-(5); Attachment A at 36, 69-70.

MHA OC provides critical services to individuals with mental health disabilities. Many MHA OC members, including those involved in the current public nuisance lawsuit, found permanent housing due to MHA OC's services. MHA OC is a rare resource for unhoused individuals with mental health disabilities. If MHA OC were forced to close or relocate out of the City due to the City's targeted actions, then hundreds of unhoused individuals with disabilities will be stripped of vital services. Also, if unhoused individuals are forced to leave the City due to the City's collective nuisance actions, those individuals will be unable to access services, including disability-related services, in the City. This will create a disparity in access to opportunity for people with disabilities, and will perpetuate segregation, rather than AFFH.

O3-5
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**4. The City Capitulates to Community Opposition to Unhoused
Individuals with Disabilities, Perpetuating Segregation and
Preventing Integration**

A major contributing factor to segregation and integration is community opposition. Attachment A at 68. The City's actions against MHA OC and others partly resulted from community members' complaints about unhoused individuals. Some of the complaints were related to MHA OC, and some were general complaints that the City attributes to MHA OC. The City should not let community opposition dictate its actions that are inconsistent with its obligation to AFFH.

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Conclusion

We thank you for the opportunity to comment on the City of Santa Ana's Revised Draft Housing Element. We urge the City to administer its programs in a way that affirmatively furthers fair housing and take no action inconsistent with that obligation. If you have any questions, please reach out at (213) 213-8093 or lucia.choi@disabilityrightsca.org.

Sincerely,



Lucia Choi, Esq.
Navneet Grewal, Esq.
Lili Graham, Esq.
Disability Rights California

Enclosures:

- Attachment A: Excerpts from California Department of Housing and Community Development, Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements, April 2021
- Attachment B: *City of Santa Ana v. MHA OC* Complaint
- Attachment C: Excerpts from Principal Planner Ali Pezeshkpour Deposition Transcript
- Attachment D: Reasonable Accommodation Request to City, March 3, 2020



ATTACHMENT A



significant impact in integrating living patterns and socio-economic concentrations—well beyond combating discrimination or mitigating disparities. Meaningful actions must be taken in concert with each other and address all of the following:³⁵

1. Significant Disparities in Housing Needs and in Access to Opportunity: Examples include incentivizing new residential development to include below-market rate housing; conserving affordability of existing housing, such as limitations on rents or conversion of such housing to higher rent or higher priced housing; encouraging systematic code enforcement activities that maintain housing stock while ensuring such enforcement does not cause displacement; and promoting housing mobility strategies and displacement mitigation strategies to ensure equitable access to opportunity. Housing mobility strategies may include providing affordable and accessible transportation options to enhance access to education and economic development opportunities. Displacement mitigation strategies may include tenant protections, conservation of existing stock, preservation of units at-risk of conversion to market-rate uses, acquisition and rehabilitation of existing stock, including naturally occurring affordable housing, and removing barriers to building affordable housing.

2. Replacing Segregated Living Patterns with Truly Integrated and Balanced Living Patterns: Examples include community benefits agreements that balance development proposals with tangible, local benefits to residents in the area (e.g., creating affordable housing, funding renter assistance programs for nearby residents, or other investments that meet community-identified needs, such as infrastructure and community amenities). Other examples include inclusionary zoning requirements and land-value recapture mechanisms, zoning for a variety of housing types, particularly those that may be lacking from the community or neighborhood, including: multifamily housing, low-barrier navigation centers, group homes, supportive housing, and accessible units. Promote education on how restrictions on multifamily housing, such as limited multifamily zoning and height and density limitations, impact inclusive communities. Seek local input on housing proposals while recognizing that “local vetoes” of affordable and mixed-income housing in racially segregated concentrated areas of affluence create fair housing issues.³⁶

3. Transforming Racially and Ethnically Concentrated Areas of Poverty (RECAP) into Areas of Opportunity: Examples include community-led, place-based strategies to revitalize communities, such as economic development strategies and prioritizing investment in RECAPs that meet the needs of existing low-income residents, such as safe routes to school, transit, parks, schools, bike and pedestrian infrastructure, urban forestry, other neighborhood improvements; preserving naturally occurring affordable housing, such as mobilehome parks; and preservation as affordable housing of market-rate units where low-income households live; and promoting mixed-income development coupled with strong anti-displacement protections. Conduct outreach and advertise city program to persons with limited English proficiency. Other examples include community engagement in planning processes, including targeted outreach, technical assistance to help apply for grants, economic development strategies, workforce development, youth engagement and educational programs, healthy food access, affordable energy, and transportation access.

³⁵ Civ. Code, §§ 890.01, 890.02, 890.03, 890.04, 890.05, 890.06, 890.07, 890.08, 890.09, 890.10, 890.11, 890.12, 890.13, 890.14, 890.15, 890.16, 890.17, 890.18, 890.19, 890.20, 890.21, 890.22, 890.23, 890.24, 890.25, 890.26, 890.27, 890.28, 890.29, 890.30, 890.31, 890.32, 890.33, 890.34, 890.35, 890.36, 890.37, 890.38, 890.39, 890.40, 890.41, 890.42, 890.43, 890.44, 890.45, 890.46, 890.47, 890.48, 890.49, 890.50, 890.51, 890.52, 890.53, 890.54, 890.55, 890.56, 890.57, 890.58, 890.59, 890.60, 890.61, 890.62, 890.63, 890.64, 890.65, 890.66, 890.67, 890.68, 890.69, 890.70, 890.71, 890.72, 890.73, 890.74, 890.75, 890.76, 890.77, 890.78, 890.79, 890.80, 890.81, 890.82, 890.83, 890.84, 890.85, 890.86, 890.87, 890.88, 890.89, 890.90, 890.91, 890.92, 890.93, 890.94, 890.95, 890.96, 890.97, 890.98, 890.99, 890.100, 890.101, 890.102, 890.103, 890.104, 890.105, 890.106, 890.107, 890.108, 890.109, 890.110, 890.111, 890.112, 890.113, 890.114, 890.115, 890.116, 890.117, 890.118, 890.119, 890.120, 890.121, 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³⁶ The Internal Revenue Service Revenue Ruling 2016-27 states that the Internal Revenue Code neither forces nor encourages local approval in decisions affecting low-income housing credits, based on the concern that the practice jeopardizes racial integration. State housing agencies are not required or encouraged to honor local vetoes.



4. Fostering and Maintaining Compliance with Civil Rights and Fair Housing Laws: Agencies must diligently comply with civil rights and fair housing laws, including the California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with section 12900) of Division 3 of Title 2), Government Code sections 8899.50, 65008, 65583, subdivisions (c)(5) and (c)(10), and 11135, Civil Code section 51 (the Unruh Civil Rights Act), and FEHA regulations in California Code of Regulations, title 2, sections 12005-12271.

In addition to taking meaningful action, public agencies must not take any action materially inconsistent with the obligation to affirmatively further fair housing. Examples of materially inconsistent actions include those that:

- Hinder any of the affirmative actions public agencies take to further fair housing (e.g., lack of enforcement of rules intended to promote fair housing choices, diminishing fair housing principles from program guidelines, and inequitable implementation or enforcement of programs and activities)
- Perpetuate discrimination, segregation, R/ECAPs, and barriers that restrict access to opportunity based on protected characteristics (e.g., lack of affirmative marketing in funded housing developments, excluding accessibility modifications from eligible uses in funding, absence of community revitalization strategies in programs and policies)
- Are inconsistent with the housing element or the No-Net-Loss Law¹⁷ (e.g., downzoning without upzoning, zoning barriers to housing choices, removing tenant protections)
- Have a disparate impact on protected classes (e.g., zoning or siting toxic or polluting land uses or projects near a disadvantaged community, lack of investment in concentrated areas of poverty, lack of multifamily housing or affordable housing options in high-resource areas, investment without anti-displacement strategies in areas of disproportionate housing need)

Public agencies must ensure housing and community development programs and activities are designed and can be reasonably expected to achieve a significant and tangible positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity.

All Public Agencies

Existing federal law requires departments and agencies to administer programs relating to housing in a way that affirmatively furthers fair housing. These obligations apply to state and local governments that receive funds or contract with the federal government and are often limited to housing programs. However, California Government Code section 8899.50 extends well beyond those agencies with federal funds or contracts and includes virtually all public agencies in California.

Public agencies include all subdivisions of the state, such as officers, offices, agencies, commissions, bureaus, boards, departments and divisions. Examples include the Department of Housing and Community Development (HCD), California Housing Finance Agency, Department of Developmental Services, Department of Health Services, Department of Social Services, Tax Credit Allocation Com-

¹⁷ Gov. Code, § 65083.



mittee, Governor's Office of Planning and Research, including the Strategic Growth Council, California Department of Transportation, California Transportation Commission, California Department of Education, Department of Conservation, California Coastal Commission, Natural Resources Agency, California Environmental Protection Agency, State Water Resources Control Board, Department of Water Resources, and many more. Public agencies also include all public housing authorities, redevelopment successor agencies, cities, counties, cities and counties, and charter cities and counties.¹⁰

Programs and Activities

The obligation to AFFH for public agencies applies to all housing and community development programs and activities. Programs and activities should be considered expansively and not in a manner to limit affirmatively furthering fair housing. For example, most state agencies are involved in some combination of planning, financial investment, regulatory function, or technical assistance, outreach and education. All of these broad categories should be considered programs and activities. This expansive application of programs and activities also applies to local governments. For example, capital improvement plans, code enforcement and other regulatory functions, housing assistance programs, and planning and zoning documents should all affirmatively further fair housing.

10 State Code § 66012.53, subd. (a)(2)

Programs and Activities Related to Housing and Community Development

All public agencies are required to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing. Housing and community development should be broadly construed and should not be interpreted in a limited manner. For example, an agency's name does not need to explicitly bear the words "housing" or "community" or "development" to have activities or programs related to housing and community development. Any program or activities that impact housing and community development should address the obligation to affirmatively further fair housing. Community development should be considered broadly as any processes or issues related to community members or social and physical surroundings. Housing and community development are not limited to housing programs and activities. For example, public agencies with programs and activities in any way related to land use or access to opportunity based on where a person lives pertains to community development, which in turn involves housing. In this way, programs and activities that involve transportation, land conservation, hazard planning, infrastructure, economic issues, public facilities, social services, coastal resources, other environmental resources, and more should be affirmatively furthering fair housing. The same applies to local agencies. This obligation is not limited to investment, planning, and outreach related to housing, but also broader community development, such as infrastructure, public schools, parks and recreation, and other capital improvements.



Barriers to AFFH

Examples of Common Zoning and Land Use Barriers Include:

- Lack of zoning for a variety of housing types throughout a jurisdiction such as multifamily, duplexes to fourplexes, group housing, transitional and supportive housing at a variety of need levels, shelters, single room occupancy, residential motels, mobilehomes, and accessory dwelling units
- Predominance of single family uses and larger lot sizes in racially concentrated areas of affluence
- Voter initiatives that restrict multifamily developments, rezoning to higher density, height limits or similar measures that limit housing choices
- Multifamily height requirements
- Minimum unit sizes
- Parking requirements
- Lack of new affordable housing choices in high resource areas
- Lack of anti-displacement policies, including nonet loss of units in the case of demolitions and replacement housing, and relocation ordinances
- Lack of incentives and other land use mechanisms to promote affordable housing throughout the community
- Excluding group homes or residential care (greater than six persons) from single family zones or excessive spacing/concentration requirements
- Family definitions or other occupancy requirements
- Nuisance or crime free ordinances or programs
- Ordinances prohibiting excessive use of city services
- Restrictive historic preservation districts
- Zoning that does not allow for residential uses in commercial zones
- Failure to allow supportive housing by right
- Failure to allow emergency shelters by right
- Lack of zoning on land appropriate for accessible development

Examples of Common Investment Barriers Include:

- Lack of infrastructure investment, including community infrastructure such as parks, community amenities in lower resource areas, disadvantaged communities, and areas of concentrated poverty
- Lack of targeted housing preservation/conservation and tenant protection programs in areas at risk of displacement
- Lack of public (local, state, or federal) funds invested in the development of affordable housing
- Absence of housing choice vouchers
- Limited housing stock affordable to lower income households or households with special needs
- Lack of proactive outreach with developers of affordable housing and non-profit service providers
- Lack of proactive measures to assist maintenance and rehabilitation of existing housing
- Lack of multilingual tenant counseling or foreclosure assistance



- Additional Information

- Provide additional relevant information, including local data and knowledge and community input, about disparities in access to opportunity in the locality and relative to the region.

Data Considerations

In collaboration, the California Tax Credit Allocation Committee (TCAC) and HCD developed the TCAC/HCD Opportunity Maps, a mapping tool that identifies areas of higher and lower resources to evaluate access to opportunity. The tool maps areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource and high segregation and poverty. Note: The moderate resource (rapidly changing) designation is still being evaluated to understand its efficacy at predicting future trends. The tool may be utilized to identify areas of high and low resources to address this analysis and is available at:

<http://www.treasurer.ca.gov/ctcac/opportunity.asp>

The TCAC/HCD Opportunity Maps can help to identify areas within the community that provide good access to opportunity for residents or, conversely, provide low access to opportunity. They can also help to highlight areas that are rapidly changing (potentially creating risk of displacement for lower-income households) and areas where there are high levels of segregation and poverty. The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low resource areas and areas of high segregation and poverty and to encourage better access for LMI and BIPOC households to housing in high resource areas.

Disparities in Access to Opportunity for Persons with Disabilities

An analysis of disparities in access to opportunity must specifically address the housing and community development needs of persons with disabilities. According to the U.S. Census Bureau, over four million Californians have a disability. 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. Critically, there are significant disparities by race within the population with disabilities, so jurisdictions should engage in an intersectional analysis of needs. The assessment should consider the unique needs and barriers faced by persons with disabilities and whether persons with disabilities are able to access housing choices and services in an integrated community-based setting. Examples include accessibility features for housing, transportation, education, jobs and other types of community elements to enable fair housing choices.

Disability types include hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

Data and factors to consider in an analysis of access to opportunity for persons with disabilities could include:



- Prevalence of Disability by Type (e.g., vision, hearing, cognitive, ambulatory, self-care and independent living)
- Disability by Age Group
- Disability by Race/Ethnicity/National Origin
- Assessment of Supportive Housing Stock and Other Housing Stock Including Group Homes, Homes for People with Intellectual or Developmental Disabilities and Mental Health Disabilities
- Assessment of Accessibility of Homelessness Programs and Coordinated Entry System
- General or Estimated Number of "Covered Multifamily Dwellings" – Adaptable Units under the Fair Housing Act⁴⁴
 - Federal law triggers specific accessibility requirements in fourplex and larger developments with covered multifamily dwellings.
- Estimated Number of Units with Mobility and Communication Accessibility Features under California Building Code Ch. 11B for public housing projects⁴⁵ – housing provided by, for, or on behalf of a public entity, or as part of a public entity's program to provide housing
 - 5 percent of these units are required to have mobility features, 2 percent of the units are required to have communication features regardless of first occupancy date or number of units in a building, including multistory dwellings and single-family dwellings. **Note:** Jurisdictions should consider higher requirements commensurate with identified need.
- Estimated Number of Multifamily Units pursuant to Government Code section 12955.1(b)
 - 10 percent of units in multifamily buildings without elevators consisting of three or more rental units or four or more condominium units are subject to accessibility building standards.

To address the housing needs of persons with disabilities and better inform the formulation of policies and actions, the analysis should include, where available: (1) data tables to evaluate trends, magnitude of needs relative to disability at a local, regional and state level (see Resources section for sample tables), (2) maps to analyze spatial patterns relative to accessibility features and services, in comparison to racial and ethnically concentrated areas of poverty, (3) housing accessibility, such as the dispersion of housing choices and zoning to encourage a variety of housing types, (4) efforts to integrate persons with disabilities into community based settings, and (5) a discussion of disproportionate housing needs, including policies and practices such as zoning barriers and gaps, disparities in access to accessibility features, services, resources and strategies, including geographically. Examples of data sources include U.S. Census and American Community Survey. When evaluating spatial patterns, an analysis should address whether persons with disabilities are concentrated or integrated throughout the jurisdiction and region and if there are any geographic patterns for persons with disabilities by age.

⁴⁴ The Fair Housing Act covers all "covered multifamily dwellings" designed and constructed for first occupancy after March 13, 1991 to be accessible to and usable by people with disabilities. Covered multifamily dwellings are all dwelling units in buildings containing four or more units with one or more elevators, and all ground floor units in buildings containing four or more units, without an elevator. Federal requirements adopted by the Department of Housing and Urban Development at 24 C.F.R. 3.103.201 define covered multifamily dwellings.

⁴⁵ California Building Code Chapter 11B covers public housing and generally meets 2010 Americans with Disabilities Act Standards. Fair Housing Act requirements are applicable to housing developed by HUD to other covered multifamily dwellings if built for first occupancy on or after March 13, 1991.



This disparities analysis for people with disabilities may be included in the disparities in access to opportunity section, segregation and integration section, as part of the section of the housing element that addresses the housing needs of persons with special needs, or in the specific analysis required on potential constraints on housing for persons with disabilities. Additionally, the analysis must go beyond simply identifying and removing barriers and constraints. The analysis should discuss resources and strategies to encourage housing options and access to opportunity to better inform meaningful and proactive goals and actions to address the housing and community development needs of persons with disabilities.

Common Zoning Barriers for Persons with Disabilities

- **Reasonable Accommodation Procedure:** The lack of a procedure to address disability issues is one of the most prominent zoning barriers because a strong process can be utilized to provide exception to zoning and land use policies that impact housing choices and livability for persons with disabilities. Other common issues with reasonable accommodation procedures include excessive findings of approval, burden on applicants to prove the need for exception, application costs, and discretionary approvals.
- **Family Definition:** Family definitions in zoning or other land use related documents can directly impact housing choices for persons with disabilities, particularly group home situations. Examples of common elements in family definitions that have an exclusionary effect include regulating the number of people, or requiring occupants to be related or under one lease agreement.
- **Excluding Group Homes:** Excluding group homes, community or residential care homes for seven or more persons, or subjecting these homes to a conditional use permit in single family zones acts as a barrier to housing choice for persons with disabilities.
- **Spacing Requirements:** Excessive spacing requirements, such 500 feet or more, between group homes or community or residential care facilities can have a direct impact on the supply of housing choices.
- **Unit Types and Sizes:** The lack of multifamily housing or zoned capacity for multifamily and a variety of sizes from efficiency to four or more bedrooms can constrain the ability of persons with disabilities to live in a more integrated community setting.
- **Lack of Accessible Accessory Dwelling Units (ADUs):** ADUs can provide an important housing choice for persons with disabilities or care providers, including independent and integrated living patterns.
- **Nuisance and Crime Free Ordinances:** Ordinances that can be used or have the effect of disproportionately targeting persons with disabilities.
- **Lack of By Right Zoning for Supportive Housing:** By right zoning for supportive housing can result in more objective processes that are less likely to discriminate or have the effect of discriminating against persons with disabilities.



Local jurisdictions should use the dissimilarity index and/or isolation index tools as part of the needs assessment to help to understand where there are areas of segregation in the community and highlight needs for housing element policies and programs to help reduce segregation. Dissimilarity index and isolation index values for census tracts within the jurisdiction can be mapped thematically to highlight areas with high levels of segregation. This will highlight locations within the community where there are needs for housing element policies and programs to promote better racial and ethnic integration and reduce segregation.

Examples of Contributing Factors to Fair Housing Issues by Area

Outreach

- Lack of a variety of media (e.g., meetings, surveys, stakeholder interviews)
- Lack of marketing community meetings
- Lack of meetings at various times
- Lack of accessibility to draft documents
- Lack of language access
- Lack of accessible forums (e.g., webcast, effective communication, reasonable accommodation procedures)

Fair Housing Enforcement and Outreach Capacity

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws to support strong enforcement
- Unresolved violations of fair housing or civil rights law (including challenges to protect the constitutional and statutory rights of unhoused people)

Segregation and Integration

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Lack of tenant protections
- Harassment
- Lack of supportive housing in community-based settings
- Policing and criminalization



Racially and Ethnically Concentrated Areas of Poverty

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Lending discrimination
- Policing and criminalization

Disparities in Access to Opportunity

- Access to financial services
- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Policing and criminalization

Disparities in Access to Opportunity for Persons with Disabilities

- Access to proficient schools for persons with disabilities
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing



- Occupancy codes and restrictions
- Lack of effective accommodations for unhoused people with disabilities
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings
- Policing and criminalization (especially people with mental disabilities or neurodivergent individuals)

Disproportionate Housing Needs, Including Displacement Risks

- The availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of renter protections
- Lack of protections for mobilehome park residents
- Land use and zoning laws
- Lending discrimination
- Lack of rental relief programs for people at risk of homelessness

Site Inventory

- Community opposition
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Local policies or practices (e.g., councilmember veto)
- Location and type of affordable housing
- Private discrimination



ATTACHMENT B



30-2020-01124 Electronically Filed by Superior Court of California, County of Orange, 01/13/2020 05:18:57 PM.
74-CU-MC-CJC - ROA # 2 - DAVID H. YAMASAKI, Clerk of the Court By Stephen Corona, Deputy Clerk.

1 SONIA R. CARVALHO (SBN 162700)
CITY ATTORNEY
2 KYLE NELLESEN (SBN 297572)
ASSISTANT CITY ATTORNEY
3 JOSE MONTOYA (SBN 300919)
DEPUTY CITY ATTORNEY
4 CITY OF SANTA ANA
20 CIVIC CENTER PLAZA M-29
5 P.O. BOX 1988
SANTA ANA, CALIFORNIA 92702
6 TELEPHONE: (714) 647-5201
FACSIMILE: (714) 647-6515

*Exempt from filing fees per
Government Code section 6103*

7 Attorneys for Plaintiff and Real Party in Interest,
8 PEOPLE OF THE STATE OF CALIFORNIA and CITY OF SANTA ANA

9
10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

12 CITY OF SANTA ANA, a charter City and
municipal corporation, and THE PEOPLE OF
13 THE STATE OF CALIFORNIA, by the City
Attorney for the City of Santa Ana.

Case No: 30-2020-01124174-CU-MC-CJC
Judge John C. Gastelum

**COMPLAINT FOR INJUNCTION TO
ABATE A PUBLIC NUISANCE;
NUISANCE PER SE**

14
15 Plaintiffs,

[Deemed Verified Pursuant to Code of
Civil Procedure Section 446]

16
17 v.

Causes of Action:
1. Public Nuisance (Civ. Code sections
3479, 3480, 3491, 3494; Code Civ. Proc.
Sections 526, 527, 731; Penal Code Section
370)
2. Public Nuisance Per Se (Civ. Code
Sections 3479, 3480, 3491, 3494; Code Civ.
Proc. Sections 526, 527, 731; Santa Ana
Municipal Code
Sections 1-8, 1-12, 1-13, and 41-190)

19 ORANGE COUNTY ASSOCIATION FOR
MENTAL HEALTH DBA MENTAL HEALTH
ASSOCIATION OF ORANGE COUNTY, a
20 California Nonprofit Corporation; B T
INVESTMENT PROPERTIES, LLC, a California
21 Limited Liability Company; and DOES 1 through
22 25 inclusive,

23
24 Defendants.

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26 This action is brought by the PEOPLE OF THE STATE OF CALIFORNIA, ("People")
27 as Plaintiff, by and through SONIA R. CARVALHO, City Attorney for the City of Santa Ana,
28 and CITY OF SANTA ANA, a charter City and municipal corporation ("City"), duly organized



1 and existing under and by virtue of the Constitution and laws of the State of California, as
2 Plaintiff and Real Party In Interest, (collectively, "Plaintiffs"), against ORANGE COUNTY
3 ASSOCIATION FOR MENTAL HEALTH DBA MENTAL HEALTH ASSOCIATION OF
4 ORANGE COUNTY, B T INVESTMENT PROPERTIES, LLC, and Does 1 through 25 (herein
5 collectively referred to as "Defendants") for allowing and maintaining a public nuisance at a
6 facility commonly known as the "Homeless Multi-Service Center" and the parcel(s) on which it
7 sits (herein referred to as the "Property").

8 **I. PARTIES, JURISDICTION, AND VENUE**

9 1. The CITY OF SANTA ANA ("City") is at all times herein mentioned, a Charter
10 City and municipal corporation, duly organized and existing under and by virtue of the
11 Constitution and laws of the State of California and located in the County of Orange.

12 2. The City is authorized, pursuant to California *Code of Civil Procedure* section
13 731, to prosecute this action in the name of and on behalf of the People of the State of
14 California.

15 3. The City is informed and believes, and thereon alleges, that Defendant Orange
16 County Association for Mental Health is a California non-profit corporation doing business as
17 the Mental Health Association of Orange County ("MHA").

18 4. The City is informed and believes, and based upon such information and belief,
19 alleges that, at all relevant times herein, Defendant MHA operates, manages, or maintains the
20 property located at 2416 S. South Main Street, Santa Ana, California, and that all of the actions
21 of Defendants alleged herein have occurred, been carried out, or have furthered the violations of
22 law at or in connection with the operations of a multi-service center by MHA at the Property,
23 which nuisance and violations of law are sought to be restrained by this action.

24 5. Plaintiffs are informed, believe and thereon allege that Defendant MHA's
25 principal office address is 1971 E. 4th Street, Suite 130A, Santa Ana CA 92705.

26 6. The City is informed and believes, and thereon alleges, that Defendant B T
27 Investment Properties, LLC, a California Limited Liability Company ("Property Owner"), has
28 been, at all times material to this action, the owner of the Property, which is commonly known



1 as 2416 South Main Street, Santa Ana, California, identified as Assessor's Parcel Number 410-
2 382-15.

3 7. The Property includes a commercial building in which MHA operates as the
4 "Homeless Multi-Service Center" at the Property. The Property is located in an area surrounded
5 by other commercial businesses and is approximately one block away from Esqueda Elementary
6 School. Delhi Park, Monroe Elementary School, and Cesar Chavez High School are also
7 located less than one mile from the Property. The Property is situated on a major arterial street
8 in the City of Santa Ana, making the actions of MHA clients, such as running into traffic,
9 serious dangers to MHA clients and members of the public traveling in the area.

10 8. The true names and capacities of Defendants sued herein as DOES ONE (1)
11 through TWENTY-FIVE (25) are unknown to Plaintiffs, who therefore sue such Defendants by
12 such fictitious names, and will amend this Complaint to show their true names and capacities at
13 such time as they are ascertained. Plaintiffs are informed and believe and thereon allege that
14 each of the Defendants designated herein as a DOE is legally responsible in some manner for the
15 events and happenings alleged in this Complaint.

16 9. Whenever in this Complaint reference is made to any act of Defendants, such
17 allegation shall be deemed to mean Defendants' officers, agents, manager, representative,
18 employees, and/or DOES 1 through 25, who authorized such acts while actively engaged in the
19 operation, management, direction or control of the affairs of Defendants, at the Defendants'
20 direction and/or while acting within the course and scope of their duties. Reference to
21 Defendants shall also mean each of the Defendants individually, as well as all of the Defendants,
22 collectively.

23 10. Plaintiffs bring this action under California *Civil Code* sections 3479, 3480, and
24 3494, California *Code of Civil Procedure* sections 526, 731, and Section 370 of the California
25 *Penal Code*. Plaintiffs seek to enjoin Defendants from engaging in the conduct alleged in this
26 Complaint and to recover fees, costs and penalties as permitted by law relating to this
27 enforcement action.

28 11. Venue is proper in this judicial district because the Property and the nuisance



1 conduct at issue are located in this judicial district.

2 12. Defendants and each of them are directly responsible for the activities occurring
3 on the Property as set forth below, are responsible for continuing violations of the laws and
4 public policy of the State of California and/or local codes, regulations and/or requirements
5 applicable to Defendants' operation and activities at the Property, and/or have permitted,
6 allowed, caused, or indirectly furthered the activities at the Property alleged herein, and
7 Defendants' use of and activities at the Property, or allowance of such uses and activities, are
8 inimical to the rights and interest of the general public and constitute unlawful business
9 practices, nuisances and/or violation of law.

10 **II. FACTS**

11 13. MHA has been the source of consistent and significant problems, crimes,
12 complaints, and calls for service for the Santa Ana Police Department ("SAPD") for several
13 years, as specified herein, and based upon evidence to be shown at trial.

14 14. During the period beginning May 1, 2017 and ending January 9, 2019, the SAPD
15 received more than two hundred and forty-nine (249) calls for service at the Property involving
16 clients of MHA. These calls for service are related to a wide variety of criminal conduct,
17 including but not limited to:

18 Assault and battery, assault with a deadly weapon, attempted suicide, criminal
19 threats, domestic violence, disorderly conduct, disturbing the peace, indecent
20 exposure, malicious mischief, rape, robbery, theft, trespassing, vandalism, and
21 vehicle burglaries.

22 15. The MHA Homeless Multi-Service Center has considerably more calls for service
23 than the other commercial businesses in the area. As such, SAPD spends a disproportionate
24 amount of time policing, patrolling, and responding to calls at the Homeless Multi-Service
25 Center. When responding to the Property, employees of MHA often refuse SAPD requests for
26 information or assistance.

27 16. Examples of some of the calls, contacts, investigations and arrests SAPD has
28 handled at the Homeless Multi-Service Center are:



- 1 a. On July 17, 2018, SAPD officers were dispatched to MHA at 2416 S. Main
2 St. in response to a report of a physical assault, a violation of *Penal Code*
3 section 242 (Battery). The officers made contact with the victim at South
4 Coast Global Medical Center, located at 2701 S. Bristol. The victim
5 informed officers that he was standing outside of MHA when a female
6 flagged him down on the east side of Main Street. Upon making contact
7 with the female, the victim stated that a male suspect approached him and
8 punched him above his left cheek with a set of brass knuckles. The victim
9 stated that the suspect had approached him because he was talking to
10 suspect's girlfriend.
- 11 b. On July 26, 2018, SAPD officers were dispatched to MHA at 2416 S. Main
12 St. in response to a report of theft, a violation of *Penal Code* section 488.
13 Upon contact with officers, the victim, an MHA client, stated that his phone
14 was stolen while it was charging behind the employee counter. MHA's
15 Assistant Coordinator informed officers that she had reviewed the video
16 footage and was aware of who stole the victim's cell phone, but refused the
17 officer's request to review the video and stated that she was not allowed to
18 provide the suspect's information.
- 19 c. On December 7, 2018, SAPD officers were dispatched to MHA at 2416 S.
20 Main St. in response to a report of a man "yelling" in the middle of the
21 street. Officers contacted an MHA employee who stated that the man
22 entered MHA and caused a disturbance. The MHA employee stated that the
23 man wanted to kill himself and needed the police. The man was later
24 witnessed running into traffic. The man was placed on an involuntary hold
25 pursuant to *Welfare and Institutions* section 5150.
- 26 d. On January 21, 2019, SAPD officers were dispatched to MHA at 2416 S.
27 Main St. in response to a physical assault, a violation of *Penal Code* section
28 242. Upon contact with officers, the victim stated that she was involved in a



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verbal altercation with suspect while eating her food at MHA. The victim stated that she was upset because suspect was brushing her teeth while everyone was eating. The suspect became upset at victim's comments and punched victim on the head and fled the building. MHA employees stated that they did not have access to the security camera footage. Officers were unable to locate suspect.

e. On January 28, 2019, SAPD officers were dispatched to MHA at 2416 S. Main St. in response to a physical assault, a violation of *Penal Code* section 242. Upon contact with officers, witnesses stated that they saw victim and suspect engage in a verbal altercation. Witnesses saw the suspect turn around and strike victim in the head three to six times near the entrance of MHA.

f. On March 4, 2019, SAPD officers were dispatched to MHA at 2416 S. Main St. in response to a report of an assault with a deadly weapon, a violation of *Penal Code* section 245(a)(1). Officers came into contact with the victim, an MHA member, who stated that on February 26, 2019, a male member of MHA had hit him with a heavy lock that was placed inside a sock on the south parking lot of MHA. The suspect attempted to hit the victim several times by swinging the "lock in a sock." The victim further stated that the suspect had kicked him on his knee inside MHA approximately two days earlier. The victim stated that MHA's Program Director yelled at the suspect to stop hitting him. The MHA Program Director stayed with the victim until the suspect left the scene. When officers attempted to retrieve the name of the suspect from MHA's Program Director, she refused to provide the suspects full name and did not allow officers to review the video footage of the incident citing Health Insurance Portability and Accountability Act (HIPAA).

g. On March 5, 2019, SAPD officers were dispatched to MHA at 2416 S.



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Main St. in response to a subject making criminal threats, a violation of *Penal Code* section 422 (Threaten Crime with Intent to Terrorize). Upon contact with officers, the victim stated that he was fixing his bicycle in the rear parking lot of MHA when the suspect called the victim to the front of MHA and said, "I'll show you my gun I'll kill you." The victim feared for his life. When officers contacted MHA's Program Director, she advised that prior to the incident, the suspect had entered MHA and caused a disturbance.

- h. On April 15, 2019, SAPD officers were dispatched to MHA at 2416 S. Main St. in response to a report of an assault, a violation of *Penal Code* sections 240 (Assault on Person) & 242 (Battery). Upon contact with officers, the victim, an MHA security guard, stated that that the suspect attempted to walk onto the MHA property, but he denied her entry. Suspect had been previously removed due to violent outbursts toward clients and staff. Victim stated that he feared the suspect was going to physically attack a MHA client sitting near the south door of MHA and stepped in between them. Victim stated that suspect began yelling profanities, struck him with a closed fist on the jaw and bit his bicep as he was attempting to restrain her.
- i. On April 17, 2019, SAPD officers were dispatched to MHA at 2416 S. Main St. in response to a report of theft and vandalism, a violation of *Penal Code* section 488 (Petty Theft) & 594(b)(1) (Vandalism[\$400 or More]). Upon contact with officers, the reporting party, MHA's Assistant Coordinator, stated that the male suspect used a rock to break an exterior window at MHA's thrift store and stole a purse that was on display. The reporting party stated that MHA operates a thrift store at the Property and has had three encounters per week with suspect since March 1, 2019.
- j. On May 2, 2019, SAPD officers were dispatched to MHA at 2416 S. Main St. in response to a report of a criminal threat, a violation of *Penal Code*



- 1 section 422 (Threaten Crime with Intent to Terrorize). The victim, an MHA
- 2 security guard, stated that the suspect walked into the parking lot of MHA
- 3 and was asked to leave due to suspect's prior incidents at the MHA
- 4 property. The suspect refused and pointed a knife at the victim and told him
- 5 she was going to kill him. The suspect was only five feet away from victim
- 6 when this occurred. When officers arrived at the scene, suspect was sitting
- 7 across the street from MHA at 2509 S. Main St. and was arrested.
- 8 k. On May 4, 2019, SAPD officers were dispatched to the 2300 block of South
- 9 Evergreen Street, less than one mile from MHA, in response to a report of
- 10 indecent exposure, a violation of *Penal Code* section 314.1. Upon contact
- 11 with officers, the victim stated that she walked out of her residence to do
- 12 laundry when she noticed the suspect in the corner of her backyard facing a
- 13 concrete wall. When the victim asked the suspect what he was doing, the
- 14 suspect turned around with his "penis" outside of his pants. The suspected
- 15 stated that he was urinating, but the victim suspects he was masturbating.
- 16 The victim stated that she was offended and feared for her children. The
- 17 suspect's address was listed as: MHA 2416 S. Main St.
- 18 i. On May 25, 2019, SAPD officers were dispatched to MHA at 2416 S. Main
- 19 St. in response to a violation of *Penal Code* section 488 (Petty Theft). Upon
- 20 contact with officers, the victim stated that he witnessed the suspect fixing
- 21 her bicycle at the southwest corner parking lot of MHA and offered his
- 22 assistance. Victim stated that he told suspect that he needed to go inside
- 23 MHA and the suspect agreed to watch his bike until he returned. When
- 24 Victim returned, the suspect had stolen his bike. MHA staff allowed the
- 25 officer to review the video footage, but did not provide a copy. Suspect was
- 26 not located.
- 27 m. On July 29, 2019, SAPD officers were dispatched to MHA at 2416 S. Main
- 28 St. in response to an assault, a violation of *Penal Code* section 245(a)(1)



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(Assault with a Deadly Weapon). Upon contact with officers, the victim, a volunteer, stated that he was in the rear parking lot of MHA feeding the cats and cleaning the parking lot when the suspect punched him in the mouth. The suspect told the victim to "leave my stuff alone." Victim stated that the suspect picked up a metal pole and attempted to hit him in the head. Victim was able to block the pole with his left hand suffering pain and bruising. The suspect fled when the victim threatened to call police. Suspect was not apprehended.

- n. On August 4, 2019, SAPD officers were dispatched to MHA at 2416 S. Main St. in response to a report of a theft, a violation of *Penal Code* section 488. Upon contact with officers, the victim stated that he was inside MHA when the suspect approached him, gave him a hug, and grabbed his car keys. The suspect told the victim "I got your keys" and fled from MHA. Officers made contact with the suspect across the street from MHA where she was found lying in the bushes. Suspect was cited and released.
- o. On August 9, 2019, officers were dispatched to a 7- Eleven market located at 2910 South Main Street, less than a half mile from MHA, in Santa Ana in response to a report of *Penal Code* section 245(a)(1), Assault with a Deadly Weapon. The victim, an employee working at the market, stated that he told the suspect to leave the store because of prior thefts. Victim stated that he pushed the suspect as he was exiting the store. The suspect later returned with two heavy metal pipes and struck the victim in the head. The suspect's address was listed as: MHA 2416 S. Main St.
- p. On August 11, 2019, officers were dispatched to MHA at 2416 S. Main St. in response to a report of an assault, a violation of *Penal Code* sections 240 (Assault on Person) & 242 (Battery). Upon contact with officers, the victim, an MHA security guard, stated that the suspect, who had been receiving services from MHA, refused to become an MHA member. As a result, the



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suspect was previously told to leave the facility. Victim stated that he encountered suspect sitting in the parking lot and asked her to leave the MHA property, but refused. When suspect finally left the property the victim followed from a distance. At that time, the victim stated the suspect attempted to hit victim with her shirt, and he had to move to avoid getting hit. The suspect also attempted to hit a second victim from MHA with her hand and “flicked” a cigarette at his face. When approached by SAPD officers at the McDonalds/CVS parking lot, approximately 200 feet from MHA, the suspect spit at one of the officers. Suspect told the victims that the CVS belonged to her. Suspect was arrested.

- q. On August 14, 2019, officers were dispatched to MHA at 2416 S. Main St. in response to a report of criminal threats. Upon contact with officers, the victim, a MHA Case Manager, stated that she intervened in an incident where suspect was “yelling” at a MHA client, a disabled veteran. Victim stated that she feared the suspect would physically harm the MHA client. When the victim asked the suspect to vacate the premises he threatened to “fuck her up” and “fuck you in the ass.” Suspect also pulled his left fist threatening to strike victim, but did not. The suspect eventually exited the building. The victim stated that it is upsetting that the MHA security guard “never did his job,” and that she had to do his job. Suspect was not at the scene when officers arrived.
- r. On October 17, 2019, SAPD officers were dispatched to MHA at 2416 S. Main St. in response to person running out in traffic, a violation of *Penal Code* section 647(f), Disorderly Conduct. When officers arrived at the scene, they witnessed the suspect “wandering” the street “confused, in a panic, and hallucinating.” Officer stated that based on his experience he believed the suspect was under the influence of narcotics. When officers attempted to take suspect into custody, the officer stated that the suspect



1 screamed and struggled violently. An officer contacted an MHA employee,
2 and she admitted that the suspect was a regular client of MHA.

3 s. On November 17, 2019, SAPD officers were dispatched to MHA at 2416 S.
4 Main St. in response to a report of a physical assault, a violation of *Penal*
5 *Code* section 242. Upon contact with officers, the victim was located at the
6 southwest corner of Warner and Main Street. The victim stated that he was
7 inside the MHA facility (common area) when he heard the suspect being
8 aggressive towards other MHA clients. Victim stated that he told the
9 suspect to "take a shower to cool down." Victim stated that suspect became
10 upset and punched him on the lower lip. An employee for MHA witnessed
11 the incident. Suspect was arrested.

12 17. Additionally, the MHA facility has also placed a tremendous burden on the City's
13 emergency services provided by the Orange County Fire Authority ("OCFA"). The City is
14 informed and believes that OCFA has received approximately 73 calls for service at the MHA
15 Property during the period beginning June 1, 2018 and ending January 7, 2020.

16 18. The City of Santa Ana has limited police and emergency resources. Those limited
17 resources have been inordinately taxed by the nuisance conditions at the MHA facility.

18 Community Complaints and the "Good Neighbor Policy"

19 19. In addition to SAPD calls for service, the nuisance operations of the MHA
20 Homeless Multi-Service Center have extended to nearby businesses and neighborhoods.

21 20. The City receives complaints on a daily basis from residents and business owners
22 regarding the nuisance conditions resulting from MHA operations.

23 21. Plaintiffs are informed that Defendant MHA, in response to extensive complaints
24 from the surrounding community, established a so-called "Good Neighbor Policy" that outlined
25 several guidelines for operation of the facility. These guidelines include: cooperation with
26 SAPD and Santa Ana School Police, installation of security cameras on the MHA building,
27 holding regular meetings with the surrounding community and business owners, providing on-
28 site security guards, and creation of an Advisory Committee to meet quarterly.



1 22. Plaintiffs are informed, believe and thereon allege, that Defendant MHA has
2 failed to implement the provisions of its Good Neighbor Guidelines. Further, such provisions
3 that have been implemented have been wholly ineffective to address the nuisance conditions and
4 well-founded concerns of the community.

5 23. By failing to comply with the terms of the Good Neighbor Policy, the Santa Ana
6 Municipal Code ("SAMC"), and State law, Defendant MHA has abdicated its responsibility to
7 remedy the nuisance conditions on the Property. Accordingly, the City of Santa Ana brings this
8 Action to protect the health, safety, and welfare of its citizens.

9 **FIRST CAUSE OF ACTION**

10 **PUBLIC NUISANCE**

11 (Preliminary and Permanent Injunction)

12 [Cal. Civ. Code Sections 3479, 3480 and 3494, Cal. Code Civ. Proc. Section 526, 527, 731
13 and Cal. Pen. Code Section 370]
14 (All Defendants and Does 1-25)

15 24. Plaintiffs re-allege and incorporate herein by reference as if alleged herein the
16 allegations in paragraphs 1 through 23.

17 25. This action is brought pursuant to section 731 of the *Code of Civil*
18 *Procedure*, by and through the City of Santa Ana, in the name of the People of the State of
19 California, to abate a public nuisance, as well as by the authority granted in *Civil Code* sections
20 3479, 3480 and 3494, and/or *Penal Code* section 370.

21 26. Defendants, and each of them, have permitted and maintained a continuing public
22 nuisance on the Property for the last several years and continuing presently. Plaintiffs are
23 informed and believe that the circumstances constituting a public nuisance, as alleged herein,
24 may have been going on since at least May 2017.

25 27. SAPD has received more than two hundred and forty-nine (249) calls for service
26 within the period beginning May 1, 2017 and ending January 9, 2020. Within the last year,
27 beginning January 1, 2019 to present, SAPD has received one hundred and twenty-five (125)
28 calls for service at the Property. The number of calls of service greatly surpasses the number of
calls for service for similar commercial properties in the City. Further, the level of required



1 police presence is grossly out of line with the community standards and expectations. This
2 nuisance affects the entire community. These conditions spill over into the surrounding
3 businesses and neighborhoods, greatly affecting the quality of life of all affected.

4 28. Defendants' operation and maintenance of the Property in the condition described
5 and summarized above, and as shown by evidence, is a continuing public nuisance, pursuant to
6 *Civil Code* sections 3479 and 3480. The maintenance and operation of the Property in such
7 continuous manner is injurious to the public's health, safety and welfare; offensive to the senses,
8 and obstructs the free use of the properties in the neighborhood.

9 29. At the time of trial, Plaintiffs will move the Court to amend this Complaint to
10 include any conditions discovered or occurring after filing this Complaint.

11 30. Unless restrained by this Court's issuance of injunctive relief as requested herein,
12 Defendants will continue to maintain said public nuisance in violation of law.

13 31. Defendants' wrongful conduct alleged herein, and/or shown by evidence,
14 constitutes a serious threat to the general health, safety, and welfare of the City of Santa Ana and
15 its residents and, in particular, the residents and business surrounding the Property, and their
16 peaceable and safe enjoyment of their respective properties.

17 32. Plaintiffs have no plain, adequate, or speedy remedy at law in that the level and
18 frequency of illegal activities is of such a magnitude as to create an immediate, permanent, and
19 perpetual risk of the health and welfare of the public and of residents of the neighborhood
20 surrounding the Property and the whole of the community of the City of Santa Ana; and
21 Defendants have demonstrated a clear unwillingness and/or inability to manage and/or inability
22 to manage and/or operate the business or the Property in a manner that is compliant with the law
23 and/or which is not injurious to the public health, welfare and safety. Instead, Defendants have
24 engaged in, furthered, contributed to, fostered, encouraged, conspired to do the same, or have
25 otherwise allowed, permitted or participated in such harmful, dangerous and unlawful activities
26 and operations to continue at the Property.

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SECOND CAUSE OF ACTION

Public Nuisance *Per Se* – Against All Defendants

(Civ. Code section 3479, 3480, 3491, 3494; Code Civ. Proc. sections 526, 527, 731)

(SAMC sections 1-8, 1-12, 1-13, and 41-190)

33. The City alleges and incorporates as though fully set forth herein Paragraphs 1 through 32, above.

34. The City of Santa Ana has enacted and codified a Zoning Code in Chapter 41 of the SAMC.

35. The City adopted the Zoning Code to promote the public safety and general welfare, all as part of the General Plan of the City. (SAMC section 41-1.)

36. The City is divided into zones to allow for the orderly, planned development of the City and to implement the General Plan. (SAMC section 41-1.) A person or business must conduct its business in compliance with all provisions of the Zoning Code, including those requiring the conduct of business within appropriately-designated areas. (SAMC section 41-190.)

37. The Property is located within the City of Santa Ana in a C2 zoning district.

38. SAMC Section 41-123 provides a definition for multiservice centers for homeless individuals. Location of multiservice centers are allowed only within industrial zones (M-1 and M-2) and industrial specific development zones. (SAMC section 41-1200.) Multiservice centers are not permitted in the C2 zone.

39. At all times herein mentioned Defendants have occupied, used, and maintained a multiservice center on the Property within the City in violation of the Zoning Code embodied in the SAMC.

40. SAMC section 1-13(a) provides that any violation of the City’s Municipal Code is deemed a public nuisance, which may be abated by civil action.

41. California *Government Code* section 38771 authorizes the Santa Ana City Council, by ordinance, to declare what constitutes a nuisance.

42. The continued operation of a multiservice center on the Property in a C2 zone is a



1 public nuisance subject to abatement by civil action under applicable law including, but not
2 limited to, *Civil Code* sections 3479, 3480, 3491 and 3494.

3 43. The City has no plain, speedy, or adequate remedy at law, and injunctive relief is
4 necessary and authorized in *Code of Civil Procedure* sections 526, 527 and 731.

5 44. The Court is expressly authorized under *Code of Civil Procedure* section 731 to
6 fashion injunctive relief to abate the public nuisances that exist on the Property.

7 45. Unless preliminarily and permanently enjoined by this Court, Defendants will
8 continue to maintain the public nuisance and prevent the City from effectively enforcing its
9 laws.

10 **PRAYER**

11 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of them, as
12 follows:

13 1. That the Property and the conditions existing thereon be declared a violation of
14 the SAMC.

15 2. That the Property and the conditions existing thereon be declared a public
16 nuisance,

17 3. That the Property and the conditions existing thereon be declared a public
18 nuisance and a violation of the California *Civil Code* sections 3479 and 3480.

19 4. That Defendants, and each of them, their agents, officers, employees, and anyone
20 acting on their behalf, and their heirs and assignees, be temporarily, preliminarily, and/or
21 permanently enjoined from operating, conducting, using, occupying, or in any way permitting
22 the use of the property and structures as a public nuisance, pursuant to the SAMC, as well as
23 Sections 3479 and 3480 of the California *Civil Code*, and sections 526, 527 and 731 of the
24 California *Code of Civil Procedure*.

25 5. That Defendants be restrained and enjoined from transferring ownership of the
26 Property and structures unless there is compliance with all applicable orders of this Court and
27 requests by the City, and the Court and City have approved of such.

28 6. An order, indicating that Defendants, and each of them, shall be held personally



1 liable and shall compensate the City for its investigative and enforcement costs and costs of suit
2 incurred herein, including reasonable attorneys' fees.

3 7. That Plaintiffs are entitled to such other relief as the Court deems proper,
4 necessary or just.

5 SONIA R. CARVALHO
6 City Attorney
7 City of Santa Ana

8 Dated: January 17, 2020

9 By: *Jose Montoya*
10 JOSE MONTOYA
11 Deputy City Attorney
12 Attorney for Defendant

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ATTACHMENT C



1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER
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5 CITY OF SANTA ANA, a charter }
6 City and municipal }
7 corporation, et al., }
8 Plaintiffs, }
9 vs. } No. 30-2020-01124174-
10 } CU-MC-CJC
11 ORANGE COUNTY ASSOCIATION FOR }
12 MENTAL HEALTH DBA MENTAL }
13 HEALTH ASSOCIATION OF ORANGE }
14 COUNTY, a California }
15 Nonprofit Corporation; }
16 et al., }
17 Defendants. }
18 }
19 LUNYEA WILLIS, DONNA ROSALIE }
20 CARRANZA, KATHLEEN PAULO, }
21 individuals, }
22 Defendant-Interveners. }
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REMOTE DEPOSITION OF ALI PEZESHKPOUR
ZOOM VIDEOCONFERENCE
Friday, April 9, 2021
Volume I

Reported by:
VALERIE D. GRANILLO
CSR No. 11469
Job No. 4511147
PAGES 1 - 88



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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

_____)	
CITY OF SANTA ANA, a charter)	
City and municipal)	
corporation, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. 30-2020-01124174-
)	CU-MC-CJC
ORANGE COUNTY ASSOCIATION FOR)	
MENTAL HEALTH DBA MENTAL)	
HEALTH ASSOCIATION OF ORANGE)	
COUNTY, a California)	
Nonprofit Corporation;)	
et al.,)	
)	
Defendants.)	
_____)	
LUNYEA WILLIS, DONNA ROSALIE)	
CARRANZA, KATHLEEN PAULO,)	
individuals,)	
)	
Defendant-Interveners.)	
_____)	

Remote Deposition of ALI PEZESHKPOUR,
Volume I, taken on behalf of Defendant-Intervener, via
Zoom Videoconference, beginning at 10:00 a.m. and ending
at 1:00 p.m., on Friday, April 9, 2021, before VALERIE D.
GRANILLO, Certified Shorthand Reporter No. 11469.



1 APPEARANCES:
2
3 For Plaintiffs:
4 BURKE WILLIAMS SORENSEN
5 BY: STEPHEN A. MCEWEN
6 Attorney at Law
7 1851 East First Street, Suite 1550
8 Santa Ana, California 92705-4067
9 (949) 265-3412
10 smcewen@bwslaw.com
11
12 For Defendant-Interveners:
13 DISABILITY RIGHTS CALIFORNIA
14 BY: NAVNEET K. GREWAL
15 LUCIA CHOI
16 Attorneys at Law
17 350 South Bixel Street, Suite 290
18 Los Angeles, California 90017
19 (213) 213-8000
20 navneet.grewal@disabilityrightsca.org
21
22
23
24
25



1 APPEARANCES (continued):

2

3 For Defendant Mental Health Association of Orange County:

4 SHEPPARD MULLIN

5 BY: ZACHARY GOLDA

6 Attorney at Law

7 650 Town Center Drive, Tenth Floor

8 Costa Mesa, California 92626

9 (714) 424-8216

10 zgolda@sheppardmullin.com

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1 MR. MCEWEN: Okay. That's fine.
2 MS. GREWAL: I don't intend to repeat those
3 questions.
4 Q Okay. So I'm going to move on. Can you tell me
5 a little bit about your background? So my first question
6 is, when did you first start working for the City of Santa
7 Ana?
8 A My start date is February 3rd, 2011.
9 Q And in what capacity did -- were you working for
10 the City of Santa Ana as of February 2011?
11 A As a planning division intern.
12 Q And what was your role as a planning division
13 intern?
14 A It was to shadow more junior and permanent and
15 senior case planners on certain projects and then also
16 manage more entry-level projects such as conditional use
17 permits for alcohol and cell phone towers and ministerial
18 permits like home occupation permits, counter permits,
19 things that a typical junior level planner would work on.
20 Q Have you been working at the City of Santa Ana
21 consistently since 2011?
22 A I have.
23 Q What was your next position after being a
24 planning intern at the City of Santa Ana?
25 A Next position was assistant planner I.



1 came in during pendency of this litigation.

2 MS. GREWAL: I don't want to know about whether

3 there was any attorney communications.

4 MR. MCEWEN: Well, that's going to -- well, that

5 will impact the answer, just so you know.

6 MS. GREWAL: Absolutely, of course.

7 MR. MCEWEN: Yeah. I'll allow the questioning to

8 go forward. I think I'm being very flexible here, but I

9 do think at some point we get outside of these categories.

10 But Mr. Pezeshkpour -- or Ms. Grewal, you can restate the

11 question.

12 MS. GREWAL: Okay.

13 Q I do want to be absolutely clear. I do not want

14 to know anything the city attorney may have done or

15 Mr. McEwen, nothing in the way of attorney communication

16 or even attorney advice, anything. I don't want to know

17 anything about that.

18 But to go back to my question is, how would --

19 how does the planning division maintain records of

20 reasonable accommodation requests?

21 A Any planning application including a reasonable

22 accommodation request is maintained in two ways. The

23 first is through our land management system software where

24 an application number is assigned using the computer,

25 contact information, project description, status,

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1 determination, all that sort of information that's typical
2 and commensurate with any application that's been
3 submitted. And then the division also maintains hard
4 copies of application requests and supplemental materials
5 such as plan drawings, applications themselves,
6 E-receipts, if applicable, in our physical file folder
7 archives.

8 Q And just to clarify, would a document like this
9 that's a letter that's not through any of the forums that
10 the planning division provides, would this be considered a
11 supplemental material?

12 A Since this sort of letter is not a required
13 component of the application checklist, if it were
14 submitted as part of an application that was formally
15 submitted, it could be and might be maintained in the file
16 as a supplemental material.

17 Q Does the planning division process reasonable
18 accommodation requests that don't come through an
19 application process?

20 A To my knowledge, no.

21 Q Do you know whether anyone at the planning
22 division ever discussed this reasonable accommodation
23 request with any employee at MHAOC?

24 MR. MCEWEN: Again -- well --

25 BY MS. GREWAL:

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1 specific use contains operational standards and a
2 particular applicant or type of business or a type of
3 operations cannot meet those operational standards, as an
4 example, then that would be a form of incompatibility.

5 Q When the planning division is processing a
6 reasonable accommodation request with regard to zoning, do
7 planning division staff consider surrounding use in making
8 the determination of whether to grant the reasonable
9 accommodation request?

10 A Whether surrounding compatibility is one of the
11 findings that are required for a reasonable accommodation,
12 that one specifically escapes me. I can certainly look it
13 up. But that one, I am at the moment unaware.

14 Q When you say you would look it up, where would
15 you look it up? And please don't share whether there
16 would be any attorney -- whether there would be an
17 attorney-client communication.

18 A It would be in the zoning code.

19 Q Have you ever processed a reasonable
20 accommodation request while you've been employed in the
21 planning division at the City of Santa Ana?

22 A I have not.

23 Q Have you been involved in any discussions about
24 whether the Main Street site is appropriately zoned?

25 MR. MCEWEN: Objection; vague and ambiguous.

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ATTACHMENT D





LEGAL ADVOCACY UNIT
350 S. Bixel St., Ste. 290
Los Angeles, CA 90017
Tel: (213) 213-8000
Fax: (213) 213-8001
TTY: (800) 719-5798
Intake Line: (800) 776-5748
www.disabilityrightsca.org

March 3, 2020

Via U.S. Mail and E-mail: eComments@santa-ana.org

Mayor Miguel Pulido
 Councilmember Vicente Sarmiento Councilmember Phil Bacerra
 Councilmember David Penaloza Councilmember Juan Villegas
 Councilmember Jose Solorio Councilmember Cecilia Iglesias
 City Council Chamber
 22 Civic Center Plaza
 Santa Ana, California 92701

Re: Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable modifications

Dear Mayor Pulido and Councilmembers:

We write on behalf of homeless individuals with disabilities, who rely on the Mental Health Association of Orange County's South Main Street Site ("MHA-OC" and "South Main Street Site" respectively) to manage the symptoms of their disabilities. The City of Santa Ana has rolled out "Homeless Programs" through multiple programs and services funded by state and federal grants to increase work with mental health providers to provide mental health treatment, health services and housing counseling to homeless individuals who reside in the City.¹ The South Main Street Site is a critical piece of that service

¹ The homeless program and services ("Homeless Programs") offered by the City of Santa Ana include: a portion of \$40 million in HUD funds to address the significant mental illness of homeless persons through its SP-60 Homelessness Strategy – 91.215(d), Homeless Evaluation Assessment Response Team (H.E.A.R.T.) which oversees homeless outreach needs, safety and security as well as addressing homeless individuals' mental health conditions, over \$4 million in Homeless Emergency Aid Program from the State of California to provide connection to mental health services through its



Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
Page 2 of 11

infrastructure. And the City of Santa Ana's lawsuit against the South Main Street Site discriminates against individuals with disabilities and eliminates access to this necessary Homeless Program. The reasons alleged are wholly related to the disabilities of individuals who utilize the Site. We demand that the City halt its discriminatory practices and allow the Site to remain open.

And though the closure is discriminatory as a whole, we also request that the City exempt individuals with disabilities, who utilize the South Main Street Site, from the Site's closure, as reasonable modifications under Title II of the Americans with Disabilities Act ("ADA"). We ask that the individuals be allowed to continue to utilize the Site until such time as the City (1) establishes a Santa Ana location that allows homeless individuals with disabilities to obtain treatment for their mental health disabilities, (2) provides a center and services to enable individuals with disabilities to maintain their symptoms and regular services for life-sustaining needs, such as nutrition, hygiene, and respite, and (3) connects individuals to permanent housing options. This request for reasonable modifications is made under Title II of the Americans with Disabilities Act ("ADA") and all other applicable state and federal laws.

Factual Background

A. The City of Santa Ana's Homelessness Issue

The 2018 Santa Ana Point-in-Time Count estimated that there were 1,030 unsheltered individuals living in Santa Ana, with an additional 564 individuals who were homeless.² Of the homeless individuals counted, 32.6% reported having mental health concerns and 36.9% reported having disabilities.³ The City attributes the causes of the unsheltered population to loss of job or loved

Continuum of Care, and Emergency Solutions Grant ("ESG") to address rapid re-housing, emergency shelters and street outreach. Programs respectively cited and available online at: HUD programs - <http://www.ci.santa-ana.ca.us/homelessness/documents/HomelessDraftPlan3-17-18.pdf> at 104; H.E.A.R.T. program and services - <https://www.santa-ana.org/homeless-engagement>; ESG programs and services - <https://www.santa-ana.org/homeless-engagement>.

² *City of Santa Ana Point-in-Time Count Survey Report* at 3 (March 2018). Available online at: <https://www.santa-ana.org/sites/default/files/Documents/HomelessImpactCCM040318.pdf>.

³ *Id.* at 6.



Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
 Page 3 of 11

one, fleeing domestic violence, lack of affordable housing, low wages, substance abuse or mental illness.⁴

The City has not provided adequate homeless services or programs to meet the needs of its residents. For example, the City allowed the 25+ years Civic Center homeless encampment to grow right outside of its City Hall, courthouse, and other government buildings. Only in April 2018 did the City, under court supervision and with the help of healthcare workers, close the Civic Center encampment by outreaching to individuals who were interested in accessing homeless services and housing – like the services provided at the South Main Street Site.⁵ However, the homeless population in Santa Ana continues to grow and shelters such as the Courtyard and the Link are consistently at capacity. And because the Santa Ana shelters are not accessible, many disabled homeless individuals are left on the streets.⁶ Without a place to maintain their disability symptoms, rest, store property, obtain food, or maintain hygiene, the death rate of homeless individuals continues to rise in Orange County.⁷

The City recognizes that it needs to provide more resources for its homeless population, as evidenced by the funds it is obtaining to further provide housing and mental health services to homeless individuals.⁸ But while the City has made clear that it would prefer for other Orange County cities (particularly in the south) to increase their homeless programs, every city in Orange County needs to do so. The City cannot on the one hand receive funds to address homelessness, and, on the other, decide that those that serve homeless individuals with disabilities should be shut down. It is discriminatory.

⁴ *Why are People Homeless?* Available online at: <https://www.santa-ana.org/sites/default/files/Documents/HomelessImpactCCM040318.pdf>.

⁵ *Civic Center plaza in Santa Ana cleared of homeless encampment, places to stay found for nearly 100*, *The Orange County Register* (April 13, 2018), available online at: <https://www.ocregister.com/2018/04/13/civic-center-plaza-in-santa-ana-cleared-of-homeless-encampment-places-to-stay-found-for-nearly-100/>.

⁶ *"This Place is Slowly Killing Me," Abuse and Neglect in Orange County Emergency Shelters*, ACLU of Southern California (March 14, 2019), available online at: https://www.aclusocal.org/sites/default/files/acju_social_oc_shelters_report.pdf.

⁷ *Orange County Draws Criticism For Over 200 Homeless Deaths This Year*, *The Orange County Register* (December 30, 2019), available online at: <https://voiceofoc.org/2019/12/orange-county-draws-criticism-for-over-200-homeless-deaths-this-year/>.

⁸ See fn. 1.



Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
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B. MHA-OC South Main Street Site

Despite the financial resources the City of Santa Ana has obtained through its Homeless Program, the City intends to worsen the living conditions for its most vulnerable residents – homeless individuals with mental health disabilities – by closing the South Main Street Site.⁹ This Site provides services to only homeless individuals with disabilities and referrals come from County-operated programs.¹⁰ The South Main Street Site services include: evaluation and assessment, individual and group counseling, substance use prevention and education, case management, referrals services, housing services, vocational services, and other therapeutic activities.¹¹ The goal of the Site is to provide homeless individuals with disabilities with assistance in a safe and comfortable atmosphere for them to engage in services and address their disability.¹²

Facts Relating to Individuals Clients

We represent the following individuals with disabilities in the City's denial of their access to the Homeless Programs and the request for reasonable modifications.

L.W. is 39 years old and has mental health disabilities. These disabilities include manic depression, bipolar disorder, and dissociative identity disorder stemming from a history of severe trauma and abuse. L.W. is a client of MHA-OC and visits the South Main Street Site every day. She uses the Site's mental health services, has a caseworker, and receives assistance with housing. She has placed her name on all the available housing lists. She can shower, do laundry, receive mail, and charge her phone at the Site. The Site provides her mental health treatment and helps her manage her mental health disability through the services and safe community provided at the Site.

⁹ See *City of Santa Ana et al. v. Orange County Association For Mental Health DBA Mental Health Association of Orange County et al.*, Case No. 30-2020-01124174-CU-MC-CJC, Orange County Superior Court, filed on Jan. 13, 2020.

¹⁰ Homeless Multi-Service Center, Behavioral Health, Orange County Health Care Agency. Available online at: http://www.ocalhealthinfo.com/bhs/homeless_multi_service_center.

¹¹ *Id.*

¹² *Id.*



*Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities
and Request for Reasonable Accommodation*
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M.F. is a 55-year-old man with physical and mental health disabilities, including depression and anxiety. Although M.F. is currently employed, he cannot afford to rent an apartment on his low income, especially with rising rents. As a result, he has been homeless for three years and sleeps in shelters whenever he can. Since becoming a client of MHA-OC, M.F. has been able to access the medication he needs for his disabilities. He is also able to do laundry, get clean clothes, and shower at the Site. He is receiving housing navigation services there as well. M.F. is typically at the South Main Street Site every day and has formed friendships with other MHA-OC clients, and relies on the community of people there who understand each other and support each other.

A.G. is 61 years old and has lived in Orange County since she was five. She has various mental health disabilities, including bipolar disorder and schizophrenia. Her and her husband's sole income is Supplemental Security Income (SSI). A.G. has been a client of MHA-OC since 2007 and visits their South Main Street Site at least once a month. Her husband is also a client and visits the Site more often. As one of MHA-OC's clients, A.G. receives her disability-related medications at the Site. She believes their mental health services have really helped her, especially given the fact she is experiencing homelessness. Additionally, she is able to do laundry and use the showers at the Site.

R.C. is 64 years old and has various physical disabilities. She also has Post Traumatic Stress Disorder (PTSD). She has been living in Orange County for the past 20 years, but became homeless in 2012 after she lost the apartment she shared with her son and daughter-in-law. She cannot afford the cost of rent on her social security income and is on the waitlist for a Section 8 voucher with the Santa Ana Housing Authority. For the past eight years, R.C. has been accessing various services at MHA-OC's South Main Street Site on a daily basis. She utilizes the bathroom, shower, and does laundry at the Site. MHA-OC has also provided her transportation to doctors' appointments and provided housing outreach services. The Site is also a safe and comfortable place for R.C., as opposed to being out in the streets. Most importantly, R.C. has access to a weekly PTSD group and a counselor at the Site.

K.P. is a 56-year-old woman with developmental and mental health disabilities. She was diagnosed with bipolar disorder and is on SSI. K.P. first became a client of MHA-OC, the South Main Street Site, about 17 years ago. Because of MHA-OC, and the team at the South Main Street Site, K.P. has been drug-free



Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
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for 17 years and housed for 15 years. But K.P. still continues to visit the center to help manage the symptoms of her disabilities and the case managers continue to help her if she needs additional services. Without the center, K.P.'s disabilities would be severely aggravated.

Summary of Relevant Laws

A. Violation of the Americans with Disabilities Act (ADA)

Our clients are people with mental health disabilities who are longtime residents of Orange County and who are currently experiencing homelessness. As such, the South Main Street Site is a crucial resource for our clients because they can manage the symptoms of their disabilities by having access to necessary mental health treatment, including medication and therapy services, to address their disabilities. In addition, to maintain their mental health, individuals are able to have their life-sustaining needs met by the Site's services that allows individuals to store essential property, access to accessible shower facilities, laundry services, and accessible bathrooms. Without the South Main Street Site, our clients would lose access to crucial mental health services and their mental health stability would be placed at risk.

Not only are the City's attempts to shut down the South Main Street Site a disservice to people with mental health disabilities in the Orange County community, but they also constitute unlawful discrimination – both through intent and effect – under federal and state laws. Specifically, the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, Civil Code §§51 and 54, and Government Code § 11135. These laws require that the City provide meaningful and equal access to its “services, programs, or activities” and prohibit it from engaging in discrimination on the basis of disability, whether through intent or actual effect. 42 U.S.C. § 12132; 29 U.S.C. § 794; 28 C.F.R. § 35.130(b)(1); 28 C.F.R. § 35.130(b)(8); Civ. Code § 51(f); Civ. Code § 54(a); Gov't Code § 11135.

In seeking to shut down the South Main Street Site, the City is discriminating against our clients by denying them the benefits of the services provided by one of the only facilities in Orange County that is tailored to meet the needs of people with mental health disabilities. Without this critical institution, people



Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
Page 7 of 11

with mental health disabilities who are homeless will have a significantly lower chance of accessing the services they need to live. See e.g. *Bloom v. City of San Diego*, 2018 WL 9539238, at *4 (S.D. Cal. 2018) (denying motion to dismiss where individuals with disabilities alleged that enforcement of anti-RV camping ordinance disproportionately harmed people with disabilities who are homeless).

The Ninth Circuit has recognized that even neutrally applied nuisance ordinances can violate the Americans with Disabilities Act when they fail to accommodate people with disabilities or unduly burden people with disabilities. See e.g. *McGary v. City of Portland*, 386 F.3d 1259, 1264-1270 (9th Cir. 2004) (finding that the plaintiff adequately stated a claim under Title II of the ADA because the city failed to reasonably accommodate his disability by denying him additional time to participate in the nuisance abatement program without incurring charges.) Here, the City's attempt to shut down the South Main Street Site and have it declared a nuisance, would unduly burden and disproportionately affect people with mental health disabilities because they are the ones accessing the Site's mental health programs. In order for individuals with disabilities to maintain the mental health treatment and the services to manage the symptoms of their disabilities, the City needs to encourage more services, such as the services provided at the South Main Street Site.

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Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
Page 8 of 11

B. Request for Reasonable Modifications

We request the reasonable modifications because your City's Homeless Programs ensure services and care to homeless individuals with disabilities in Santa Ana.¹³ The closure of the South Main Street Site would directly affect all individuals with mental health disabilities and prevent individuals from treating for and maintaining their mental health disabilities. Therefore, as stated, we ask for reasonable modifications that the Site remain open until the City continues services as requested.¹⁴

This request for reasonable modifications is made under Title II of the Americans with Disabilities Act ("ADA") and all other applicable state and federal laws. "A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program or activity." 28 C.F.R. § 35.130(b)(7)(i). A failure to provide such modifications is an independent basis for liability under the ADA. *Id.*; *Wis. Cmty. Servs. V. City of Milwaukee*, 465 F.3d 737, 751 (7th Cir. 2006). Thus, government entities may be required to modify neutral policies if they bear more heavily on people with disabilities than on others, even if there are insufficient grounds for a disparate treatment or a disparate impact claim. *See Crowder v. Kitagay*, 81 F.3d 1480, 1484-1485 (9th Cir. 1996); *Fry v. Saenz*, 98 Cal. App. 4th 256, 264 (2002).

Moreover, reasonable modifications of a policy may address the poverty and homelessness arising out of a disability, not merely the impairment itself. *See Giebeler v. M & B Associates*, 343 F.3d 1143, 1150-51 (9th Cir. 2003) (holding that reasonable accommodations may adjust for the practical impact of a disability, including financial limitations, not merely the immediate manifestations of the impairment giving rise to the disability). This can include the obligation to alter policies that can be barriers to nondisabled persons as well. *Id.*

¹³ See fn. 1.

¹⁴ The request for reasonable modification is the City (1) establishes a Santa Ana location that allows homeless individuals with disabilities to obtain treatment for their mental health disabilities, (2) provides a center and services to enable individuals with disabilities to maintain their symptoms and regular services for life-sustaining needs, such as nutrition, hygiene, and respite, and (3) connects individuals to permanent housing options.



Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
 Page 9 of 11

C. Violation of the Welfare and Institutions Code Section 5120

The City of Santa Ana also discriminates against people with mental health disabilities by violating Welfare and Institutions Code section 5120. Per Section 5120, the City cannot discriminate "in the enactment, enforcement, or administration of any zoning laws, ordinances, or rules and regulations between the use of property for the treatment of general hospital or nursing home patients and the use of property for the psychiatric care and treatment of patients, both inpatient and outpatient." This provision, as codified in The Lanterman-Petris-Short Act, was aimed at ending the longstanding involuntary commitment of people with disabilities by ensuring that they were provided treatment and services in the least restrictive settings and in local communities instead. Welf. & Inst. Code § 5001; Welf. & Inst. Code § 5120. Here, the City's lawsuit is directly at odds with the stated intent of the Act because it seeks to prevent MHA-OC from providing mental health treatment and services at the South Main Street Site, which is part of the local community.

Notably, the City itself has long recognized that the South Main Street Site is a program that is a psychiatric treatment or mental health clinic program within the meaning and intent of Welfare and Institutions Code §5120 and the Site has written confirmation from the City of Santa Ana.¹⁵

D. The South Main Street Site Does Not Violate the City's Zoning Code

The City also alleges that the South Main Street Site is a multiservice center, and as such, cannot operate in a C2 General Commercial zoning district per the zoning code embodied in the Santa Ana Municipal Code. However, the City misstates its own zoning laws and the zoning for the South Main Street Site. The South Main Street site is a center that provides mental health treatment in a clinic setting. The Site is permitted by right in a C2 zone, as C2 zone incorporates, under Sec. 41-377(a), all uses permitted in the C1 district.¹⁶ The

¹⁵ April 24, 2002 City of Santa Ana letter issue confirming the application of Welfare & Institutions Code §5120 to the South Main Street Site. Attached as Ex. A.

¹⁶ "Uses Permitted in the C2 district. ... (a) All uses which are permitted in the C1 district pursuant to section 41-365." Section 41-377(a), C2 General Commercial of the City of Santa Ana Planning and Building Agency, Planning Division (emphasis omitted). Available online at: https://www.santa-ana.org/sites/default/files/Documents/C2_0.pdf.



Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities and Request for Reasonable Accommodation
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C1 Community Commercial zoning district, under Sec. 41-365(h), allows for the permitted use of hospitals, clinics, and sanitariums.¹⁷

The County of Orange lists the South Main Street Site as a County-contracted, homeless resource for "psychiatrically disabled homeless adults in Orange County" that provides housing specialists to help move individuals into permanent housing.¹⁸ The County further states that this County-contracted agency provides services at the South Main Street Site that includes evaluation and assessment, individual and group counseling, and referrals to appropriate mental health services according to specific needs.¹⁹ Because of the nature of the services it offers, the South Main Street Site is in compliance with the City's zoning provisions.

The City discriminates against our clients by maintaining that the Site is in violation of the City's zoning codes. Per Welfare and Institutions Code section 5120 and its own laws, the City cannot discriminate "in the enactment, enforcement, or administration of any zoning laws, ordinances, or rules and regulations between the use of property for the treatment of general hospital or nursing home patients and the use of property for the psychiatric care and treatment of patients, both inpatient and outpatient."

E. Failure to Provide Notice or Warning of Public Nuisance Allegations

Finally, the City violated due process as it never provided reasonable notice or warning to MHA-OC or the individuals with disabilities who rely on the South Main Street Site to manage their disabilities or their essential life-sustaining needs of the City's plans to close down the Site.²⁰ The City cites issues of public nuisance but took no action to work with MHA-OC, the provider, on accommodations that would continue to allow homeless individuals with disabilities to access the City's Homeless Program and balance the City's other interests.

¹⁷ "Uses permitted in the C1 district. ... (h) Hospitals, clinics, and sanitariums." Section 41-365(h), C1 Community Commercial of the City of Santa Ana Planning and Building Agency, Planning Division (emphasis omitted). Available online at: <https://www.santa-ana.org/sites/default/files/Documents/C1.pdf>.

¹⁸ Housing Resource Guide, Orange County 2019, at 42. Available online at: [santa-ana.org/sites/default/files/2019-06/HRG2019.pdf](https://www.santa-ana.org/sites/default/files/2019-06/HRG2019.pdf).

¹⁹ See fn. 11.

²⁰ 42 U.S.C. §§ 1983, 1986; Fourteenth Amendment.



*Demand to Stop the Unlawful Discrimination Against Individuals with Disabilities
and Request for Reasonable Accommodation
Page 11 of 11*

Conclusion

We request that homeless individuals with mental health disabilities have the continued ability to access services at the South Main Street Site, or, in the alternative, provide reasonable modifications as requested. We further request that the City establish a procedure for homeless individuals with disabilities who lack access to permanent housing and access to mental health services to apply for such modifications.

For the reasons set forth above, the closure of the South Main Street Site is discriminatory against homeless individuals with disabilities who utilize the Site and discriminates based on disability in violation of the ADA. Our clients lack the income to afford housing and ability to access services offered at the South Main Street Site if it were to close. Without the Site, our clients would be denied access to the City of Santa Ana's Homeless Programs and unable to manage the symptoms of their disabilities.

If the City does not allow the Site to remain open, our clients will have no choice but to pursue further action. If you would like to discuss stopping the closure of the South Main Street Site or our clients' modification request, please contact me at (619) 814-8523 or lill.graham@disabilityrightsca.org no later than March 6, 2020.

Sincerely,

Lill Graham
Heidi Joya
Navneet K. Grewal

Attorneys

cc: City Attorney Sonia R. Carvalho
Assistant City Attorney Kyle Nellesen
Deputy City Attorney Jose Montoya



EXHIBIT A

Letter Re: Orange County Association for Mental Health v. City of Santa Ana (OCSC Case No. 02CC05569)-June 17, 2002



Jun 20 10:11:15a

Mental Health Advocacy

TEL: 714-484-2907

P.2

FROM LATHAM & WATKINS OC #1

(MON) 6/17/02 18:03/ST. 10:02/NO. 4861483304 P. 2

BOSTON
BRUSSELS
CHICAGO
FRANKFURT
HAMBURG
HONG KONG
LONDON
LOS ANGELES
MOSCOW
NEW JERSEY

Latham & Watkins
ATTORNEYS AT LAW
WWW.LW.COM

NEW YORK
NORTHERN VIRGINIA
ORANGE COUNTY
PARIS
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
SINGAPORE
TOKYO
WASHINGTON, D.C.

June 17, 2002

FILE NO 50830007

VIA FACSIMILE AND U.S. MAIL

Jose Sandoval, Esq.
Senior Assistant City Attorney
City of Santa Ana
Office of the City Attorney
P.O. Box 1988
Santa Ana, CA 92702

Re: Orange County Association for Mental Health v. City of Santa Ana
(OCSC Case No. 02CC05569)

Dear Mr. Sandoval:

This letter confirms that the Orange County Association for Mental Health ("MHAOC") and Edward Petriz, (collectively, "Plaintiffs"), have filed a dismissal without prejudice in the above-referenced action. You should have already received a file-endorsed copy of the dismissal.

As you are aware, Plaintiffs initiated this lawsuit in order to enforce MHAOC's right to operate its mental health treatment program at its current location of 2416 South Main Street in Santa Ana, in a C2 zone (the "South Main Street Site") and to obtain from the City of Santa Ana (the "City") a certificate of occupancy reflecting its use of the premises for that purpose. The action was based in part on Welfare & Institutions Code § 5120, which was enacted to prevent local governments from discriminating against individuals with mental disabilities through land use and zoning regulations. Section 5120 reflects California's longstanding commitment to ensuring that individuals with mental disabilities have access to care and treatment in local communities by providing that psychiatric treatment facilities may be located in any zone in which hospitals and nursing homes are permitted, either by right or conditional use.

The City has agreed that MHAOC's program at the South Main Street site is a psychiatric treatment program within the meaning of Section 5120 and is thus permitted by right in this C2 zone. The City has further agreed that MHAOC is not required to obtain a conditional use permit. It is the City's recognition of MHAOC's statutory right to operate at its present location that has led to Plaintiffs' dismissal of this lawsuit without prejudice. And, while we anticipate that the City will continue to comply with Section 5120 and operate in good faith with

880 Town Center Drive, Suite 2000 • Costa Mesa, California 92626-1925
TELEPHONE: (714) 840-1235 • FAX: (714) 756-0200

OC_DCS\601468.1\W2002j



PUBLIC OUTREACH

Jun 20 02 11:16a Medical Health Advocates (213) 464-2907 p.3

FROM LATHAM & WATKINS OC #1 (MON) 6/17/02 18:04/ST. 18:02/NO. 4861483304 P 3

LATHAM & WATKINS

Jose Sandoval
June 17, 2002
Page 2

MHAOC, we have filed the dismissal without prejudice in case litigation is required in order to protect MHAOC's rights in the future.

We are pleased that we were able to resolve this matter without protracted litigation and we look forward to the City of Santa Ana continuing to recognize the right of mental health treatment programs to locate their programs within the community pursuant to Welfare & Institutions Code § 5120.

Very truly yours,

Kristel A. Massey
Kristel A. Massey
of LATHAM & WATKINS

DC_DOCS\501498.1 (7/2000)



JUN 20 02 11:16a Health Advocacy TEL 1494-2907 p.4

FROM LATHAM & WATKINS OC #1 (MON) 6 17 02 18:04/ST 18:02/NO 4861483304 P 4

LATHAM & WATKINS

Jose Sandoval
June 17, 2002
Page 3

bcc: Robert K. Break
Kim Savage (via facsimile)
Crystal Sims (via facsimile)
Mark Gordon (via facsimile)
Jeffrey Thrash (via facsimile)

CL_DPCS01469 1/17/2001



O3. Response to Comments from Disability Rights California, dated February 24, 2022.

O3-1 The Commenter expressed the City's duty to Affirmatively Further Fair Housing (AFFH) opportunities to combat discrimination, overcome patterns of segregation, and foster inclusive communities. It comments on the incomplete assessment of Fair Housing in the draft Housing Element (6th cycle). The City is providing additional information and analyses to demonstrate compliance with AFFH statutory requirements. Appendix E of the Housing Element Update.

O3-2 The Commenter commented that the City's Housing Element must demonstrate the requirements Government Code Section 65583 and that the City has a non-compliant Housing Element since the 2013-2021 (5th cycle) no longer satisfies statutory requirements.

The City is working to address the comments received related to AFFH analysis based on the draft Housing Element Update submitted for review to the California Department of Housing and Community Development (HCD). HCD letter to the City dated April 15, 2022 comments is requiring additional analysis, which is being provided in Appendix E of the document.

It should be noted that California State Housing Element Law (California Government Code Article 10.6) establishes the requirement for Housing Elements of the General Plan. Specifically, California Government code Section 65588 and the City will comply with all the statutory requirements to obtain a certify Housing Element by HCD, which will also show compliance with AFFH requirements.

O3-3 The Commenter states that the data do not demonstrate a fully integrated and inclusive community in Santa Ana in terms of people experiencing homelessness, mental health and developmental disability. The Commenter also indicated that the dissimilarity indices between non-white and white groups in Orange County and Santa Ana show that the City has stayed relatively the same in regards to segregation. However, the focus of the commenter is



related to unhoused individuals with disabilities and disparities by race within this segment of the population.

The State of California passed SB 2, effective January 1, 2008, modifying state housing element law to require local planning and zoning regulations to facilitate homeless shelters. Specifically, SB 2 requires all cities and counties to provide at least one zoning category in which emergency shelters can be located without discretionary approval from the local government. Pursuant to this requirements, the City adopted Ordinance NS-2948 on September 3, 2013 to allow homeless shelters in industrial zones.

The City has also approved and funded several projects that provide supportive housing. Among others, City-funded permanent supportive housing projects include: The Orchard, Casa Querencia, Heroes Landing, Depot @ Santiago, FX Residences, Legacy Square, Arts Collective, Crossroads at Washington, Westview Housing, and North Harbor Village, some of which are currently under construction.

To this end, the City has removed constraints to the development of housing to accommodate special needs households and individuals experiencing homeless or at-risk of becoming homeless in compliance with State law, and therefore, working toward a more integrated and inclusive community.

- O3-4 The Commenter commented on the City's obligation to have both proactive and meaningful actions to AFFH and take no action inconsistent with its obligation to AFFH. The comment alleges the City's lack of actions to zone for a variety of housing types, including Low Barrier Navigation Centers. See response to comment 3 above.
- O3-5 The commenter asserts that the "City currently has only one shelter operating, the Yale Shelter, and it requires a referral from a Police Department." The Commenter commented that the City is using the public nuisance law causing displacement of unhoused individuals. "The City uses code and zoning enforcement to intentionally displace unhoused individuals, inconsistent with its duty



to AFFH. The fact that unhoused folks do not have a permanent home does not mean that they do not have a right to exist in a location that provide access to a potential home, shelter, and services.” The Commenter makes allegations specifically to the City’s actions against MHA OC throughout the letter.

The City has a number of shelters that operate within the City. The City is completing the construction of a Homeless Navigation site at 1815 E. Carnegie and schedule to open the week of June 6, 2022. It will have initial capacity of 200 (men, women, families) with expansion capability of 300 total. The shelter will be operated by the Illumination Foundation and provide wrap-around services to improve the lives of those served.

Other shelters include WISEPlace, Mercy House, Casa Teresa, A Safeplace Transitional Living Facility, Santa Ana Armory, and the Carnegie Shelter for up to 200 beds has commenced limited intake while the construction of the center is completed.

It should be noted that MHA OC does not provide housing for unhoused individuals.

Lastly, the City does not comment on pending litigation.



Letter O4 – YIMBY Law (5 pages)



YIMBY
LAW



February 28, 2022

Policy Recommendations for 6th Cycle Housing Element

Dear Planning staff:

YIMBY Law submits this letter to share our policy goals and recommendations for the Policies and Programs section of your Housing Element. We appreciate the opportunity to participate in the Housing Element process.

The Policies and Programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. We repeatedly see findings that housing prices are high, segregation exists, and there is a lack of housing for special populations, but the Policies and Programs don't respond to these findings or try to change outcomes. The overview of the city's housing environment should set the scene, and the policies and programs should explain what the city is going to do to fix it.

Intro

Our policy goals are as follows:

Affirmatively Furthering Fair Housing

- 1. Prioritize rezoning in high resource, historically exclusionary neighborhoods.** Many of the highest resource neighborhoods with the best access to jobs, good schools, and other amenities have histories of exclusion which are still reflected in their zoning. Cities should rezone to allow more housing opportunities in those neighborhoods, particularly those with low Vehicle Miles Traveled, as part of their

O4-1

1



Housing Elements.

2. Establish a strong tenant protection ordinance so that new housing benefits everyone. Development should not permanently displace current residents.

Housing replacement programs, temporary housing vouchers, right of return, and demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with existing rent-controlled apartments or other rental housing with lower income residents.

O4.2

3. Support homeownership opportunities for historically excluded groups.

Homeownership continues to be a path to building financial security and inter-generational wealth, which has been systematically denied to many Americans. As a society, we need to make this right by intentionally offering opportunities to communities who have been excluded. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.

O4.3

Site Capacity

4. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. Housing will not be feasible if you have a high density paired with low height limits. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.

O4.4

5. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%. Not every site will be developed at maximum density during the eight-year planning period. Identify an ample amount of opportunity sites and zone the sites to accommodate lower-income housing types (usually a statutory minimum of 30 dwelling units per acre) to give the city the best chance at meeting its RHNA.

O4.5



- 6. **Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.** Likelihood of development is a measure of the probability of an inventory site being developed during the planning period. The median likelihood of development across the state is 25%, meaning only one of every four sites will likely be developed during the planning period for the median city. Incorporating the likelihood of development into the zoned capacity will set the city up to successfully achieve their RHNA, making the housing element less of a paper exercise and more of an actionable, functional document. 04-6

Accessory Dwelling Units

- 7. **Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.** We highly recommend complying with HCD's standards of using one of its "safe harbor" methodologies to anticipate future ADU production. However, if the city is optimistic about ADU growth, then creating an automatic mid-cycle adjustment will automatically facilitate alternative housing options (i.e., a rezoning program, removing development constraints, ADU incentives, etc.) if the city falls behind the estimated ADU production. 04-7

- 8. **Incentivize new ADUs, including those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers.** Consider offering low- or no-interest loans, forgivable loans, impact fee waivers for ADUs that are 750 square feet or larger, allowances to facilitate two-story and second-story ADU construction, etc. 04-8

Zoning

- 9. **Allow residential to be built in areas that are zoned for commercial use.** There are a myriad of ways to do this, but a housing overlay is one common policy. Additionally, consider eliminating new commercial space in mixed-use developments where there is not a strong demand or there is otherwise a glut of commercial space that is unused or frequently vacant. 04-9

- 10. **Allow flexibility in inclusionary zoning.** Cities should require different percentages for different AMI levels. Additionally, we urge cities to incentivize land 04-10



dedication to affordable developers in order for market-rate developers to meet their inclusionary requirements. Avoid getting trapped into thinking that the affordable units must be “sprinkled throughout” the market-rate units, or require the market-rate units to look exactly the same as the affordable ones. This should be balanced against not locating all of the affordable units in one place and ghettoizing neighborhoods by creating or perpetuating racially concentrated areas of poverty.

O4-10
cont'd

Better Entitlement Process & Reducing Barriers to Development

11. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing. A discretionary process for housing development creates uncertainty and adds to the cost of construction. For example, multi-family housing should not require a conditional use permit or city council approval unless the builder is asking for unique and extraordinary concessions. Right-sizing governmental constraints, entitlement processes, and impact fees will help the city successfully meet its RHNA.

O4-11

12. Reduce parking standards and eliminate parking minimums. Minimum parking requirements are a major constraint on housing, especially for lower cost housing types. They can cost in excess of \$30,000 per spot and can raise rents by as much as 17%, and eliminating them is particularly important for smaller & other spatially constrained sites. Consider adopting a parking maximum.

O4-12

13. Cap fees on all new housing. Most construction costs are outside the City’s control, but reducing impact fees can demonstrate that a city is serious about building new housing. At a minimum, cities should delay the collection of impact fees until the issuance of the certificate of occupancy to reduce financial impacts on new housing and make the units cheaper by not asking the developer to carry impact fee charges or debt throughout the construction phase.

O4-13

14. Provide local funding. One of the largest barriers to building new affordable homes is the lack of city/county funds available to assemble sites, provide gap funding, and to pay for dedicated staff. Without new funding, especially at the local level, we will not be able to build more affordable homes. There are three

O4-14



new revenue streams that should be considered: 1) **Transfer tax**, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) **Vacancy tax** may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) **Commercial linkage** fees should be adopted or revisited for increases on new commercial developments.

O4-14
cont'd

We urge you to include these policies in your 6th cycle Housing Element.

Best regards,

Sonja Trauss
Executive Director
YIMBY Law
sonja@yimbylaw.org



O4. Response to Comments from YIMBY Law, dated February 28, 2022.

- Intro This comment describes the intent of YIMBY as cities prepare their housing plan. It is noted that policies and programs should be based in the needs of the community as identified by the Housing Needs analysis.
- O4-1 Comment recommends rezoning in high resource, historically exclusionary neighborhoods. The City does not need to rezone any properties as part of the housing element.
- O4-2 Comment recommends establishing a strong tenant protection ordinance(s) so that new housing benefits everyone. The City recently adopted two, (1) Rent Stabilization and (2) Just Cause Eviction, ordinances that directly address tenant protections. Through the implementation of the General Plan elements and the comprehensive update to the City's zoning code, the City will continue to explore ordinances/regulations that aim to protect tenants.
- O4-3 Comment recommends and supports homeownership opportunities for historically excluded groups and notes that the element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership. Program 34 directly supports homeownership opportunities. In addition, through Program 18 and the zoning code update, the City will continue to explore additional programs that support homeownership opportunities.
- O4-4 Comment notes that the City should ensure that a site's density will accommodate the number of homes that are projected to be built. The City will comply with its RHNA utilizing ADU projections and pipeline projects. A site inventory is not required as there are no remaining RHNA units to accommodate.
- O4-5 Comment recommends that the element should provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30-percent. Site capacity is not needed as noted on Comment O4-4 above.



- O4-6 Comment recommends the use of data from the 5th cycle to calculate the likelihood of development for the 6th cycle site inventory. Site inventory not need as stated on Comment O4-4 above.
- O4-7 Comment recommends an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the element. Program 43 has been modified to include a motoring program to monitor the level of ADU production every two years, and if production levels fall below anticipated goals, take action to increase production or find suitable sites to accommodate shortfall within six months.
- O4-8 Comment recommends incentivizing new ADUs, including those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers. Program 43 has been modified to address a handful of programs to incentive ADU production including pre-approved ADU plans, funding sources to assist lower and moderate-income homeowners, and fee reductions.
- O4-9 Comment recommends allowing residential units to be built in areas that are zoned for commercial use. The City has multiple zoning districts that allow for stand-alone residential development and increased housing areas through the adoption of the General Plan.
- O4-10 Comment recommends flexibility in inclusionary zoning such as incentivizing land dedication to affordable developers in order for market-rate developers to meet their inclusionary requirements. The City's inclusionary housing ordinance, the Affordable Housing Opportunity and Creation Ordinance, was recently amended to allow flexibility and incentivize the development of affordable housing.
- O4-11 Comment recommends ensuring that the City has a ministerial process for housing permitting, especially multi-family housing, and removing impact fees for deed-restricted housing. The element includes various programs to streamline housing permitting and funding sources for the development of affordable housing.
- O4-12 Comment recommends reducing parking standards and eliminating parking minimums. The City has already



reduced parking requirements for housing within the Transit Zoning Code, Harbor Mixed-Use Transit Corridor, and Metro East Mixed-Use Overlay Zone areas. Through Program 18 and the zoning code update, the City intends to reevaluate parking requirements citywide.

O4-13 Comment recommends capping fees on all new housing or at a minimum, delay the collection of impact fees until the issuance of the certificate of occupancy to reduce financial impacts on housing. Collection of fees ahead of permit issuance has not proven to be a hindrance to the development of housing in Santa Ana. That fact is proven through the number of units that have been developed in the City over the past five years and the number of applications that the City continues to accept for the construction of new units. See Table C-2 in Appendix C for number of projects, both market rate and affordable, that are currently in the pipeline.

O4-14 Comment recommends local government to provide funding for affordable housing through transfer tax, vacancy tax, and commercial linkage fees. The City will continue to provide and seek funding for affordable housing through programs 21 to 25.



Letter O5 – Californians for Homeownership (3 pages)



CALIFORNIANS FOR
HOMEOWNERSHIP

MATTHEW GELFAND, COUNSEL
MATT@CAFORHOMES.ORG
TEL: (213) 739-8206

O5

March 24, 2022

Steven Mendoza
City of Santa Ana
Email: smendoza@santa-ana.org

RE: Santa Ana's failure to timely adopt a Sixth Cycle Housing Element.

Dear Steven Mendoza:

Californians for Homeownership is a 501(c)(3) non-profit organization that uses impact litigation to address California's housing crisis. We are monitoring local compliance with the law governing housing elements. Our understanding is that the City has not adopted a sixth cycle housing element, which it was required to do by October 15, 2021.¹ It also missed the second compliance deadline of February 12, 2022, subjecting it to additional penalties.² We are currently preparing for litigation against cities that have not timely adopted housing elements, like yours.

In light of the City's failure to timely adopt its housing element, our organization could immediately sue the City under Code of Civil Procedure Section 1085 to compel it to adopt a compliant housing element.³ As a result of this litigation, in addition to being ordered to adopt a housing element on a short timeline,⁴ the City could also face a number of serious penalties. For example, the court could suspend all non-residential permitting,⁵ or could judicially approve housing development projects within the City.⁶ And the court could impose these penalties while the litigation is pending, even before reaching a final decision.⁷ Housing element litigation is given priority in the court system,⁸ and a successful plaintiff can obtain attorneys' fees under Code of Civil Procedure Section 1021.5. Indeed, in a recent case involving the City of Huntington Beach's housing element, a court awarded another non-profit organization over \$3.5 million in fees.⁹

O5-1

The purpose of this letter is to offer the City a pathway to avoid immediate litigation by our organization. Enclosed is an Acknowledgment that sets forth some of the penalties to which the City is currently subject in light of the City's failure to adopt a housing element. If the City signs and returns the Acknowledgment, we will not initiate litigation against the City at this time.

¹ Gov. Code § 65588(c)(3).

² Gov. Code §§ 65583(c)(1)(A), 65581.2(c), and 65588(c)(4)(C).

³ Gov. Code §§ 65587, 65751.

⁴ Gov. Code § 65754.

⁵ Gov. Code § 65755(a)(1).

⁶ Gov. Code § 65755(a)(4).

⁷ Gov. Code § 65757.

⁸ Gov. Code § 65752.

⁹ <https://www.communitylegalcoal.org/amedys-commission-awarded-3-5-million-in-attorneys-fees-for-advocacy-in-huntington-beach-low-income-housing-case/>



523 S. Virgil Avenue
Los Angeles, CA 90020



March 24, 2022
Page 2

We ask that you return the Acknowledgement by April 1, 2022. If you decline to do so, understand that we may initiate litigation against the City, using the City's refusal to acknowledge these basic requirements of state housing law to demonstrate the existence of a dispute necessitating judicial intervention. As part of the litigation, we would likely seek a judicial declaration that the City is subject to the same penalties described in the Acknowledgment, among other remedies. We have dedicated in-house resources sufficient to maintain at least 10 simultaneous housing element lawsuits as part of our commitment to enforcing this important aspect of state housing law.

O5-1
cont'd

Finally, while we acknowledge that it takes a significant dedication of resources to comply with the requirements of state housing element law, it is worth noting that many cities throughout the Southern California (SCAG) region, both big and small, have already adopted their sixth cycle housing elements after fully complying with state law mandates governing consultation with the public and the state Department of Housing and Community Development (HCD). We believe that, with appropriate planning, all of the SCAG cities could have adopted their housing elements by the October 15, 2021 deadline. For this reason, it would not be productive to respond to this letter by listing the steps the City has taken towards adoption, or the obstacles it has faced. Instead, we simply ask that the City sign the Acknowledgment. There are no statutory exceptions to the penalties identified in the Acknowledgment, and HCD does not have the authority to excuse the City from them.

We look forward to receiving the signed Acknowledgment. If you would like to discuss any of this with me, please do not hesitate to give me a call at (213) 739-8206.

Sincerely,



Matthew Gelfand

cc: Sonia Carvalho, Esq., City Attorney (by email to scarvalho@santa-ana.org)

325 S. Virgil Avenue
Los Angeles, CA 90020

CALIFORNIANS FOR HOMEOWNERSHIP



ACKNOWLEDGMENT

The City of Santa Ana hereby acknowledges that it has not timely adopted a sixth cycle revised housing element of its general plan within the deadline set forth in Government Code Section 65588, and that its housing element is therefore not in substantial compliance with Article 10.6 of the Government Code. As a result, the City is subject to the following:

1. Pursuant to Government Code Sections 65583(c)(1)(A), 65583.2(c), and 65588(e)(4)(C), the City will be required to complete any rezoning required under housing element law in connection with the City's sixth cycle housing element by October 15, 2022.
2. The City is currently prohibited from rejecting housing development projects based on subdivisions (d)(1) and (d)(5) of the Housing Accountability Act (HAA), Government Code Section 65589.5. The City acknowledges that this means that, unless another exception within subdivision (d) applies, the City is prohibited from using its general plan and zoning standards to reject a proposal that meets the affordability requirements described in subdivision (h)(3) of the HAA.

The public, including without limitation any applicant to develop any project involving residential units, may rely on this Acknowledgment as the City's binding commitment to comply with the provisions of state law described above.

DATED: _____, 2022 CITY OF SANTA ANA

By: _____
[Signature]

[Name]

Its: _____
[Title]



O5. Response to Comments from Californians for Homeownership, dated March 24, 2022.

O5-1 Comments received are related to the adoption of the Housing Element and the City not meeting the initial deadline of October 15, 2021 and the second deadline of February 12, 2022. The City has been working on revising the Housing Element per comments received by the state Department of Housing and Community Development (HCD) on December 20, 2021 and April 25, 2022. Staff anticipates adoption of the element by the City Council during the summer and HCD approval/certification by the Fall of 2022.



Letter I1 - Tim Rush (1 Page)

From: timrush@bhhsccaprops.com <timrush@bhhsccaprops.com>
Sent: Monday, October 25, 2021 5:23 PM
To: SAHousingElement2021 <SAHousingElement2021@santa-ana.org>
Subject: Comment regarding the need for more Affordable Housing

I1

Honorable Chairman Morrissey & Planning Commissioners:

I wish to share with my concern about this continued fascination that exists among some community members about the "growing need" for Affordable Housing in our city. When I say Affordable, I am referencing all types of subsidized housing. When you consider that SA has met its RHFA numbers for many years and for most years has exceeded its quota.....one wonders why the need for more? Especially when most of the other cities in our county and doing nothing towards their allocated building requirements. We are "carrying the piano, when our neighboring cities are carrying the stool"and it might be argued they aren't even carrying the stool. So I would caution you to throttle back this insatiable demand for more and more affordable housing in all its forms. What we need in town is more at market rate housing so we create more affluence to offset the level of public assistance seems to grow at every turn in SA. No one can legitimately claim that SA is not doing more than its share already.

I1-1

I1-2

Thank you for your consideration,

Sincerely,
Santa Ana Taxpayers Association

Tim Rush, 1225 South Broadway, Wilshire Square

Berkshire Hathaway HomeServices California Properties
(714) 299-4455



I1. Response to Comments from Tim Rush, dated October 25, 2021.

- I1-1 This comment is statement implying that Santa Ana continues to meet its RHNA while other Orange County cities are not.
- I1-2 This comment is a statement that the City should cut down on affordable housing and instead provide more market rate housing. Residential land uses are permitted in various districts in the City. The City does not make any distinction based on affordability when determining whether to approve or deny a project.



Letter I2 – Dale Helvig (4 pages)

I2

Dale Helvig
Resident, Santa Ana CA 92706

December 20, 2021

Planning Commissioners
City of Santa Ana
Santa Ana CA 92702

Subject: Housing Element 2021-2029

Some of my comments are minor but there are those which need to be addressed prior to sending the Housing Element to City Council. I recommend the Planning Commission return this element for review and correction prior to bringing it back to the Planning Commission.

Intro

Comments are listed in the order in which they appear in the document.

Page 9: "Housing will incorporate sustainable "green" practices in design, site planning, and construction." It is commonly accepted that repurposing a building is more "green" than tearing it down and creating a new structure due to the particulate pollution and non-bio degradable waste, etc. generated during the destruction and waste disposal phases of a project. I hope the City keeps this in mind when approving future projects.

I2-1

Page 10: Starting on page 10, the phrase "extremely low-income" is used. HE-2-4 states it will, "provide rental housing for extremely low, very-low, and low income residents as well as moderate-income Santa Ana workers." Page B-19 text discussing the Housing Opportunity Ordinance mentions "eligible rental projects are required to set aside at least (15) percent of the units to low-income households, ten (10) percent rented to very low-income households, or 5 percent for extremely low-income households...". Page A-36, Table A-17, Regional Housing Needs Allocation, 2021-2029, lists 4 income group categories, 1) very low, 2) low, 3) moderate, 4) above moderate. Extremely low-income is not one of the categories used by RHNA so why does Santa Ana use a category of "extremely low-income"?

I2-2

Page 11: Insert a paragraph break prior to HE-2.8 Entitlement Process.

I2-3

Page 14: SPECIAL NEEDS section. Replace "female headed households" with page A1 text "single-parent families" as inclusion in this category is not limited by gender in today's society and may open the City to lawsuits. Page A1 text: "Special Needs. Special needs in the City, including seniors, people with disabilities, large families, single-parent families, people who are experiencing homelessness, and other special needs groups."

I2-4



Dale Helvig
Resident, Santa Ana CA 92706



Page 15: HE-4.5 Healthy Homes states, "Support efforts to make homes healthier by addressing health hazards... and prohibit smoking in multi-family projects" How will this be addressed/enforced? Does the City currently have a policy to prohibit smoking in multi-family projects? Section 53 Reducing Second-Hand Smoke in Multifamily Housing of the Housing Element only states, "This may include crafting an ordinance, educating property managers and owners, and building community consensus around this important health consideration". This will not prohibit smoking in multi-family projects!

12-5

Page 32: "In addition, to combat increasing rents and potential displacement, the City will adopt a rent stabilization ordinance and a just cause eviction ordinance." Should change this to "has adopted".

12-6

Page A-2: Table A-1 Population Growth Trends states the 2045 population will increase to 360,100, an 8.6% increase. I find this interesting because the OC Register has been using a population of 470,00 to 595,000 for calculating COVID data for the past several months. At one of the community Focus meetings for the General Plan Update, it showed 431,629 as the 2045 buildout population. Why is the 2045 population in this document only 360,100, and why can't we be consistent in population numbers throughout the General Plan?

12-7

Page A-3: Table A-1 Race and Ethnicity. You should check the data again and then revise the paragraph preceding it. Table shows the White population declined by 11.7%, not the 29% listed in the preceding paragraph.

12-8

Page A-19: I think the City is presenting an incomplete view of the data when it states: "The average Santa Ana apartment rent is approximately \$1,971. The average apartment rent in Santa Ana was \$1,497 in 2013, a 31 percent increase over 8 years." Change to read: "The average apartment rent in Santa Ana was \$1,497 in 2013, a 31 percent increase, or 4% over 8 years." FYI...if the new rent stabilization law was applied to this issue, the rent would have increased to \$1841 at the end of 8 years.

12-9

Page B-6: Table B-1 General Plan Designations Allowing Housing. At least part of this table requires a revision.

Table B-1 General Plan Designations Allowing Housing:			
Designation	Description	Corresponding Zones	Maximum Density
Urban Neighborhood	Primarily a mix of residential uses with pedestrian oriented commercial, schools and small parks	SD - Specific Development Zone SP - Specific Plan	0.5 to 1.5 FAR 5 to 30 units per acre
Source: City of Santa Ana, General Plan Land Use Element, September 2021			
Land Use Element, Table LU-3. DENSITY AND INTENSITY STANDARDS (Page LU 17)			
Urban Neighborhood		UN-20 UN-30 UN-40 UN-50	1.0 FAR or 20 du/ac 1.5 FAR or 30 du/ac 1.5 FAR or 40 du/ac 1.5 FAR or 50 du/ac

12-10

Page B-15: Random or incomplete note on right side of page.



Dale Helvig
Resident, Santa Ana CA 92706

Page B-16: Table B-5 Residential Parking Standards

Residential Type	Parking Standards Basic Requirement
Accessory Dwelling Units	One parking space per unit as allowed under state law

Are there other requirements or, is this really true?

12-11

Page B-17: Parking Standards. Does not take into consideration/is silent on, the impact SB-9 will have on the City. If I read SB-9 correctly, parking is not required when building in accordance with SB-9. From B-17, last paragraph:

"These efforts will inform programs and policies to address parking issues caused by changes automobile ownership rates and the number of adults who drive per household, which have led to certain neighborhoods being parking impacted, and parking standards and regulations for new residential development to ensure they are not an undue constraint to development and minimize parking impacts to the surrounding neighborhoods."

12-12

Page B-18: Other standards as allowed by the Planning Commission: It then goes on to say the City Council, Planning Commission, or Zoning Administrator has the authority to grant a minor exception or variances when specific criteria are met. These exceptions have no standard and it will be impossible to maintain any consistent implementation. I question who has the authority to grant these minor exception or variances.

12-13

Page C-5:

I think the result of the table below speaks volumes. Using the current Pipeline Housing Projects numbers, the City will exceed the RHNA numbers by 3404 units or, 208%. For the previous RHNA cycle the City exceeded RHNA numbers by over 2300%, receiving an A+ grade in all levels. **At some point in time, as in now, we need to just meet the goals or we will run out of land.** Keeping at the current pace could subject the City to a \$600,000/month fine. See <https://www.santa-ana.org/general-plan/housing-element-update-2021>, Housing for All - Part 1, presented by the Orange County Council of Governments [time 1:40].

12-14

	Affordability Level				
	Very Low	Low	Moderate Income	Above	Total
RHNA Allocation by Affordability Category	606	362	545	1624	3137
Balance of RHNA to Accommodate	102	-482	232	-3,253	-3,401
For Comparison 2014-2021 RHNA objectives					
Units	407	1,084	28	3,184	4,703
% Exceeding RHNA Allocation	904%	3,388%	76%	3,538%	2,305%



Dale Helvig
Resident, Santa Ana CA 92706

Page E-24: Exhibit E-2 – Predominant Population – Hispanic Majority Tracts
It should reference what this is based upon, the 2020 Census?

12-15

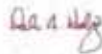
Page E-25: Exhibit E-3 – Predominant Population – Asian Majority Tracts
It should reference what this is based upon, the 2020 Census?

12-16

Some of these comments are minor but there are comments that need to be addressed prior to sending it to City Council. I recommend the Planning Commission return the Housing Element for correction and review prior to bringing it back to the Planning Commission. Let's live by the theme of having a "Shared Vision for Santa Ana".

Thank you for your thoughtful consideration. Stay safe, stay healthy.

Respectfully,



Dale A Helvig
Resident, Santa Ana

cc: Kristine Ridge
City Manager, Santa Ana
Sonia Carvalho
City Attorney, Santa Ana
Minh Thai,
Executive Director, Planning
Fabiola Zelaya Melicher,
Manager, Planning



12. Response to Comments from Dale Helvig, dated October 25, 2021.

- Intro Comment recommends changes to be made to the element and return to the Planning Commission for consideration before presenting to the City Council for adoption.
- 12-1 This comment is statement that repurposing a building is more “green” than tearing down a building and building a new one and recommends that the City should take this into account when approving future projects. The City currently has an Adaptive Reuse ordinance that aims to reduce construction emissions through repurposing existing underutilized commercial buildings into mixed-use and housing developments. The City will continue to promote its Adaptive Reuse ordinance.
- 12-2 This comment is a statement about the use of extremely low-income and inconsistency with RHNA categories. State housing program guidelines also often combine extremely low and very low-income into one category, called very low-income. The extremely low, very low, and low-income categories are also often considered “lower” income. These terms are used throughout the Housing Element.
- 12-3 Comment is regarding document format. A break between policies HE-2.7 and HE-2.8 has been included.
- 12-4 Comment recommends changing the wording “female-headed households” to “single-parent households.” Government Code Section 65583(a)(7) requires “An analysis of any special housing needs, such as those of the elderly, persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter....”
- 12-5 Comment is questioning the implementation of Policy HE-4.5. This policy correlates with the City’s environmental justice efforts and implementation of such policy will be included with other environmental justice implementation efforts.
- 12-6 Comment is regarding a typo found under Program 37. The element has been revised to address this typo.



PUBLIC OUTREACH

- I2-7 Comment is questioning population growth and inconsistent methodologies. The City uses various sources to forecast growth, however, Table A-1 has been revised to provide clarity on growth trends.
- I2-8 Comment is recommending that staff check data regarding population. Data is correct and no additional changes are needed.
- I2-9 Comment is a statement that the City is presenting an incomplete view on rental fees. Staff believes rental fees are correct and no additional changes are needed.
- I2-10 Comment recommends revising Table B-1 to reflect the updated General Plan land use designations. Table B-1 has been updated to reflect the recently adopted General Plan.
- I2-11 Comment recommends revising "Parking Solutions" text and questions if ADU parking requirements are correct. "Parking Solutions" text has been revised and the ADU parking requirements are correct per State law.
- I2-12 Comment addresses that the parking analysis did not take into account SB-9. The parking analysis provided is regarding existing parking standards and how such standards could be a constraint to the development of housing. Through Program 28 and the zoning code update (Program 18), the City will evaluate parking standards citywide.
- I2-13 Comment is questioning the City's minor exception and variance process. Minor exceptions can be granted by the City's Zoning Administrator while variances can be granted by the Planning Commission. The City Council, if appealed, has the final authority to approve or deny a minor exception or variance.
- I2-14 Comment is a statement that the City's current pipeline projects number will exceed the RHNA numbers and that the City should just meet its RHNA numbers and not exceed such number.
- I2-15 Comment recommends that a data reference be included to Exhibit E-2. All maps under Appendix E have been changed with the data source provided at the bottom of each exhibit/figure.



I2-16 Comment recommends that a data reference be included to Exhibit E-3. Refer to Comment I2-15 above.



SAMPLE PUBLIC OUTREACH MATERIALS



COMMUNITY SURVEY
6TH CYCLE **HOUSING ELEMENT** UPDATE



**SURVEY OPEN UNTIL
SEPT. 9, 2021**

Complete the survey for a chance to win a \$50 gift card!



Complete the survey and let us know about your experiences with HOUSING needs and priorities in Santa Ana. Share your vision for the type of HOUSING and services that are most important to ensure a high quality of life in Santa Ana.

Your input will guide the update of the City's Housing Element, which establishes housing goals, policies, and programs to accommodate Santa Ana's existing and projected needs through the year 2029.

Complete survey online at www.santa-ana.org/housing-element-update-2021 or by scanning QR code. **Hard copies available upon request.**

(714) 667-2781 • SAHousingElement2021@santa-ana.org • www.santa-ana.org/housing-element-update-2021



ENCUESTA COMUNITARIA
6º CICLO DE ACTUALIZACIÓN DEL **ELEMENTO DE VIVIENDA**



**ENCUESTA ABIERTA HASTA:
SEPT. 9, 2021**

¡Llene la encuesta y podría ganar una tarjeta de \$50!



Complete la encuesta y díganos acerca de sus experiencias con las necesidades y prioridades de VIVIENDA en Santa Ana. Comparta su visión para el tipo de VIVIENDA y servicios que son más importantes para garantizar una alta calidad de vida en Santa Ana.



Su opinión guiará la actualización del Elemento de Vivienda de la Ciudad, que establece metas, políticas y programas de vivienda para adaptarse a las necesidades actuales y proyectadas de Santa Ana hasta el año 2029.

Complete la encuesta en línea en www.santa-ana.org/housing-element-update-2021 o escanee el código QR. Hay copias impresas disponibles si se solicitan.

(714) 667-2781 • SAHousingElement2021@santa-ana.org • www.santa-ana.org/housing-element-update-2021



KHẢO SÁT CỘNG ĐỒNG
CHU KỶ THỨ 6 CẬP NHẬT **YẾU TỐ NHÀ Ở**



**KHẢO SÁT ĐẾN
9 THÁNG 9, 2021**

Hoàn thành khảo sát để có cơ hội nhận được thẻ quà tặng trị giá \$50!


Cập nhật Yếu tố Nhà ở

Hãy hoàn thành bản khảo sát và cho chúng tôi biết về trải nghiệm của quý vị với các nhu cầu và ưu tiên về NHÀ Ở tại Santa Ana. Chia sẻ đường hướng tương lai của quý vị về loại NHÀ Ở và các dịch vụ quan trọng nhất để đảm bảo phẩm chất cuộc sống cao ở Santa Ana.



Thông tin đầu vào của quý vị sẽ hỗ trợ việc cập nhật Yếu tố Nhà ở của Thành phố, thiết lập các mục tiêu, chính sách và chương trình về nhà ở để đáp ứng các nhu cầu hiện có và dự tính của Santa Ana cho đến năm 2029.

Hoàn thành khảo sát trực tuyến tại www.santa-ana.org/housing-element-update-2021 hoặc bằng cách quét mã QR. Có bản in theo yêu cầu.

(714) 667-2781 • SAHousingElement2021@santa-ana.org • www.santa-ana.org/housing-element-update-2021





City of Santa Ana - Municipal Government ✓
September 9 at 2:10 PM · 🌐

REMINDER: Housing Element Survey Closes at Midnight tonight! Would you like to shape the future of housing in Santa Ana? Complete the Santa Ana Housing Element Survey! www.santa-ana.org/housing-element-update-2021

The City of Santa Anais in the process of updating its long-range housing plan, called the Housing Element, and needs your feedback. Please take our community survey and share your thoughts on how the City can address housing needs for all Santa Ana residents. The...
See More



Housing Element Update



golden city beyond
A SHARED VISION FOR SANTA ANA

Take the survey before Sept. 9!



COSAS: City Manager's Newsletter for Sept. 3, 2021

Date: September, 03 2021 Category: City Manager, City Manager's Newsletter, Notification

Share this Page   



In this issue of COSAS (City of Santa Ana Stories), learn about important upcoming meetings on the General Plan Update, getting registered for the Revive Santa Ana 5K, the library's new self-checkout and laptop kiosks, and other City news and events.

[Subscribe to Receive the Newsletter in Your Inbox](#)

Take the Housing Element Survey



Housing Element Update 2021



Take the survey
before Sept. 9!

The City of Santa Ana is in the process of updating its long-range housing plan, called the Housing Element, which will be approved separately from the rest of the General Plan. Please take our community survey and share your thoughts on how the City can address housing needs for all Santa Ana residents. The survey is available in English, Spanish and Vietnamese, and will be open until Sept. 9. Complete the survey for an opportunity to win a \$50 gift card!

Join us at the Planning Commission for a workshop on Sept. 27 to discuss the update to the Housing Element and Community Housing Survey result, as well as suggested policies and programs to address Santa Ana housing needs.

Learn More and Take the Survey: <https://www.santa-ana.org/general-plan/housing-element-update-2021>

Sat
Sep 25 - Sep 25



The Pacific Symphony is coming to Santa Ana!
Category: Parks and Recreation
Date: Sep 25, 2021 - Sep 25, 2021
Time: 07:00 PM - 10:00 PM

[Read More >](#)

Mon
Sep 27 - Sep 27



FOSAPL Basement Bookstore
Category: Library Services
Date: Sep 27, 2021 - Sep 27, 2021
Time: 12:00 PM - 02:00 PM

[Read More >](#)

Mon
Sep 27 - Sep 27



Planning Commission - Housing Element Workshop
Category: Planning and Building General Plan
Date: Sep 27, 2021 - Sep 27, 2021
Time: 05:30 PM - 07:30 PM

[Read More >](#)



**Table F-2
List of Stakeholders Involved During Roundtables and Workshops**

<i>Name of Participant</i>	<i>Organization</i>	<i>Summary of Organization</i>
Ryan Lehman	American Family Housing	American Family Housing (AFH) provides housing and an array of support services to help vulnerable populations recover from the long-term effects of homelessness. AFH's services target at-risk populations, such as veterans, families with a disabled household member, and vulnerable adults with barriers to housing stability such as mental illness.
Steven LaMotte Adam Wood	Building Industry of Southern California, OC Chapter	The Building Industry Association of Southern California (BIA/SC) is a nonprofit trade association representing 1,100 companies affiliated within the homebuilding industry throughout Southern California. The Orange County Chapter is one of four chapters that make up BIA/SC and is also affiliated with the California Building Industry Association (CBIA) and the National Association of Home Builders (NAHB).
Barry Cottle	C & C Development	C & C Development is a real estate development company that has developed affordable housing developments in the city.
Kim Prijatelj Ryan Aeh	City Ventures	City Ventures is a homebuilder focused on repositioning underutilized real estate into residential housing and focused on the construction of townhomes, condominiums, lofts, mixed-use, live-work, and single-family detached homes. City Ventures has developed housing developments in the city.
Kyle Paine	Community Development Partners	Community Development Partners (CCP) develops and operates affordable housing with a focus on long-term community engagement. They developed and operate the Orchard and La Placita Cinco housing developments.
Karla Juarez	Heninger Park Neighborhood Association	Heninger Park Neighborhood Association is one of Santa Ana's neighborhood associations and represents the residents of Heninger Park, which is one of the City's historic districts.
Gina Scott	HomeAid Orange County	HomeAid Orange County was established by the BIA/SC, Orange County Chapter, and they primarily construct housing for nonprofit service providers and public entities that serve people experiencing homelessness.
Leia Smith	Isaiah House - Orange County Catholic Worker	Isaiah House of the Orange County Catholic Worker is located in Santa Ana's eastside barrio on Cypress Street. This house of hospitality is open to people in need and offers services to people experiencing homelessness.
Marianne Loewe	L'Arche Wavecrest Orange County	L'Arche Wavecrest, located in Orange County, currently has two homes with eight Core Members (IDD) and four live-in Assistants. L'Arche communities provide homes and workplaces where people with and without intellectual disabilities live and work together as peers; create inclusive communities of faith and friendship; and transform society through relationships that cross social boundaries.
Hilda Ortiz	Latino Health Access	Latino Health Access is a nonprofit organization in Santa Ana that trains community workers to educate their own neighbors about diabetes, breast cancer, obesity, domestic violence, parenting,



**Table F-2
List of Stakeholders Involved During Roundtables and Workshops**

<i>Name of Participant</i>	<i>Organization</i>	<i>Summary of Organization</i>
		and more and operates a family resource center in Downtown Santa Ana.
Selica Diaz	Pacific Park Neighborhood Association	Pacific Park Neighborhood Association is one of Santa Ana's neighborhood associations.
Dale Helvig	Park Santiago Neighborhood Association	Park Santiago Neighborhood Association is one of Santa Ana's neighborhood associations.
Brian Diaz	Recupero & Associates, Inc.	Recupero & Associates Inc. is a housing development consultant firm.
Idalia Rios	Santa Ana Building Healthy Communities	Santa Ana Building Healthy Communities (SABHC) is an initiative that aims to transform communities by building social, political, and economic power, implementing proven health protective policy, and changing the narrative about what produces health.
Carl Benninger	Santa Ana Communication Linkage Forum (Com-Link)	Com-Link was formed in July 1989, for the purpose of providing a nonpartisan forum to promote the exchange of ideas and information between neighborhoods and community leaders. Com-Link partners with the City of Santa Ana to communicate the positive aspects of Santa Ana and to enhance a sense of community. Com-Link originally consisted of five neighborhood associations and now represents over 60 Santa Ana neighborhood associations.
Jeremy Cogan KeDarius Colbert	Santa Ana Unified School District (SAUSD)	SAUSD is the second largest school district in Orange County serving the children of Santa Ana and the second largest employer in Santa Ana, providing job opportunities to approximately 5,000 employees.
Victor Cao	The California Apartment Association	The California Apartment Association represents a number of owners, investors, developers, managers, and suppliers of rental homes and apartment communities in Santa Ana.
Paola Padilla	The Center for the Study of Social Policy (CSSP)	CSSP is a nonprofit policy organization that connects community action, public system reform, and policy change to create a fair and just society in which all children and families thrive.
Cesar Covarrubias Cynthia Guerra Daisy Cruz	The Kennedy Commission	The Kennedy Commission is a community-based nonprofit that works with residents and community organizations to increase the production of homes affordable to lower income households in Orange County. They assist in developing housing solutions that affirm the dignity of families with very low and extremely low incomes and unite communities across Orange County.



**Table F-2
List of Stakeholders Involved During Roundtables and Workshops**

<i>Name of Participant</i>	<i>Organization</i>	<i>Summary of Organization</i>
Luis Sarmiento	THRIVE Santa Ana Community Land Trust	THRIVE is the first and only community land trust (CLT) in Santa Ana, founded by local residents and community organizations. They dedicated themselves to building community wealth and healthy neighborhoods through land stewardship and multigenerational resident leadership, and work with community members on neighborhood needs assessments, data analysis, and community visioning—promoting dialogue between residents and the City about local, unmet needs, including housing, micro-farms, community spaces, and local small businesses.
Erica Heras	Vecindario Lacy en Accion (VeLA)	VeLA is a group of residents from the Lacy neighborhood that have united to advocate for their community. The group includes: mothers, fathers, students, individuals with special abilities, and community leaders that share the vision of improving the quality of life in their neighborhood and the city.
Tracy La	VietRISE	VietRISE is a community organization based in Orange County. Its mission is to advance social justice and build power with working-class Vietnamese and immigrant communities in Orange County. They build leadership among communities and work toward systemic change through organizing, shifting narratives, cultural empowerment, and civic engagement.
Ray Diaz Irlanda Martinez Isuri Ramos Alan Wood	City Commissioners	Members of the Youth, Community Development, and Planning commissions in the city.
Jesus Santana Alejandra Luciano Jaden Kim Leticia Moreno Maribel Alducin Maricela Castro Mireya Gutierrez Silvia Hernandez Yanely Matute Leticia Roque Rosario Garcia Sergio Cantu Dinh Nguyen Christopher Le	City Residents	Residents of the City of Santa Ana



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