

City of Santa Ana General Plan Housing Element 2021-2029

City of Santa Ana

Planning Division



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Table of Contents

Housing Element

Introduction 1

Overview.....	1
Purpose and Content of Element	2
Relationship to the General Plan.....	3

Policy Framework.....5

Housing Vision & Policy Plan.....	5
Housing and Neighborhoods	6
Housing Supply and Diversity	8
Housing Assistance	11
Special Needs	13
Affirmatively Furthering Fair Housing	15

Housing Plan 17

Overview.....	17
Housing and Neighborhoods	18
Housing Supply and Diversity	23
Housing Assistance	28
Special Needs Housing	31

Appendices

Appendix A. Housing Needs..... A-1

Overview.....	A-1
Demographic Characteristics	A-2
Economic Characteristics	A-7
Neighborhood and Housing Profile	A-13
Special Housing Needs	A-23
Housing Needs.....	A-37

Appendix B. Housing Constraints.....B-1

Overview.....	B-1
Market Factors	B-2
Governmental Factors.....	B-6
Environmental Factors	B-43

Appendix C. Housing Resources C-1

Overview.....	C-1
Housing Development Credit.....	C-3
Land Inventory.....	C-7
Housing Preservation.....	C-36



Financial Resources for Housing C-41

Appendix D. Program Evaluation D-1

 Overview D-1

 Goal 1: Housing and Neighborhoods D-3

 Goal 2: Housing Supply and Diversity D-11

 Goal 3. Housing Assistance D-24

 Goal 4. Special Needs D-30

Appendix E. Assessment of Fair Housing E-1

 Overview E-1

 Santa Ana History E-2

 Fair Housing Enforcement and Outreach E-4

 Patterns of Integration and Segregation E-9

 Access to Opportunities E-36

 Contributing Factors E-77

Appendix F. Public Outreach F-1

 Overview F-1

 Major Themes F-5

 Survey Results F-8

 Sample Public Outreach Materials F-12

Figures

Figure C-1 Potential Housing Sites in the Metro East Overlay C-13

Figure C-2 Potential Housing Sites along Harbor Boulevard C-21

Figure C-3 Transit Zoning Code Regulating Plan C-29

Figure E-1 FHEO Inquiries by City and HCVs by Tract E-7

Figure E-2 Regional Racial/Ethnic Minority Concentrations by Block Group (2018) E-15

Figure E-3 Racial (2010) E-16

Figure E-4 Racial/Ethnic Minority Concentrations by Block Group and Sites Inventory (2018) E-17

Figure E-5 Regional Concentrations of Persons with Disabilities by Tract E-18

Figure E-6 Concentration of Persons with Disabilities by Tract and Sites Inventory E-19

Figure E-7 Households - Orange County, Santa Ana, and Neighboring Cities E-21

Figure E-8 Regional Percent of Children in Married Couple Households by Tract E-23

Figure E-9 Regional Percent of Children in Female-Headed Households



by Tract.....E-24

Figure E-10 Children in Married Couple Households by Tract and Sites Inventory.....E-25

Figure E-11 Children in Married Couple Households by Tract and Sites Inventory.....E-26

Figure E-12 Regional LMI Household Concentrations by Tracts.....E-29

Figure E-13 LMI Household Concentrations by Block Group and Site Inventory.....E-30

Figure E-14 R/ECAPs, TCAC Areas of High Segregation and Poverty, and Poverty Status by Tract.....E-33

Figure E-15 Regional Racial/Ethnic Minority Population and Median Income by Block Group.....E-34

Figure E-16 Racial/Ethnic Minority Populaion and Median Income by Block Group.....E-35

Figure E-17 Regional TCAC Opportunity Areas by Tract.....E-43

Figure E-18 TCAC Opportunity Areas by Tract and Sites Inventory..E-44

Figure E-19 Regional TCAC Opportunity Area Economic Scores by Tract.....E-46

Figure E-20 TCAC Opportunity Area Economic Scires by Tract.....E-47

Figure E-21 Regional TCAC Opportunities Area Education Scores by Tract.....E-49

Figure E-22 TCAC Opportunity Area Education Scores by Tract.....E-50

Figure E-23 Regional TCAC Opportunity Area Environmental Scores by Tract.....E-52

Figure E-24 TCAC Opportunity Area Environmental Scores by ... Tract.....E-53

Figure E-25 Regional CalEnvironScreen Scores by Tract.....E-54

Figure E-26 CalEnvironScreen Scores by Tract.....E-55

Figure E-27 Orange County All Transit Metrics.....E-56

Figure E-28 Santa Ana All Transit Metrics.....E-57

Figure E-29 Regional HUD Jobs Proximity Index by Block Group and HQTAs.....E-58

Figure E-30 HUD Jobs Proximity Index by Block Group.....E-59

Figure E-31 Regional Cost Burdened Owners by Tract (2019).....E-65

Figure E-32 Regional Cost Burdened Renters by Tract (2019).....E-66

Figure E-33 Cost Burdenend Owners by Tract and Sites Inventory (2019).....E-67

Figure E-34 Cost Burdened Renters by Tract and Sites Inventory (2019).....E-68

Figure E-35 Regional Overcrowded Households by Tract.....E-70

Figure E-36 Overcrowded Household by Tract.....E-71

Figure E-37 Regional Sensitive Communities At Risk of



Displacement.....E-75
 Figure E-38 Sensitive Communities At Risk of Displacement.....E-76

Tables

Table 1 Housing Element Quantified Objectives, 2021-2029 17
 Table 2 Housing Implementation Summary 37
 Table A-1 Population Growth Trends A-2
 Table A-2 Race and Ethnicity..... A-3
 Table A-3 Current Population by Age and Sex..... A-4
 Table A-4 Household Composition, 2010-2018..... A-6
 Table A-5 Occupations and Annual Earnings A-9
 Table A-6 Household Income, 2010-2018 A-10
 Table A-7 Santa Ana Household Characteristics by Tenure..... A-12
 Table A-8 Housing Growth, 2010-2020 A-15
 Table A-9 Housing Tenure, 2010-2018 A-16
 Table A-10 Housing Affordability by Income Group..... A-18
 Table A-11 Existing Rental Survey and Affordability, 2021 A-20
 Table A-12 Santa Ana Senior Housing Options..... A-25
 Table A-13 State Licensed Facilities for People with Disabilities.....A-27
 Table A-14 Sample of Multi-Family Residential Projects, 2017 to Present A-31
 Table A-15 Homeless Subpopulations and Disabling Conditions A-34
 Table A-16 Santa Ana Homeless Housing Gaps Analysis..... A-36
 Table A-17 Regional Housing Needs Allocation, 2021-2029..... A-38
 Table B-1 General Plan Designations Allowing Housing B-6
 Table B-2 Permitted Housing Types in Santa Ana..... B-8
 Table B-3 Residential Development Standards B-15
 Table B-4 Multiple-Family Residential Development Standards B-16
 Table B-5 Residential Parking Standards..... B-17
 Table B-6 Parking in Growth Areas to Address the RHNA B-17
 Table B-7 Sample of Multiple-Family Residential Projects Approved Since 2017 B-24
 Table B-8 Residential Development Standards in Metro East Mixed-Use Overlay Zone..... B-25
 Table B-9 Permitted Residential Building Types by District in Transit Zoning Code..... B-27
 Table B-10 Residential Development Standards in the Transit Zoning Code B-28
 Table B-11 Permitted Residential Uses by District in SP-2 B-29
 Table B-12 Building Type and Development Standards by District.... B-29
 Table B-13 Building Code Standards B-31
 Table B-14 Required Street Widths..... B-33
 Table B-15 Permit Processing Timeframe for Housing Projects B-36
 Table B-16 Planning Division Fees in Santa Ana B-37
 Table B-17 Residential Development Fees in Santa Ana B-37
 Table C-1 Regional Housing Needs Allocation 2021-2029 C-2
 Table C-2 Pipeline Housing Projects..... C-4



Table C-3 Vacant and Underutilized Land - MEMU C-11

Table C-4: Units and Densities of Recent Projects in MEMU (OZ1)... C-16

Table C-5 Vacant and Underutilized Land - Harbor Corridor Plan.... C-19

Table C-6: Units and Densities of Recent Projects in Harbor Corridor
Plan (SP2)C-24

Table C-7 Vacant and Underutilized Land in the Transit Zoning
Code.....C-27

Table C-8: Units and Densities of Recent Projects in Transit Zoning
Code (SD84) C-31

Table C-9 Summary of RHNA and Housing Sites Table.....C-34

Table C-10 Development Potential SummaryC-35

Table C-11 Units at Risk of Conversion by 6/30/2031 C-36

Table C-12: Estimated Market Value of Units At-Risk C-37

Table C-13: Rental Subsidies RequiredC-38

Table C-14: Estimated New Construction CostC-38

Table D-1 Summary of Progress 2014–2021 Quantified Objectives..... D-2

Table D-2 Progress toward Housing Element Goal #1 Objectives..... D-5

Table D-3 Progress toward the 2014–2021 RHNA objectivesD-11

Table D-4 Progress toward Housing Element Goal #2 Objectives.....D-14

Table D-5 Progress toward Housing Element Goal #3 Objectives D-25

Table D-6 Progress toward Housing Element Goal #4 Objectives..... D-31

Table E-1 Racial/Ethnic Composition - Orange County, Santa Ana, and
Neighboring Cities.....E-10

Table E-2 Racial/Ethnic Dissimilarity Trends - Orange County and Santa
Ana.....E-10

Table E-3 Distribution of RHNA Units by Racial/Ethnic Minority
Population: Opportunity Sites.....E-12

Table E-4 Distribution of RHNA Units by Racial/Ethnic Minority
Population: Pipeline Projects.....E-12

Table E-5 Distribution of RHNA Units by Children in Married Couple
Households: Opportunity Sites.....E-22

Table E-6 Distribution of RHNA Units by Children in Married Couple
Households: Pipeline Projects.....E-22

Table E-7 Income Level Distribution.....E-27

Table E-8 Distribution of RHNA Units by Concentration of LMI
Households: Opportunity Sites.....E-28

Table E-9 Distribution of RHNA Units by Concentration of LMI
Households: Pipeline Projects.....E-28

Table E-10 Poverty Status by Race/Ethnicity.....E-31

Table E-11 Domains and List of Indicators for Opportunity Maps.....E-37



TABLE OF CONTENTS

Table E-12 HUD Opportunity Indicators by Race/Ethnicity - Santa Ana/Orange County.....E-38

Table E-13 Opportunity Map Scores and Categorization.....E-39

Table E-14 Housing Problems by Race/Ethnicity.....E-60

Table E-15 Cost Burden by Race/Ethnicity and Tenure - Orange County.....E-61

Table E-16 Cost Burden by Race/Ethnicity and Tenure - Santa Ana.E-62

Table E-17 Distribution of RHNA Units by Percent of Cost Burdened Renters: Opportunities Sites.....E-64

Table E-18 Distribution of RHNA Units by Percent of Cost Burdened Renters: Pipeline Projects.....E-64

Table E-19 Overcrowding by Tenure.....E-68

Table E-20 Distribution of RHNA Units by Percent of Overcrowded Households: Opportunity Sites.....E-69

Table E-21 Distribution of RHNA Units by Percent of Overcrowded Households: Pipeline Projects.....E-69

Table E-22 Incomplete Facilities.....E-72

Table E-23 Santa Ana Housing Stock - Year Structure Built.....E-73

Table F-1 List of Stakeholders Involved During Roundtables & Workshops..... F-18



Introduction

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

OVERVIEW

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 it boasts an eclectic urban environment, burgeoning employment centers, transit hub, historic neighborhoods and downtown, and a rich history dating 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 “Downtown Orange County.”



1

PURPOSE AND CONTENT OF ELEMENT



California law requires that cities develop housing programs to meet their fair share of housing needs for the 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 been assigned a planning goal of accommodating 3,095 (3,135⁷ with transfer from County of Orange) housing units for the planning period of 2021 to 2029.

To comply with state law, Santa Ana prepares a housing element every eight years. The Housing Element must contain goals, policies, and programs to facilitate the development, improvement, and preservation of housing. State law prescribes the scope and content of the 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 contains 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 Affirmatively Furthering Fair Housing (AFFH) 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

The City is currently in the process of updating its General Plan and will be taking its public review draft to City Council on February 15, 2022. As such, all elements of the General Plan will be monitored and continually reviewed for internal consistency. As individual elements are updated in the future, the City will review the various related elements for consistency.



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Policy Framework

HOUSING VISION & 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.

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 provides goals and policies to provide a foundation for the Housing Plan.



2

HOUSING AND NEIGHBORHOODS



Vintage home in north Santa Ana

The City of 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 later 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 of children

Some residential neighborhoods in Santa Ana are well preserved: streets are lined with trimmed canopy trees; physical infrastructure is sufficient in size 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) the availability of parks, trails, and recreational facilities; 4) the availability of affordable and healthy food options; 5) safety of residents 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 blight, unhealthy or dangerous housing conditions.
- 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.



Neighborhood projects

- 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 provide a non-profit housing organization the right of first refusal to purchase mobile home parks and publicly supported multi-family residential properties on the market to prevent tenant displacement, promote homeownership opportunities, and create long-term affordability.](#)



Santa Ana is [at the](#) forefront in creating attractive and unique housing options.

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 toward 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 other 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.

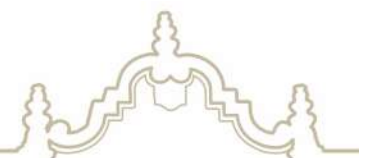
The following goal and policies guide the City’s efforts to improve supply and diversity of housing in Santa Ana.

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 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. [Implement various strategies using the in lieu fees generated by the Housing Opportunity Ordinance 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 alleviating 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.

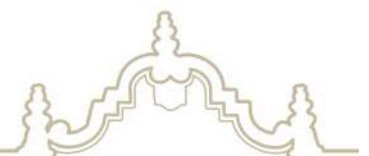
HOUSING ASSISTANCE

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. Increases in housing prices and rents make it increasingly difficult for lower and moderate-income households to afford housing, resulting in increasing cost burdens for residents. Rising cost burdens have contributed to significant overcrowding, displacement and relocating from 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, comprising a socially and economically diverse community of renters and homeowners. Housing our residents and workforce is of 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 opportunities and afford a greater choice of rental or 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 employees working 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, childcare 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 which 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 a priority preference for displaced families in affordable project financed with City funds is given.

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.





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

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 the 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.
- 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, VOC-laden materials, and prohibiting smoking in multi-family projects, among others.



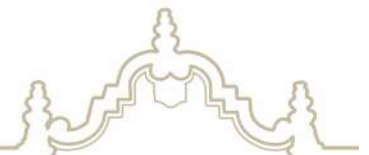
- HE-4.6 **Homeless Services.** Partner with homeless service providers to provide tenant-based and project-based housing opportunities linked with case management, employment, physical, mental health, substance abuse, and other wrap-around services for people experiencing homelessness.
- HE-4.7 **Regulatory 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 Housing Opportunity 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 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 towards 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 Housing Opportunity 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 to continue 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	50			50		
Rental Assistance	2,800 ¹		2,800			
Homeowner Assistance	80			60	20	

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

The remainder of this chapter describes City programs that will be implemented 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 Home Rehabilitation

Periodic repair and rehabilitation of single-family housing is critical for maintaining the quality of housing and preserving residential neighborhoods. The City of Santa Ana estimates that up to 12,819 single-family, owner-occupied homes may require repair and rehabilitation. The City offers a Residential Rehabilitation Grant Program and provides grants of up to \$25,000 for the repair and rehabilitation of single-family homes. These include one- to four-unit residential properties on a single lot that are owner-occupied units. To qualify for a residential rehabilitation grant, the household must have a low-income.

2. Mobile Home Repair

Santa Ana has twenty-nine 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, whereby very low-income households and seniors are eligible to receive a grant of up to \$25,000 to make repairs. The City will continue to implement this program and partnerships with other nonprofits to ensure the health and safety of mobile homes.

3. Multiple-Family Rental Rehabilitation

The City of Santa Ana's multiple-family rental rehabilitation program is designed to encourage the timely rehabilitation of multiple-family rental apartment housing. The City offers loans up to \$75,000, at 0 percent interest, amortized for 10 years. In order to qualify for a loan, not less than 51 percent of the units must be affordable to and occupied by lower income households. Once housing improvements are completed, the units are subject to deed restrictions. Priority for loan assistance is given to properties cited by the City's Code Enforcement Department.



Lush trees beautify parks and neighborhoods in Santa Ana.

NEIGHBORHOOD INITIATIVES

4. Neighborhood Improvement

The Neighborhood Improvement 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 of Santa Ana 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.

5. 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 program 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.

6. 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. The City is a Tree City USA, implements a Community Forestry Program, and is involved in installing greenways, where feasible, and improving parks. 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 garden 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.

COMMUNITY-BUILDING INITIATIVES

7. Santa Ana Building Healthy Community Initiative

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 Health 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.

8. 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 other worthy community projects. 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.

9. Neighborhood Safety

Safe neighborhoods are an important and indispensable part of quality of life. This goal is achieved through the efforts of multiple city departments, including planning and housing, 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 startup Neighborhood Watch groups and provide mentoring activities for youth.

CODE ENFORCEMENT

10. Property Maintenance Standards (Healthy Housing)

Santa Ana requires adherence to building and property maintenance standards in its municipal codes (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 overall health of residents. The American Public Health Association and National Center for Healthy Housing have created a National Healthy Housing Standard. The standard’s health-based codes are designed 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.

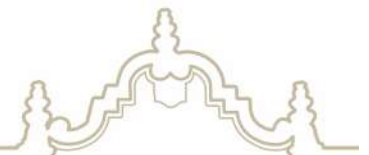
Many jurisdictions are exploring additional ways to enforce property maintenance standards, especially when related to health and safety conditions in interior living spaces. When a property demonstrates substantial habitual violations and failure to conduct repairs and maintenance, state law provides tenant protection clauses that allow rent reductions, protection from eviction or other retaliation, relocation, and a delay of rental payment until repairs are completed.

11. 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 the effectiveness of this program, the City seeks to augment levels of funding and personnel where feasible.

12. Residential Response Team

The Residential Response Team (RRT) is a complement to the existing PREP program and focused 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-occupied or rented single-family residences. The team also handles traditional code enforcement concerns involving the lack of exterior property maintenance and abandoned vehicle violations that detract from the neighborhood. The most commonly reported violations involve substandard housing, hazardous conditions, unpermitted work, illegal business in a residence, 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

13. 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 through the placement of properties on the Local Register of Historic Resources and through review of 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.

14. 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.

15. Historic Neighborhood Preservation

Santa Ana has residential, commercial, and industrial areas that have cultural or historic significance to the community. Residential neighborhoods include, but are not limited to, French Park, Floral Park, Wilshire Square, Eastside, Washington Square, and Heninger Park residential neighborhoods. The City is also known for its historic Mexican barrios, including the Logan, Lacy, Delhi, and Santa Anita neighborhoods, which date to the late 1880s. Several of these are recognized as historical districts, while others are not. In addition to preservation strategies for individual structures, the City could explore strategies to identify and preserve neighborhoods or elements thereof that are locally considered worthy of preservation efforts, but not necessarily individually eligible for a formal state or national historic designation.



HOUSING SUPPLY AND DIVERSITY

HOUSING SUPPLY

16. Transit Zoning Code

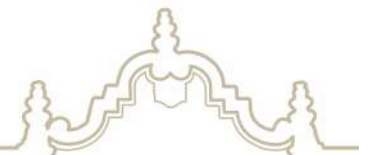
Santa Ana continues to pursue efforts to revitalize its historic core. The City adopted the Transit Zoning Code in 2010 and updated several of its sections in 2019 to encourage residential/mixed-use housing opportunities and support transit goals. The Transit Zoning Code applies to properties adjacent 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.

17. 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 development forms and land uses that will provide for the creation of a high-intensity, mixed-use urban village within a previously developed mid- to high-rise office environment near the intersection of 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.

18. Urban Villages

Santa Ana includes District Centers and Urban Neighborhood areas to encourage active, mixed-use urban villages. District Centers at MacArthur Place, Metro East, City Place, MainPlace Mall and other areas are intended to accommodate high-rise office, commercial, residential, and mixed-uses. Residential uses in most District Centers allow up to 90 units per acre when developed as an integral component of a master-planned, mixed-use project. Urban Neighborhoods allow for a mix of residential uses and housing types, including as mid to low-rise multiple neighborhood serving retail, and public spaces. Both “urban village” areas are intended for a high degree of walkability, access to transit and other active transportation options. Santa Ana will continue to direct multiple-family, mixed-use housing, and commercial projects into select District



Centers and Urban Neighborhoods that further the City’s housing, economic development, and other general plan objectives.

19. 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 is 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.

20. Comprehensive General Plan Update

The City of Santa Ana is in the process of updating the General Plan. The General Plan update will cover a wide variety of topics, including employment and economic vitality, community health and wellness, strong neighborhoods, multimodal transportation system, public safety, education, and parks and recreation among other topics. Subsequent to the adoption of the updated General Plan, the City will undertake a comprehensive update to the Zoning Ordinance (Program 21).

21. Zoning Ordinance Update

The comprehensive update of the General Plan will create a need to review the Zoning Ordinance for consistency and for additional direction to implement the vision, goals, and policies of the General Plan. To that end, the Zoning Ordinance update will include a revision to development standards that will align the Zoning Ordinance 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.

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 allow innovative and creative approaches to provide parking for all residential projects.



In accordance with State law, the City will need to amend its zoning ordinance to address current laws pertaining to low-barrier navigation centers and supportive housing as a by-right use. In the absence of tailored local zoning regulations, State law shall apply.

BUILDING DESIGN

22. Building Design Guidelines

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.

23. 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 development a simplified healthy design checklist for use by planners.

INCENTIVES

24. Affordable Housing Financial 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.

25. Extremely Low Income Housing

Housing Element law includes a focus on the housing needs of extremely low-income households. 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, of which 14,255 are renter households. The Housing Authority provides up to 2,699 housing choice vouchers to extremely low and very low-income households each year. Of all the housing choice vouchers issued, 75 percent of them will be 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 shall be given to projects that benefit a higher percentage of units for extremely low-income households with deeper affordability. The City of Santa Ana will continue to seek opportunities to apply for additional funding and provide other incentives as feasible to support the production of affordable housing for extremely low-income households.

26. 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 of California, the City no longer has an RDA. The Santa Ana Housing Authority acting as the Successor Housing Agency is responsible for completing all remaining enforceable obligations.

27. Density Bonus Ordinance

The City's density bonus ordinance, Section 41-1600, will be updated to reflect recent changes in State law. The State's Density Bonus Law (found in California Government Code Sections 65915 – 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 which 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.

28. Housing Opportunity Ordinance

The Housing Opportunity Ordinance was adopted in 2011 and amended in 2015 and again in 2020. For eligible ownership projects, at least 10 percent of for sale units must be set aside for moderate income households for at least 55 years, and at least, for rental projects, 15 percent must be affordable to low-income, or 10 percent affordable to very 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 Housing Opportunity Ordinance to provide affordable housing opportunities.

29. Adaptive Reuse

Santa Ana contains a variety of buildings not originally constructed for residential uses, that are vacant or underutilized, and which may be candidates for reuse as new housing. Santa Ana's Adaptive Reuse Ordinance allows for the adaptive reuse of historic and/or underutilized buildings to create a diversity of housing opportunities and stimulate new investment.

REGULATORY INCENTIVES

30. Specific Development District

Historically, the City has used Specific Development (SD) Districts to facilitate creative residential and mixed/multiuse developments where otherwise strict application of the Zoning Ordinance would make the project infeasible. Under a SD zone, the City may permit attached and detached single-family residences, town homes, patio homes, zero lot lines and any other housing types permitted by the regulations of the underlying zone. Residential/mixed-use development standards are individually tailored to specific project needs. This tool has been useful to facilitate small in-fill sites, allowing for the development of new housing. The approval process is similar to any zone change process. The City will continue to implement the Specific Development District for projects based on sample objective development standards provide by the City.

31. 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. These types of units are being built with financial assistance from the City and within the Transit Zoning Code. The City will monitor applications for residential projects to ensure they match existing and future housing demand in Santa Ana and propose ordinance changes if needed to align products with needs.

32. Parking Study

The City will conclude a city-wide parking study to evaluate parking needs and standards for existing and new residential neighborhoods and developments. The study will inform programs and policies to address parking issues caused by changes in 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. Should the parking study determine 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. Because of the relationship of parking to other residential development standards (e.g., open space, height, lot coverage, etc.), this effort may be completed in conjunction with the update to the Zoning Ordinance.

HOUSING ASSISTANCE

RENTAL ASSISTANCE

33. Housing Choice Voucher Program

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 are extremely low-income. 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.

34. Family Self-Sufficiency Program

The Family Self-Sufficiency (FSS) Program is voluntarily available to participants in the Housing Choice Voucher Program to enable assisted families to achieve economic self-sufficiency. Those 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.

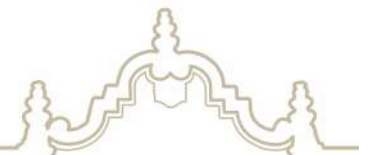
HOUSING PRESERVATION

35. Preservation of At-Risk Housing

Santa Ana has over 3,400 units of rental housing affordable to lower income households. Of that total, there are presently 808 units at risk of losing affordability controls and reverting to market rents by 2029. Given the importance of assisted affordable projects, the City will conduct regular outreach to owners of assisted projects to understand their intentions for converting projects and enter into negotiations to preserve at-risk housing.

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 [to improve the living environment of existing residents](#). 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.



37. Local Housing

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 longstanding 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 for these units. In addition, to combat increasing rents and potential displacement, the City will adopt a rent stabilization ordinance and a just cause eviction ordinance.

HOMEOWNERSHIP ASSISTANCE

38. 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 \$80,000 toward the purchase price for no interest and no payments for 45 years for low-income households and \$40,000 for moderate-income households. 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. In 2018, the City updated the program to double the amount of assistance available to low-income households from \$40,000 to \$80,000. The City will periodically review the program to increase or adjust the amount of assistance needed per household to purchase their first home.

39. Homeownership Partners

In today's economic climate, public/private/nonprofit partnerships are a prerequisite to provide homeownership assistance. The City of Santa Ana has a track record of working with various nonprofit organizations to provide homeownership opportunities. 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, Community Land Trusts (CLT) 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

40. 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, the Municipal Code will be reviewed and amended for changes in state law with respect to these facilities. This action [will be](#) incorporated into the Zoning Ordinance update.



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

41. 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 chronically homeless individuals with a disability with supportive housing with on-site wrap-around services and amenities. 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. This may include reviewing or endorsing grant 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.

42. Housing Accessible to People with Disabilities

The aging of our nation, changing demographics, and desire to house people of all abilities into residential neighborhoods has led to innovative concepts such as aging-in-place. This refers to the ability to live in one's home and community safely, independently, and comfortably, regardless of age, income, or ability level. To further this goal, city planners and housing professionals are supporting new models of housing, such as visitability, universal design, or barrier free housing. As this concept supports Santa Ana's inclusive, multigenerational housing vision, 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.

HOUSING FOR PEOPLE WHO ARE HOMELESS

43. 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](#), as well as incorporate the recent best practices for development, operation and maintenance of emergency shelters and associated navigation centers.

44. 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 provided assistance for the development of 227 units of permanent supportive housing. In addition, the Santa Ana Housing Authority has 449 tenant-based vouchers for people experiencing homelessness including homeless 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.

[The City will amend the Municipal Code related to supportive housing developments with 50 or fewer units to be permitted by right in zones where multi-family and mixed-use developments are permitted in accordance with AB 2161.](#)



San Miguel Residence



45. 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 continued provision of a range of prevention, outreach, and supportive services for people experiencing homelessness.

HOUSING FOR SENIORS

46. Housing Facilities

Over 1,300 subsidized senior housing units are located in Santa Ana, and the City is monitoring them to help preserve their affordability. In 2018, the City approved a density bonus agreement with regulatory incentives for the development of a 418-unit senior housing complex. Senior housing is permitted in several districts, and regulatory incentives are available to facilitate the construction of new projects. As opportunities become available, the City continues to facilitate new senior housing, provide tenant-based housing vouchers for seniors, and/or preserve deed restricted affordable senior housing in the community.



Sunrise Gardens and many other facilities provide a range of senior housing options.

47. Senior Life Care Facilities

As the needs of an aging population change, Santa Ana seniors need a wider choice of housing options that would allow them to age in place. “Aging in place” refers to the idea that seniors should have suitable housing that allows them to stay in their own home, neighborhood or community. This includes three approaches. The City’s reasonable accommodation ordinance allows for modifications to make structures more accessible so seniors can continue to live in them. For those wishing to stay in the city but desire a more supportive environment, life-care facilities are available that allow for independent, semi-independent, or assisted-living. And, in other cases, residential care facilities for the elderly are important. To that end, Santa Ana will continue working to facilitate the most appropriate type of housing for seniors living in the community.



48. 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 riders 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 various agencies to address the housing needs of seniors.

HOUSING FOR FAMILIES

49. 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.

50. Child Care Options

The availability of affordable, conveniently located, quality childcare is one of the most pressing concerns of contemporary family life, particularly for families with single parents 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 the Zoning Code to ensure that day care and childcare provisions are consistent with state law; 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.



51. Multi-Generational Housing and Accessory Dwelling Units

According to Generations United, 51.4 million Americans live in multigenerational households which represents a 10 percent increase since 2007, defined as those consisting of 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 accessory dwelling unit 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. As part of the Zoning Ordinance update, City staff will explore and review residential development concepts that offer appropriate opportunities for multi-generational housing that fits neighborhoods in Santa Ana [and will amend the Accessory Dwelling Unit \(ADU\) Ordinance to comply with current State ADU law](#). Moreover, the City is in the process of rolling out a pre-approved accessory dwelling unit plan program to further reduce barriers to construction of these types of units.

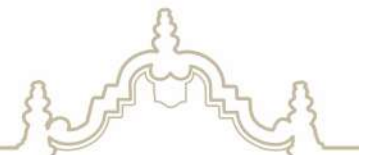
FAIR HOUSING SERVICES

52. 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.

53. 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 important for children, the elderly, and those with preexisting health concerns. With growing concern over the effects of second hand smoke, the private housing industry has become increasingly aware of the impact of second-hand smoke. Various multifamily unit complexes in Santa Ana already have adopted voluntary bans on smoking, including 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.



**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
HOUSING AND LIVABLE NEIGHBORHOODS				
Housing Rehabilitation				
1. Single-Family Home Rehabilitation	<ul style="list-style-type: none"> Provide grants of up to \$25,000 for the repair and rehabilitation of single-family homes, prioritizing applicants in R/ECAP and TCAC census tracts, and low-income households. Seek to augment funding and program reach by tracking and applying for grants as opportunities arise. 	CDA, Housing Division	CDBG HOME	Ongoing
2. Mobile Home Repair	<ul style="list-style-type: none"> Provide grants of up to \$25,000 for the repair and rehabilitation of mobile homes, prioritizing applicants in R/ECAP and TCAC census tracts, low-income households, and seniors throughout the community. Seek to augment funding and program reach by tracking and applying for grants as opportunities arise. 	CDA, Housing Division	CDBG HOME	Ongoing
3. Multiple-Family Rental Rehabilitation	<ul style="list-style-type: none"> Provide low-interest loans to assist in the rehabilitation of rental properties occupied by low-income and family households, prioritizing applicants in R/ECAP and TCAC census tracts. Seek to augment funding and program reach by tracking and applying for grants as opportunities arise. 	CDA, Housing Division	CDBG HOME	Ongoing
Neighborhood Initiatives				
4. Neighborhood Improvement	<ul style="list-style-type: none"> Assist, create, and support neighborhood associations, especially in R/ECAP and TCAC census tracts, to collaborate on projects and sponsor and hold annual events. Support the Communication Linkage Forum and the Santa Ana Resource Network to train and equip residents to be leaders in their neighborhoods. 	PBA, Planning Division	CDBG	Ongoing
5. Neighborhood Infrastructure	<ul style="list-style-type: none"> Complete infrastructure improvements in residential neighborhoods consistent with the City's Capital Improvement Plan. Seek additional funds to improve infrastructure, including state and federal grants for improvements for health and wellness, prioritizing R/ECAP and TCAC census tracts. 	PWA PWA	M2 SR2S Prop 84 CDBG GF	Ongoing Annual



**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
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, especially in R/ECAP and TCAC census tracts, to promote Healthy Neighborhood Initiative and safe and active environments. Update the City’s zoning code’s 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. 	PWA	GF	Ongoing
		PRCSA	Grants	Ongoing
		PBA	LEAP	2022-Dec. 2023
Community Building				
7. Santa Ana Building Healthy Communities	<ul style="list-style-type: none"> Support and build upon the SABHC Initiative 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	GF	Ongoing
8. Building Community Efforts	<ul style="list-style-type: none"> Prepare an annual report for City Council and public review providing the status of the General Plan Housing Element and progress toward its implementation. 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	GF	Apr. Annually
		PRCSA/ PWA	CIP, GF	Ongoing
9. Neighborhood Safety	<ul style="list-style-type: none"> Apply the principles of Crime Prevention Through Environmental Design (CPTED) to enhance safety and security within multi-family residential developments. Create a housing amnesty program for unpermitted units in the city to facilitate legalization to address potential life safety issues. 	PBA Planning Division	GF	Ongoing
		PD PBA, Planning and Code Enforcement Divisions	GF	Dec. 2024



Table 2
Housing Implementation Summary

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
Code Enforcement				
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 Encourage resident interaction with Orange County Health Department regarding county health services and educational opportunities, including Senate Bill 488 mandates related to lead hazards. Research industry 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 Coordinate PREP Program inspections and City Residential Rehabilitation Grant Program to facilitate health and safety improvements. 	PBA, Code Enforcement Division CDA, Housing Division	CDBG GF CDBG, HOME	Dec. 2022 Ongoing
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 4,200 rental units annually. Work with the County Health Department to identify infestation code violations and streamline resolution of violations. 	PBA, Code Enforcement Division	Rental Fee CDBG GF	Ongoing
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, Code Enforcement Division	CDBG GF	Ongoing
Historic Preservation				
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	CDBG Grants GF	Ongoing
14. Historic Home Rehabilitation Incentive	<ul style="list-style-type: none"> Seek new funding sources, including grants and loans that can be used or leveraged with others to focus on preventive, rather than corrective repairs of historic homes and complement the Mills Act program. Establish a fee reduction or waiver program for low-income applicants to ensure equitable access and participation in the Mills Act Program. 	CDA, Housing Division PBA, Planning Division	Grants GF	Ongoing Dec. 2023



HOUSING PLAN

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
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	GF	Ongoing Dec. 2023
HOUSING SUPPLY AND DIVERSITY				
Housing Supply				
16. Transit Zoning Code	<ul style="list-style-type: none"> Continue to implement the Transit Zoning Code for eligible properties in downtown Santa Ana. Update the development review processes for the plan area to streamline by-right housing and mixed-used developments. Facilitate and encourage the development of varied housing types at a mix of affordability levels, including for lower income households using appropriate incentives. 	PBA, Planning Division CDA, Housing Division	GF CDBG; HOME	Dec. 2023 Ongoing
17. Metro East Mixed-use Overlay Zone	<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. Update the development review processes for the plan area to streamline by-right housing and mixed-used developments. 	PBA, Planning Division	GF	Dec. 2023 Ongoing 2023
18. Urban Villages	<ul style="list-style-type: none"> Continue to facilitate and encourage the development of mixed-use housing in the various District Centers and Urban Neighborhood areas. Consider the amendment Amend the District Center and Urban Neighborhood boundaries through the comprehensive General Plan Update to allow for new residential products that meet City housing goals and policies. 	PBA, Planning Division	GF	May 2021 Ongoing 2022
19. Harbor Mixed-use Transit Corridor	<ul style="list-style-type: none"> Continue to facilitate and encourage the development of mixed-use housing in the Harbor Mixed-use Transit Corridor Specific Plan (SP2). Update the development review processes for the plan area to streamline by-right housing and mixed-used developments. 	PBA, Planning Division	GF	Dec. 2023 Ongoing 2023
20. Comprehensive General Plan Update	<ul style="list-style-type: none"> Complete multi-years long effort to comprehensively update the City's General Plan. 	PBA, Planning Division	GF	May 2022
21. Zoning Ordinance Update	<ul style="list-style-type: none"> Coordinate outreach to the public, development community, and stakeholders regarding design and development standards. Review and revise the 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 healthy design ordinance or development concepts that encourage development types that foster active living, health and wellness. 	PBA, Planning Division	GF Grants	Dec. 2022-2023



**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
Building Design				
22. Building Design Guidelines	<ul style="list-style-type: none"> Create comprehensive objective design standards 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	GF GF	Dec. 20223
23. 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 PBA, Planning Division	GF GF	Ongoing Dec. 2022
Housing Incentive				
24. Affordable Housing Incentives	<ul style="list-style-type: none"> Provide financial assistance to support the production and/or rehabilitation of affordable housing for extremely low, very-low and low-income families, prioritizing those projects in R/ECAP and TCAC census tracts. Support state and federal grant applications that provide 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 for extremely low, very-low and low-income families. 	PBA, Planning Division CDA, Housing Division	GF HOME, LMIHAF, Inclusionary	Annually & Ongoing
25. Extremely Low-income Housing	<ul style="list-style-type: none"> Provide financial assistance to support the production of affordable housing for extremely low-income households. Apply for additional funding and provide other incentives as feasible to support the production of affordable housing for extremely low-income households. Apply for opportunities to expand the number of housing choice vouchers provided by the Housing Authority, and continue to set aside at least 75 percent of vouchers for extremely low-income households. 	PBA, Planning Division CDA, Housing Division	GF HOME, LMIHAF, Inclusionary	Annually & Ongoing
26. Successor Housing Agency	<ul style="list-style-type: none"> Provide and/or leverage Successor Housing Agency funds with other sources to support the production and/or rehabilitation of affordable housing for extremely low, very-low and low-income families. 	CDA, Housing Division	LMIHAF, SERAF and Boomerang funds	Evaluate availability annually
27. Density Bonus Ordinance Update	<ul style="list-style-type: none"> Update the density bonus ordinance in accordance with recent changes to state law to incentivize the development of extremely low, very low, and low-income rental units. Provide information to developers on the opportunities to develop affordable housing using State density bonus law. 	PBA, Planning Division CDA, Housing Division	GF	Dec. 2023



HOUSING PLAN

Table 2
Housing Implementation Summary

Housing Program	Objective	Responsible Agency	Funding	Timeframe
28. Housing Opportunity Ordinance	<ul style="list-style-type: none"> Require eligible housing development projects of 20 or more units to include at least 15 percent of the units as affordable to low-income households or 10 percent of the units as affordable to very low-income households for rental housing. Require 10 percent of the units as affordable to moderate-income households for for-sale housing. 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. 	PBA, Planning Division CDA, Housing Division	GF, Inclusionary	Ongoing
29. Adaptive Reuse	<ul style="list-style-type: none"> Consider expansion of structures eligible for adaptive reuse. Promote 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	GF	Aug. 2023 Ongoing
30. Specific Development District	<ul style="list-style-type: none"> Continue to facilitate quality development in Utilize the Specific Development District Centers or other appropriate zoning districts to permit unique, sustainable, and innovative developments in the District Center and Urban Neighborhood land use designations. s and other locales through the implementation of the Specific Development zoning district. 	PBA, Planning Division	GF	Ongoing
31. 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. Promote the Establish guidelines for new housing development projects of housing 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 (see Program 24). Monitor applications for new residential development to track type of products proposed and balance of unit sizes and bedrooms proposed. 	PBA, Planning Division CDA, Housing Division PBA, Planning Division	GF, HOME, LMIHAF, Inclusionary GF	Ongoing Dec. 2026
32. Parking Study and Management	<ul style="list-style-type: none"> 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. Collaborate with OCTA, developers and business owners to create education and incentives promoting active transportation to reduce parking needs and vehicle trips. Reevaluate the Residential Parking Permit Program to ensure it complies with state law and best practices. 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. Develop a pilot program to partner with commercial property owners to utilize parking at centers adjacent to residential uses to expand parking options for residential neighborhoods. 	PBA, Planning Division PWA CDA, Economic Devt. Division	GF	Dec. 2023² Dec. 2023 Dec. 2022 Dec. 2022



Table 2
Housing Implementation Summary

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
HOUSING ASSISTANCE				
Rental Assistance				
33. Housing Choice Voucher	<ul style="list-style-type: none"> Administer the Housing Choice Voucher program for extremely low and very low-income households. Apply for new housing choice vouchers made available by HUD. 	SAHA	Federal Funds	Ongoing
34. Family Self-Sufficiency	<ul style="list-style-type: none"> Administer the Family Self-Sufficiency program and expand the participation of Housing Choice Voucher holders in the program. 	SAHA	Federal Funds	Ongoing
Housing Preservation				
35. Preservation of At-Risk Housing	<ul style="list-style-type: none"> Conduct regular outreach to owners of assisted projects to understand their intentions for converting projects and enter into negotiations to preserve at-risk housing. 	CDA, Housing Division		Ongoing
36. Multiple-Family Housing Acquisition and Rehabilitation	<ul style="list-style-type: none"> Acquire and rehabilitate multiple-family housing, encourage size-appropriate units, extend affordability controls and improve residential neighborhoods. 	CDA, Housing Division	HOME, LMIHAF, Inclusionary	Ongoing
37. Local Housing	<ul style="list-style-type: none"> Enhance market and streamline local preferences <u>program</u> for residents working and living in Santa Ana who are seeking affordable housing. Adopt a rent stabilization ordinance(s) to preserve affordable housing through regulating rent increases and establishing just cause eviction regulations. 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. Explore a right-of-first-refusal ordinance for mobile home parks and publicly supported multi-family residential properties to minimize tenant displacement and preserve affordable housing stock. Evaluate and pursue collective ownership models for mobile home parks as a tool to prevent displacement. 	CDA, Housing Division CDA, Housing Division	TBD	Dec. 2023 and Ongoing Feb. 2022 Nov. 2022 42 Dec. 2022 Dec. 2023 Dec. 2022 & ongoing
Homeownership Assistance				
38. Down Payment Assistance	<ul style="list-style-type: none"> Assist low-income households with down payment assistance loans of up to \$80,000 and moderate-income households with loans of up to \$40,000. Periodically review the down payment assistance program to increase or adjust the amount of assistance needed per household to purchase their first home. 	CDA, Housing Division	CDBG	Ongoing



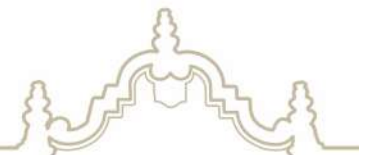
HOUSING PLAN

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
39. Homeownership Partners	<ul style="list-style-type: none"> Partner with nonprofit organizations to provide homeownership assistance and opportunities for families. Support nonprofit and for-profit organizations to educate homeowners, administer programs, and expand homeownership opportunities. Identify funding and partner with community based organizations to support a Community Land Trust (CLT) program. Develop a right of first refusal ordinance to minimize tenant displacement and promote homeownership opportunities. 	CDA, Housing Division	CDBG	Ongoing Dec. 2022 & ongoing Dec. 2023
SPECIAL NEEDS				
People with Disabilities				
40. Care Facilities	<ul style="list-style-type: none"> Amend Municipal Code to define community care facilities (including residential 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	GF	Dec. 2022 Dec. 2022
41. Housing for People with Disabilities, including Developmental Disabilities	<ul style="list-style-type: none"> Work with affordable housing developers and the Regional Center of Orange County to expand independent living options for the developmentally and physically disabled. Reviewing or endorse grant opportunities, solicit applications for projects, review and facilitate new projects, or other actions to facilitate the rehabilitation of housing for persons with disabilities. Review and evaluate the Reasonable Accommodation ordinance's findings for approval to ensure compliance with Federal Fair Housing Acts and California Fair Employment and Housing Act and amend ordinance as required. 	PBA, Planning Division CDA, Housing Division	GF HOME, LMIHAF, Inclusionary	Annual basis Dec. 2023
42. 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	GF	Ongoing Ongoing
People Who Are Homeless				
43. Emergency Shelters and Transitional Housing	<ul style="list-style-type: none"> Continue to provide funding for providers of emergency shelter and permanent supportive housing for people who are homeless. Amend the City's Municipal Code to revise its homeless shelter ordinance separation criteria to comply with state law, such as AB 139 and AB 101, and most recent best practices. 	CDA, Housing Division PBA, Planning Division	PLHA, Inclusionary , HHAP, CDBG, ESG GF	Ongoing Dec. 2023
44. Permanent Supportive Housing	<ul style="list-style-type: none"> Provide funding and technical assistance to support the provision of permanent supportive housing for people experiencing homelessness. Continue efforts to address Homeless Youth needs through access to permanent and supportive housing and workforce development. Amend Municipal Code to comply with AB 2162. 	CDA, Housing Division PBA, Planning Division	PLHA, Inclusionary , HHAP, CDBG, ESG GF	Ongoing Dec. 2023
45. Supportive Services	<ul style="list-style-type: none"> Provide funding and technical assistance, as available, to support and encourage the continued provision of a range of prevention, outreach, and supportive services for people experiencing homelessness. 	CDA, Housing Division	CDBG ESG	Ongoing

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
Senior Housing				
46. Housing Facilities	<ul style="list-style-type: none"> Continue to offer development incentives and density bonuses to incentivize the development of senior housing. Work with nonprofit and for-profit agencies that propose the construction of senior housing. 	PBA, Planning Division	GF	Ongoing
47. Senior Life Care Facilities	<ul style="list-style-type: none"> Continue to offer development incentives to incentivize life care facilities. Work with nonprofit and for-profit agencies that propose the construction of senior housing. 	PBA, Planning Division	GF	Ongoing
48. 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 Housing Division	CDBG	Ongoing
Housing for Families				
49. Family Housing	<ul style="list-style-type: none"> Provide Housing Choice Vouchers to extremely low-income and very low-income families. Provide financial assistance to support the production and/or rehabilitation of affordable housing for extremely low, very-low and low-income large families. Offer down payment assistance to qualified low-income and moderate-income families. 	SAHA CDA, Housing Division	HOME, LMIHAF, CDBG, Inclusionary	Ongoing
50. 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	GF	Dec. 2023
		CDA Housing Division	CDBG	Ongoing



HOUSING PLAN

**Table 2
Housing Implementation Summary**

<i>Housing Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Funding</i>	<i>Timeframe</i>
51. Multi-Generational Housing and Accessory Dwelling Units	<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. Create accessory dwelling unit pre-approved plan program to reduce barriers to constructing additional units at a property. Create an accessory dwelling unit webpage to promote creation of more units, provide information and links to additional resources. Explore opportunities for funding to assist lower and moderate-income homeowners to construct Accessory Dwelling Units (ADUs). Collaborate with other local jurisdictions and HCD to identify best practices to monitor ADU affordability and to create an incentives program to covenant their affordability. Amend the Accessory Dwelling Unit (ADU) ordinance to comply with state law and to incorporate best practices. 	PBA, Planning Division	GF	Dec. 2023
		PBA, Planning Division	GF	Jun. 2022 Jul. 2022
		CDA, Housing Division	TBD	Dec. 2023
			TBD	Dec. 2022
				Feb. 2023
Fair Housing Services				
52. 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. Hold annual small apartment managers' workshop to train and educate property owners, HOAs, property managers, and tenants of best practices in property management, neighborhood safety, and landlord/tenant responsibilities. Partner with legal assistance organizations to provide legal clinics for tenants on tenants' rights and recourse for intimidation and unjust evictions. 	CDA, Admin. Services	CDBG	Ongoing Annually/Jan.
		PBA, Planning Division	GF	Annually/ Dec
		CDA, Admin. Services	CDBG	Annually
53. 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 Housing Division	GF, CDBG	Ongoing Dec. 2025

Source: City of Santa Ana, 2021.

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 Housing Opportunity Ordinance

Agency:

CDA: Community Development Agency
 PBA: Planning and Building Agency
 SAHA: Housing Authority of the City of Santa Ana
 PWA: Public Works Agency
 PRCSA: Parks, Recreation, and Community Services Agency
 TCE: The California Endowment



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, including 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. Unlike surrounding cities and the county as a whole, during this period Santa Ana did not experience a residential construction boom. Rather, the City experienced an increase in household size due in part to immigration from other countries and natural increase. During the 1990s the City experienced significantly 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, however, between 2010 and 2020 the City's population increased by 2 percent according to the State Department of Finance (DOF) E-5 Population and Housing Estimates. Growth forecasts generated by Southern California of Governments (SCAG) for preparation of the regional planning document *Connect SoCal* predict a steady increase in population through 2045. From 2020 to 2045, SCAG estimates that Santa Ana's population will grow by 8.6 percent, and the countywide population is expected to increase by 11.14 percent.

Table A-1
Population Growth Trends

<i>City / County</i>	<i>2010</i>	<i>2020</i>	<i>2045</i>	<i>% Change</i>	<i>%Change</i>
				<i>2010-2020</i>	<i>2020-2045</i>
Santa Ana	324,647	331,304	360,100	2.0%	8.6%
Orange County	3,010,232	3,180,491	3,535,00	5.6%	11.14%

Source:

1. CA DOF E-5 Population and Housing Estimates
2. SCAG Growth Forecast



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.

Santa Ana has experienced slight demographic changes. Between 2000 and 2010, the Hispanic population increased its share of the 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 continued to decline 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.

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>
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	0.9%	2,745	0.8%
American Indian and Alaska Native	507	0.2%	485	0.1%
Asian	33,618	10.3%	37,440	12%
Native Hawaiian/Pacific Islander	826	0.3%	635	0.2%
Other	375	0.1%	921	0.3%

Source: US Census Bureau 2010 and 2020 Census

According to the 2014-2018 ACS, Santa Ana has a large population of foreign-born residents: 45 percent is foreign born compared to 30 percent countywide. During the 1990s, one in every four immigrants to Orange County moved to Santa Ana. Significant research has been published over time regarding the changing economic status, household characteristics, and housing needs of this group (see Population Dynamics Group at the USC, Center for Demographics Research at California State University of Fullerton (CDR), and the Federal Department of Housing and Urban Development).



Although no single study describes the characteristics of foreign-born residents, the research collectively yields insights about demographic trends that may affect housing needs. 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. With slowing immigration patterns, housing needs could likely be more influenced by second and third generations of immigrant families. Santa Ana’s future households may tend to be more affluent than previous generations and prefer smaller family sizes and homeownership opportunities. Research continues to examine the extent to which the housing market can best serve this growing segment of the population in California.

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.

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

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.

Between 2010 and 2018, the population of children/youth, college age, and young adults decreased, while the population of middle-aged adults



and seniors increased. Growth in both of these subgroups coincides with the nationwide aging baby boomer generation. These changes, indicate that residents in Santa Ana are aging in place, which may create additional demand for affordable housing opportunities 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 City’s 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. According to the 2020 Census, Santa Ana has 79,181 households, an increase of 2,285 households since 2010. Typical of a city near buildout, the composition and corresponding needs have not significantly changed over the past decade.

Between 2010 and 2018, the City of Santa Ana has seen a decrease in the number of married families with children as shown on Table A-4. However, the number of married families without children has increased, while the number in the “other families” category has slightly increased. Single persons and other nonfamilies have also seen a decline during 2010 and 2018. In 2018, the City household composition was 81 percent families, which is 15 percent higher than the national average (66 percent). This trend suggests a continued need for larger family housing than other communities.

According to DOF Population and Housing Estimates, the City’s has an average household of 4.4 persons. These DOF estimates indicate Santa Ana has the largest household size in Orange County and the 18th highest in the State. From 2010 to 2021, 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 also increased in number by 11.3 percent from 24,289 families to 27,021 families. Part of this is due to increasing housing prices and low housing supply.

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 Household Size	4.30		4.30		0percent

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



ECONOMIC CHARACTERISTICS

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

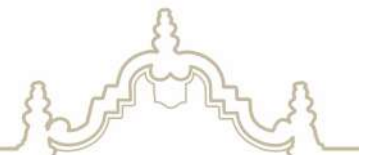
Santa Ana has a lot to offer the business community. With lower lease and sales prices than in adjacent cities, its central location in Orange County, proximity to transportation hubs (e.g., John Wayne Airport and major freeways, a major railroad line, and the Santa Ana Regional Transportation Center), 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 the City of 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 15 percent of jobs in Santa Ana. The top three manufacturers are Power Circuits Inc., Curtiss-Wright Surface Technologies, Behr Process Corporation.



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



RESIDENT OCCUPATIONS

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 pandemic, Santa Ana's unemployment rate rose considerably, from 2.8 percent in February 2020 to an unprecedented 15.1 percent by May of 2020. The job market has started to recover, and unemployment was down to 6 percent in August of 2021. Santa Ana's unemployment rate has been consistently higher than the county's which also reached its peak in May of 2020 at 14.5 percent. The county's rate for August 2021 was 5.9 percent.

Employment by Industries

According to the American Community Survey 2014-2018 5-year Estimates, the most common employment sectors for those who live in Santa Ana are Manufacturing (25,279 people), Professional Services (24,408 people), Art, Entertainment, Recreation (24,465 people), Education and Social Services (22,000 people), Retail Trade (17,812 people), Construction (13,557 people), Other (11,315 people), Finance (8,815 people), Transportation (5,221 people), Public Administration (2,807 people) and Agriculture (1,952 people).

Santa Ana has 161,159 workers living within its borders who work across 13 major industrial sectors. The most prevalent industry is manufacturing with 25,279 employees (15.7percent of total) and the second most prevalent industry is Professional Services with 24,408 employees (15.1percent of total).

Employment by Occupations

As shown in Table A-5, 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 18.8 percent. Production, transportation, and material moving occupations make the lowest percent of all occupants in Santa Ana at 11.3 percent and have average earnings of \$38,452.



**Table A-5
Occupations and Annual Earnings**

<i>Occupations</i>	<i>Total Part- & 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 45–64 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-6
Household Income, 2010-2018**

<i>Household Income</i>	<i>2010</i>		<i>2018</i>		<i>Change in No. 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 Survey 2006-2010 and 2014-2018

Income by Family Type

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

Other household characteristics are associated with differences in the median household income of Santa Ana households. According to the 2014-2018 ACS, household income varies between foreign (non-citizen) and native residents. The median income for foreign-born, non-U.S. citizen households in Santa Ana was \$56,266 versus \$73,409 for native



residents. These differences do not reflect patterns or trends associated with education, occupation, country of origin, or other factors.

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 on the other hand have a lower household size with an average of 4.75 persons. Literature from the Population Dynamics Center at the University of Southern California suggests that median household 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.

Income Distribution

The California Department of Housing and Community Development uses these household income surveys to identify the need for housing assistance in communities. As summarized below, 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 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. 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 requires no more than 30 percent of a household’s gross income.

In Santa Ana, 48 percent of the households are considered cost burdened, spending more than 30 percent of their gross household income on mortgage, rent and housing costs. As detailed in Table A-7, lower-



income renters households are experiencing the highest rate of overpayment at 96 percent.

**Table A-7
Santa Ana Household Characteristics by Tenure**

<i>Household Characteristics</i>	<i>Owner Households</i>	<i>Percent</i>	<i>Renter Household</i>	<i>Percent</i>	<i>All Households</i>	<i>Percent</i>
Number of Households	35,321	46.1%	41,200	53.8%	76,521	
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						
All Households Overpaying for Housing (>30%)	11,195	32.4%	25,330	61%	36,526	48%
Lower-Income Households Overpaying for Housing (>30-80%)	9,320	83.2%	24,605	96%	33,925	92.8%

Source:
Comprehensive Housing Affordability Strategy 2013-2017
American Community Survey 2014-2018



NEIGHBORHOOD AND HOUSING PROFILE

Neighborhood and housing characteristics define the nature of housing needs in Santa Ana. This section analyzes housing growth patterns, housing characteristics, tenure and vacancy trends, housing prices, and affordability.

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, apartments, and a combination of industrial and residential uses. The diversity of these neighborhoods is great, and each neighborhood varies widely in condition. 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.

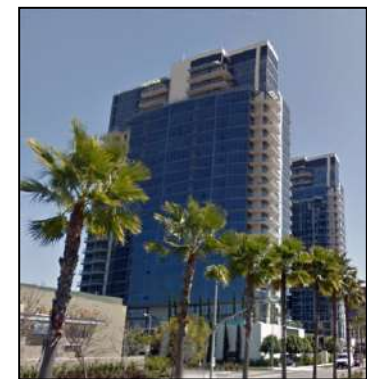
To protect and stabilize residential neighborhoods, support the City's economic base, and provide housing for the local workforce, Santa Ana has established new residential neighborhoods close to employment centers. These district centers include the Metro East, MacArthur Place, Downtown, City Place,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



Vintage Home in Santa Ana



Rowhouses in Santa Ana.



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



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 control the quality of development. This included design guidelines, traffic management plans, and neighborhood revitalization programs.

Further, in the 1990’s the City reevaluated the general plan for many areas. The City is currently concluding a comprehensive General Plan update that will further strengthen the Housing Element through a series of land use policies. The City of Santa Ana has responded to the housing crisis by adopting several specific plans that allow for high densities housing of up to 90 units per acre.

Based on 2021 State Department of Finance estimate, from 2010 to 2020 a total of 2,266 housing units were constructed in Santa Ana, an average of 224 units per year. Additionally, the population from 2010 to 2020, increased by 2.05 percent from 324,647 to 331,304 people, increasing the demand for housing.



HOUSING TYPE

As the county seat and most diverse population in the county, Santa Ana has a broad range of housing needs. It is thus important for the City of Santa Ana to maintain an equal diversity of housing types and prices that can accommodate the varied lifestyles and housing needs of people of all walks of life.

In 2020, the State Department of Finance reported 78,761 housing units in Santa Ana. Between 2010 and 2020, the housing stock increased by 1,842 units. These homes predominantly consist of single-family homes (53 percent). Multiple-family (5+ units) housing comprises 32 percent, while duplexes, triplexes, and fourplexes make up 10 percent of all housing. Mobile home units make up the remaining 5 percent. In addition, a small percentage of the existing single-family and multiple-family units are reserved for group quarter purposes.



Mixed-Use Prototypes



Residential Care Facility

**Table A-8
Housing Growth, 2010-2020**

Unit Type	Housing Units			
	2010	Percent	2020	Percent
Total Units	76,919	100%	78,761	100%
1 Unit, Detached	35,444	46%	35,768	45.4%
1 Unit, Attached	5,637	7.3%	5,801	7.3%
2 to 4 Units	7,500	9.7%	7,581	9.6%
5 or More Units	24,289	31.5%	25,562	32.4%
Mobile Home	4,049	5.2%	4,049	5.1%
Housing Types				
Single-Family	41,081	53.4%	41,569	52.7%
Multiple-Family	31,789	41.3%	33,143	42%
Other	4,049	5.2%	4,049	5.1%

Source: 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.

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





Apartment Project in Santa Ana Residential Care Facility

group quarters and shared by residents. A number of specialized facilities, including residential care facilities (serving six or fewer persons), senior housing, emergency and transitional housing, and other special needs housing are also in Santa Ana.

Housing Tenure

The American dream is often represented by homeownership, as this can provide financial independence, economic stability, and personal safety. Home investment, pride in homeownership, and the physical presence of homeowners are perceived to 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. The share of renters in Santa Ana is higher than the County’s overall.

**Table A-9
Housing Tenure, 2010-2018**

	2010		2018	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
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 propose policies to support increasing the supply of quality rental housing opportunities in the City.



HOUSING SUPPLY

Housing Vacancy

An adequate supply of housing is essential to maintaining adequate choices for residents, moderating housing prices, and encouraging the normal maintenance of properties. 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 housing vacancy rate of 1.5–2.0 percent for ownership units and 5–6 percent for rental units are optimal and offer a variety of choices for residents. In 2000, the vacancy rate was 2.2 percent for renters and 0.9 percent for owners. In 2010, the vacancy rate saw a significant increase at 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.

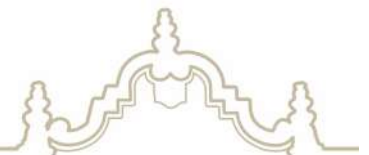
HOUSING PRICES AND AFFORDABILITY

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 home ownership 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-10 below 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-10
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 (30-50MFI)		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 (81-100MFI)		120% AMI	110% AMI
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

Source:

Based on 2021 Orange County MFI \$106,700 and 2021 HCD State Income Limits

Based on CA Tax Credit Allocation Committee 2021 Maximum Rents. 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% , 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.



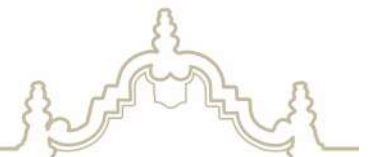
Condominiums provide low-income households, moderate-income households, seniors, and first-time homebuyers with a more affordable and lower maintenance opportunity than single-family detached homes. In Fall 2021, the median price of a condominium/townhome was \$400,000, which is affordable to households 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 multi-family apartment complexes in Santa Ana revealed that only approximately 4 percent offer three or more bedrooms.

According to Costar data, out of 1,069 apartment complexes there are 28 Class A properties. Class A properties represent the highest quality buildings in their market; these are often newer properties, with top amenities, and high-income rents. There are 126 Class B properties characterized as generally older, often with some deferred maintenance, tend to have lower income rents, and may or may not be professionally managed. Most of the apartment properties (915 properties or 86 percent) are Class C. Typically, Class C properties are more than 30 years or older, have some renovation and rehabilitation needs, and have the lowest rental rates in a market. 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. 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-11
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 & 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 additional Class A rental housing in Santa Ana. 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 otherwise loss of housing. The following defines and describes the prevalence of overcrowding and overpayment in Santa Ana.

Overcrowding

Overcrowding is a critical issue for many cities. 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 Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, and severely overcrowded when there are more than 1.5 occupants per room.

According to the 2014-2018 ACS, 23,845 households in Santa Ana (31 percent) are overcrowded. Approximately 17 percent of the City's housing units are overcrowded, and 14 percent are severely overcrowded. The ACS acknowledges error rates of 25–50 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, 18 percent of home owners (6,470) live in overcrowded conditions, while 42 percent of renters (17,375) 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 must often forego other necessities, including health insurance and adequately sized housing. In recent years, the housing boom artificially pushed up 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.



HOUSING NEEDS

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 36,975 households (48 percent) overpaid for housing. Of this total, 61 percent were renters (25,214 households) and 32 percent were owners (11,761 households). Housing overpayment is most severe among extremely low, very low, and low-income households and special needs groups.



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 that target 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.** These State licensed facilities provide care, supervision, and assistance with activities of daily living for persons 60 years of age and over. According to the Department of Social Services, the City has 486 beds in facilities that are often called assisted living facilities, retirement homes, and board-and-care homes.
- **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.
- **Continuing Care Facilities.** The City is home to a large continuing care facility, Town and Country Manor, which provides 240 beds in a variety of settings.



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 exclusively for seniors, out of which recreational, social, health, education, and other 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-12 summarizes senior housing options in Santa Ana.



Table A-12
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



Residential Care Facility

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-13 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.
- **Mental.** 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.
- **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 forth access and adaptability requirements that apply to public buildings, employee housing, privately funded, 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-6 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 0–59 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.

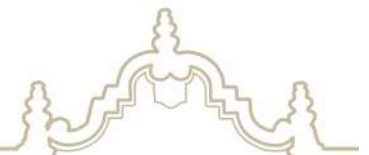
Several agencies provide services to people with disabilities. The Dayle McIntosh Center and Goodwill Industries provide programs to improve the income and quality of life of disabled persons, such as job training, independent living skills training, and barrier-free housing referrals. Goodwill Industries 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 Regional Center also provides services for developmentally disabled residents and have 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-13
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

Source:
California Department of Social Services, September 2021
California Department of Health Care Services, September 2021
California Department of Public Health, September 2021





FAMILIES

State law specifies that large families and female-headed households are a special need group. 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 household, perspective on special needs. 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. 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.



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 a rate of 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

As noted by the Anne Casey Foundation, the shortage of affordable family housing continues to create its own crisis in family well-being, education, and health. Unsafe and overcrowded housing makes parenting difficult and places enormous stress on parent-child relationships. Living in substandard housing can lead to health



problems in children, 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 among children. 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 up to 2,699 housing choice vouchers to extremely low and very low-income households each year. Of all the housing choice vouchers issued, 75 percent of them will be for extremely low-income households. 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 to assist the large number of families who are overpaying for housing and live in overcrowded conditions.

In addition, the City's Housing Opportunity Ordinance, which was adopted in 2011 and amended in 2015 and again in 2020, is designed to support the production of affordable housing units. For eligible ownership projects, at least 10 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 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 Housing Opportunity Ordinance to provide affordable housing opportunities. Programs 25-28 of the Policy Framework provide financial and technical assistance for those in need of lower rental housing.

Improve Housing Conditions

The City of Santa Ana has a large number of multiple-family housing projects that were built before the City instituted modern residential design guidelines. Although safeguards are in place to ensure that new apartments are built to modern standards, many older apartment projects need rehabilitation. Poor housing conditions include the physical condition of the unit, the lack of or condition of utilities, the lack of open space and recreational amenities, and insufficiently sized units that are unhealthy for parents and their children. The Housing Framework constitute the City's Community Building Initiatives providing guidance for building both healthy communities and supporting collaborative projects to improve neighborhood livability.





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

Santa Ana is actively involved in the acquisition and rehabilitation of multiple-family housing as a means to improve the living conditions of residents and provide a long-term or permanent source of affordable housing. Although state law focuses on increasing the supply of housing as a key driver of long-term affordability, simply increasing the supply will not address the need to maintain and improve the existing housing stock. The Framework contains programs to encourage and facilitate the preservation and rehabilitation of housing.

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 market adjustments, current condominium prices are such that the gap between the sales price and what low and moderate income families can afford is not as large as prior years. The Housing Plan states that the City will investigate the feasibility of reconstituting its homeownership program to allow residents to afford housing. Programs 38-39 are 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.

In recent years, the City of Santa Ana has supported the production of multiple-family housing consisting of a range of unit sizes and affordability levels. Table A-7 shows projects built or approved during the housing element planning period that provide a broad mix of housing types and sizes.



Table A-14
Sample of Multi-Family Residential Projects, 2017 to Present

<i>Project Name</i>	<i>Parking Ratio</i>	<i>Density</i>	<i>Bedrooms</i>		
			<i>0-1</i>	<i>2</i>	<i>3+</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 at Washington (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 Development	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. Even income support services and rental assistance, such as the vouchers available from the Housing Authority, are important ways to support 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.



According to the Southern California Association of Governments (SCAG) 6th Cycle Final RHNA Allocation Plan, the City of Santa Ana has 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 following are ways that the City is addressing the need for extremely low-income households to secure housing in Santa Ana.

Housing and Services

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

Rental Assistance

The Santa Ana Housing Authority provides over 3,026 housing vouchers to Santa Ana residents, predominantly those with extremely low-incomes. This includes 2,699 regular Housing Choice Vouchers and 650 Special Purpose Vouchers. Given the magnitude of need, vouchers serve much less than the need. In July 2015, the Housing Authority opened up the Housing Choice Voucher Program Waiting List for application and received a total of 16,375 applications. The Housing Element establishes an objective that the Santa Ana Housing Authority continue 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.

New Construction

The City of Santa Ana is providing financial incentives and also encouraging new multiple family units that would be 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

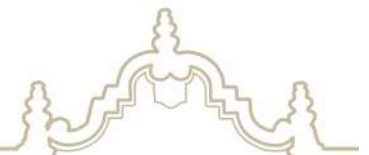
Farm workers are a special needs group because their limited income, coupled with the lack of affordable housing, places them in a precarious situation. Although the community has an agricultural past, Santa Ana is now completely urbanized. The ACS 2014-2018 reports that 1,454 Santa Ana residents, or 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.

[According to the USDA Census on agriculture population there are 377,593 farm workers hired for labor in Orange County. The City has less than one percent of those hired farm workers residing in the City. The USDA, National Agriculture Statistics provides 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. There is one agricultural zone in the City, however this zone is completely built out with single family homes. It is then estimated that Santa Ana has about one percent of hired farmworkers residing in the City, but do not work 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.](#)

PEOPLE EXPERIENCING HOMELESSNESS

As the primary health and welfare service center in Orange County, Santa Ana has a significant number of individuals and families experiencing homelessness. The County of Orange conducts an annual homeless needs assessment and biennial point in time count (PIT). A total of 6,860 individuals were counted as experiencing unsheltered and sheltered homelessness during the Orange County 2019 Point In Time Count. Based on the PIT Survey, roughly 26 percent of the people counted reported Santa Ana as their last place of residence before becoming homeless. Therefore, the City estimates that approximately 1,769 people were homeless in Santa Ana as of 2019.



Numerous factors contribute to homelessness, such as unemployment, mental illness, family problems, and substance abuse. Homeless people also have a variety of unmet needs: medical care, job training, childcare, mental health care, credit counseling, substance abuse treatment, and/or English language education. The City’s homeless population is especially vulnerable and at risk of premature loss of life due to untreated medical conditions, substance abuse, crime and violence, and exposure to the elements.

The 2019 PIT Survey revealed the following characteristics of the homeless population countywide, as summarized in Table A-5.

**Table A-15
Homeless Subpopulations and Disabling Conditions**

<i>Survey Findings</i>	<i>Percent</i>
Chronic Homelessness	36%
Substance Use Issues	26%
Mental Health Issues	21%
Developmental Disability	9%
Domestic Violence	8%
HIV/AIDS	2%

Source: County of Orange Point In Time Survey, 2019

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:

- **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.](#)
- **Emergency Shelter.** Short-term facilities, detoxification programs, and vouchers. This includes transitional shelter and case management services to prepare residents to obtain and maintain housing and live self-sufficiently. The City has also amended its Zoning Code in compliance with SB2 to allow emergency shelters in industrial zones. [After it is completed in January 2022, the Carnegie Shelter will provide 200 emergency shelter beds with wrap-around supportive services for people experiencing homelessness.](#)
- **Residential Rehabilitation/Substance Abuse.** A residence that provides housing for up to six months and provides specialized



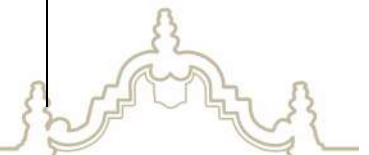
treatment and active rehabilitation for alcoholism and other drug-related issues on-site.

- **Transitional Housing.** A residence that provides a stay of up to two years, during which residents are provided case management services that prepare them to obtain and maintain housing and live self-sufficiently. [The City administers vouchers for foster youth for up to 5 years through the Foster Youth to Independence program.](#)
- **Permanent Supportive Housing.** A residence that provides permanent affordable housing for formerly homeless individuals and families that is linked with ongoing support services. [The City has financed a total of 227 permanent supportive housing units and 207 additional units are under construction \(as of January 2022\).](#)

[Orange County's Continuum of Care \(CoC\) is comprised of a large network of public, private, faith-based, for-profit, and non-profit service providers who utilize various federal, state and local resources to provide services and facilities for people experiencing homelessness. The region's cities and public housing authorities, including the City of Santa Ana, also participate in the CoC and provide funding for resources and services for people experiencing homelessness and those at-risk of becoming homeless. Non-profit homeless service providers play a critical role in the CoC and in addressing homeless needs within the City of Santa Ana. These organizations provide a range of services throughout the city ranging from job training to creating permanent supportive housing opportunities. The CoC guides the development of homeless strategies and the implementation of programs to end homelessness throughout the region.](#)

[The Emergency Solutions Grants \(ESG\) Program provides funds to assist sheltered and unsheltered homeless individuals, as well as those at risk of homelessness to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. Recipients of ESG Program funding in Orange County include the following entitlement jurisdictions: County of Orange, City of Anaheim, City of Irvine, City of Santa Ana and City of Garden Grove. Collectively, this group is referred to as the Orange County ESG Collaborative. To ensure that funds are leveraged to create maximum impact, the Orange County ESG Collaborative manages a combined Request for Proposals process, with aligned values and priorities, and makes funding recommendations collaboratively to achieve the Orange County Continuum of Care goal to end homelessness.](#)

[On an annual basis, the City provides funding for HMIS. As a member of the Orange County Continuum of Care Board, the City develops](#)



[funding, policies and procedures for the operation and administration of HMIS for the CoC. The City is also on the Policies, Procedures, and Standards Committee that reviews any policies and procedures for the operation and administration of HMIS prior to consideration by the Board. The City also serves as the Chair of the Housing Opportunities Committee for the CoC Board.](#)

Based on the 2019 estimate of approximately 1,769 individuals experiencing homelessness and the current stock of 600 emergency shelter beds and 434 supportive housing units in Santa Ana, the City has an unsheltered homeless population of 735 people (see Table A-16).

**Table A-16
Santa Ana Homeless Housing Gaps Analysis**

<i>Jurisdiction</i>	<i>Point In Time 2019</i>
Orange County	6,860
Santa Ana (26% of County)	1,769
Emergency Shelter Beds in Santa Ana	600
Supportive Housing Units	434
Unsheltered Homeless Need in Santa Ana	735

Source: City of Santa Ana, September 2021
Note: Table does not include seasonal emergency shelter beds.



HOUSING NEEDS

The City of Santa Ana has a wide range of housing needs related to the production of new housing, rehabilitation, and preservation of housing. This section provides a summary of these needs in Santa Ana.

HOUSING PRODUCTION NEEDS

State law requires cities to plan to accommodate population and employment growth through implementing housing programs. The Southern California Association of Governments (SCAG) prepares housing construction needs goals for each city in Southern California as part of the Regional Housing Needs Assessment (RHNA). All local governments are required to set aside sufficient land, adopt programs, and provide funding, to the extent feasible, to facilitate and encourage housing production commensurate with that need.

Santa Ana's RHNA for the 2014–2021 planning period is 3,137 new housing units divided into four household income/affordability groups (Table A-17).

Population and Job Growth

The first component of the RHNA is the number of units needed to accommodate projected growth in both households and employment levels. The household growth component is determined by calculating the expected population growth that will occur during the planning period. Between 2010 and 2020, as reported by the California Department of Finance, the population of Santa Ana grew approximately 2.07 percent, from 324,647 to 332,369. However, according to the 2020 Census, the population of Santa Ana decreased by approximately 4.4 percent from 324,647 to 310,227. The growth forecasts generated by SCAG for the 2020–2045 Regional Transportation Plan (RTP) identifies a 1 percent increase in population from 2020 to 2040. According to SCAG projections, Santa Ana's employment is also projected to increase by 3.3 percent from 160,600 to 166,000 jobs.

Housing Factors

While population and job growth are key influences in housing demand, the RHNA also includes factors to address the supply of new housing. The RHNA is adjusted to accommodate a certain number of vacant units to allow for sufficient choice for consumers, maintain rents and prices at adequate levels, and create an environment conducive to housing maintenance and repair. In built-out cities such as Santa Ana, new residential development requires the demolition or removal of



existing uses. SCAG adjusts the City’s housing planning goals for the RHNA by a standard “replacement factor” based on the historical rate of units lost to demolition. However, for the upcoming planning period, residential growth is proposed in underutilized commercial and office areas (in the case of Harbor Boulevard and Metro East), though additional replacement of housing is likely in areas such as Downtown and other district centers.

Fair Share Factor

State HCD ultimately determined the projected regional housing need for the SCAG region, assigning a RHNA of 1,341,827 new housing units for the 6th cycle 2021-2029 planning period. In turn, SCAG approved a methodology and process to distribute this RHNA allocation to communities in the SCAG region by income levels. Santa Ana has a total RHNA of 3,137 housing units to accommodate in the Housing Element period. The income distribution is shown in Table A-17.

**Table A-17
Regional Housing Needs Allocation, 2021-2029**

<i>Income Group</i>	<i>Percent of County AMI</i>	<i>Number of Units Allocated</i>	<i>Percent of Total Allocation</i>
Very Low	0-50%	606	19.3%
Low	51-80%	362	11.5%
Moderate	81-120%	545	17.3%
Above Moderate	120%+	1,624	51.7%
Total		3,137	100%

Source: SCAG, 2021

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 than newer homes.

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.



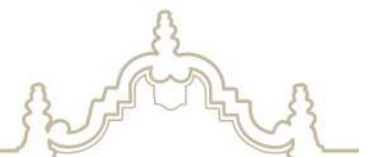
While the homes built in the last 30 years are presumed in good condition, Santa Ana homes built between 1960 and 1980 may begin to require rehabilitation. Much of Santa Ana's housing was built during this period, before the development of the latest residential design standards. Typically, these homes 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 frequently 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% 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 Community Development Block Grant \(CDBG\) program to help with code violations and repairs.](#)

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.



- **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.
- **Lead-Based Paint and Soils.** Lead paint hazards are typically found in buildings constructed prior to 1978. HUD estimates that 74 percent of dwellings built prior to 1980 have some level of lead-based paint. Lead poisoning can affect nearly 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 housing units were constructed before 1980 (used as a proxy for 1978), accounting for 87 percent of the ownership housing stock and 76 percent of the rental stock. There are 23,340 households in Santa Ana 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 units that may contain lead-based paint. According to the State Department of Public Health, based on children screened for lead, there were 57 children within Orange County with blood lead levels greater than 9.5 micrograms per deciliter in 2019. This includes 52 children under the age of six, and five children between the ages of six through 20.

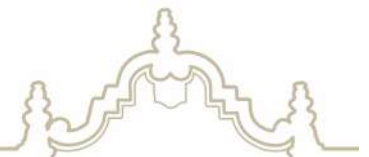
HUD defines housing problems as a household 1) not having complete kitchen facilities, 2) not having complete bathroom facilities, 3) paying more than 30 percent of gross income for housing costs, or 4) having more than 1 person/ room (excluding bathrooms and kitchens). According to the 2020-2024 Consolidated 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 households earning up to 80 percent AMI, 35,037 households (66 percent) are cost burdened. This share is predominately comprised 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.

HOUSING PRESERVATION

The City will continue to keep an inventory of affordable housing units and promote, through the Housing Division, the use of additional affordable housing assistance programs, as appropriate, for existing homes that are at risk of converting to market rate. When available, the City utilizes resources such as HOME funds, California Housing Finance Agency single-family and multi-family programs, HUD Section 208/811 loans, and HOPE II and III ownership programs to stimulate private developer and nonprofit entity efforts in development and financing of housing for lower-and moderate-income households. There are currently 512 deed-restricted affordable housing units at-risk of conversion to market rate during the planning period. The City will continue to leverage funding for the production of affordable units through the Housing Opportunity Ordinance and monitor affordability for future planning periods.



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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 on-line 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 multi-family parcels, is due to the location of mixed-use residential sites located 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

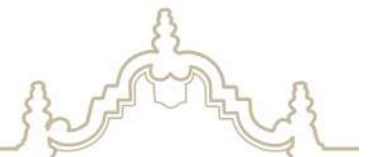
Per the R.S. Means database, construction costs for a one to seven-story apartment building in Santa Ana range from \$160 to \$200 per square foot, which translates to \$176,000 to \$220,000 for a 1,100-square-foot unit. Residential development with limited ground preparation, simplified architectural 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 estimate.

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 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, as well as 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 Residential Rehabilitation Grant 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. 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 65percent 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 also higher equity contribution 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 exceeds 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 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 for many residents to attain homeownership opportunities.



GOVERNMENT CODE 65583(A)(6) DEVELOPMENT ANALYSIS

Government Code section 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-43 for permit processing timeframes). 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.

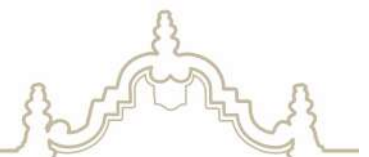
Requests for Lower Development Densities

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 that which 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 multi-family residential project, depending on project complexity. For example, a multi-family 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 the 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 incentives programs that create more flexibility and clarity to development standards, facilitate housing production (programs 24, 25, 26, 46, 49, and 51), 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

The General Plan Land Use Element sets forth land use designations to guide the location, type, and intensity and/or density of permitted uses of land. The Zoning Code implements the General Plan by providing specific direction and development standards within each of the general land use categories. The City of Santa Ana’s General Plan sets three primary residential land use categories and two mixed-use residential and commercial land use categories, described in Table B-1 below.

Table B-1
General Plan Designations Allowing Housing

<i>Designation</i>	<i>Description</i>	<i>Corresponding Zones</i>	<i>Maximum Density</i>
Low Density Residential	Primarily single-family homes in established residential neighborhoods	A1 – General Agriculture RE – Residential-Estate R1 – Single-Family Residence	7 units per acre
Low Medium Residential	Mobile homes, mix of small multiple-family units, and small lot subdivisions	R1– Single-Family Residence	11 units per acre
Medium Density Residential	Multiple-family uses, such as duplexes, apartments, or a combination of both uses	R2 – Two-Family Residence	15 units per acre
District Centers	Major activity centers that allow high-rise office and commercial uses in a mixed-use setting	SD – Specific Development Zone SP – Specific Plan	90 units per acre
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

Urban Villages

The City of Santa Ana’s Land Use Element guides the long-range vision for land use and development in specific areas of the community to promote “urban villages.” Areas designated District Centers are intended to serve as anchors and to be developed with a mixture of high-rise office, commercial, and residential uses. Areas designated as Urban Neighborhood encourage low to mid-rise with neighborhood serving



retail and public spaces. These urban village areas provide a range of shopping, business, cultural, educational, recreational, entertainment, and housing opportunities.

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 Harbor Mixed-Use Transit Corridor Specific Plan (SP2), MainPlace Specific Plan (SP3), and Metro East Mixed-Use Overlay Zone (MEMU). Finally, the Transit Zoning Code (TZC) 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.

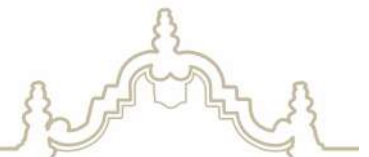
High Density General Plan Designation

The General Plan Land Use Element was amended in the late 1990s to eliminate the high density residential (HR) land use designation that supported the R-3 and R-4 zoning districts. Both these zones encompassed approximately 1,175 acres throughout the city. This action was taken to allow the City to address long-term neighborhood stabilization goals. Since that time, the City has created comprehensive design and development standards, developed programs to improve public infrastructure and traffic control, and undertaken other planning efforts to improve and rehabilitate housing.

The absence of the HR land use designation does not constrain the City’s ability to achieve its Regional Housing Needs Allocation (RHNA), nor does it constrain the production of housing. More than 80 percent of the R-3 and R-4 zones have multiple-family projects with five or more units. Although a small portion of sites are underutilized, the City has been directing multiple-family unit developments to its SD zone in District Centers and Urban Neighborhoods. Since 2016, the City has approved approximately 2,870 units within the SD zoning district. The TZC, SP2, SP3 and MEMU areas also provide additional housing opportunities.

PERMITTED HOUSING OPPORTUNITIES

The City of Santa Ana provides a broad range of housing types that allow for households of all types and income levels the ability to find suitable housing and furthers fair housing opportunities. The City’s Zoning Districts specify the types of housing allowed, specific lot coverage and development standards, and the permitting process for each use. Table B-2 summarizes the housing types allowed in each zoning district and whether the housing is permitted by right (denoted as “P” in the table) 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 the 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
<u>Supportive Housing</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>		<u>P</u>	<u>P</u>
Emergency Shelters							P		
<u>Low Barrier Navigation Ctr</u>	<u>See text on Page B-16</u>								
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				<u>C^b</u>	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

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 A1, RE, R1, R2, and R3 residential zones. 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 R4 zones. The current General Plan Land Use Element does not have a corresponding land use designation for the R3 and R4 zones, but rather actively directs and encourages multiple-family residences in many District Centers and Urban Neighborhood areas, either as a by-right use or pursuant to a SD Zone.

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.

The Government Code, Sections 65852.3 and 65852.4, specifies 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 City's Zoning Code defines mobile homes consistent with state law and allows mobile home parks in the A-1 and General Commercial (C-2) zones. Santa Ana has 29 mobile home parks containing 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 Residential Rehabilitation Grant 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 Section 65852.2, ADUs in Santa Ana are permitted by right in all zoning districts which allow residential uses.



ADUs must be a minimum of 220 square feet in size 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, the California Department of Housing and Community Development \(HCD\) noted that several sections of the City's current ADU ordinance were not consistent with State ADU law. The City has included Program No. XX in the element to update the existing ADU ordinance to comply with Government Code Section 65852.2.](#)

Farmworker and Employee Housing

The Health and Safety Code (Section 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 (General Agricultural) Zone allows one single-family dwelling, a detached guest home, and employees' quarters, all of a permanent character, in this zone. 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. The Housing Plan proposes to define employee housing and revise the permitting process, as required, in accordance with the Health and Safety Code, Sections 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. Santa Ana General Plan allows areas like the Transit Zoning Code Industrial Overlay to accommodate 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 assure a healthy living environmental. Live-work lofts were also built in areas near the Santa Ana Regional Transportation Center. These mixed-use



opportunities help to reduce vehicle miles traveled, improve jobs/housing balance and encourage social interaction.

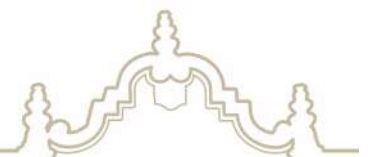
The General Plan facilitates a variety of mixed-use housing opportunities in District Centers. In these areas, generally residential development is permitted at up to 90 units per acre when it is a component of a mixed-use, master planned project, and located near a major transit corridor. The allowable floor area ratio (FAR) for District Centers ranges from 1.0 to 5.0 FAR. Additionally, the Urban Neighborhood General Plan designation allows primarily a mixture of residential uses (7 to 50 du/acre) with pedestrian oriented commercial uses. The SD zoning district is one implementing tool that allows flexible standards that facilitate these uses. Examples of these types of mixed-use development opportunities are: MacArthur Place, City Place, Metro East, and other focused areas. The Transit Zoning Code district also provides opportunities for mixed-uses.

A unique aspect of the Santa Ana Municipal Code is a live-work community, 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 within the Transit Zoning Code.](#)

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.

Based on the 2019 Orange County Point In Time Count, the number of people experiencing homelessness in Santa Ana is estimated to be 1,769 (830 unsheltered and 939 sheltered). The City currently has 434 supportive housing units to help service this population, with efforts underway to provide emergency shelter with a total overall capacity of a 625 beds to serve our community needs.



The following shows how the City actively provides a continuum of housing options for homeless people, including emergency shelter, transitional housing, and permanent supportive housing.

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 \(M-2\) zones and within Specific Development \(SD\) zoning districts that allow industrial uses. These zones comprise of](#) approximately 995 acres of land are in close proximity to transit and access jobs and provide adequate capacity to accommodate the City’s unsheltered homeless.

[Article XIII \(Homeless Shelters\) of Chapter 41 \(Zoning\) of the SAMC identifies development and operation standards for emergency shelters. Section 41-1201 \(2\) of the SAMC currently 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. Through the implementation of Program 43 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 43 also proposes to revise parking requirements consistent with AB 139.](#)

Transitional and Supportive Housing

[Transitional and Supportive Housing are regulated under Article XIII \(Homeless Shelters\) of Chapter 41 \(Zoning\) of the SAMC. The SAMC defines “transitional housing” as a building or buildings configured as rental housing developments, but 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, which shall be no less than 6 months. The SAMC defines “supportive housing” as 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 currently reside, and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing 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 developments with 50 or fewer units be permitted by-right in zones where multiple family and mixed-use developments are permitted, provided the development meets 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 44, the City plans to amend the Zoning Code to address these supportive housing provisions and ensure compliance with State law.](#)

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 non-residential 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, are designed to 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 43 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.

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.



[Community Care facility](#)

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 licensed by the State of California. The list of types of nonlicensed facilities continues to increase. Moreover, many of these nonlicensed 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 three programs. Programs 40, 41, and 42 monitor changes to state law and implement the City’s reasonable accommodation ordinance 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 in a twofold manner: 1) development standards that apply Citywide; and 2) development standards that apply to areas that will accommodate housing needed to address the RHNA.

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**

Zone	Development Standards				
	Corresponding Density ⁽¹⁾	Minimum Lot Size	Lot Cover	Building Height	Front & Rear Yard Size
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 on following page				
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

Note:

- 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](#)

Parking Solutions

The cost of structured parking can be detrimental to the impact 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.

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 32 of the Housing Plan.

In an effort to provide quality housing, further neighborhood preservation goals, and maintain property values, 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**

Project Specifics	Building Classification			
	Class 1	Class 2	Class 3	Class 4



HOUSING CONSTRAINTS

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 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, many neighborhoods in the City are 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 onsite 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>
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	Basic Requirement	Comments
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/ of 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 spaces 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 Growth Areas to Address the RHNA**

Location of Housings	Bedrooms			
	Studio	One	Two	Three
Transit-Oriented				
• TZC 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 Section 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. The Housing Plan (Program 32) 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 automobile ownership rates, which have led to parking-impacted neighborhoods, and parking standards and regulations that do not unduly burden or their surrounding 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 (e.g., open space, height, lot coverage, etc.), this effort may be completed in conjunction with the update to the Zoning Ordinance.

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 holdout 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/Agency 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 notes that graduated density zoning relies on market incentives to motivate property owners to voluntarily assemble land.¹ Property owners may see a financial incentive to consolidate lots prior to development or sale of the lot to a third party and therefore agree to 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 21). 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 of Santa Ana 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.

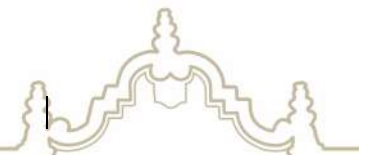
The primary local tools to facilitate development are the exception process, the density bonus ordinance, and Specific Development Zone below.

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

¹ Donald Shoup, "Graduated Density Zoning," *Journal of Planning Education and Research* 28 (Dec. 2008): 161–179.



- 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; and
- 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. The Density Bonus Law (found in California Government Code Sections 65915 – 65918) provides developers with powerful tools to encourage the development of affordable and senior housing, including up to a 50percent 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, however. 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 which 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, Section 41-1600, incorporates State Density Bonus Law *as it may be amended from time to time*. As described in the Housing Plan (Program 27), the City will revise its density bonus ordinance to reflect changes in State law.

Housing Opportunity Ordinance

[The City’s Housing Opportunity Ordinance \(HOO\) was first adopted in 2011 and has been amended since then to address market conditions and community needs, and the Covid-19 pandemic. The intent of the HOO is to encourage development of housing that is affordable to a range of households with varying income levels. The HOO applies to projects of 20 or more units and/or lots and which exceed the prescribed general plan and/or zoning densities. Projects subject to a Development Agreement, Regulatory Agreement, or is an Adaptive Reuse project are exempt from the ordinance.](#)

[The inclusionary requirements only applies to the incremental units beyond that which is allowed. For sale projects are required to provide a minimum of 10-percent of the total number of units as moderate-income units. For rent projects are required to provide affordable units as follow:](#)

- [A minimum of 15-percent of the units for low-income households; or](#)
- [A minimum of 10-percent of the units for very 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 ranges from \\$5.00 psf for projects with 5-19 lots/units to \\$15 psf for projects with 20 or more](#)



lots/units. To assist in compliance with the HOO 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 increase.

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 Government Code 65583 (a) requires assessments of the potential and actual constraints being placed 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.

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.

Among other Specific Development Zones, and as discussed later in Appendix C, the key District Centers include:

- Harbor Corridor
- MetroEast
- MainPlace
- MacArthur Place



- [MidTown](#)
- [Transit Zoning Code](#)

The implementing zone for District Centers is often the Specific Development (SD) zoning district. SD's 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.

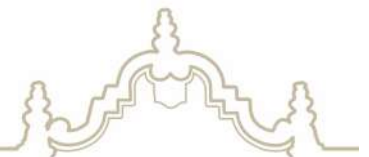
The SD district is intended to achieve several objectives: 1) protect and enhance the value of properties by encouraging the use of good design principles and concepts; 2) encourage the orderly and harmonious appearance and aesthetic development of structures and grounds; 3) provide a method for specific 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, which 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 20 and 21 of the Housing Plan propose to facilitate residential/mixed-use development along major corridors or focus areas. The City is in the process of updating the General Plan. Subsequent to the adoption of the updated General Plan, the City will undertake a comprehensive update to the Zoning Ordinance (Program 21). The comprehensive update of the General Plan will create a need to review the Zoning Ordinance for consistency and for additional direction to implement the vision, goals, and policies of the General Plan.

To that end, the Zoning Ordinance update will include a revision to development standards that will align the Zoning Ordinance 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 allow innovative and creative approaches to provide parking for all residential projects. Evaluation of parking standards will consider best practices, available development scenario models, and compared to City-approved projects from 2017 to present. Table B-7 below 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**

Project Name	Parking Ratio	Density	Bedrooms		
			0-1	Two	Three+
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 (MEMU)

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 10 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. Multi-family 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 developments are 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 designed as an integrated development on a single development site.](#)

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

Standards	Development District ¹		
	Neighborhood Transitional	Village Center	Active Urban
Allowable Uses			
Multiple-Family Uses	Permitted	Permitted	Permitted
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 ²	2.25	2.0–2.25	2.0–2.25

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

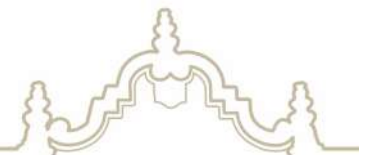
Notes:

1. The ultimate permitted density for each site is dictated by the specific development standards and building type applied in each development district.
2. 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 is 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 within 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

The Santa Ana Transit Zoning Code (TZC) 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. The TZC was adopted in 2010 and amended in 2019 to reflect current development trends and to provide flexible development standards.

[The TZC 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 \(Refer to Page B-42 for DP process\). Multi-family housing as part of a mixed-use development is permitted in the Transit Village, Downtown, Urban Center, and Corridor zoning districts. Structures/ developments over 4 stories in height require approval of a SPR.](#)

For existing industrial uses within the TZC area, property owners may develop sites as residential uses should they choose to activate the



overlay zone, much like the Metro East Mixed-Use Overlay Zone. Table B-9 illustrates the housing types envisioned for each district.

Table B-9
Permitted Residential Building Types by District in Transit Zoning Code

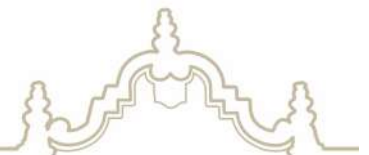
<i>Building Type</i>	<i>Building Types Allowed by Development District</i>					
	<i>TV</i>	<i>DT</i>	<i>UC</i>	<i>CDR</i>	<i>UN-2</i>	<i>UN-1</i>
Tower-on-Podium	Y	--	--	--	--	--
Flex Block	Y	Y	Y	Y	--	--
Lined Block	Y	Y	Y	--	--	--
Stacked Dwellings	Y	Y	Y	--	--	--
Hybrid Court	--	--	--	--	Y	--
Courtyard 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.

Residential Development Standards

The TZC provides a range of residential development standards that are based on building type. The TZC allows for 12 different building types, of which 10 permit multiple-family housing. Densities range from five 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 the TZC 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 per unit plus 0.15–0.25 guest spaces per unit, reflect the transit-oriented nature of the area. The TZC modest minimum and maximum setbacks (0–15 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 the Transit Zoning Code**

<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.

Notes:

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 TZC 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](#)

[The Harbor Mixed Use Transit Corridor Specific Plan \(SP-2\), 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 and Table B-12 illustrates the housing uses allowed, development standards, and types of housing envisioned for each zoning district.](#)



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

Standard	Zoning Districts			
	Transit Node North	Transit Node South	Corridor	Neighborhood Transitional
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
Structures over 3 stories in height	SPR	SPR	SPR	SPR

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

Notes:

1. 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.

P = Use permitted by right.

N = Use not permitted.

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

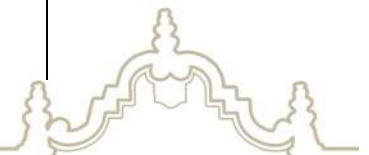
SPR = Use permitted subject to approval of a Site Plan Review.

Table B-12
Building Type and Development Standards by District

Building Type	Density Range	Lot Size (feet)		Minimum & Maximum Building Heights (stories)			
		Depth	Width	Transit Node North	Transit Node South	Corridor	Neighborhood Transitional
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.

As illustrated in Table 11, stand-alone multi-family developments are allowed in the Corridor and Neighborhood Transitional zoning districts. Multi-family units with a mixed-use development are allowed in the Transit Nodes districts. Structures/developments over 3 stories in height within SP-2 require approval of a SPR application (refer to Page B-43 for SPR process). Projects not exceeding 3 stories in height require approval of a DP application (refer to Page B-42 for DP process).



Stand Alone Residential Developments within MEMU, TZC, & 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 multi-family units be developed within a mixed-use development or as an integrated horizontal mixed-use development. These specific areas are located within transit facilities and major City and County hubs which ensure adequate access to goods, facilities, and jobs. By encouraging mixed-use development, the City intends to build environments that reduce vehicle miles travelled (VMT), improve air quality, and create a more equitable jobs-housing balance.

Over the years, both 100% residential projects and mixed-use projects have been approved and built within these areas. Requiring multi-family units within mixed-use developments has not constrained housing development in the City. 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 which have been developed under these requirements are occupied and operating successfully in concert with the residential developments above and around the commercial uses.

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 (Section 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-11 lists the City’s adopted building code standards.

Table B-13
Building Code Standards

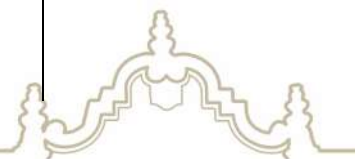
<i>Code Types</i>	<i>Adopted Building Code</i>
Building/Dwelling Code	2019 California Building Code / 2019 Residential Building Code
Plumbing Code	2019 California Plumbing Code
Mechanical Code	2019 California Mechanical Code
Electric Code	2019 California Electrical Code
Fire/Life Safety	2019 California 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 Existing 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 also 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 Municipal Code prohibits residential overcrowding. Pursuant to *Briseño v. City of Santa Ana* 6 Cal. App. 4th 1378(1992), the court held that the ordinance was “invalid,” which is to deprive 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 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-14 below.](#)



**Table B-14
Required Street Widths**

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

Flexibility to street standards, access requirements, minimum lot sizes, and setbacks can be provided through the establishment of a Specific Development zoning district. Furthermore, in 2018, the City adopted a small lot subdivision ordinance (Article XX (Small Lot Subdivisions) of Chapter 41 of the SAMC) to encourage the development of fee-simple home ownership opportunities. 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 built 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 project, the City is charged with the responsibility of ensuring that residential projects are decent, safe, and well designed. This process and the timeframes are described below and summarized in Table B-15.



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**

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 critical component of the City’s housing strategy and 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, written objective standards are available to the project applicant, the design review process is not considered a constraint to the development of housing in Santa Ana.

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 timeframe is one month for a Negative Declaration, six months for a Mitigated Negative Declaration, and one year for an EIR.

Discretionary Actions

Variations, 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 as 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 discretion on SPR applications is limited and 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-15 provides a summary of the City's development permit processing steps and the associated timeframes to process a prototypical single-family, condominium, and multiple-family residential product. Permit processing times vary from two months to 10 months, depending on the complexity of the project and associated environmental clearance required.



**Table B-15
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.

Development Fees

Table B-13 displays the planning fees for typical city permits and actions.

**Table B-16
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
Other Actions	
New Single-Family Residence Review	\$1,593
Accessory Dwelling Unit Review	\$2,421



Table B-16
Planning Division Fees in Santa Ana

<i>Planning Service</i>	<i>Fee</i>
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 three prototypical projects—a duplex, an 18-unit condo project, and a 266-unit apartment project. As shown in Table B-17, 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 other agency charges. 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-17
Residential Development Fees in Santa Ana

<i>Permitted Housing</i>	<i>Product Types¹</i>		
	<i>Van Ness Duplex</i>	<i>Edinger 17-Unit Condo Project</i>	<i>Legacy 226-Unit Apartment</i>
City Development Fees			
Building Fees	\$17,607.59	\$65,982.67	\$382,454.66
Planning Fees	\$18,797.52	\$45,190.44 ²	\$137,225.92 ³
Public Work Fees	\$10,410.00	\$20,820.00	\$102,783.96
City Impact Fees			
Park Fees	\$12,830.00	\$104,153.00	\$902,749.00
Sewer	\$2,940.00	\$24,941.00	\$194,677.00
Drainage	\$1,627.12	\$0.00	\$0.00
TSIA, Residential Multiple-family	\$0.00	\$34,764.40	\$258,170.40
Fire Facility Fee	\$0.00	\$0.00	\$247,928.76
Regional Impact (Other Agency)			
School Fees (\$3.20/sf)	\$16,166.40	\$101,132.80	\$844,012.80
Orange County Fire Authority	\$626.00	\$1,992.00	\$8,3258.00
Orange County Sanitation District	\$11,548.00	\$87,837.00	\$617,135.48
SMIP - State Seismic	\$143.00	\$1,464.00	\$1,680.00
Federal Clean Water	\$2,706.60	\$5,413.20	\$8,124.60
State Building Stds	\$44.00	\$1,464.00	\$1,680.00



Table B-17
Residential Development Fees in Santa Ana

<i>Permitted Housing</i>	<i>Product Types¹</i>		
	<i>Van Ness Duplex</i>	<i>Edinger 17-Unit Condo Project</i>	<i>Legacy 226-Unit Apartment</i>
Transportation Corridor Fee	\$0.00	\$0.00	\$602,064.00
Total Fees per Unit			
Total Fees	\$92,739.63	\$495,154.51	\$4,383,944.58
Total Fees Per Unit	\$46,369.82	\$29,126.74	\$19,397.98
City Fees Only Per Unit	\$32,106.12	\$17,403.03	\$9,849.51
Other Agency Fees Per Unit	\$14,263.70	\$11,723.71	\$9,548.47

Source: City of Santa Ana, September 2021

Notes:

- (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

In recent years, many cities have adopted inclusionary ordinances and in-lieu fees to finance the development of affordable housing. The Housing Opportunity Ordinance was adopted in 2011 and amended in 2015 and again in 2020. For eligible ownership projects, at least 10 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 households, or 10 percent affordable to very 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 impact on developers can be reduced through the pursuit of density bonus benefits.

[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. 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 webpage provides links to planning applications, building applications, online permitting system, and appointment scheduler. As a part of the Planning Division, webpages provide links to items such as the Municipal Code, zoning maps, and fee schedules among other useful information available to the public. These resources and other 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 Section 65008 to require 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

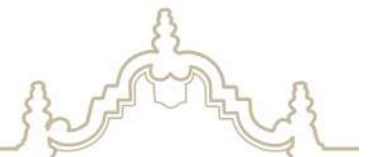
The City has already removed some potential constraints to housing by adopting the California Building Code, 2019 edition, including Appendix 1, based on the 2018 International Building Code, which requires sites, facilities, and buildings to address the accessibility requirements. The City also has 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 to be 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 42), 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 Uniform Housing Code (UHC). 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 conditional use permit (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 three housing programs (Programs 43-45) 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 6 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 40, the City will conduct a comprehensive analysis of the City's Care Home Ordinance to identify constraints and amend the zoning code to alleviate such constraints. Amendments may include the elimination of the CUP process for large care homes and requiring just an administrative DP application.](#)

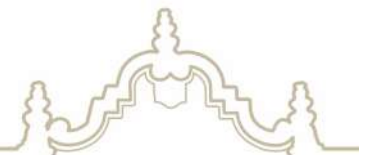


Reasonable Accommodation

In 2010, Santa Ana formally 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 implements a formal reasonable accommodation ordinance (Programs 41 and 46 in the Housing Plan). The City's reasonable accommodation information is available at City Hall and on the City's website.

The reasonable accommodation process is outlined in Sections 41-652 through 41-658 of the Santa Ana Municipal Code (SAMC). 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 take 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 non-compliance is 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 done ministerial, unless the decision is appealed.

Through Program 41, the City will re-evaluate its Reasonable Accommodation ordinance to ensure compliance with the Federal Fair Housing Acts and the California Fair Employment and Housing Act and amend the ordinance as required. In particular, the City will analyze Factor No. 8, as noted above, as a potential constraint to request reasonable accommodation.



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

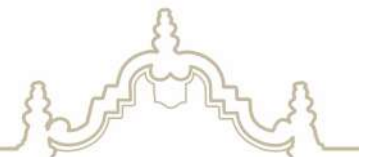
Like the entire Southern California region, the City of Santa Ana is in an area of high seismic activity. Although no active fault traces cross the City, Santa Ana's close proximity to five major fault zones subjects the area to surface rupture, ground shaking, and ground failure. Several of Santa Ana's public buildings have undergone rehabilitation to reduce seismic risk. Flooding is also a consideration for several areas within Santa Ana. The principal watercourse traversing the City is the Santa Ana River, with Santiago Creek as 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 imported 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 their 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 case 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.

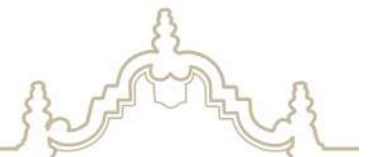
State Requirements

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 non-residential lighting requirements. Homes built under this code are about 53 percent more energy efficient than those built under the 2016 Energy Code. Non-residential 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 inventory, analysis, and assessment of the City's resources to address its housing needs, including the City's regional housing needs allocation (RHNA).

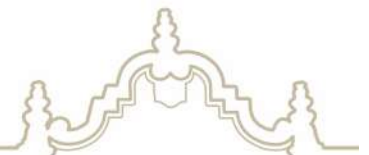
OVERVIEW

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 discussed further.

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 others, the following factors: market demand for housing; employment opportunities, availability of suitable sites and public facilities, commuting patterns, and 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 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 in order to jointly develop an affordable housing project known as the Crossroads at Washington (85 affordable units and one manager’s unit), which is comprised of 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-income category.

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

	Very Low (0–50% of MFI)	Low (51–80% of MFI)	Moderate (81–120% of MFI)	Above Moderate (120% above MFI)	Total
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
- Appropriately zoned land. Development on vacant and underutilized land that are adequate to accommodate development from 2021-2029.



HOUSING DEVELOPMENT CREDIT

This section discusses the two primary ways the City will be achieving compliance with its RHNA: accessory dwelling units (ADUs) and pipeline projects. However, it should be noted that while ADUs and pipeline projects together comprise the vast majority of units credited toward the 2021-2029 RHNA, this appendix contains a section evaluating development opportunities on vacant and underutilized sites to plan for the remaining RHNA.

ADU PRODUCTION

Accessory dwelling units (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 the use of ADUs as a key tool in achieving a greater supply of affordable housing. Santa Ana's four-year average for ADUs permitted is 70 units (2017-2021—when extrapolating for full year totals for 2021). When the average is carried over an eight-year period for the planning cycle, there is potential for more than 500 ADUs to be permitted, with a majority of them being in the lower income affordability categories (based on the SCAG study that found that of ADUs constructed in Orange County, 25 percent were affordable to very low-income households, 43 percent to low-income households, and 30 percent to moderate-income households).

Additionally, the latest round of ADU activity may be somewhat depressed by the pandemic and other events of 2020. Given the substantial legislation aimed at encouraging ADU development, the State's unprecedented projections for housing production, and increased efforts by the City (pre-approved ADU plan program slated to come online in 2022 and exploration of an ADU amnesty program in the Housing Plan), interest and applications for ADUs are expected to dramatically increase throughout the 2021-2029 planning cycle.

To hedge that optimistic outlook on ADU production should the trend not continue, only approximately 60 percent of the over 500 expected units (360) will be counted toward meeting the 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 towards the current planning cycle. In total,



there are 6,169 pipeline housing units. Of those, the following affordability levels are shown: 414 are for very low-income households, 689 are for low-income households, and 2 are for moderate-income households.

Furthermore, a survey of rental rates of approximately 1,500 recently built multi-family 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 four 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 is to continue. Applying the four percent ratio that is drawn from the survey outcome to the total above moderate income pipeline units (5,064) results in approximately 203 of those units being rented in the moderate-income income affordability category.

Collectively, through the projected ADUs, the pipeline housing units, and pipeline moderate-income units, two of the four RHNA allocation categories will be met with only the very low-income (remaining 102 units) and moderate-income (remaining 232 units) remaining and needing to be planned for and accommodated during this planning cycle through identifying housing opportunity sites. A breakdown of the ADU projections, pipeline units, and projected moderate-income units for the planning cycle by general area of Santa Ana are found on Table C-2.

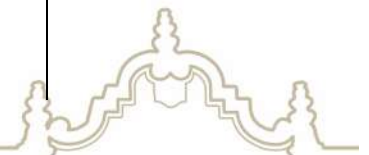
**Table C-2
Pipeline Housing Projects**

Projects	Expected Completion Date	Affordability Level				Total
		Very Low	Low	Mod.	Above	
Pipeline Projects¹						
Metro East Mixed Use Overlay (MEMU)						
Central Pointe	2027				644	644
Innovative Housing Opportunities Mixed-Use (South) Development	2025		80			80
Innovative Housing Opportunities Mixed-Use (North) Development	2025		80			80
Madison Project	2027				260	260
AMG East First Apartments / 1st Point One	2022	56	491		5	552
Elan Mixed-Use Development	2023				603	603
Transit Zoning Code (SQ-14(TZC))						
Crossroads at Washington	2023	85			1	86
Midoros LLC Train Station Lofts	2021				5	5
Legacy Square Mixed-Use Development	2023	75	17		1	93



**Table C-2
Pipeline Housing Projects**

Projects	Expected Completion Date	Affordability Level				
		Very Low	Low	Mod.	Above	Total
Francis Xavier/ FX Residences	2025	16			1	17
3rd & Broadway	2028	19			152	171
4th and Mortimer (Block A)	2026				99	99
4th and Mortimer (Block B)	2026				70	70
First American Mixed-Use Development	2024	11			209	220
Lacy Crossing Development	2023				117	117
Harbor Corridor Plan (SP-3)						
North Harbor Village	2022	89			2	91
City Ventures Townhomes	2025				23	23
John Le 5-Unit Development	2024				5	5
Bewley Townhomes 2	2025				17	17
Hue-Vo <u>Two</u> Unit Development	2026				<u>2</u>	<u>2</u>
Fifth and Harbor Mixed-use Apartments	2026				94	94
West Fifth Villas	2024				8	8
Midtown Specific Plan (SP-3)						
The Orleans Adaptive Reuse Apartments	2022				24	24
Broadway Live/Work Units	2024				3	3
MainPlace Specific Plan (SP-4)						
MainPlace Residential Community	2025				309	309
Other Areas						
Lam Residential	2024				6	6
Civic Center Subdivision	2023				6	6
Habitat for Humanity	2024			2		2
Bewley Townhomes	2024				10	10
Bui 8-Unit Development	2024				8	8
610 Newhope Condos	2022				9	9
Nguyen McFadden Duplex Development	2026				<u>6</u>	<u>6</u>
King Street Five Home Subdivision	2022				5	5
Westview <u>House</u>	2024	63	21		1	85
Saint Thomas 3-Lot Subdivision	2025				3	3
2700 Main Street Apartments	2028				312	312
Dante's North Olive Subdivision	2027				4	4
One Broadway Plaza	2028				415	415
Craftsman Residential Duplex	2024				2	2



**Table C-2
Pipeline Housing Projects**

Projects	Expected Completion Date	Affordability Level				
		Very Low	Low	Mod.	Above	Total
Haphan Housing	2026				18	18
Our Lady of Guadalupe Office/Residence	2024				1	1
Redhill/Warner	2024				1,100	1,100
Legado at the MET	2028				278	278
Legacy Sunflower	2022				226	226
SUBTOTAL		414	689	2	5,064	6,169
Accessory Dwelling Unit Projection²						
Accessory Dwelling Units/Junior Accessory Dwelling Units - Citywide		90	155	108	7	360
Moderate-income Pipeline³						
Moderate-income Pipeline Units – Citywide				203		
RHNA Allocation by Affordability Category		606	362	545	1,624	3,137
Balance of RHNA to Accommodate		102	-482	232	-3,244	-3,392

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. The total ADU projection is based on a conservative estimate (less than 65 percent) of the permitted four-year average of 70 (2018-2021; extrapolating 2021 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.
3. Moderate-income pipeline unit totals taken from total above moderate-income pipeline units and reclassified as moderate income based on survey results. The 203 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, rather, have been carried over to the moderate-income category.



LAND INVENTORY

The housing element must identify available sites in the City that can accommodate the remaining RHNA allocation. The first step in identifying adequate sites is preparing an inventory of land suitable for residential development. California Government Code Section 65583.2(a) specifically provides that land suitable for residential development includes vacant and underutilized land. This land must be zoned and designated to allow for residential development.

The land inventory shall include 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 (this information need not be identified on a site-specific basis)
- A map that shows the location of the sites included in the inventory

The second step in identifying adequate sites to address the 2021–2029 RHNA involves determining the capacity of sites identified in the inventory and their ability to accommodate affordable housing (Section 65583.2(c) of the California Government Code). To determine capacity, the City can rely on minimum density requirements adopted through local regulations. If minimum densities have not been adopted or capacity is calculated based on a density greater than the minimum, the housing element must describe the methodology used to establish the number of units.

To establish the ability to accommodate affordable housing, the analysis must demonstrate 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, and project experience. As an alternative, Section 65583.2(c)(3)(b) of the California Government Code establishes default density standards. Specifically, if Santa Ana has adopted density standards that allow at least 30 dwelling units per acre, state law presumes that the sites and zoning districts are appropriate for accommodating the regional housing need for lower income households.

For underutilized land, the housing element must also include 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 potential sites.

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 to be 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 demonstrates how the City can accommodate its RHNA in each plan area. The information is presented for each area as follows:

- A brief **introduction** of the area and **map** of identified parcels
- A **table** listing key attributes for each parcel
- 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

METRO EAST MIXED-USE OVERLAY

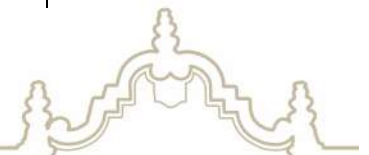
Santa Ana adopted the Metro East Mixed-Use Overlay (MEMU) in 2007 to facilitate the development of a vibrant urban village with a balance of professional office, mixed-use and live-work, commercial, retail, and recreational uses connected by highly amenitized pedestrian linkages. The plan proposes three mixed-use districts and supporting policies and programs to facilitate an ultimate buildout of 5,551 residential units. In 2018, the City updated the MEMU by extending its boundaries to create additional opportunities for residential, mixed-use, and commercial developments. In total, 33.5 acres were added to the overlay area.

The City has identified 14.16 acres of underutilized land in the plan area that can accommodate a minimum of 637 units. These sites were chosen based on their vacant status or highly underutilized nature, recent residential development interest expressed for several of these parcels, historical location within a former redevelopment project area, proximity to transit lines, and site characteristics. Table C-3 and Figure C-1 illustrate sites in the MEMU area and its development potential.

Adequate Sites Analysis

The MEMU applies to all of the properties listed in Table C-3. The properties are located in the Active Urban District and Village Center District, respectively, within the MEMU overlay district. No zoning or general plan land use designation changes would be required to develop the sites [as these districts permit residential uses](#). Residential development [in the plan area](#) must obtain a Site Plan Review application approval by the Planning Commission, which makes specific findings that the project is consistent with the MEMU. The following sites could accommodate residential development:

Site 1 is a 1.37-acre vacant two parcel site, owned by a single entity, and available for development. It is adjacent to the I-5 and a high-rise office complex. [The site is across the street from a residential project that was recently developed \(The Nineteen01\) and in close proximity to five projects shown in the pipeline projects.](#) The projects in close proximity total [2,219](#) units, of which over [700](#) are affordable. Ongoing trends in this area, marked by the development that has happened and by the number of projects in the pipeline in the immediate vicinity, speak to market



conditions present to make this site highly likely to be developed within this planning period.

Site 2 is a 3.7-acre parcel which contains an office building built in the mid-eighties. The building has struggled to remain tenanted over the years, with available parking spaces at the property having been used for surrounding development creating a barrier to tenants leasing spaces. As a result, the building has stood largely vacant and the property owner has reached out to the City to discuss options to redevelop the site with housing. This site is adjacent to the AMG East First Apartments/1st Point One (552 total units; 547 are affordable) apartments under construction. In addition, the site is located half a block from 2222 East First Street, where 418 senior affordable apartments (AMG Villa Court) were built in May 2021. Based on development trends and communication with the property owner, this site is highly likely to be redeveloped during this planning cycle.



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

Map Key	Acres	APN	Maximum Permitted Density (du/acre)	Assumed Density (du/acre)	Potential Units ¹	Unit Affordability			Existing Conditions			Owner ⁴	I/L Ratio ⁵	Existing Zoning/GP
						Lower	Mod.	Above Mod.	Site Use	Year Built ²	Site Rating ³			
1a	.5	402-211-03	<u>90</u>	<u>45</u>	23		<u>23</u>		Vacant	--	--	A	-	C1-OZ1-DC
1b	.87	402-211-02	<u>90</u>	<u>45</u>	39		<u>39</u>		Vacant	--	--	A	-	C1-OZ1-DC
Site 1	1.37				62		<u>62</u>							
2	3.72	402-191-03	<u>90</u>	<u>45</u>	167	<u>167</u>			Office Building	1985	4	B	2.30	C2-OZ1-DC
Site 2	3.72				167	<u>167</u>								
3a	2.29	400-051-15	<u>90</u>	<u>45</u>	103		<u>103</u>		Office Building	1976	4	C	0.99	P-OZ1-DC
3b	2.62	400-051-14	<u>90</u>	<u>45</u>	117		<u>117</u>		Office Building	1977	3.25	C	0.87	P-OZ1-DC
3c	2.39	400-051-09	<u>90</u>	<u>45</u>	108		<u>108</u>		Office Building	1973	3.75	C	0.55	P-OZ1-DC
3d	1.77	400-051-02	<u>90</u>	<u>45</u>	80		<u>80</u>		Office Building	1971	3.75	C	1.28	P-OZ1-DC
Site 3	9.07				408		<u>408</u>							
Total:	14.16				637	<u>167</u>	<u>470</u>							

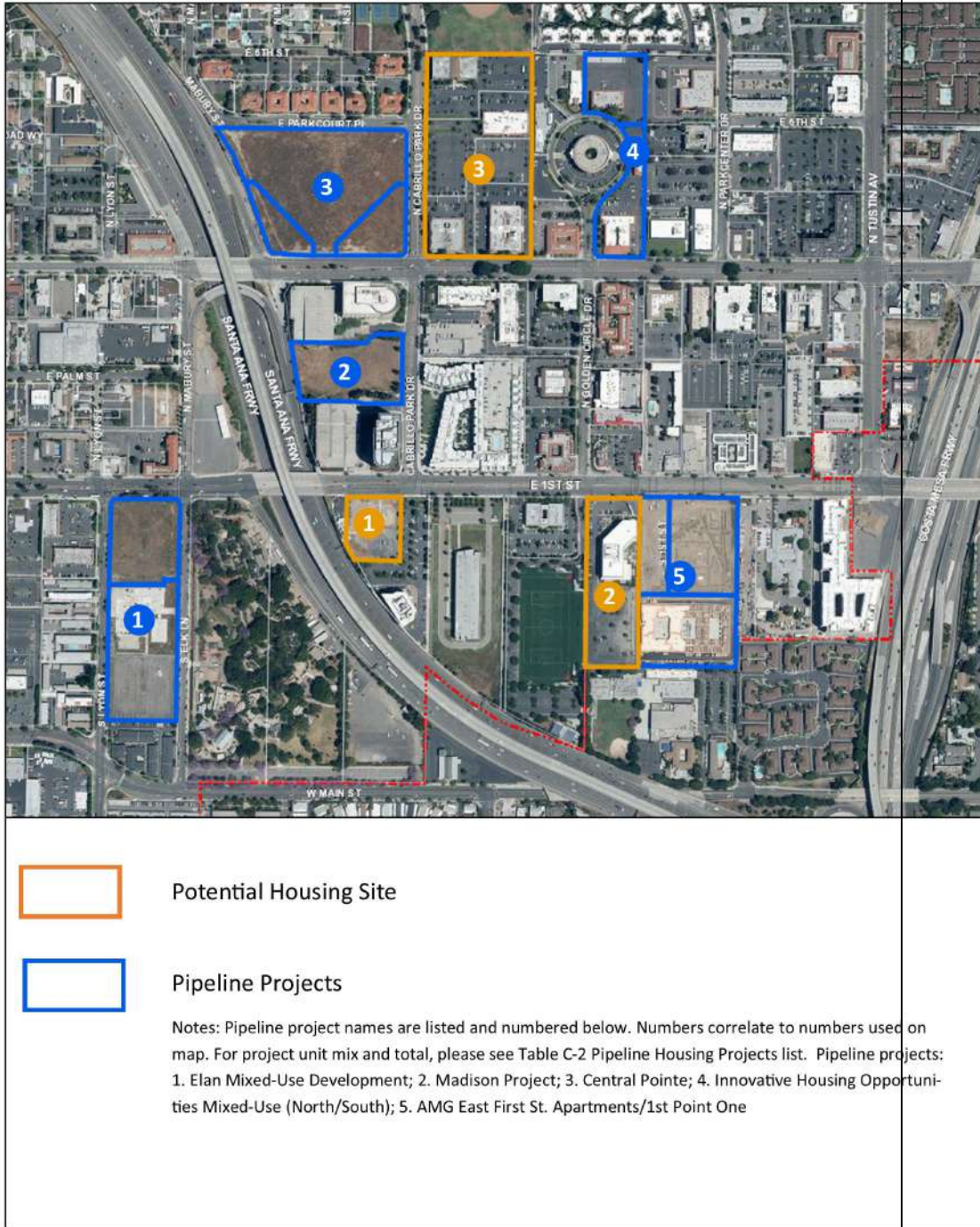
Source: City of Santa Ana (GovClarity).

Notes:

1. Based on multiplying 45 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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Figure C-1 Potential Housing Sites in the Metro East Overlay



Site 3 includes four lots totaling 9 acres, owned by a single entity. The large site size and single ownership make this site advantageous for development, as consolidation [of lots owned by multiple entities](#) would not be necessary. Structures on [lots 3a-3d](#) are or will soon be over 50 years old, and may be ready to transition to other uses. Much like [Site 1](#) and [Site 2](#), Site 3 is in an area undergoing tremendous development activity and interest from developers. The site is directly across the street from the Central Pointe development project and half a block from Innovative Housing development projects (North and South), respectively, which are both on the pipeline projects list. While the site is currently improved with low rise office buildings, sites such as these have struggled to remain competitive with newer office parks and office complexes in nearby cities that offer substantially more amenities and what contemporary office tenants are seeking. Additionally, a shift in telecommuting patterns borne by the COVID-19 pandemic has compounded the disadvantages these types of office buildings face in drawing tenants. Recent activity and trends in the MEMU, changes in market demands for these types of office buildings, as well as communication from potential developers, all indicate that this site is opportune from development.

Environmental and Infrastructure Analysis

The MEMU Environmental Impact Report (August 2018) provides the most recent focused documentation of the potential environmental constraints to residential development. [The EIR also identifies the adequacy of the existing infrastructure to serve the anticipated type and magnitude of land uses, including residential and mixed-use development, and their impact on existing and planned infrastructure.](#)

The MEMU EIR indicates that implementation of the overlay zone:

- would not be constrained by any significant biological, seismic, geological, or hazard constraints (MEMU EIR, Sections 4.3, 4.5, and 4.6)
- would generate an additional demand for water, but would not require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements (MEMU EIR, Section 4.13)
- 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 (MEMU EIR, pages 4.13-8-9)
- 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 (MEMU EIR, pages 4.13-17)

- [would not generate solid waste that exceeds the permitted capacity of landfills serving the Overlay Zone \(MEMU EIR, pages 4.13-20\)](#)
- [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 \(MEMU EIR, pages 4.13-27\)](#)

The construction of residential/mixed-uses in the MEMU could require the expansion or construction of wastewater conveyance systems. Although the proposed sites are supported by 12-15-inch sewer lines, proposed developments would be required to undertake a site-specific sewer evaluation and might be required to determine the adequacy of sewer pipe capacity in the affected project area (MEMU EIR, 4.13-16-17). [These mitigations would occur during the project development stage.](#)

[Taken together, the planned infrastructure in the MEMU Overlay is adequate to support planned residential and mixed uses and is not a constraint to its development during the 2021-2029 period.](#)

Capacity Analysis

The maximum intensity permitted by the MEMU Overlay Zone is a floor area ratio (FAR) of 3.0, as determined by the District Center General Plan land use designation and the MEMU development standards. Although converting FAR terms to density (units per acre) can vary depending on unit sizes, the maximum residential density would be approximately 90 units per acre. [Additionally, a minimum density is dictated by the requirement that every development within the Active Urban District must be at least three stories, which would generally yield a minimum of 25-30 units per acre.](#)

[While the development standards in the MEMU do allow for 100 percent non-residential development, market trends and recently constructed and proposed developments in the area demonstrate otherwise. Of the seven projects proposed and/or constructed in the same subzones in the plan area as the identified housing opportunity sites, not one has been 100 percent commercial or non-residential. All have been predominantly residential with small commercial components on the ground floor to satisfy the mixed-use requirement in the MEMU. Additionally, three of the seven projects have been affordable housing developments.](#)



**Table C-4:
Units and Densities of Recent Projects in MEMU (OZ1)**

<u>Project Name</u>	<u>Zone/GP Designation</u>	<u>Total Units</u>	<u>Density (du/acre)</u>
Elan Mixed-Use Development	OZ1/DC	603	94
Madison Project	OZ1/DC	260	93
Central Pointe	OZ1/DC	644	77
Innovative Housing Opportunities Mixed-Use Development- North and South	OZ1/DC	160	45
AMG East First Apartments/1st Point One	OZ1/DC	552	80
AMG Villa Court Senior Affordable Apartments	OZ1/DC	418	132
Nineteen 01 Development	OZ1/DC	264	52

Source: City of Santa Ana

The MEMU area is expected to build out at an average density of 45–60 units per acre based on building prototypes and [the](#) vision in the MEMU Overlay Zone. [Notwithstanding the mixed-use requirement in the subzones of the plan area where the opportunity sites are located,](#) recent developments permitted or are under construction in the MEMU have [proposed and achieved](#) higher densities [than that assumed in Table C-3,](#) ranging from 45 to [over 100](#) units per acre [as detailed in Table C-4,](#) indicating that an expected minimum density of 45 units per acre is realistic and feasible [and that the mixed-use requirement has not constrained the development of housing in the plan area.](#)

Financial Feasibility Analysis

Although the MEMU allows for both residential and nonresidential development, its policies and development standards expressly encourage and facilitate the development of higher density housing. The MEMU could accommodate more than 5,000 units. Flexible development standards allow a variety of housing types and sizes to meet a range of housing needs and enhance the financial feasibility of developing new residential projects.

Development within the MEMU area is subject to the City’s [inclusionary housing ordinance, known as the](#) Housing Opportunity Ordinance (HOO). This ordinance requires that at least 10 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 ten percent must be affordable to very low-income households for at least 55 years.



Summary Assessment

The 14.16 acres of land discussed herein are excellent candidates for new housing. The MEMU vision is to create a district center that contains residential/mixed-use and supports a vibrant employment center. The 637-unit capacity projected for the planning period is realistic, representing less than 12 percent of the total buildout for the area. The average density threshold of 45 units per acre is realistic; it is based the lower end of the range of projects in the pipeline or constructed in the plan area. The MEMU also has flexible development standards, by right residential/mixed-use subject to conformance review, and location within a redevelopment project area. Taken together, the 14.16 acres identified in the MEMU are likely candidates for residential development in the planning period.

[In accordance with Section 65583.2\(c\)\(3\)\(b\) of the California Government Code, the identified sites are zoned so they allow at least 30 units per acre and therefore have the capacity to accommodate lower income housing. Planned infrastructure in the MEMU Overlay is adequate to support planned residential and mixed uses and is not a constraint to its development during the 2021-2029 period.](#)

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! BRT 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-2 depicts the candidate sites within the Harbor Corridor Plan area that could accommodate residential development needed to satisfy the RHNA. Table C-5 provides property characteristics for each candidate site.](#)



Adequate 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, which included affordable units, totaling over 630 units were constructed along the corridor during the prior planning cycle, and various projects totaling 240 units are on the pipeline projects list above. Continued interest and development along the corridor is expected. The following sites could accommodate residential development:

Site 1 is a 1.47-acre site comprised two parcels. The two parcels are owned by one owner and improved with two small buildings occupied by auto service and sales uses, respectively. [While the site is comprised of two lots, consolidation of the parcels does not present a barrier to development as they are owned by the same entity.](#) A majority of the two parcels is being utilized as vehicle storage and is undeveloped. While 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 and will be developed during this cycle.

Site 2 is a 2.1-acre site comprised of 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.](#)



Table C-5
Vacant and Underutilized Land - Harbor Corridor Plan

Map Key	Acres	APN	Maximum Permitted Density (du/acre)	Assumed Density (du/acre)	Potential Units ¹	Unit Affordability			Existing Conditions			Owner ⁴	I/L Ratio ⁵	Existing Zoning/GP
						Lower	Mod.	Above Mod.	Site Use	Year Built ²	Site Rating ³			
1a	1.18	144-311-14	<u>50</u>	<u>30</u>	35		<u>35</u>		Auto sales	<1970	2.5	A	0.00	SP2/UN
1b	0.29	144-311-15	<u>50</u>	<u>30</u>	9		<u>9</u>		Auto services	1987	2.5	A	0.00	SP2/UN
Total:	1.47	—			44		44		—	—	—	—	0.00	—
2a	0.15	198-182-17	<u>50</u>	<u>30</u>	5	<u>5</u>			Auto service	No bldg.	1.25	A	0.03	SP2/UN
2b	0.15	198-182-18	<u>50</u>	<u>30</u>	5	<u>5</u>			Auto service	No bldg.	1.5	A	0.03	SP2/UN
2c	0.30	198-182-19	<u>50</u>	<u>30</u>	9	<u>9</u>			Vacant	No bldg.	—	B	0.01	SP2/DC
2d	0.28	198-182-20	<u>50</u>	<u>30</u>	8	<u>8</u>			Vacant	1963	—	B	0.19	SP2/DC
2e	0.42	198-182-21	<u>50</u>	<u>30</u>	13	<u>13</u>			Vacant	1963	—	B	0.02	SP2/DC
2f	0.35	198-182-22	<u>50</u>	<u>30</u>	11	<u>11</u>			Vacant	1966	—	B	0.10	SP2/DC
2g	0.21	198-182-23	<u>50</u>	<u>30</u>	6	<u>6</u>			Vacant	<1964	—	B	0.03	SP2/DC
2h	0.12	198-182-24	<u>50</u>	<u>30</u>	4	<u>4</u>			Auto service	<1960	—	A	0.70	SP2/UN
2i	0.12	198-182-25	<u>50</u>	<u>30</u>	4	<u>4</u>			Auto service	1961	1.75	A	0.70	SP2/UN
Total:	2.1	—			63	63			—	—	—	—	0.20	—
3	0.85	198-081-22	<u>50</u>	<u>30</u>	26		<u>26</u>		Vacant	No bldg..	—	A	0.00	SP2/DC
Total:	0.85	—			26		26		—	—	—	—	0.00	—
Total	4.42				133	63	70							

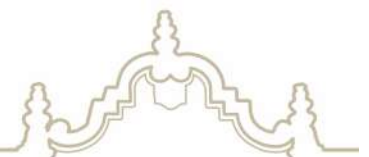
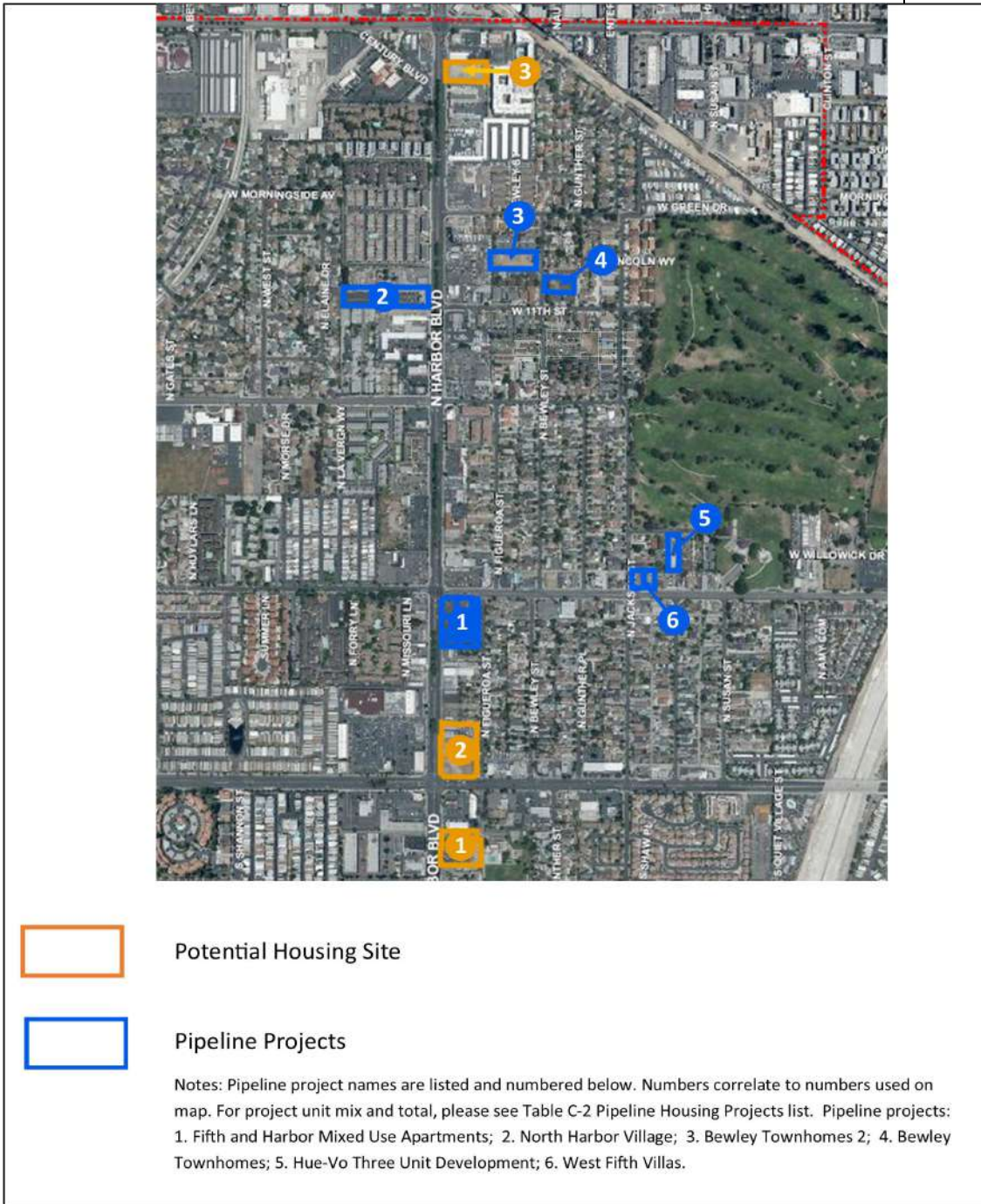
Source: City of Santa Ana, 2021 (GovClarity).

Notes:

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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Figure C-2 Potential Housing Sites along Harbor Boulevard



This site is comprised of nine lots, owned by two separate entities. Consolidation of five of those lots is not a barrier to development as they are owned by one owner and there is precedence on the corridor for multi-lot sites consolidating and jointly developing, like the Fifth and Harbor Mixed-Use Apartments sited on nine lots. Consolidating the four lots owned by a separate entity might be a challenge, however, 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 half-acre of land, which they could separately develop 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, coupled with discussions with the owners and potential developers, it can be argued with a high degree of confidence that Site 2 will be jointly redeveloped during this planning cycle.

Site 3 is a 0.85-acre site comprised of one vacant parcel that is available for development. The site is located in the norther 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 permits by right housing development, all speak to this site having a high probability of developing during the planning period.

Environmental and Infrastructure Analysis

The Harbor Corridor Plan is supported by a programmatic [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 1-5 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 their 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 additional 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 previous 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 their 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 \(Harbor Corridor Plan EIR, 5.14-4\).](#)
- [Existing and/or proposed facilities would be able to accommodate project-generated utility \(electricity and natural gas\) demands forecasted by the Harbor Corridor Plan buildout assumption \(Harbor Corridor Plan EIR, 5.14-5\).](#)

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 non-residential 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 \(residential projects in the Transit Node subzone of the plan are required to have a mixed-use component, while those in the Corridor and Neighborhood Transitional may be standalone residential\), with only one being a commercial development. Table C-6 below provides a summary of the total number of units and densities achieved at each of those sites.](#)



**Table C-6:
Units and Densities of Recent Projects in Harbor Corridor Plan (SP2)**

<u>Project Name</u>	<u>Zone/GP Designation</u>	<u>Total Units</u>	<u>Density (du/acre)</u>
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
Andalucía 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 (Previously Santa Ana Veterans Village)	SP2/NT	76	49

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.

In conformity with Section 65583.2(c)(3)(b) of the California Government Code, the identified sites are zoned so they allow at least 30 units per acre and therefore have the capacity to accommodate lower income housing.

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 Housing Opportunity Ordinance. This ordinance requires that at least 10 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 lower income households or ten percent must be affordable to very 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 that occurred during the prior planning cycle, and the number of projects in the plan area that are at various stages of the entitlement, permitting, and construction processes, it is reasonable to assume that at least 133 units of new housing at densities around 30 units per acre could be built along the corridor on the identified sites within the planning period.

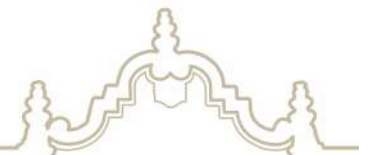
TRANSIT ZONING CODE

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 necessary to support the long-term development of a transit program. The integration of the OC Streetcar, which is slated to be completed in 2022, through the center of the plan area and connects 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 housing units.

Adequate 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. The City has identified the potential for 615 units on approximately 20.8 acres in the TZC area. 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 is 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 to accommodate a portion of the City’s remaining 2021–2029 RHNA

Additionally, the City’s Housing Opportunity Ordinance 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.

The following site can accommodate residential development:

Site 1 is comprised of two parcels owned by the County of Orange. The parcels are improved with a low intensity warehouse and vehicle storage. The parcels are now 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 878 units of pipeline projects listed above in the pipeline projects list within the plan area.](#) 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. Further, the City has been in on-going dialogue with the County of Orange regarding redevelopment of this site to residential mixed-use to align with the vision of the Transit Zoning Code.

[Table C-7 and Figure C-3 and provide an illustration and development potential of the TZC.](#)



Table C-7
Vacant and Underutilized Land in the Transit Zoning Code

Map Key	Acres	APN	Maximum Permitted Density (du/acre)	Assumed Density (du/acre)	Potential Units ¹	Unit Affordability			Existing Use				Existing Zoning/GP	
						Lower	Mod.	Above Mod.	Site Use	Year Built ²	Site Rating ³	Owner ⁴		I/L Ratio ⁵
1b	0.16	398-208-01	90	30	5	5			Parking lot	N/A	--	A	0.00	SD84/DC
1d	2.09	398-101-16	90	30	63	63			Warehouse /Parking Lot	1960	1.75	A	2.83	SD84/DC
Total	2.25	--			68	68			--	--	0.87	--	1.41	--
Total	2.25				68	68								

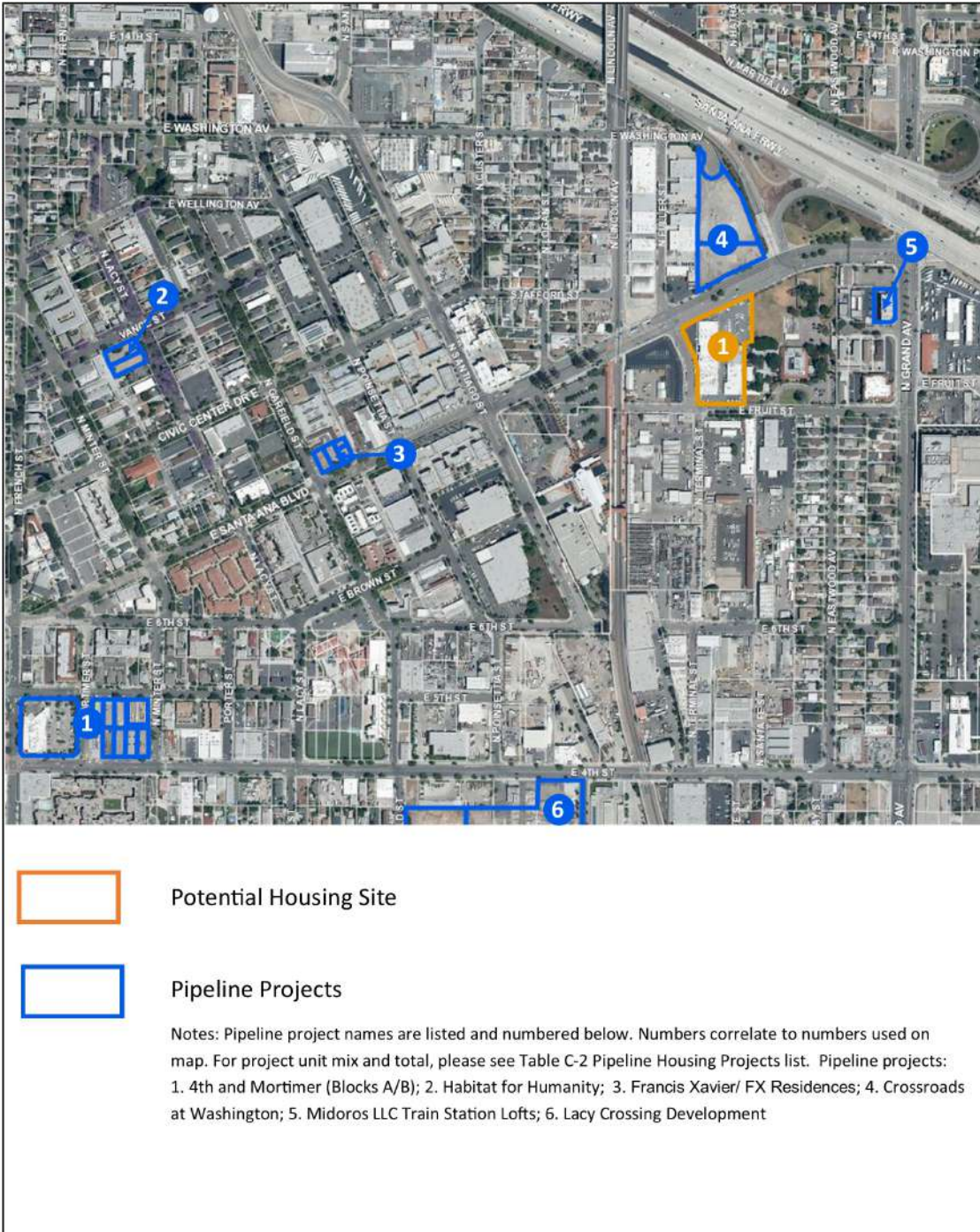
Source: City of Santa Ana, 2021

Notes:

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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Figure C-3 Transit Zoning Code Regulating Plan



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 exceeding the capacity of existing or planned stormwater drainage systems, additional mitigation will 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 the needed improvements to and/or replacement of infrastructure, the City's practice is to require all developers to pay a pro rata share of the costs to improve or replace the infrastructure. This is in addition to the on and offsite improvements that are required under the Municipal Code (Article III) to serve individual projects. These included 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

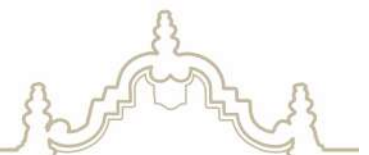
A fundamental goal of the Transit Zoning Code is to facilitate a variety of form-based housing choices that may include lofts, live-work buildings, courtyard housing, rowhouses, and other types of multiple-family housing. [While the development standards in the Transit Zoning Code do allow for 100 percent non-residential 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 non-residential. Conversely, all have been predominantly residential with those projects in the Transit Village, Downtown, Urban Center, and Corridor subzones of the plan area providing small commercial components on the ground floor to satisfy mixed-use requirements \(the Urban Neighborhood 1 and Urban Neighborhood 2 subzones of the plan permit standalone residential\).](#) 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 25–45 units per acre, with other sites building townhouses and single-family detached products at 7–15 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-8:
Units and Densities of Recent Projects in Transit Zoning Code (SD84)**

<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

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 Housing Opportunity Ordinance. This ordinance requires that at least 10 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 lower income households or ten percent must be affordable to very low-income households for at least 55 years.

Summary Assessment

In total, the projects developed in the area covered by the TZC have access to incentives to facilitate residential development, including affordable housing, within the housing element planning period. Given the TZC's potential to support up to 4,075 units, 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 within the planning period.

SITES IDENTIFIED IN PRIOR CYCLES

Of the sites identified, 11 parcels in the Harbor Corridor Plan area, six non-vacant and five vacant, were identified as opportunity sites in prior planning cycles. Pursuant state housing law, these sites are inadequate to accommodate housing for lower-income households during the current planning cycle unless the following two condition can be demonstrated: 1) The site's current zoning is appropriate for the development of housing affordable to lower-income households by either including analysis or meeting the appropriate density, and; 2) The site is subject to a housing element program that requires rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households (Gov. Code, § 65583.2 (c)).

The two non-vacant lots that make up Site 1 in the Harbor Corridor Plan, and detailed in Table C-5, were previously identified in prior planning cycles. Both have current zoning that is appropriate for the development



of housing that is affordable to moderate income households, with appropriate density permitted by right. The current zoning for these two parcels is Specific Plan No. 2 (SP2 or Harbor Corridor Plan), which permits multiple-family residential uses at a density up to 50 dwelling units per acre, more than the mandated 30 units per acre for jurisdictions in metropolitan counties.

The combined size of the two parcels is 1.47 acres. The Legacy Square Mixed-Use Development and North Harbor Village projects are both affordable housing developments being constructed on similar sized lots and are both on the pipeline development list. Additionally, the Harbor Corridor Plan requires less parking for housing compared to other residential zones in the City providing an incentive for residential development. Properties within the plan area also qualify to develop small lot subdivisions with lots as small as 1,500 square feet in size. This provides additional options for the development of up to 42, fee-simple owner occupied units at the site. Moreover, the existing zoning permits residential development by right. As such, the site meets the two conditions to be identified as an opportunity site for this planning period.

Site 2 in the Harbor Corridor Plan has nine lots (Table C-5) identified in prior planning cycles. Five lots are vacant and four have buildings. As is the case with Site 1, these lots have current zoning that is appropriate for the development of housing affordable to lower income households, and permit development of multiple-family residential uses at a density up to 50 units per acre. The combined size of the nine lots is 2.1 acres, which is of similar size to the Andalucia project (70 affordable units on 2.16-acre site built in 2017) and the Fifth and Harbor Mixed-Use project which proposes 94 units on a 1.85-acre site, both in the Harbor Corridor Plan area. The site also benefits from the same reduced parking ratios, small lot subdivision opportunities, and existing zoning that makes no distinction based on affordability of units and permits residential development. As such, the site meets the two conditions needed to be identified as an opportunity site for this planning period.

SUMMARY OF 2021-2029 RHNA CREDITS

The City of Santa Ana has made a diligent effort through approving residential projects and making available sites to fully accommodate its 2021-2029 RHNA by income category. The following table and description summarize the pipeline residential projects, accessory dwelling units, summary of available residential capacity, 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 as



to the affordability for the various units. These projects are being built in the vicinity of each opportunity area–Transit Zoning Code, Harbor Corridor Plan, and MEMU.

- 2) Accessory dwelling units. The City continues to maintain a robust ADU program. As discussed earlier, the City is conservatively estimating the production of 360 ADUs during the 2021-2029 RHNA planning period–well 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.
- 3) Opportunity Sites. The affordability of the opportunity sites is based on default densities allowed in accordance with Section 65583.2(c)(3)(b) of the California Government Code, which is 30 units per acre. The opportunity areas allow for densities significantly higher than the state default density and current projects are being built to exceed that density (tables C-4, C-6, and C-8). As such, the identified capacity of those sites will be applied toward meeting the lower and moderate income RHNA, as indicated on a site by site basis on tables C-3, C-5, and C-7.

Taken together, the City is identifying a capacity for 678 housing units in the lower income affordability category and 308 housing units in the moderate income category above that which is required by the 2021-2029 RHNA. The above-moderate income category already has an existing surplus of development capacity so no further analysis is needed. This strategy allows the City to satisfy its RHNA by income category without the need to rezone property and provides an additional buffer to address SB 166 no net loss requirements.

Table C-9
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>
<u>RHNA</u>	<u>968</u>	<u>545</u>	<u>1,624</u>	<u>3,137</u>
<u>Pipeline Units</u>	<u>1,103</u>	<u>205</u>	<u>4,870</u>	<u>6,178</u>
<u>Accessory Dwelling Units</u>	<u>245</u>	<u>108</u>	<u>7</u>	<u>360</u>
<u>Harbor Corridor Opportunity Sites</u>	<u>63</u>	<u>70</u>	<u>=</u>	<u>133</u>
<u>Transit Zoning Code Opportunity Sites</u>	<u>68</u>	<u>=</u>	<u>=</u>	<u>68</u>
<u>MEMU Opportunity Sites</u>	<u>167</u>	<u>470</u>		<u>637</u>
<u>Remaining Need</u>	<u>-678</u>	<u>-308</u>	<u>-3,253</u>	<u>-4,239</u>

Notes: RHNA totals include 42 units transferred to Santa Ana from the County of Orange. Among the lower income category – 298 Opportunity Site units are being credited to the Very Low category.



DEVELOPMENT POTENTIAL SUMMARY

The City of Santa Ana has identified several major areas—Metro East, the Transit Zoning Code, Harbor Mixed-Use Transit Corridor Specific Plan—to address its remaining RHNA. Table C-10 summarizes the sites, capacity, and program commitments that apply to specific areas proposed for residential/mixed-use.

Table C-10
Development Potential Summary

	<i>Metro East</i>	<i>Harbor Blvd.</i>	<i>Transit Zone</i>
Site Adequacy			
Available in Planning Period	Yes	Yes	Yes
Appropriate GP/Zoning	Yes	Yes	Yes
Multiple-Family Allowed by Right	Yes	Yes	Yes
Appropriate Regulations/Standards	Yes	Yes	Yes
Adequate Lot Sizes	Yes	Yes	Yes
Capacity			
Total Acres	14.16	4.42	2.25
Density Range (du/ac)	25–98	5–50	12–90
Density Assumed (du/ac)	45	30	30
Residential Units	637	133	68
Environmental Clearance	Yes	Yes	Yes
Adequate Water and Sewer Infrastructure	Yes	Yes	Yes
Transit System Access	Yes	Yes	Yes
Known Environmental Constraints	No	No	No
Financial Feasibility			
Zoning Code, Specific Plan or Overlay for Area	✓	✓	✓
CEQA Infill Exemption	✓	✓	✓

Source: City of Santa Ana, 2021.



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 is multiple-family rental housing that receives government assistance under federal, state, and/or local programs.

Santa Ana has 3,542 assisted housing units that receives public subsidies in return for long-term affordability covenants. Typically, these projects provide units affordable to very low and low-income households, including persons with special needs. Some of the 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.

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 element must include:

- Each development by project name and address
- Type of governmental assistance received
- Earliest possible date of conversion from low-income use 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 C-11 details the City’s affordable housing inventory that is at risk of converting to market rate housing by June 30, 2031).

Table C-11
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			<u>512</u>	<u>512</u>	--

Source: City of Santa Ana, 2021.



EVALUATION OF PRESERVATION OPTIONS

Table C-11 shows that 512 housing units are at risk of conversion by the end of the planning period (2029). 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 to purchase the units at risk. Using typical assumptions on revenue and expenses, Table C-12 estimates the market value of the at-risk units.

**Table C-12:
Estimated Market Value of Units At-Risk**

<u>Project</u>	<u>Restricted Units</u>
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)

*= Income brought in by the project annually.

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

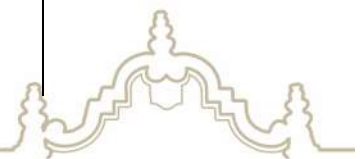
5. Multiplication factor for a building in good condition is 12.5.

Purchase of Affordability Covenants

Another option to preserve the affordability of an at-risk project is to provide 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 C-13 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 C-13:
Rental Subsidies Required**

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

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 a variety of 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 provides a range of cost estimates depending on unit size for multi-family rental housing. Based on the range shown, it would cost approximately \$330,000 to construct one new multiple-family housing unit. For the identified 512 units at-risk, new construction would cost approximately \$168.9 million. This estimate assumes a \$200 per square foot costs and does not include the cost of land acquisition; therefore, the estimates shown in Table C-1 are conservative.

Table C-14: Estimated New Construction Cost

<u>Total Units</u>	<u>Estimated Average Unit Size</u>	<u>Estimated Gross Building Size</u>	<u>Estimated Gross Building Cost</u>
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, the



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, whereas 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 housing units to replace the currently at-risk units is high, with an estimated total cost of nearly \$168.9 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.

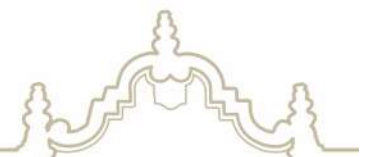
Entities Interested in California's First Right of Refusal Program

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 that may be interested in participating in California's First Right of Refusal Program in Orange County. The list is located at <https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml>. Three of those organizations on the list include Jamboree Housing Corporation, Innovative Housing Development Corporation, and Civic Center Barrio Housing Corporation, all of which develop, acquire, renovate, manage affordable housing in Santa Ana and in other cities in California for working families, seniors, and people with special needs.

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 of at-risk projects 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](#).
- **Technical Assistance.** [As resources are available, the City will](#) assist the owners of properties eligible for conversion to market rate housing in seeking funds and completing 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 a number of qualified agencies interested in managing affordable housing in Orange County and other counties 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 35, the City will allocate, [as feasible](#), technical and financial resources to preserve at-risk housing units in Santa Ana.



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.

FEDERAL RESOURCES

Housing Choice Voucher Programs

The Housing Choice Voucher Program is a federal rental assistance program that provides a 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 any housing that meets program requirements—it is not limited to units located in subsidized housing projects. This Program includes project-based vouchers. A total of 20 percent of the Annual Contributions Contract (ACC) for the Housing Authority can be used for project-based vouchers. An additional 10 percent of the ACC can be used for project-based vouchers if they are awarded to projects for special needs populations. Funds available in 2021/2022 total \$42.7 million.

Community Development Block Grant (CDBG) 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 (HOME) 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 re-housing, outreach, and homelessness prevention services. Funds available in 2021/2022 total \$489,141.

Low Income Housing Tax Credits (LIHTC)

The federal Low Income Housing Tax Credit 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 utilize this source of funding as the largest source of funding for their projects.

STATE RESOURCES

Permanent Local Housing Allocation Program (PLHA)

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.

LOCAL RESOURCES

[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 assisting the homeless population and persons and families of extremely low, very low, and low income within the County of Orange.](#)



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), as well as 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 Housing Opportunity 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.

PRIVATE RESOURCES

Federal National Mortgage Association (Fannie Mae)

Fannie Mae provides financial resources through a variety of programs, including the Community Home Buyer Program (fixed-rate mortgages), the Community Home Improvement Mortgage Program (mortgages for purchase and rehabilitation of a home), and the Fannie Neighbor Program (low down-payment mortgages for the purchase of single-family homes for underserved low-income minorities).

California Community Reinvestment Corporation (CCRC)

The CCRC is a nonprofit mortgage banking consortium that pools resources to reduce lender risk in financing affordable multiple-family housing. CCRC provides long-term mortgage and bond financing for new construction, acquisition, and rehabilitation, and direct equity investment funds to acquire housing at risk of converting to market rate rents. These programs are available for family and senior housing, mixed-use projects, and special needs housing.



Federal Home Loan Bank Affordable Housing Program

This is a competitive program that provides grants twice a year through financial institutions for investment in low or moderate-income housing initiatives. Member banks partner with developers and community organizations to finance the purchase, construction, or rehabilitation of owner-occupied or rental housing. Grants can also be used to lower the interest rate on loans or cover down payment and closing costs. The program is flexible so that funds can be used in combination with other programs and funding sources, ensuring a project's feasibility.



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, and supporting policies to guide actions with respect to housing:

- Livable and complete neighborhoods of quality housing conditions, ample parks and community services, and 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.
Note 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), (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 in the City. 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 in the City and encouraged collaboration and coordination between residents, their volunteer associations, 100+ Home Owner Associations (HOAs), 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 toward 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.</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 infrastructure, including state and federal grants for 	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.</p> <p>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 also secured for pedestrian improvements</p>



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

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
	improvements for health and wellness	PWA	along First Street in Downtown and 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. In 2017, the City began community-based planning efforts to improve walk-ability/bike-ability 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. Appropriateness: This program will continue for the 2021–2029 period.
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 	PWA PRCSA	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 purchase of additional street lights and conversion of all City owned streetlights to LED. Educational awareness was conducted via the City web site, literature, and public events.



**Table D-2
Progress toward 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>
<p>7. Santa Ana Building Healthy Communities</p>	<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 	<p>PBA, Planning Division</p>	<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>
<p>8. Building Community Efforts</p>	<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 	<p>PBA, Planning Division PWA</p>	<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 toward 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> <ul style="list-style-type: none"> • Appropriateness: This program will be expanded for the 2021–2029 period.
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.</p> <p>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 	PBA, Code Enforcement Department	<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. 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 toward 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"> • Prepare an annual report for City Council summarizing PREP Program activities and accomplishments • Coordinate PREP inspections and City Rehabilitation Loan Program to facilitate improvements 	CDA Housing Division	
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 for the 2021–2029 period.</p>



**Table D-2
Progress toward 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 not be continued.</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 continue for the 2021–2029 period.</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 period covering 2014-2021.

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 during the planning period, 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 toward the 2014–2021 RHNA objectives**

<i>Type of Project</i>	<i>Affordability Level</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%% percent	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.

Identification of Housing Sites

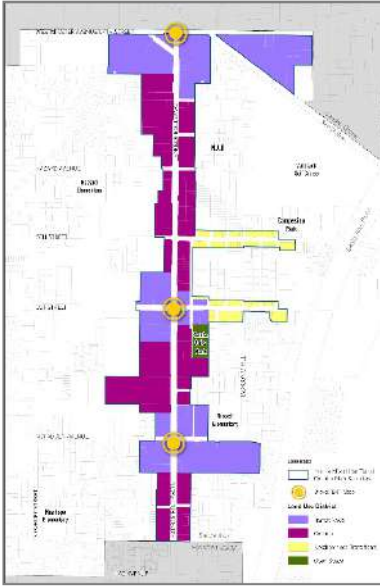
The 2014–2021 Housing Element, built on the Land Use Element by setting goals, policies, and actions to facilitate development in District Centers and other infill locations such as transit corridors and the downtown area. During the planning period, the City updated the Transit Zoning Code, which covers 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 5 and 55 freeways. The Transit Zoning Code and MEMU facilitates a range of housing products with varying levels of affordability.

The 2014–2021 Housing Element identified several corridors to accommodate residential development to address its RHNA goals. The City was successful in updating 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.

Housing Incentives

Santa Ana adopted several programs to facilitate the development of affordable housing in the community. In 2011, the City adopted a Housing Opportunity Ordinance. For eligible ownership projects, at least 10 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 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.



The Harbor Mixed-use Transit Corridor Specific Plan encourages mixed-use, transit-oriented development.



Housing Production and Approval

Ultimately, the success of housing programs is reflected in 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 built or approved during the planning period include:

- **Santa Ana Arts Collective.** This project includes the adaptive reuse of an existing office building and new construction, for a total of 57 affordable rental units designated for professional artists of all disciplines and one manager’s unit. Of the total number of units, 15 are set aside for permanent supportive housing. The project was funded using approximately \$4.8 million in Inclusionary Housing funds, \$2.6 in HOME Investment Partnership Program funds, and \$500,000 in Community Development Block Grant funds.



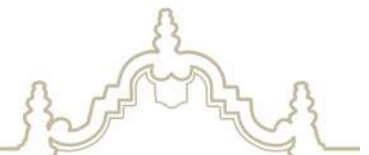
**Table D-4
Progress toward Housing Element Goal #2 Objectives**

<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 was approved by City Council in 2010 and amended by 2019 in an effort to implement a variety of residential and mixed-use opportunities in the Renaissance project area. The Transit Zoning Code was completed after an extensive multiyear outreach effort to engage public discussion. 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 the development of a 16-unit supportive housing project (FX Residences) and a two-unit housing project (Habitat for Humanity) within the boundaries of the Transit Zoning Code.</p> <p>Appropriateness: This program is appropriate for the 2021–2029 period.</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.</p>



**Table D-4
Progress toward Housing Element Goal #2 Objectives**

Name of Program	Objective	Responsible Agency	Status
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 has 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: This program is appropriate 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>



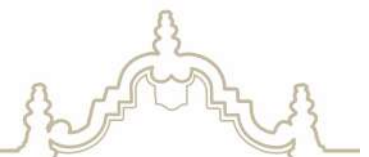
**Table D-4
Progress toward Housing Element Goal #2 Objectives**

<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 meeting 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: This program 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 toward Housing Element Goal #2 Objectives**

Name of Program	Objective	Responsible Agency	Status
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.</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, however, is planned to be completed during the next.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>



**Table D-4
Progress toward Housing Element Goal #2 Objectives**

Name of Program	Objective	Responsible Agency	Status
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 	PBA, Planning Division CDA, Housing Division PBA, Planning Division	<p>Accomplishments:</p> <p>In 2016, the City supported two (2) 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 (2) affordable housing rental projects. The City also worked with a local non-profit 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 (3) 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 non-profit 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 non-profit 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.</p> <p>In 2019, the City conducted a Tax Equity and Financial Responsibility Act (TEFRA) Hearing for two (Cornerstone</p>



**Table D-4
Progress toward 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 (Santa Ana Veterans Village, Aqua Housing and Tiny Tim) broke ground with financial support from the City. The four new construction 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 Tax Equity and Financial Responsibility Act (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>



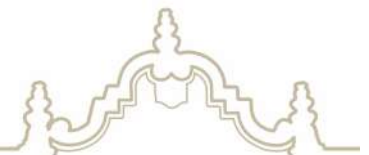
**Table D-4
Progress toward Housing Element Goal #2 Objectives**

<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, one hundred (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 toward Housing Element Goal #2 Objectives**

Name of Program	Objective	Responsible Agency	Status
			<p>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.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
<p>27. Successor Housing Agency</p>	<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 	<p>PBA, Planning Division</p>	<p>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</p> <p>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 the City of Santa Ana (both the amount of funds and number of units are already referenced in Goal # 26).</p> <p>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.</p> <p>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.</p> <p>In 2019, the City included one Housing Authority-owned property housing asset in a RFP for the development of affordable housing on the site. Pre-development 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).</p> <p>In 2020, Pre-development work for two homeownership units for moderate-income households is underway for a site awarded to Habitat for Humanity in the 2018 Request for Proposal (RFP) for Affordable Housing Development. Pre-development 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.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
<p>28. Density Bonus Ordinance Update</p>	<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 	<p>CDA, Housing Division Economic Develop.</p>	<p>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).</p> <p>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</p>



**Table D-4
Progress toward Housing Element Goal #2 Objectives**

Name of Program	Objective	Responsible Agency	Status
			<p>American); a 552-unit affordable rental project (First Point I and II); and a 93-unit affordable rental project (Legacy Square).</p> <p>In 2020, the City approved a Density Bonus Agreement for the development of one project: a 171-unit mixed-use commercial and residential development with 19 affordable units for very-low-income households (Third & Broadway).</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
<p>29. Housing Opportunity Ordinance</p>	<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 	<p>PBA, Planning Division</p>	<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, twelve 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>
<p>30. Adaptive Reuse</p>	<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 	<p>PBA, Planning Division</p>	<p>Accomplishments: In 2014, the City adopted an Adaptive Reuse Ordinance allowing existing non-residential 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>
<p>31. Specific Development District</p>	<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 	<p>PBA, Planning Division</p>	<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>



**Table D-4
Progress toward Housing Element Goal #2 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>Appropriateness: This program will continue for the 2021–2029 period.</p>
<p>32. Variety in Household Sizes Program</p>	<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 • 	<p>PBA, Planning Division</p>	<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>
<p>33. Parking Study</p>	<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 	<p>PBA, Planning Division</p>	<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 also 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 non-elderly, disabled people experiencing homelessness, homeless veterans and foster youth.

Table D-5 on the following page describes progress made to individual housing assistance programs.



**Table D-5
Progress toward 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, six (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, seven (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, seven 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.</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 	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 toward Housing Element Goal #3 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
	<ul style="list-style-type: none"> Assist in preserving the Wycliffe Towers senior apartment project by issuing bond 		
<p>38. Multiple-Family Housing Acquisition and Rehabilitation</p>	<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. 	<p>CDA, Housing Division</p>	<p>Accomplishments: In 2016, after issuing two separate RFPs, the City awarded 71 project-based vouchers and \$1.2 million in HOME Investment Partnerships Program 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. It is expected to begin construction in Jan 2017. 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 July 2017. The project broke ground on construction. In 2019, The City consolidated forty-three existing loans into two amended and restated loan agreements, and resubordinated \$7.2 million in current affordable housing loans for the rehabilitation of 126 affordable rental units at Cornerstone Apartments.</p> <p>Appropriateness: This program will continue for the 2021-2029 period.</p>
<p>39. Neighborhood Stabilization</p>	<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, the City continued to implement its remaining three NSP awards. In 2016, one (1) development was awarded funds and is currently under construction. During 2017, the City continued to implement its remaining three NSP awards. This year, one (1) development was completed, yielding 69 affordable housing units. In 2018, the City issued an RFP for Affordable Housing Development that includes the remaining NSP Program funds. The Review Panel for the RFP is recommending award of the NSP Program funds to a new construction affordable housing project (# of units to be determined). In 2018, the City issued an RFP for Affordable Housing Development that included the remaining NSP Program funds. In 2019, the City awarded \$963,951 in NSP program funds to the construction of a 100% affordable housing project consisting of 85 units of rental housing (Crossroads at Washington). All of the units will be affordable for extremely low-income households and 43 of the 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 toward Housing Element Goal #3 Objectives**

Name of Program	Objective	Responsible Agency	Status
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 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 completed construction of two (2) homes and sold the homes to qualified homebuyers. In 2017, Habitat started construction of five (5) 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 non-profits 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 continue for the 2021-2029 period.</p>



**Table D-5
Progress toward 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 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.</p> <p>The City continued to monitor legislative initiatives and programs to address local foreclosure impacts and rental increases.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</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 <p>Amend Municipal Code to define facilities not regulated under the Community Care Facilities Act and specify permit process consistent with state law</p>	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 Municipal Code was not updated to ensure consistency with state law.</p> <p>Appropriateness: 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 (formerly ESG) 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 it 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</p>



**Table D-5
Progress toward Housing Element Goal #3 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			Washington) with 192 units including 148 units of permanent supportive housing. Appropriateness: This program will continue for the 2021–2029 period.
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	Accomplishments: City's reasonable accommodation ordinance is posted on the City website and available in print version at the public counter for reference for appropriate modifications. The City continues to process these types of applications making accommodations to allow equal enjoyment of residential units for those covered under the Acts. Appropriateness: This program will continue for the 2021–2029 period.



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. While adding to the richness of the Santa Ana community, many residents have special housing needs. Many of these special needs are common to all, while other special needs are more common to people of different 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 1 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 consists of 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 a concise description of each program's progress.



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

Name of Program	Objective	Responsible Agency	Status
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 eleven (11) organizations, including fifteen 15 programs. Six (6) programs provided shelter; three (3) programs targeted street outreach for people who are homeless; three (3) programs provided homelessness prevention; one (1) program provided data collection; and two (2) programs provided rapid re-housing.</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 multi-service 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 (8) organizations, providing twelve (12) different programs. Four (4) programs provided shelter; three (3) programs targeted street outreach for people who are homeless; two (2) programs provided homelessness prevention; one (1) program provided data collection; and two (2) programs provided rapid re-housing</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<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 (9) non-profits 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 City municipalities, along with 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. In 2018, the City provided Emergency Solutions Grant (ESG) program funds to seven (7) organizations, providing eleven (11) different programs. Three (3) programs provided shelter; three (3) programs targeted street outreach for people who are homeless; two (2) programs provided homelessness prevention; one (1) program provided data collection; and two (2) 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</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>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 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 City municipalities, along with other constituents to optimize the delivery of homeless services. 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 Notice of Funding Availability for the 2017 Mainstream Voucher program to serve non-elderly, disabled homeless individuals and families. The City was awarded 50 Mainstream Vouchers to serve this target population. 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. 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 re-housing. 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 (HEART) program oversees citywide homeless outreach needs, safety, and security. In 2020, the City provided Emergency Solutions Grant program funds to seven organizations, providing eight different programs. Two</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>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 re-housing. 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 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 (2) organizations provided rapid rehousing programs</p> <p>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.</p> <p>In 2017, the City provided ESG funding to eight different organizations providing twelve (12) 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 (2) 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.</p> <p>In 2018, the City provided ESG funding to seven different organizations providing eleven (11) 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 (2) organizations provided rapid rehousing services. (also referenced in Goal # 46)</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>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.</p> <p>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> <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 (7) 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 (1) 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 continue for the 2021–2029 period.</p>
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 non-profit homeless service providers to provide supportive services. The City encouraged non-profit 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 non-profit homeless service provider managed the Link and work with other service organizations in the community to coordinate supportive services.</p> <p>Appropriateness: 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 	PBA, Planning Division CDA,	<p>Accomplishments: Consistent with State law, the City continued to offer density bonus incentives for affordable housing, including senior living</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
	<ul style="list-style-type: none"> Work with nonprofit and for-profit agencies that propose the construction of senior housing 	Housing Division and Admin	<p>In 2017, the City approved the site plan for the development of a 418-unit affordable senior rental residential community. In 2018, the City approved a density bonus agreement for the development of a 418-unit affordable senior rental residential community (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) (also referenced in Goal # 28) In 2020, the City approved a Density Bonus Agreement for the development of a 171-unit mixed-use commercial and residential development with 19 affordable units (3rd & Broadway).</p> <p>Appropriateness: This program will 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 continue 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 service and food distribution program at each of its senior centers. In addition, physical fitness classes are common on a weekly basis. 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>
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 a total commitment of \$8,795,000 for a developer to build 69 units of affordable housing, of which there will be six (6) four-bedroom units, twenty-eight (28) three-bedroom units and thirty-five (35) two-bedroom units (one being a manager’s unit) for families In 2018, The City issued an RFP for Affordable Housing Development. Following the first deadline for the RFP, a Review Panel recommended an award of \$9,893,644.00 in affordable housing funds, one hundred (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</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
			<p>affordable housing projects with approximately 200 units of affordable housing including over 100 2- and 3-bedroom units for families. (also referenced in Goal # 25 - 27)</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 units for extremely low-income families (also referenced in Goal #26).</p> <p>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: This program will continue for the 2021–2029 period.</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

<i>Name of Program</i>	<i>Objective</i>	<i>Responsible Agency</i>	<i>Status</i>
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 several 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 space for The Wooden Floor, a dance and education studio serving underserved local youth.</p> <p>Appropriateness: This program will continue for the 2021–2029 period.</p>
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 Development Project Review process to evaluate floor plans to ensure they meet City development standards, serve residents’ needs, and provide a balanced design to 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 to have 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 - 2021.</p> <p>In 2015, the City updated its Analysis of Impediments to Fair Housing Choice in order to identify, remove and/ or mitigate potential impediments to fair housing in Santa Ana.</p> <p>In 2019-20, the City participated in a County-wide regional effort to update its Analysis of Impediments to Fair Housing Choice in order to identify, remove and/ or mitigate potential impediments to fair housing in Santa Ana and throughout the County. The updated Analysis of Impediments to Fair Housing Choice was started in 2019 and completed in 2020.</p>



**Table D-6
Progress toward Housing Element Goal #4 Objectives**

Name of Program	Objective	Responsible Agency	Status
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>Appropriateness: This program will continue for the 2014–2021 period</p> <p>Accomplishments: America OnTrack and other community serving organizations attend a variety of Santa Ana community events to educate the public on the health benefits of smoke free environments. In 2015, America OnTrack has provided educational information at Neighborhood Associate meetings, several Santa Ana Street/Hearth Fairs, local school safety fairs, and Santa Ana Youth Summit.</p> <p>Owners of some recently built multi-family housing in Santa Ana have decided to require smoke free environments. Conversations continue regarding the feasibility of a smoke free ordinance City-wide for multifamily housing.</p> <p>Appropriateness: This program will continue for the 2014–2021 period</p>

Source: City of Santa Ana, 2021.

Funding:

- GF: General Fund
- CDBG: Community Development Block Grant
- HOME: HOME Partnership Funding
- LIHTC: Low income Housing Tax Credits
- ESG: Emergency Solutions Grant
- HOPWA: Housing Opportunities for Persons with AIDS
- NSP: Neighborhood Stabilization Funds

Agency:

- CDA: Community Development Agency
- PBA: Planning and Building Agency
- SAHA: Santa Ana Housing Authority
- PWA: Public Works Agency
- PRCSA: Parks, Recreation, and Community Services Agency
- TCE: The California Endowment



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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, and then provides the requisite analysis. Programs to address concerns are 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 Act has two main purposes –prevent discrimination and reverse housing segregation.

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.



- Sites Inventory. The identification of sites for housing 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 their 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 or household 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 county-wide AI, there are jurisdiction-specific versions that include goals specific to Santa Ana.

Before discussing fair housing issues in accordance with AB 686, the following provides a brief overview of the history of the City that has shaped the community and housing opportunities.

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 it 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, unconstitutional, and confirmed that no landlords could refuse to rent to people based on their skin color, race or ethnicity, or religion.

Equally as 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 are 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 historic position as one of Orange County's earliest pioneer settlements. Since Santa Ana was founded in the 19th century, its primary settlement period occurred 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 (SDs) 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 multi-family 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:

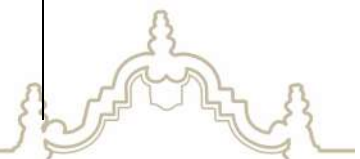
- Unruh Civil Rights Act – extends to businesses and covers age and arbitrary discrimination



- [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 2780-2782](#) – defines disciplinary actions for discrimination, prohibits panic selling and affirms the broker’s duty to supervise
- [Business and Professions Code](#) – covers people who hold licenses, including real estate agents, brokers, and loan officers.

[Residents in the City of Santa Ana 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 FEHA, the Disabled Persons Act, the Unruh Civil Rights Act, and the Ralph Civil Rights Act. DFEH investigates complaints of employment and housing discrimination based on race, sex, including gender, gender identity, and gender expression, religious creed, color, national origin, familiar status, medical condition \(cured cancer only\), ancestry, physical or mental disability, marital status, or age \(over 40 only\), and sexual orientation. DFEH established a program in May 2003 for mediating housing discrimination complaints, which is among the largest fair housing mediation program in the nation to be developed under HUD’s Partnership Initiative with state fair housing enforcement agencies. 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. Key features of the program are: 1\) it is free of charge to the parties; and 2\) mediation takes place within the first 30 days of the filing of the complaint, often avoiding the financial and emotional costs associated with a full DFEH investigation and potential litigation.](#)

[Community Legal Aid SoCal is a holistic legal services provider serving low-income people in Orange County and Southeast Los Angeles County. Overall, community legal aid provides direct representation, as well as engages in policy advocacy and impact litigation. The advocates in the housing program provide 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 mobile homes, housing discrimination, and predatory lending practices.” The main](#)



office is located in Santa Ana, with additional offices in Norwalk, Anaheim, and Compton. Across four offices, the organization has 100 staff members and 30 attorneys. Like other Legal Aid offices, Community Legal Aid SoCal is funded by the Legal Services Corporation, which carries restrictions against representing undocumented clients.

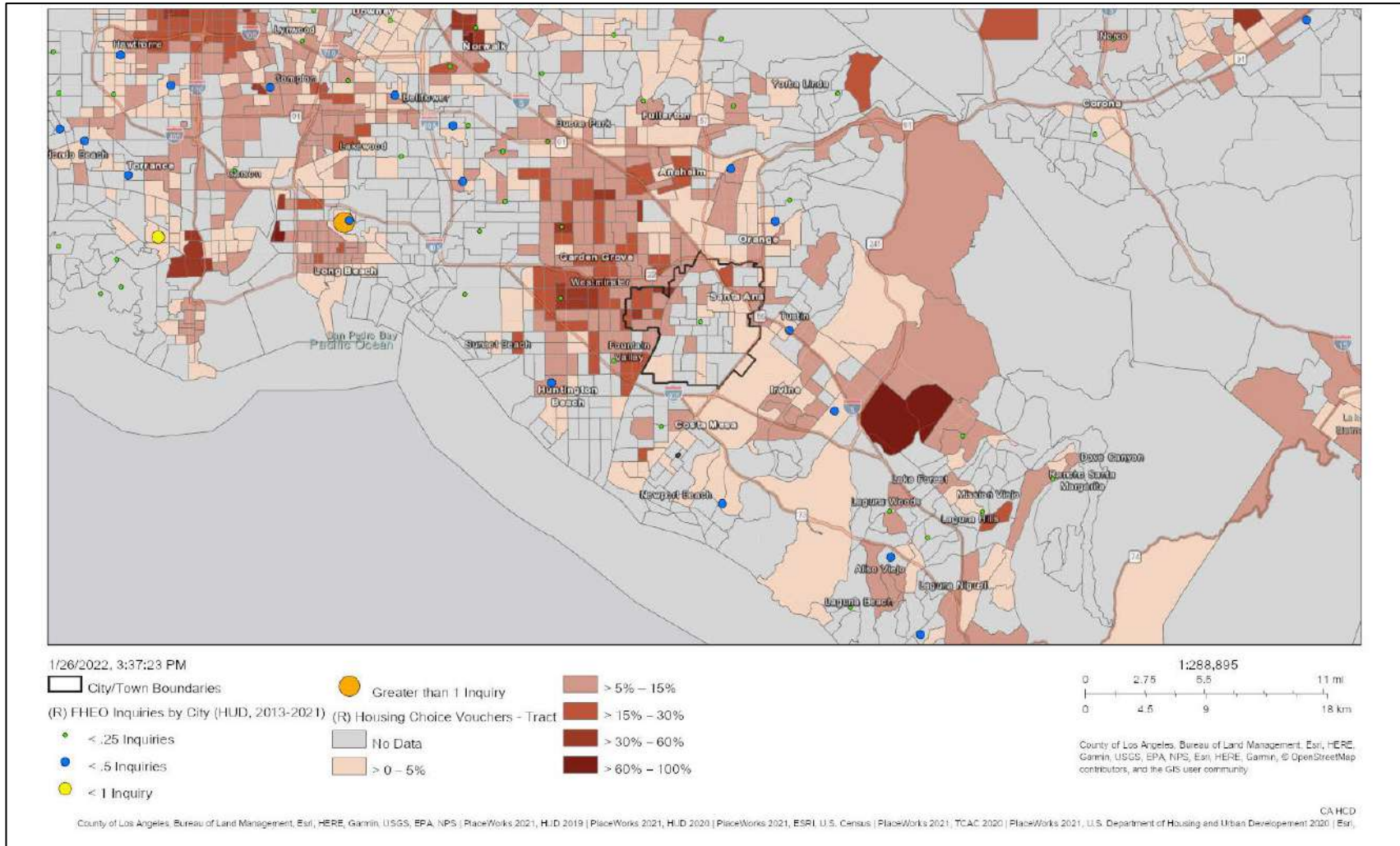
Founded in 1965, the Fair Housing Council of Orange County is a non-profit operating throughout the county with a mission of ensuring access to housing and preserving human rights. The council provides a variety of services including community outreach and education, homebuyer education, mortgage default counseling, landlord-tenant mediation, and limited low-cost advocacy. Their services are provided in English, Spanish, and Vietnamese. In addition to these client services, the Fair Housing Council 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. The City of Santa Ana funds the Council each year with Community Development Block Grant funds (CDBG). In Quarter 1 of the fiscal year 2021-2022, 1,053 residents were served with fair housing services, which included fair housing education, tenant counseling, and fair housing enforcement activities. The Fair Housing Council of Orange County will continue to be funded by the City's grant programs to provide fair housing services to residents.

Fair Housing Inquiries (FHEO) by City and housing choice voucher (HCV) recipients by tract 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. It is important to recognize where these instances have occurred and in what capacity in relation to those who utilize HCVs. HCVs are most concentrated in the areas west of Santa Ana, near Fountain Valley, moving toward Los Angeles County, and in the north in Garden Grove and Anaheim.

According to the HCD AFFH Data Viewer, there has been 65 FHEO inquiries in Santa Ana since 2013. A majority of these were related to a specific basis of discrimination towards a disability. Complaints that have been processed by the Fair Housing Assistance Program and HUD also show that disability is the most prevalent complaint when it comes to discrimination complaints. Out of 33 complaints filed between January 2013 and March 2021 by Santa Ana residents, 15 of those were on the basis of discrimination. There is no additional discrimination complaint or case data available for the City of Santa Ana.



Figure E-1: FHEO Inquiries by City, and HCVs by Tract



Source: HCD AFFH Data Viewer, HUD 2013-2021, 2021.

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PATTERNS OF INTEGRATION AND SEGREGATION

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 sites inventory as it relates to minority (non-White) concentrated areas.

Regional Trend. As shown in Table E1, racial/ethnic minority groups make up approximately 59% of the Orange County population. Just over 34% of the Orange County population is Hispanic/Latino, 40.6% of the population is White, 20.3% is Asian, and 1.6% 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.

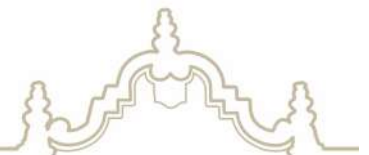


Table -E1
Racial/Ethnic Composition –Orange County, Santa Ana, and Neighboring Cities

<i>Race/Ethnicity</i>	<i>Santa Ana</i>	<i>Anaheim</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 and 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 in regards to segregation since 1990. Segregation between Black and White communities has decreased, while 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 areas in Orange County have high concentrations of racial/ethnic minorities. Coastal cities, including Huntington Beach and Costa Mesa, and the areas east and south east 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 immediate surrounding jurisdictions. Coastal communities west and south of Santa Ana tend to have smaller racial/ethnic minority populations, while 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% of the Santa Ana population identifies as being Hispanic or Latino of any race. In comparison, only 34.1% of Orange County residents identify the same. The City has a smaller population of white alone residents compared to neighboring jurisdictions.

Dissimilarity indices between non-White and White groups indicate that the City has also stayed relatively the same in regards to segregation since 1990. Segregation between Black and White Hispanic communities has decreased, while 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, as well as many of the immediate surrounding areas, have greatly increased in minority concentration.

Sites Inventory. To assess the City’s sites 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-3 and Table E-3 and Table E-4. This analysis includes units from opportunity sites in the first table and pipeline projects in the second table. Most units are in block groups where 61-80% of the population belongs to a racial/ethnic minority group, including 87% of moderate income units from opportunity sites. The majority of the units for lower income are also in block groups with 61-80% of the population belonging to a racial/ethnic minority group. The location of the sites to satisfy the RHNA does not exacerbate existing conditions.



**Table E-3:
Distribution of RHNA Units by Racial/Ethnic Minority Population: Opportunity Sites**

<i>Racial/Ethnic Minority Population (Block Group)</i>	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Total</i>
<= 20%	0.0%	0.0%	0.0%
21 - 40%	0.0%	0.0%	0.0%
41 - 60%	0.0%	0.0%	0.0%
61 - 80%	55.7%	87.0%	75.8%
> 81%	44.3%	13.0%	24.2%
Total	300	540	840

**Table E-4:
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%	64.1%	0.0%	51.9%	54.1%
> 81%	35.9%	100.0%	48.1%	45.9%
Total	1,103	2	5,064	6,169

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% of Orange County residents experience a disability. Only 7.2% of the Santa Ana population experiences a disability. Santa Ana has a smaller population of persons with disabilities compared to Anaheim (8.5%) and Costa Mesa (8.3%) but larger than Irvine (5.6%) and Tustin (6.6%).

As shown in Figure E-5, less than 20% of the population in most tracts in Orange County experience a disability. Tracts with disabled populations exceeding 20% are not concentrated in one specific area of the County. Santa Ana and to the east have the smallest concentration of persons with disabilities. The concentration of persons with disabilities in Santa Ana is comparable to neighboring jurisdictions.

Local Trend. Most tracts in Santa Ana have populations of persons with disabilities below 10% (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% of the population experiences an independent living difficulty, 2.6% experiences a cognitive difficulty, 2.5% experiences an ambulatory difficulty, 2.2% experiences a hearing difficulty, 1.1% experiences a vision difficulty, and 0.9% experiences a self-care difficulty.

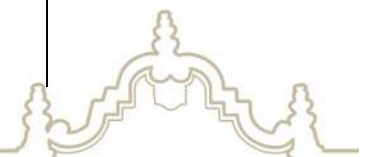
All sites selected to meet the 2021-2029 RHNA are in tracts where less than 10% of the population experiences one or more disabilities.

Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. 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 such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law.

Regional Trend. Approximately 55% of Santa Ana households are families with a married couple. Out of those couples, 36% have children. The City's share of households with a married couple is larger than the County, and the neighboring cities of Anaheim, Costa Mesa, Garden Grove, Irvine and Tustin (Figure E-7). Of the selected jurisdictions, Costa Mesa has the largest proportion of single-adult households representing 47.3% of all households in the City.

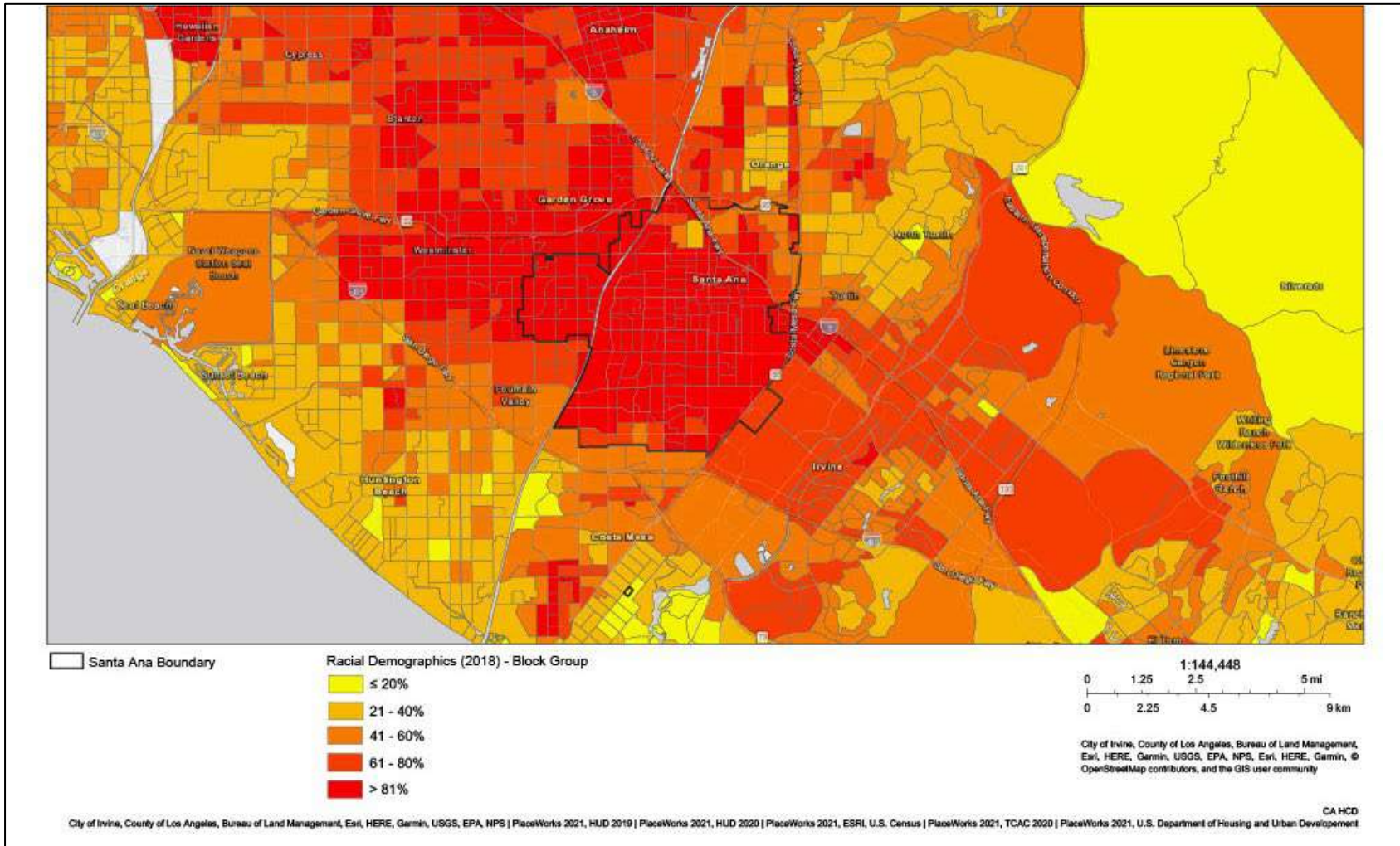
More than 60% of children in most areas around Huntington Beach, Tustin, Irvine, and Costa Mesa live in married couple households (Figure E-8). Figure E-9 shows percent of children living in single-parent female-headed households by tract. Children in female-headed households are most concentrated in the areas west and North of Santa Ana, including Westminster and Anaheim. In general, there are more children living in female-headed households in the central Orange County areas and this could be based on housing types available to them.



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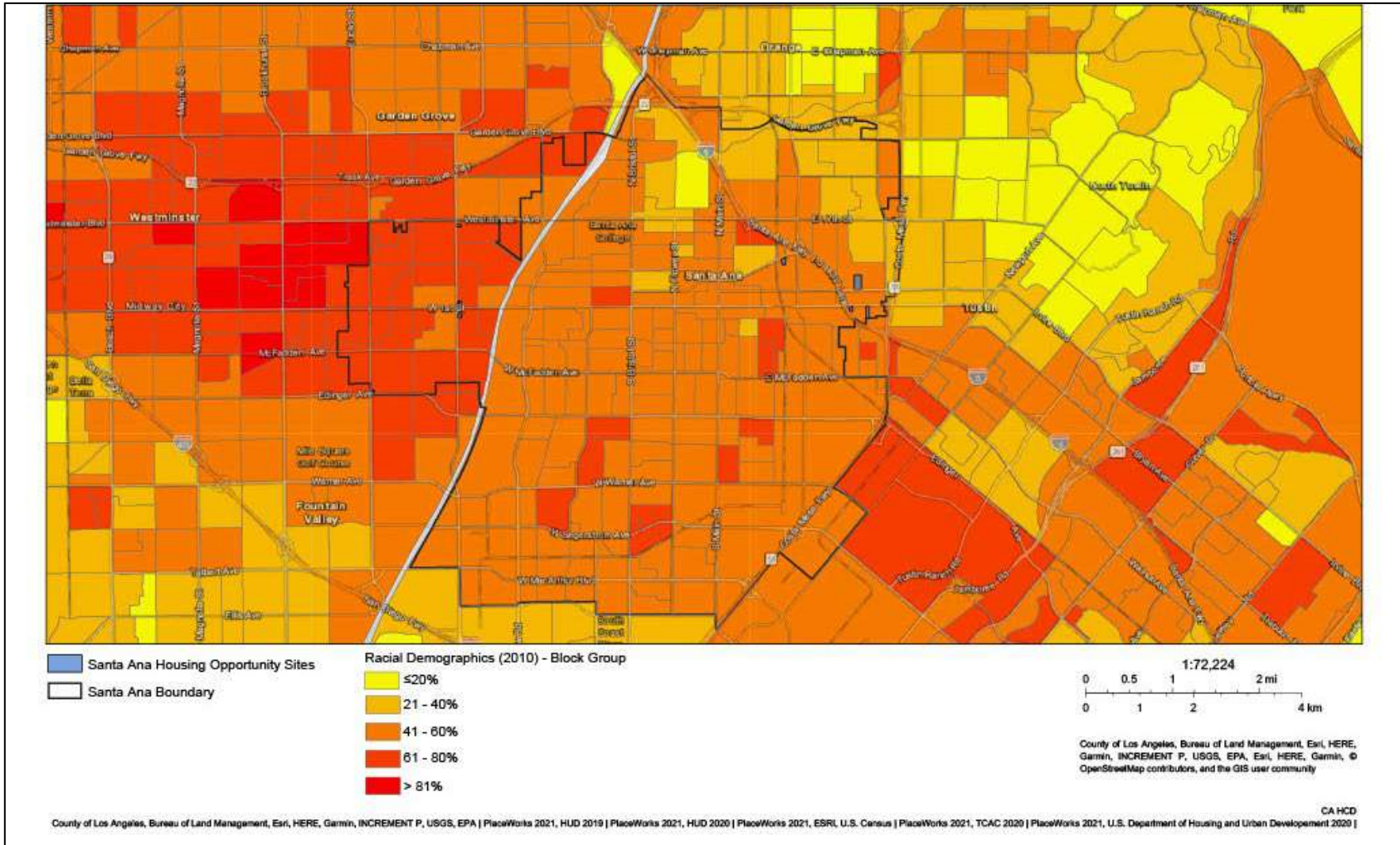


Figure E-2: Regional Racial/Ethnic Minority Concentrations by Block Group (2018)



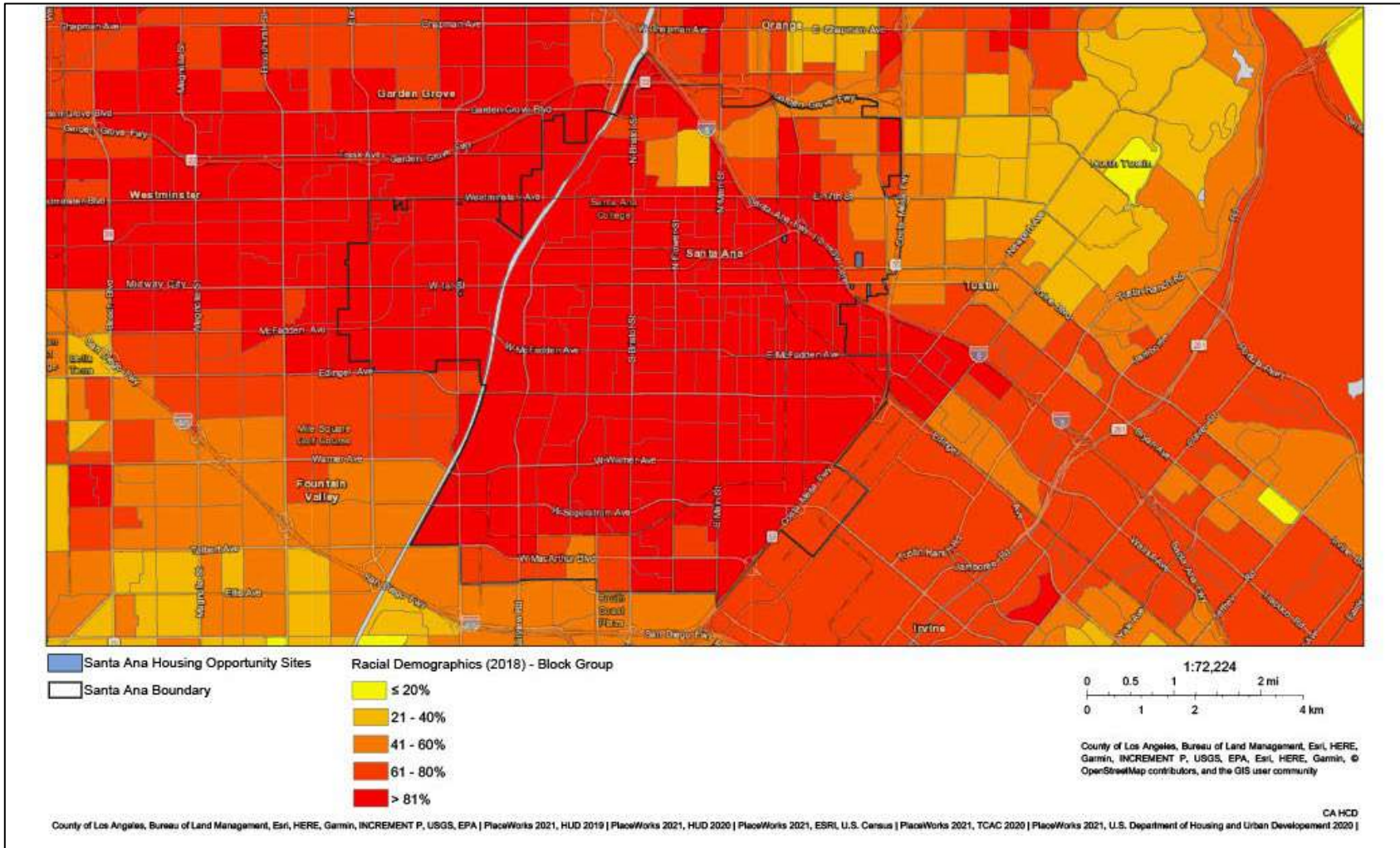
Source: HCD AFFH Data Viewer (2018), 2021.

Figure E-3: Racial/Ethnic Minority Concentrations by Block Group (2010)



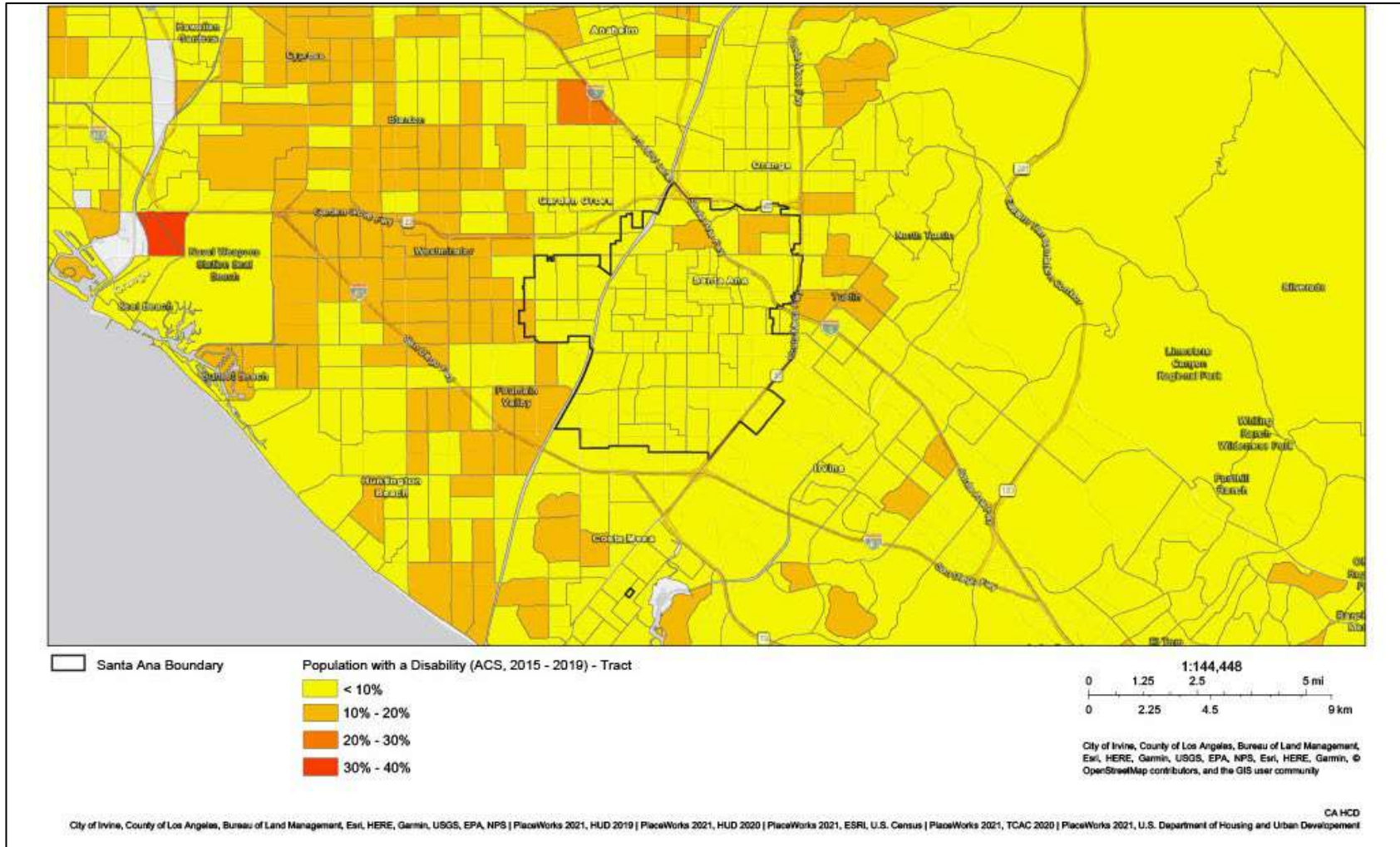
Source: HCD AFFH Data Viewer (2010), 2021.

Figure: E-4: Racial/Ethnic Minority Concentrations by Block Group and Sites Inventory (2018)



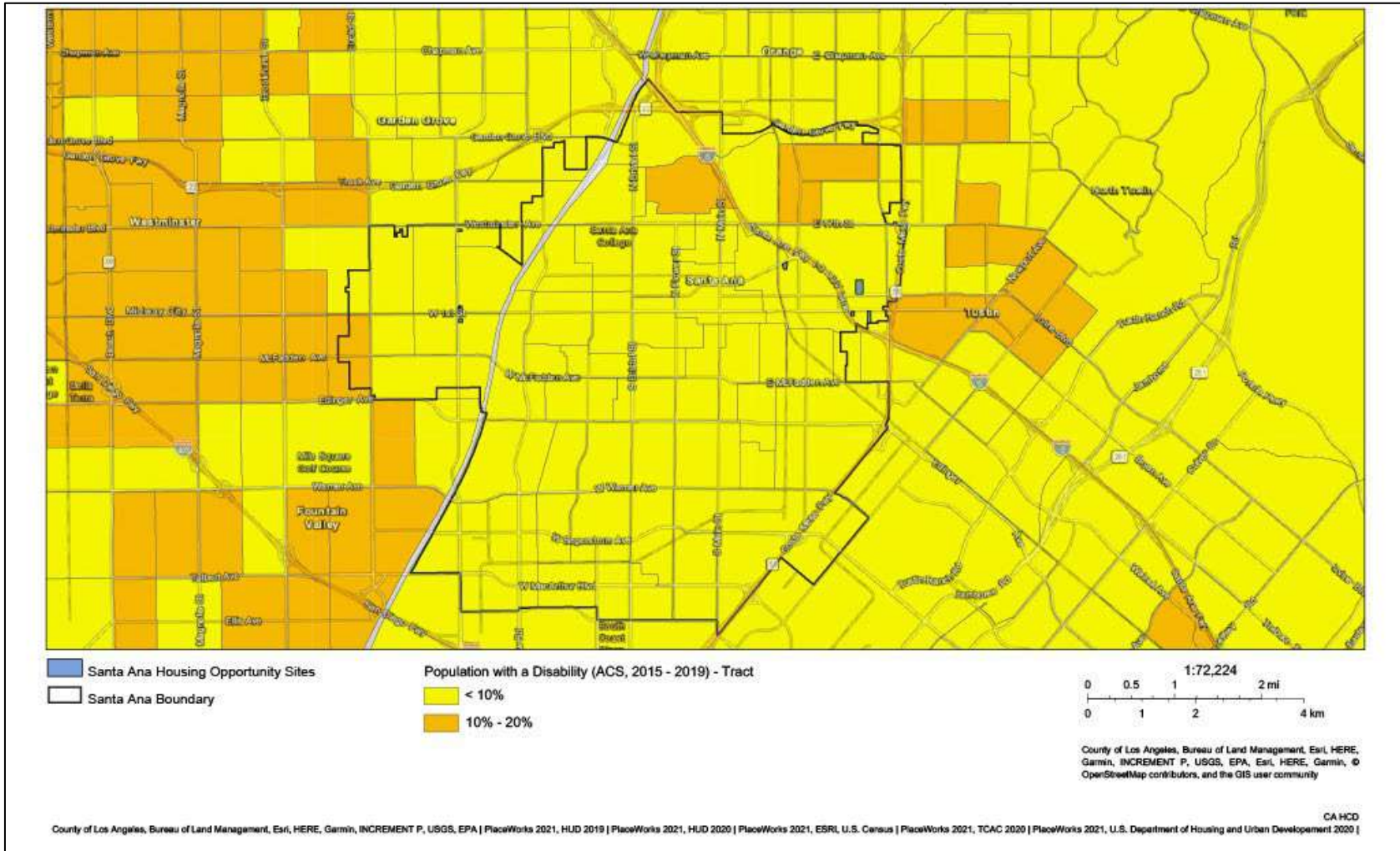
Source: HCD AFFH Data Viewer (2010-2018), 2021.

Figure E-5: Regional Concentrations of Persons with Disabilities by Tract



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

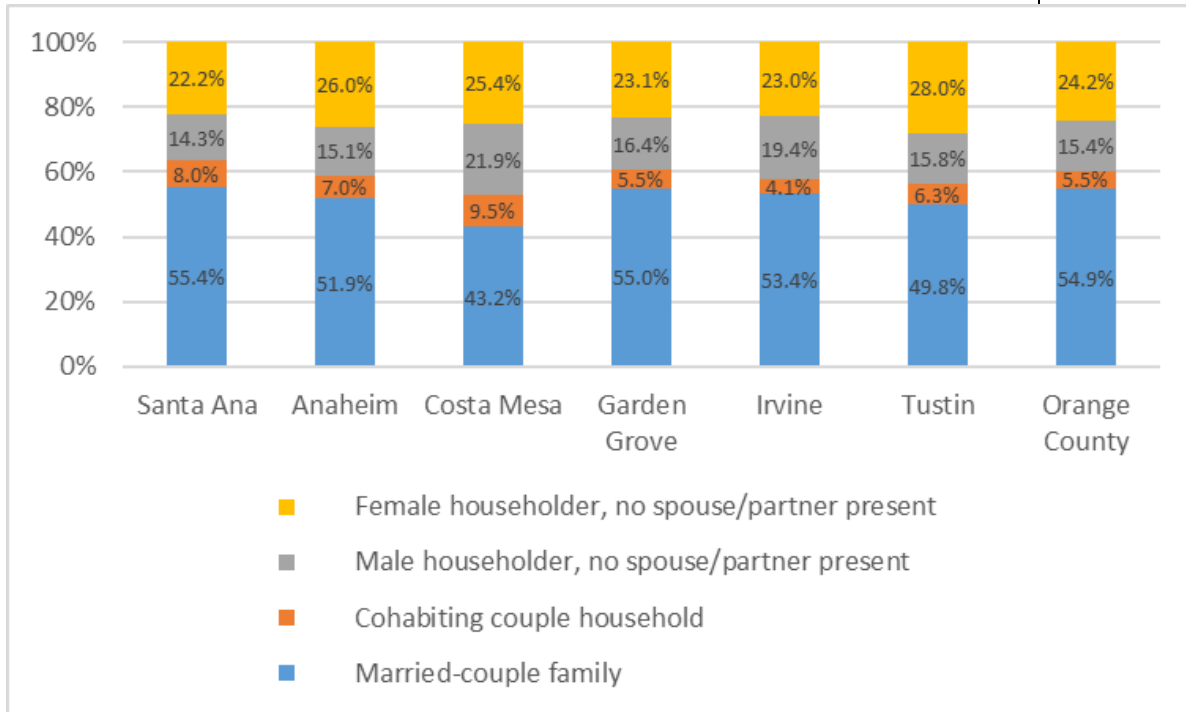
Figure E-6: Concentrations of Persons with Disabilities by Tract and Sites Inventory



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021

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Figure E-7: Households – 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, there were 47% of households with children. The most recent 2015-2019 ACS estimates there is now only 40% of households with children in Santa Ana representing 13% decrease. According to the 2014-2018 ACS, approximately 12% of Santa Ana households are single parents with children, of which 72% 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, there are tracts in downtown Santa Ana that have a higher proportion of female headed households with children.

Sites Inventory. In Santa Ana, a majority of the City’s RHNA units are located in tracts with 60 to 80 percent of households being married couple households with children. 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 location of the sites does not exacerbate existing conditions.

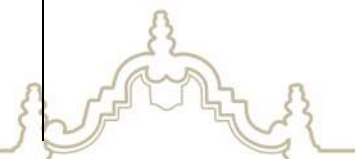


Table E-5:
Distribution of RHNA Units by Children in Married Couple Households: Opportunity Sites

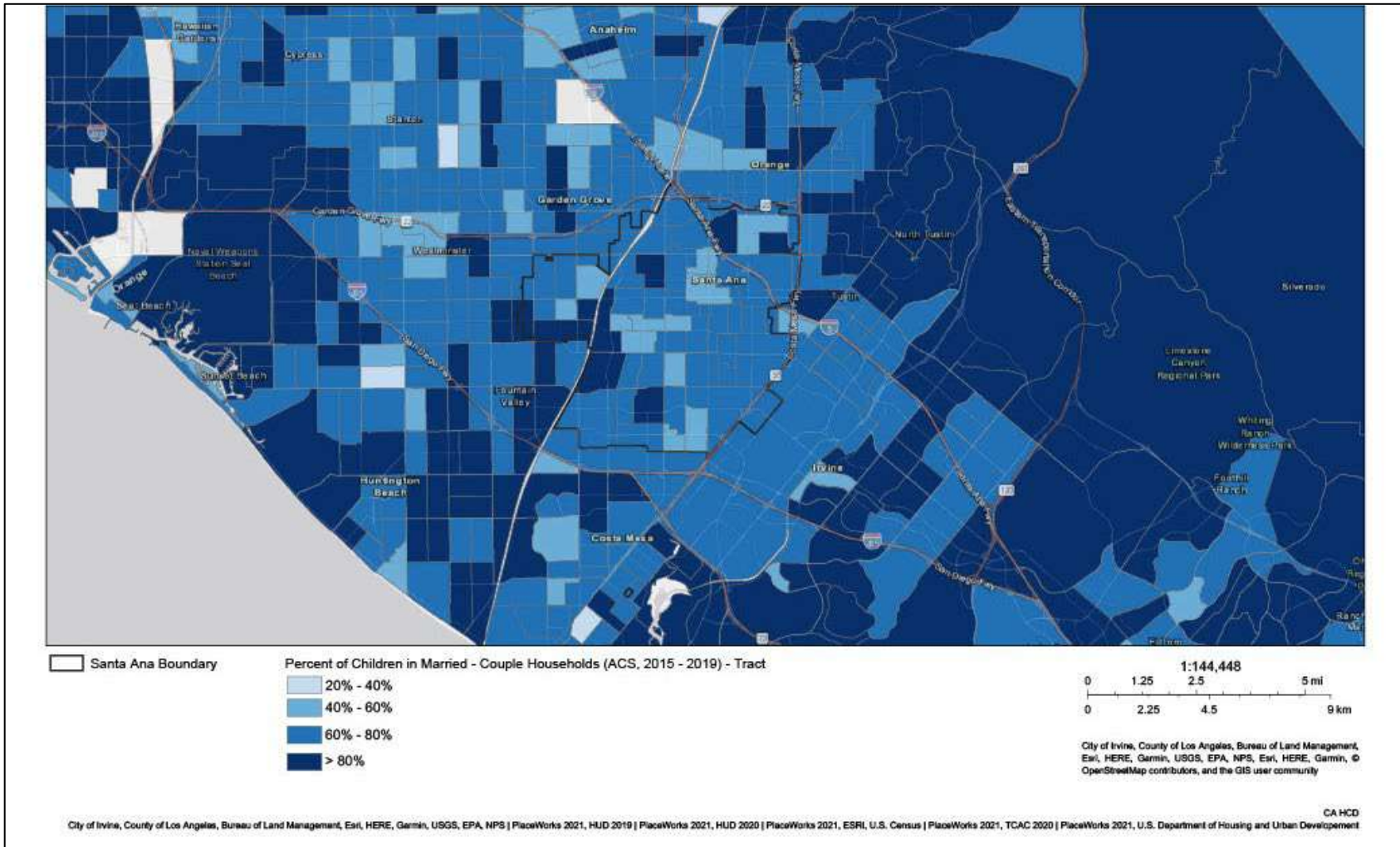
<i>Children in Married Couple Households</i>	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Total</i>
< 20%	0.0%	0.0%	0.0%
20% - 40%	0.0%	0.0%	0.0%
40% - 60%	21.7%	0.0%	7.7%
60% - 80%	78.3%	91.9%	87.0%
> 80%	0.0%	8.1%	5.2%
Total	300	540	840

Table E-6:
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%	11.1%	0.0%	26.5%	23.7%
60% - 80%	88.9%	100.0%	72.6%	75.5%
> 80%	0.0%	0.0%	0.9%	0.8%
Total	1,103	2	5,064	6,169



Figure E-8: Regional Percent of Children in Married Couple Households by Tract



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

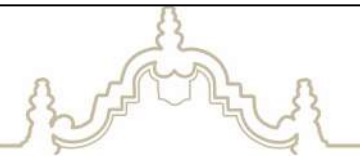
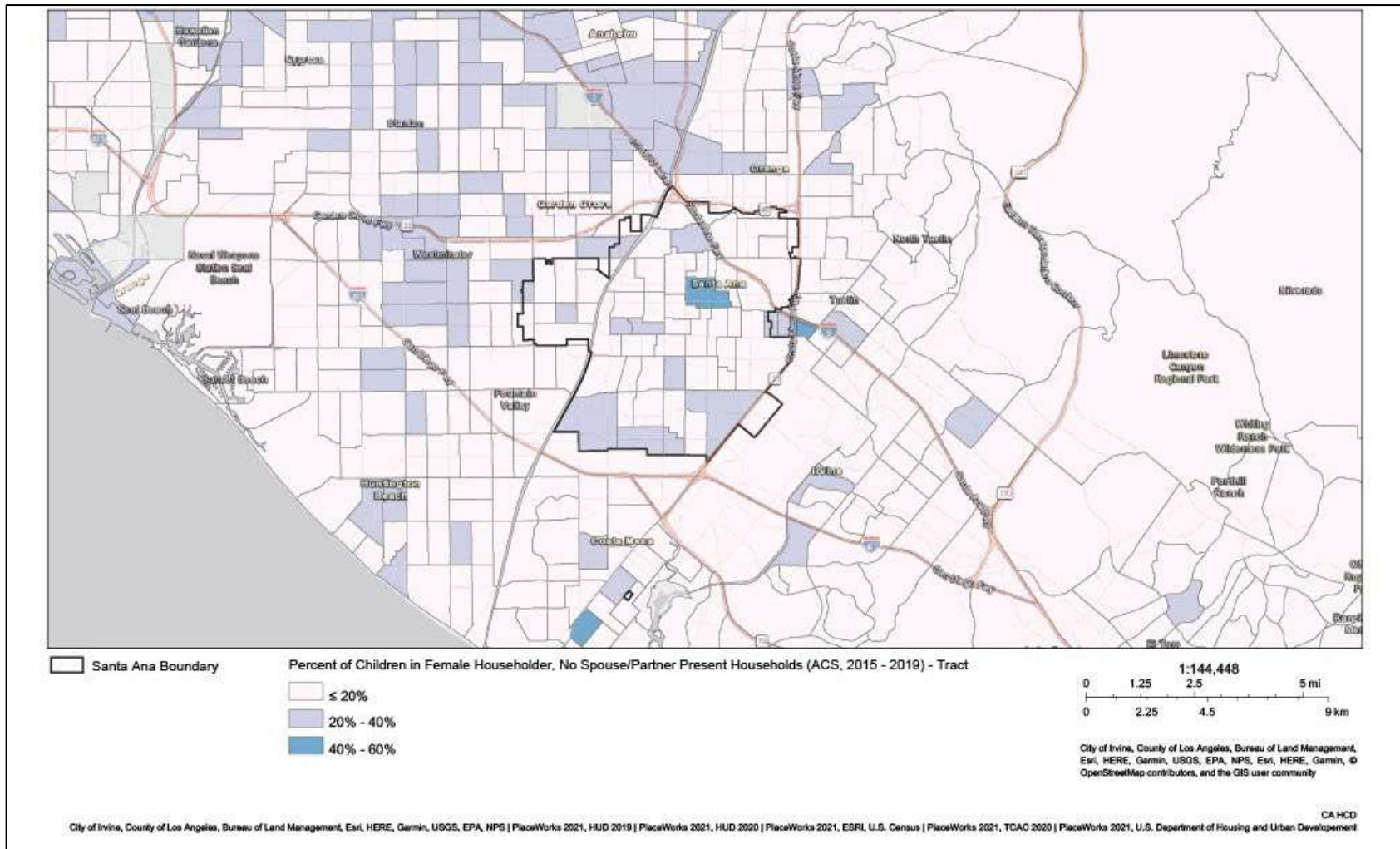
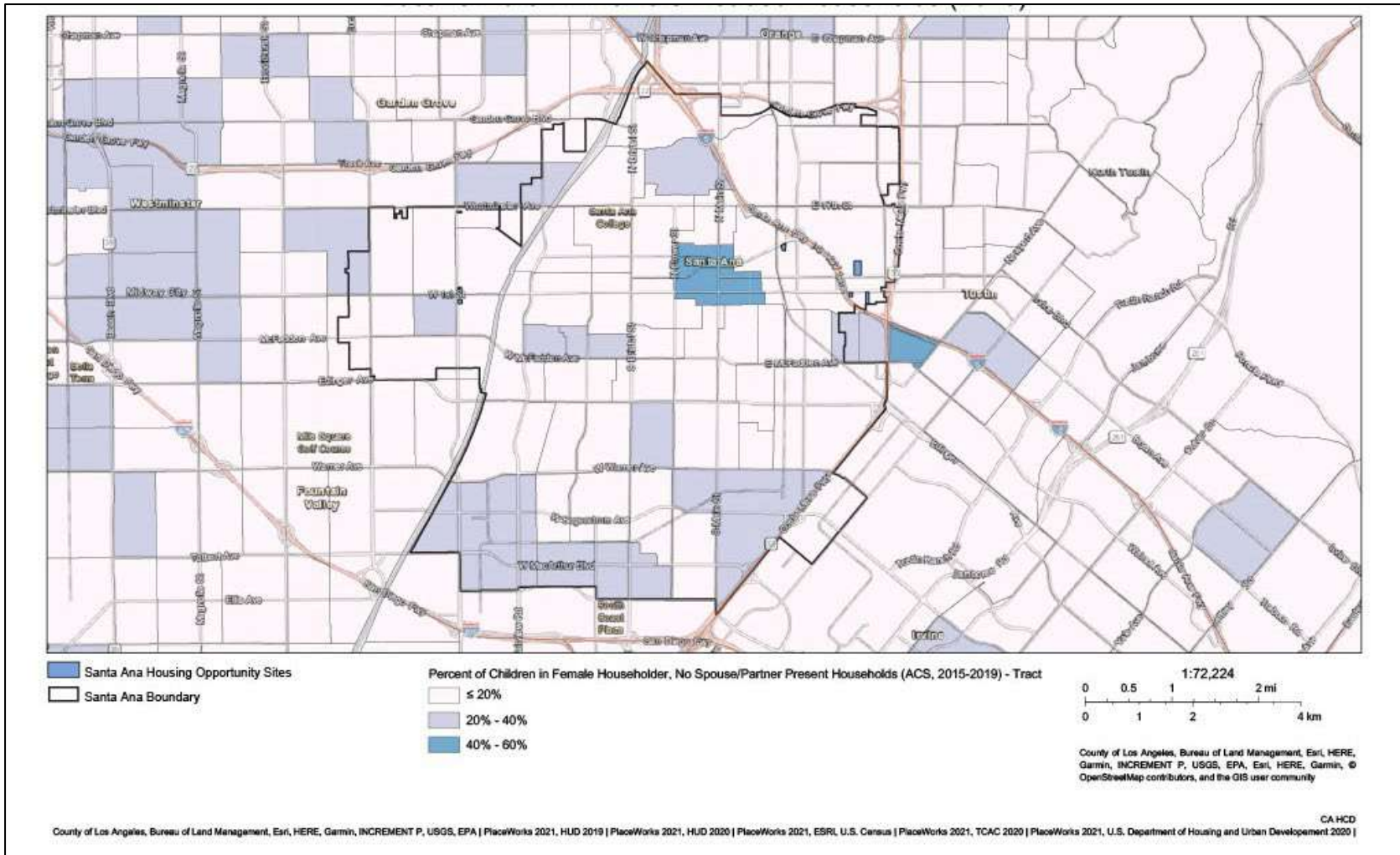


Figure E-9: Regional Percent of Children in Female-Headed Households by Tract



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure E-10: Children in Married Couple Households by Tract and Sites Inventory



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

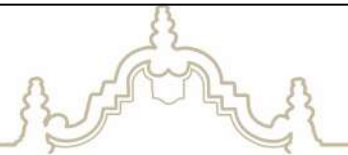
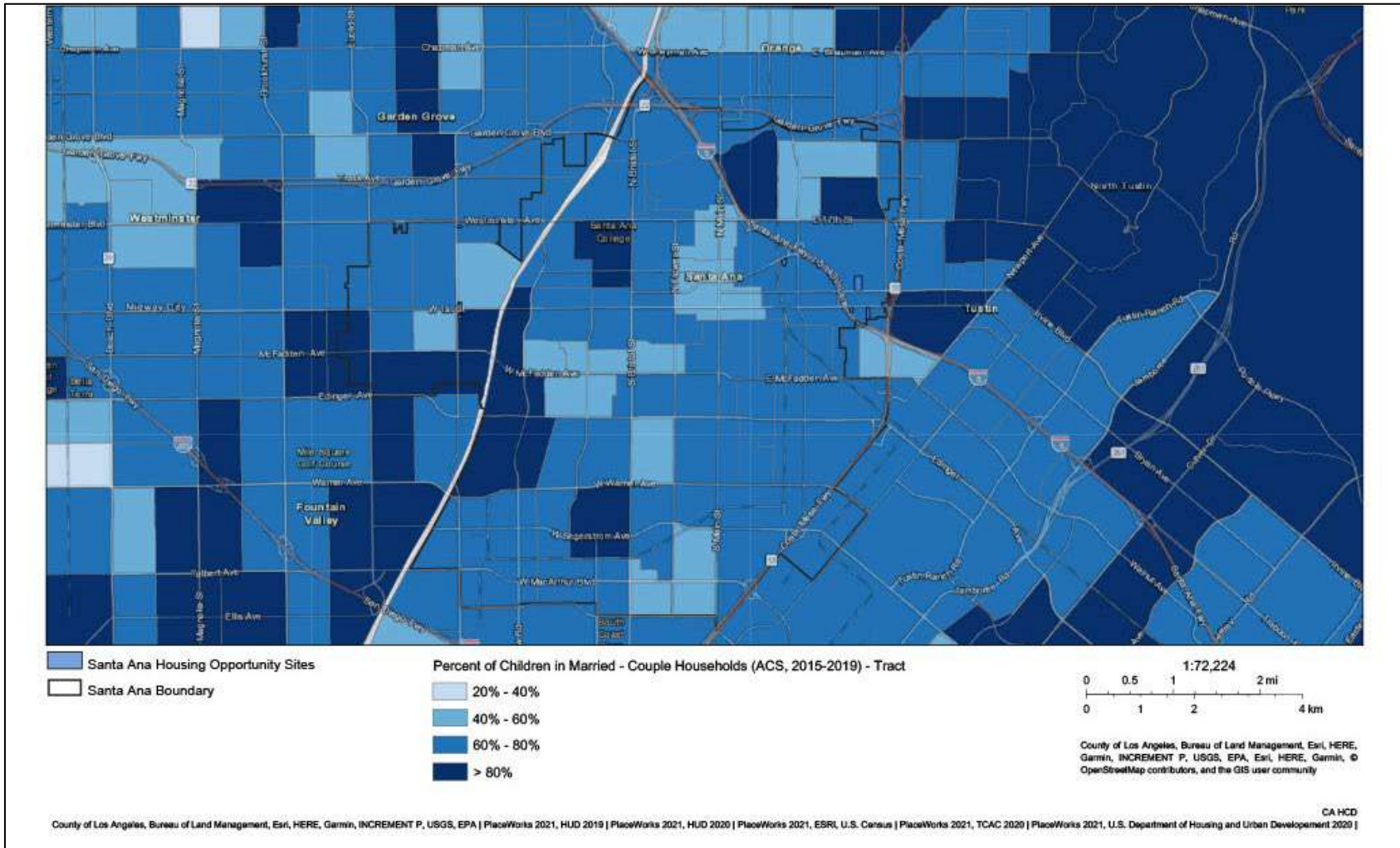


Figure E-11: Children in Married Couple Households by Tract and Sites Inventory



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Income

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a census tract or block group where over 51% of the population is LMI (based on HUD’s income definition of up to 80% of the AMI).

Regional Trend. Table E-7 shows that 56.4% of Santa Ana households earn 80% or less than the area median income and are considered lower income, compared to 40.5% 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).

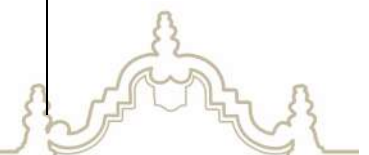
Table E-7
Income Level Distribution

<i>Income Category</i>	<i>Santa Ana</i>		<i>Orange County</i>	
	<i>Households</i>	<i>Percent</i>	<i>Households</i>	<i>Percent</i>
<u>Very Low Income (<50% AMI)</u>	<u>25,989</u>	<u>34.2%</u>	<u>252,051</u>	<u>24.6%</u>
<u>Low Income (50-80% AMI)</u>	<u>16,848</u>	<u>22.2%</u>	<u>163,078</u>	<u>15.9%</u>
<u>Moderate Income (80-120% AMI)</u>	<u>14,624</u>	<u>19.2%</u>	<u>182,380</u>	<u>17.8%</u>
<u>Above Moderate Income (>120% AMI)</u>	<u>18,519</u>	<u>24.4%</u>	<u>427,467</u>	<u>41.7%</u>
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, and the southern end of Irvine have low concentrations of LMI households. In these areas, less than 25% or 25-50% 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 specifically concentrated in downtown and the west side of the City.



Sites Inventory. Figure E-13 also shows the opportunity sites used to meet the 2021-2029 RHNA. Most of the opportunity sites as well as the pipeline projects are in LMI areas where more than 50% of households are low or moderate income. The majority of the City’s lower income RHNA units are located in tracts with 50-75% of households being low or moderate income. The location of opportunity sites and pipeline projects are well dispersed throughout the City and do not exacerbate existing conditions.

Table E-8
Distribution of RHNA Units by Concentration of LMI Households: Opportunity Sites

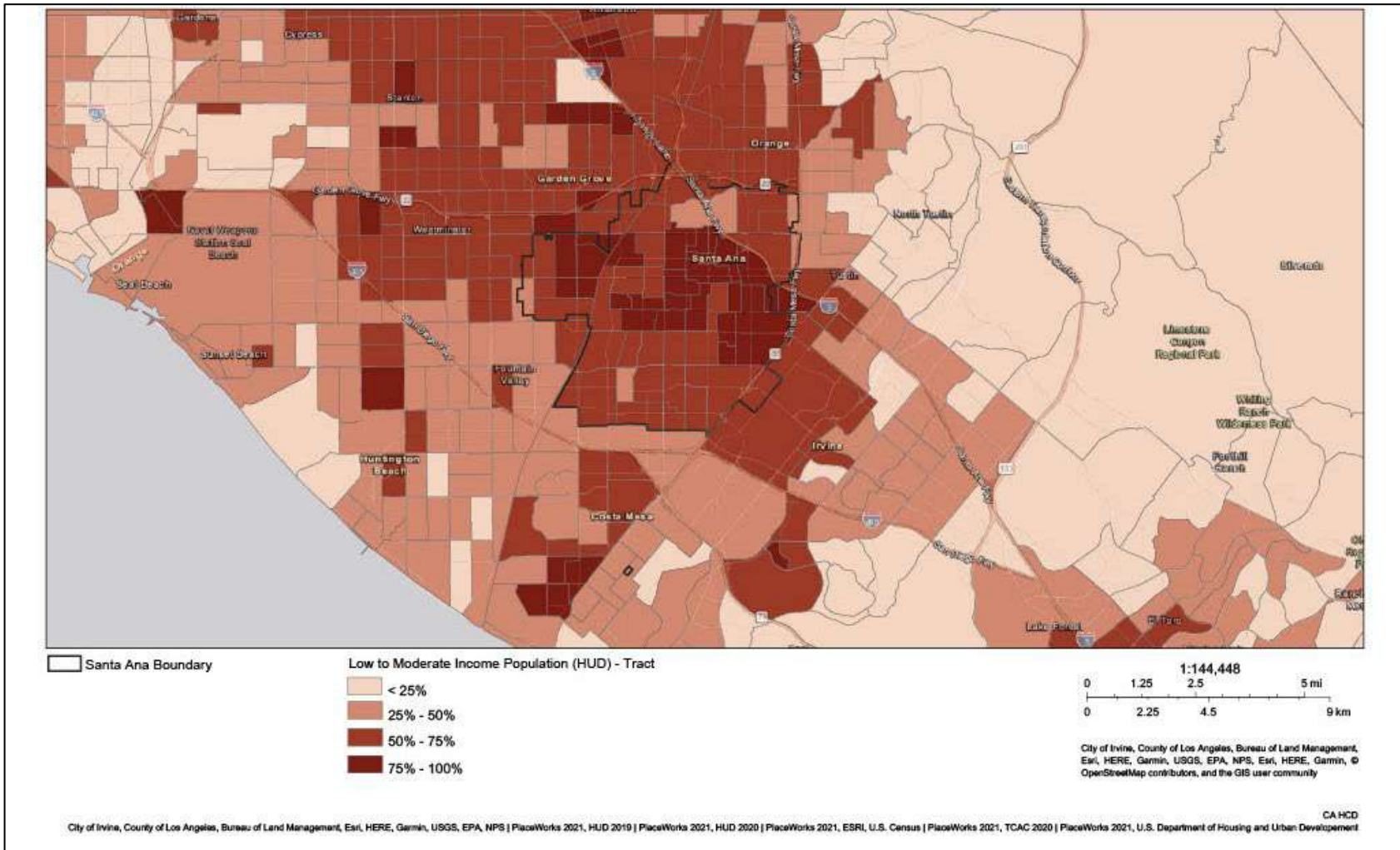
<i>Concentration of LMI Households (Block Group)</i>	<i>Lower Income</i>	<i>Moderate Income</i>	<i>Total</i>
< 25%	0.0%	0.0%	0.0%
25% - 50%	0.0%	0.0%	0.0%
50% - 75%	78.3%	91.9%	87.0%
75% - 100%	21.7%	8.1%	13.0%
Total	300	540	840

Table E-9
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%	64.1%	0.0%	63.2%	63.3%
75% - 100%	35.9%	100.0%	36.8%	36.7%
Total	1,103	2	5,064	6,169

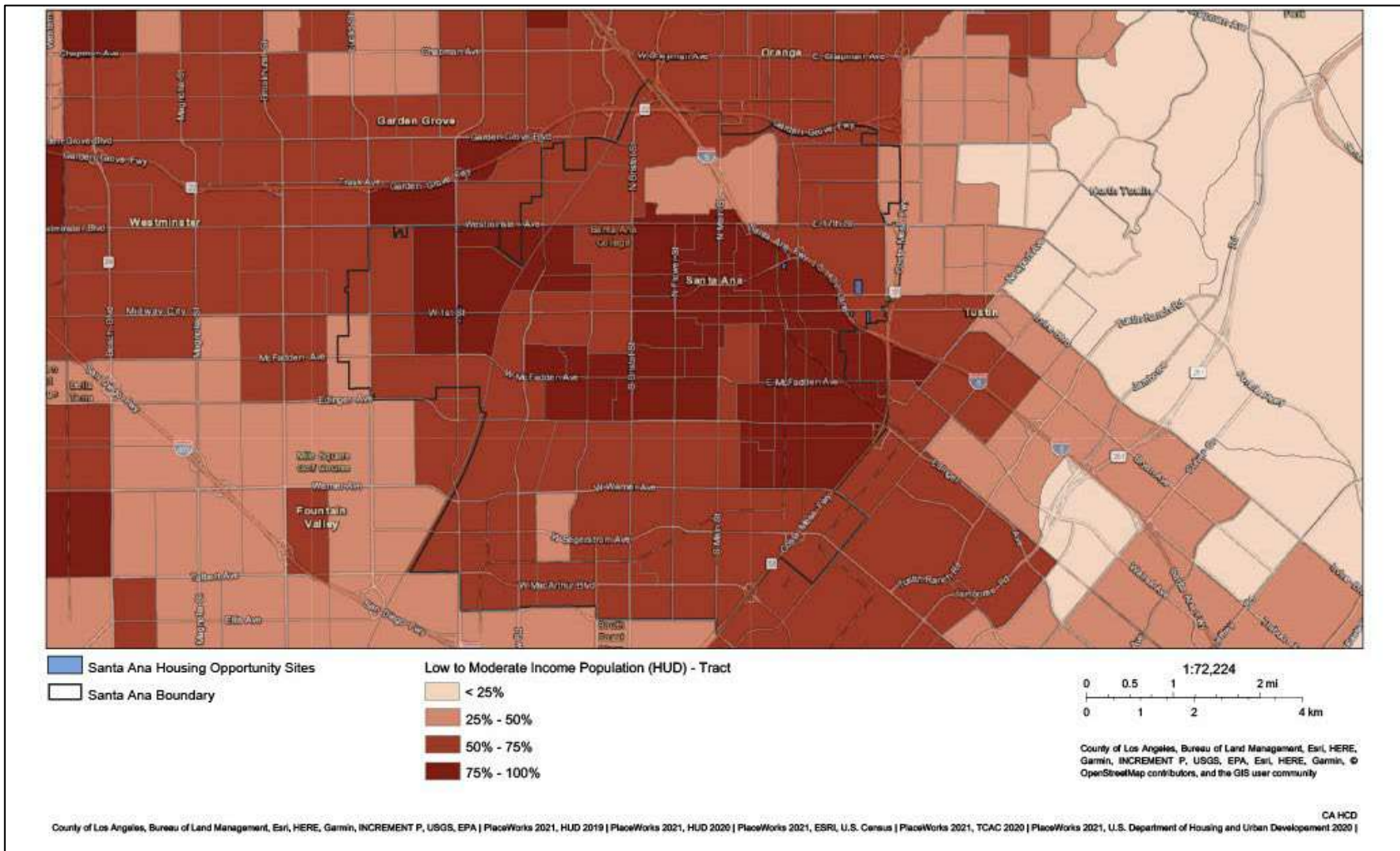


Figure E-12: Regional LMI Household Concentrations by Tract



Source: HCD AFFH Data Viewer, HUD LMI database (based on 2011-2015 ACS), 2021

Figure E-13: LMI Household Concentrations by Block Group and Sites Inventory



Source: [HCD AFFH Data Viewer, HUD LMI database \(based on 2011-2015 ACS\), 2021.](#)

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

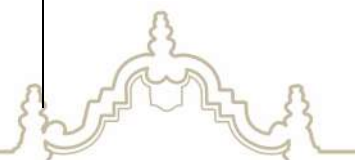
In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD identified census tracts with a majority non-White population with a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. HCD and the California Tax Credit Allocation Committee (TCAC) convened a Fair Housing Task Force to create opportunity maps. The maps 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-10). 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% of all people are below the poverty level.

**Table E-10
Poverty Status by Race/Ethnicity**

	<i>Percent Below Poverty Level</i>	
	<i>Santa Ana</i>	<i>Orange County</i>
<u>White alone</u>	<u>13.8%</u>	<u>9.5%</u>
<u>Black or African American alone</u>	<u>13.9%</u>	<u>13.8%</u>
<u>American Indian and Alaska Native alone</u>	<u>18.2%</u>	<u>13.2%</u>
<u>Asian alone</u>	<u>16.1%</u>	<u>11.2%</u>
<u>Native Hawaiian and Other Pacific Islander alone</u>	<u>3.8%</u>	<u>14.7%</u>
<u>Some other race alone</u>	<u>17.5%</u>	<u>17.9%</u>
<u>Two or more races</u>	<u>10.8%</u>	<u>7.5%</u>
<u>Hispanic or Latino origin (of any race)</u>	<u>16.5%</u>	<u>15.2%</u>
<u>White alone, not Hispanic or Latino</u>	<u>8.6%</u>	<u>7.1%</u>
<i>Source: 2015-2019 ACS (5-Year Estimates).</i>		
<i>Note: -- = Data not available.</i>		

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 the central County areas 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 in Table E-10 above, 15.7% 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% the American Indian and Alaska Native population, 17.5% of the population belonging to a race not listed (“some other race”), and 16.5% 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 (RCAAs)

While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) 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 their research, HCD defines RCAAs as census tracts where 1) 80% 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 one RCAA, a block group with median income exceeding \$125,000 and racial/ethnic minority population below 20%, in North Tustin.

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).

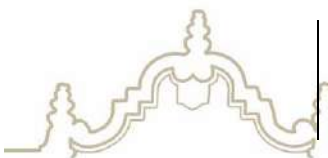
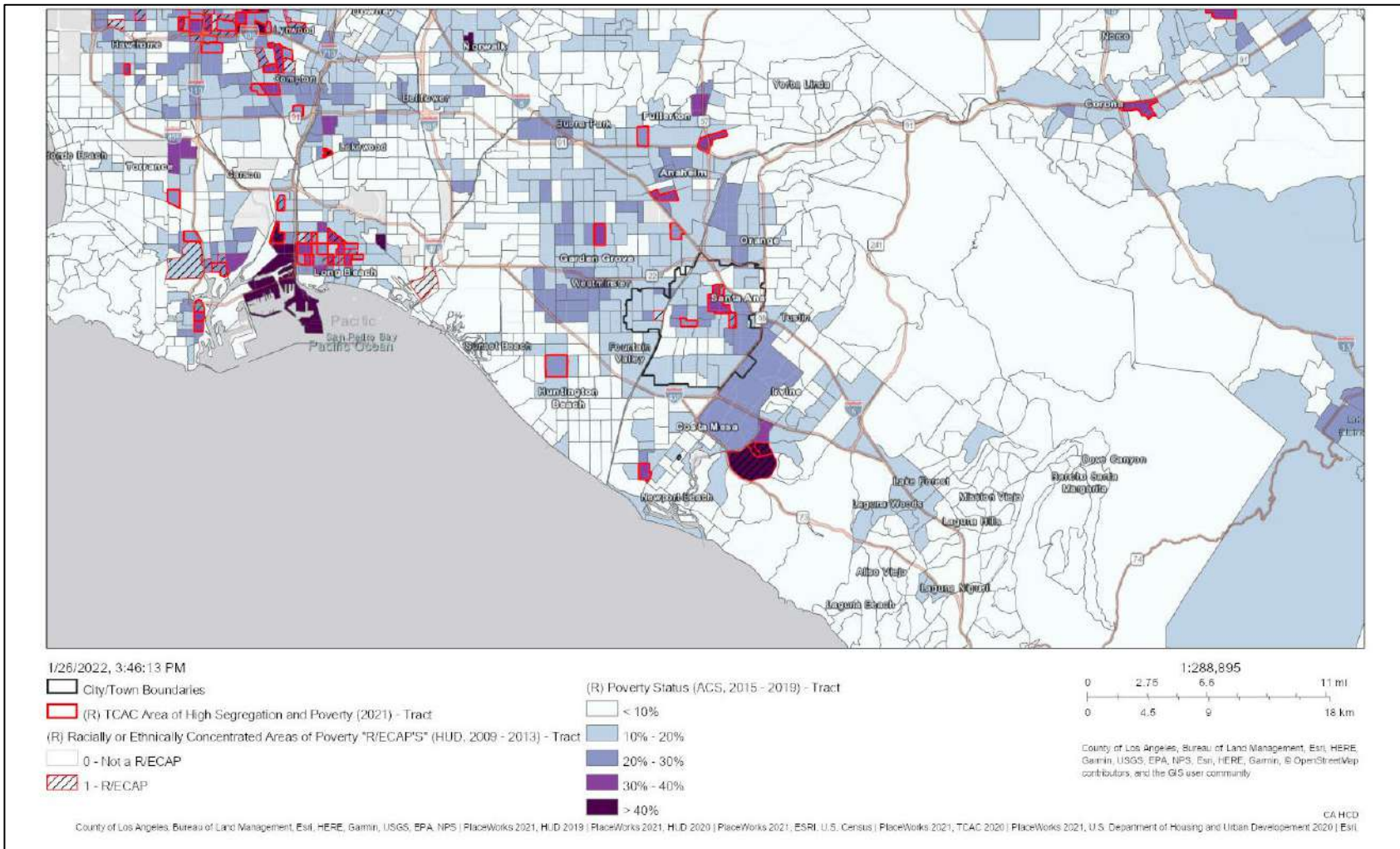
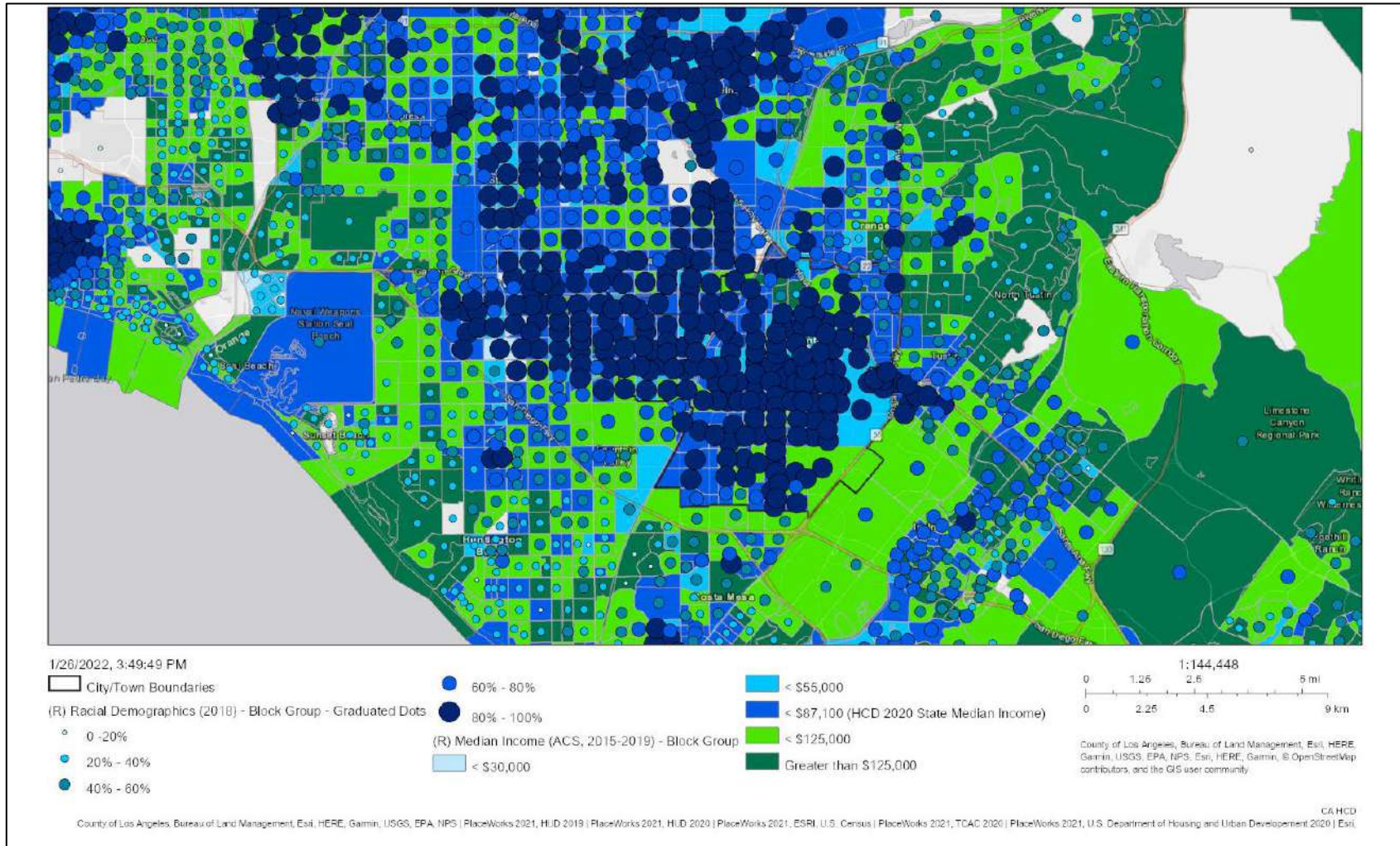


Figure E-14: R/ECAPs, TCAC Areas of High Segregation and Poverty, and Poverty Status by Tract



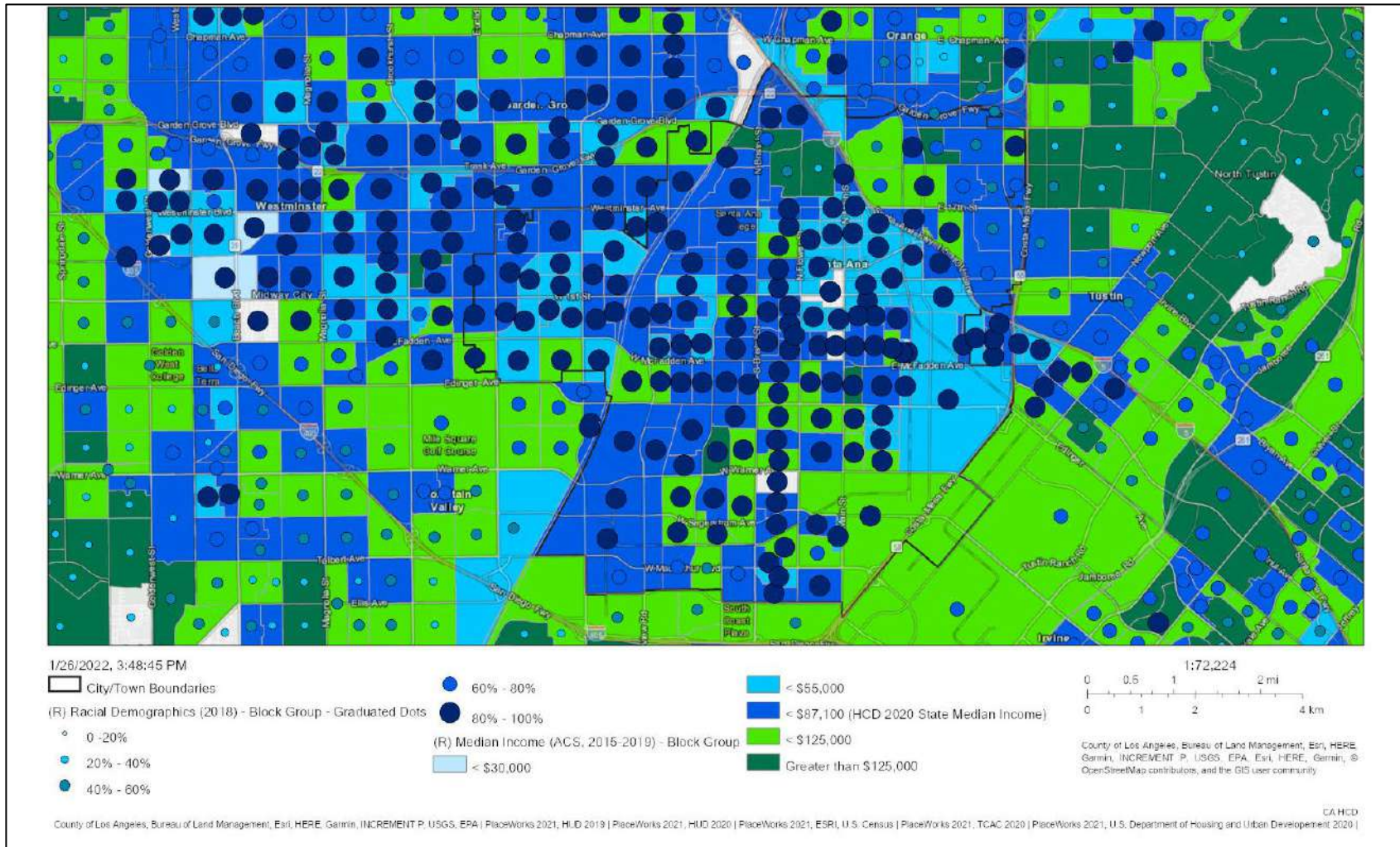
Source: HCD AFFH Data Viewer, HUD 2009-2013 R/ECAP database, TCAC 2021, 2015-2019 ACS, 2021.

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



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.



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% of the population; therefore, there are no RCAAs in Santa Ana.

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, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task Force (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 has 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% 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-11 shows the full list of indicators.

Table E-11: Domains and List of Indicators for Opportunity Maps

<u>Domain</u>	<u>Indicator</u>
<u>Economic</u>	<u>Poverty</u>
	<u>Adult education</u>
	<u>Employment</u>
	<u>Job proximity</u>
	<u>Median home value</u>
<u>Environmental</u>	<u>CalEnviroScreen 3.0 pollution Indicators and values</u>
<u>Education</u>	<u>Math proficiency</u>
	<u>Reading proficiency</u>
	<u>High School graduation rates</u>
	<u>Student poverty rates</u>
<u>Poverty and Racial Segregation</u>	<u>Poverty: tracts with at least 30% of population under federal poverty line</u>
	<u>Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County</u>
<u>Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.</u>	

Regional Trend. HUD Opportunity Indicator scores for Orange County are shown in Table E-12. 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, while being most likely to use public transit.

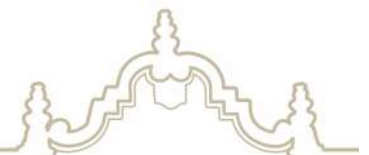


Table E-12: HUD Opportunity Indicators by Race/Ethnicity – Santa Ana/Orange County

	<u>Low Poverty</u>	<u>School Prof.</u>	<u>Labor Market</u>	<u>Transit</u>	<u>Low Transp. Cost</u>	<u>Jobs Prox.</u>	<u>Env. Health</u>
Santa Ana - Total Population							
<u>White, non-Hispanic</u>	43.58	40.95	48.31	92.62	80.95	74.89	10.29
<u>Black, non-Hispanic</u>	37.22	34.86	40.19	92.78	81.04	67.18	10.60
<u>Hispanic</u>	27.34	28.45	33.05	92.92	80.41	62.17	11.06
<u>Asian or Pacific Islander, non-Hispanic</u>	37.32	41.90	37.03	92.43	79.82	52.24	10.44
<u>Native American, non-Hispanic</u>	30.92	33.84	37.35	92.65	79.81	61.51	
Santa Ana - Population below federal poverty line							
<u>White, non-Hispanic</u>	36.59	35.69	45.31	92.55	81.75	72.63	10.59
<u>Black, non-Hispanic</u>	30.40	34.66	39.64	91.94	82.25	76.57	10.44
<u>Hispanic</u>	22.21	27.00	30.56	93.36	82.18	60.87	10.98
<u>Asian or Pacific Islander, non-Hispanic</u>	36.22	40.88	35.66	92.11	80.53	46.13	10.05
<u>Native American, non-Hispanic</u>	22.28	21.56	35.82	93.35	79.06	60.67	11.72
Orange County - Total Population							
<u>White, non-Hispanic</u>	76.48	81.89	74.59	60.92	67.05	46.96	24.39
<u>Black, non-Hispanic</u>	69.50	75.53	68.16	74.64	71.50	44.07	15.23
<u>Hispanic</u>	58.20	67.52	59.65	75.35	73.08	45.50	15.65
<u>Asian or Pacific Islander, non-Hispanic</u>	69.64	76.68	67.46	77.05	70.10	43.85	13.93
<u>Native American, non-Hispanic</u>	68.87	73.43	68.92	69.65	69.78	46.01	19.49
Orange County - Population below federal poverty line							
<u>White, non-Hispanic</u>	68.31	77.99	69.03	62.05	71.85	49.98	24.26
<u>Black, non-Hispanic</u>	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 the City of Santa Ana are comprised of mostly low and moderate resource tracts and areas of high segregation and poverty. The central Orange County area, including Anaheim, and Garden Grove, also have 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.](#)

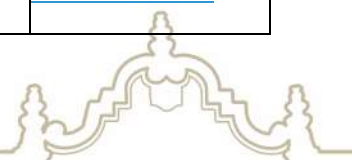
Local Trend. [The HUD Opportunity Indicator scores for Santa Ana are found in Table E-12. Like for the County data, the White population in Santa Ana, including the population below the federal poverty line, received the highest scores in low poverty and labor market participation. However, Asian or 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 sites inventory. A majority of the industrial uses in the City are located along the southeastern and southwestern areas of the City.](#)

[Most of the tracts in the City are low resource tracts, with slightly higher resource tracts in the moderate resource category located 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 located 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-13.](#)

Table E-13: Opportunity Map Scores and Categorization

Census Tract	Economic Score	Environmental Score	Education Score	Composite Score	Final Category
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
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

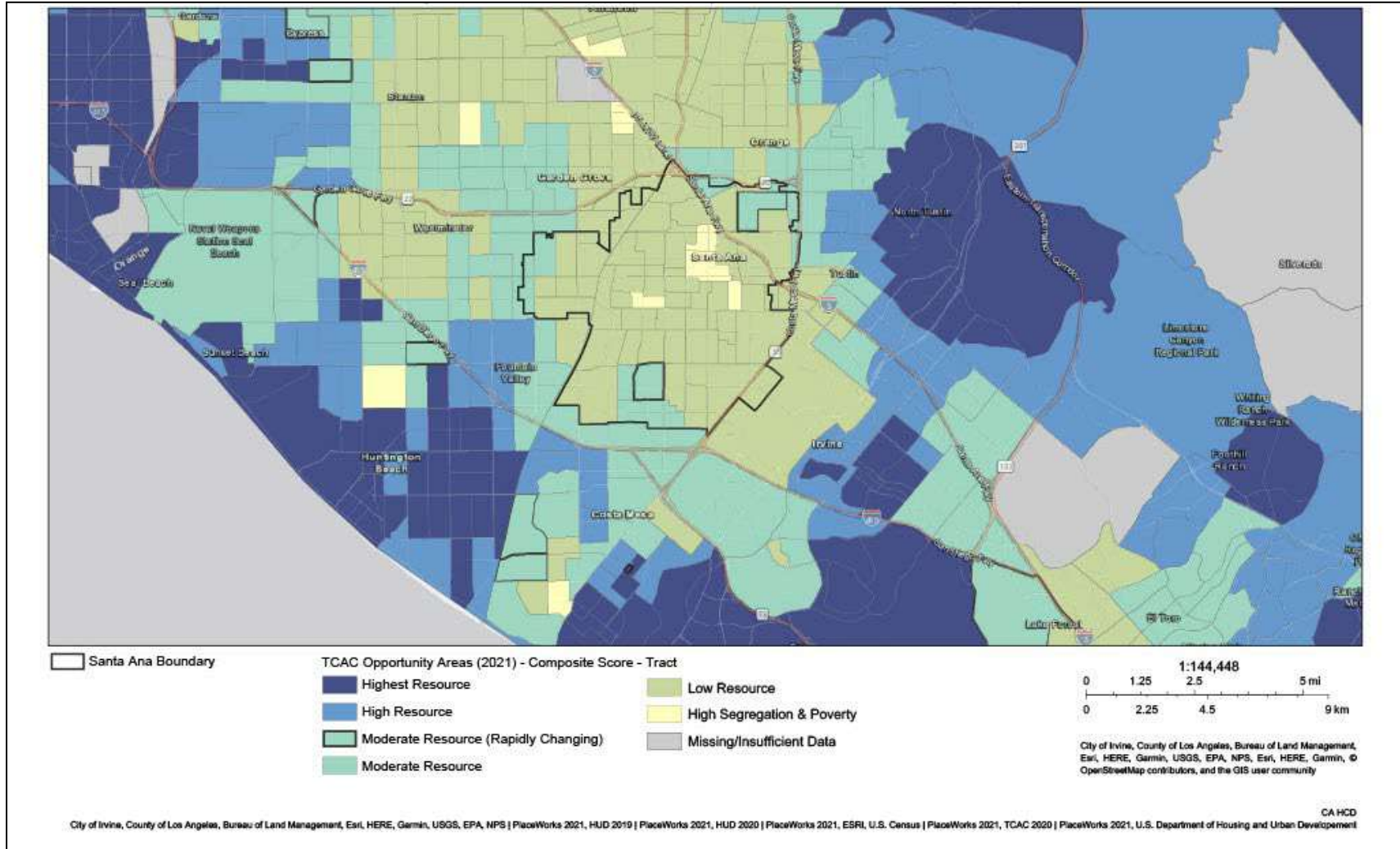


06059075515	0.45	0.01	0.24	-0.84	Low Resource
06059075701	0.78	0.16	0.43	-0.03	Moderate Resource
06059075806	0.66	0.06	0.32	-0.3	Moderate Resource
06059075902	0.37	0.19	0.29	-0.34	Low Resource
06059076000	0.67	0.08	0.3	-0.29	Moderate Resource
06059088903	0.15	0.42	0.51	-0.14	Moderate Resource
06059089001	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.



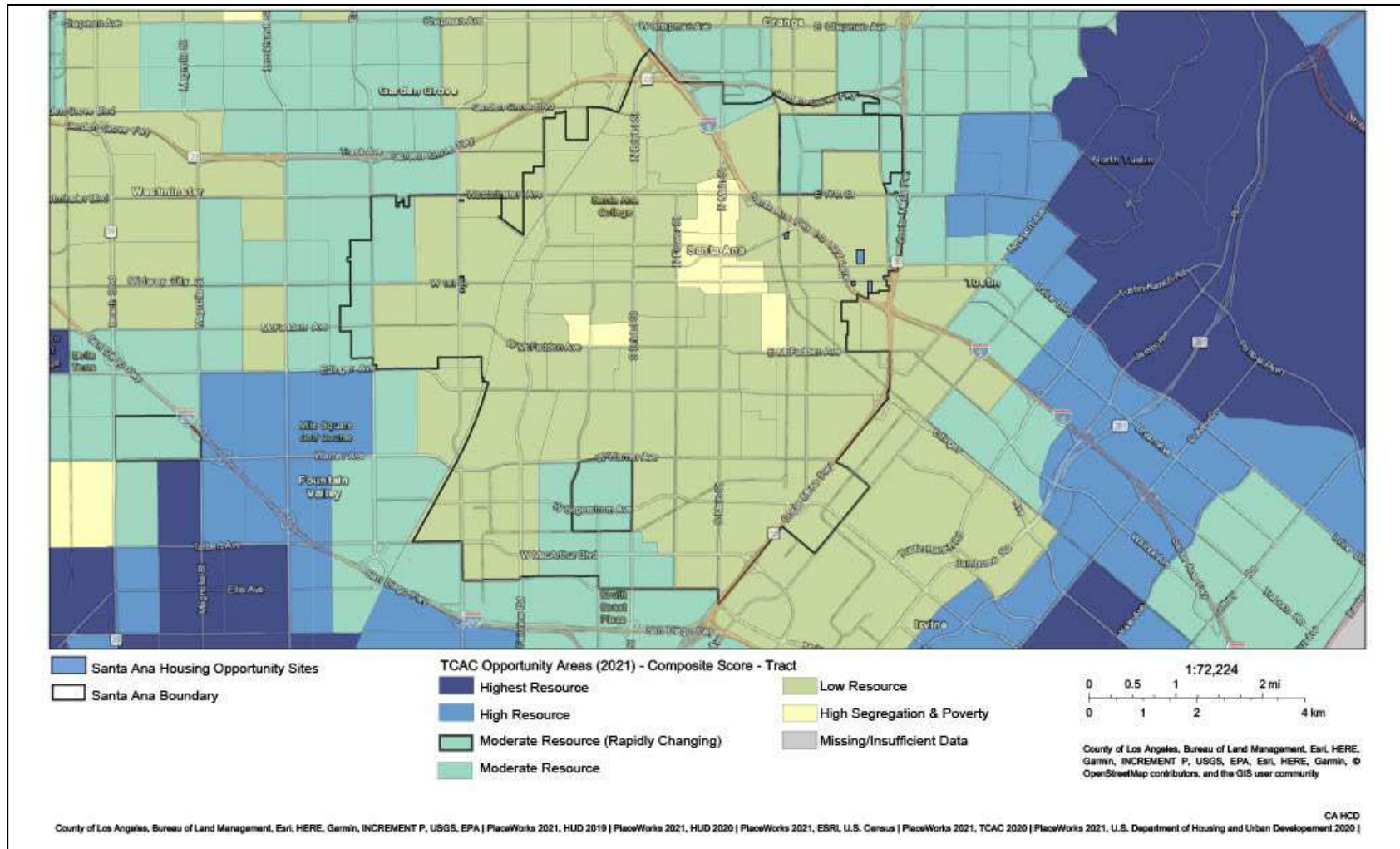
Figure E-17: Regional TCAC Opportunity Areas by Tract



Source: [HCD AFFH Data Viewer, TCAC 2021, 2021.](#)



Figure E-18: TCAC Opportunity Areas by Tract and Sites Inventory



Source: HCD AFFH Data Viewer, TCAC 2021, 2021.

Economic

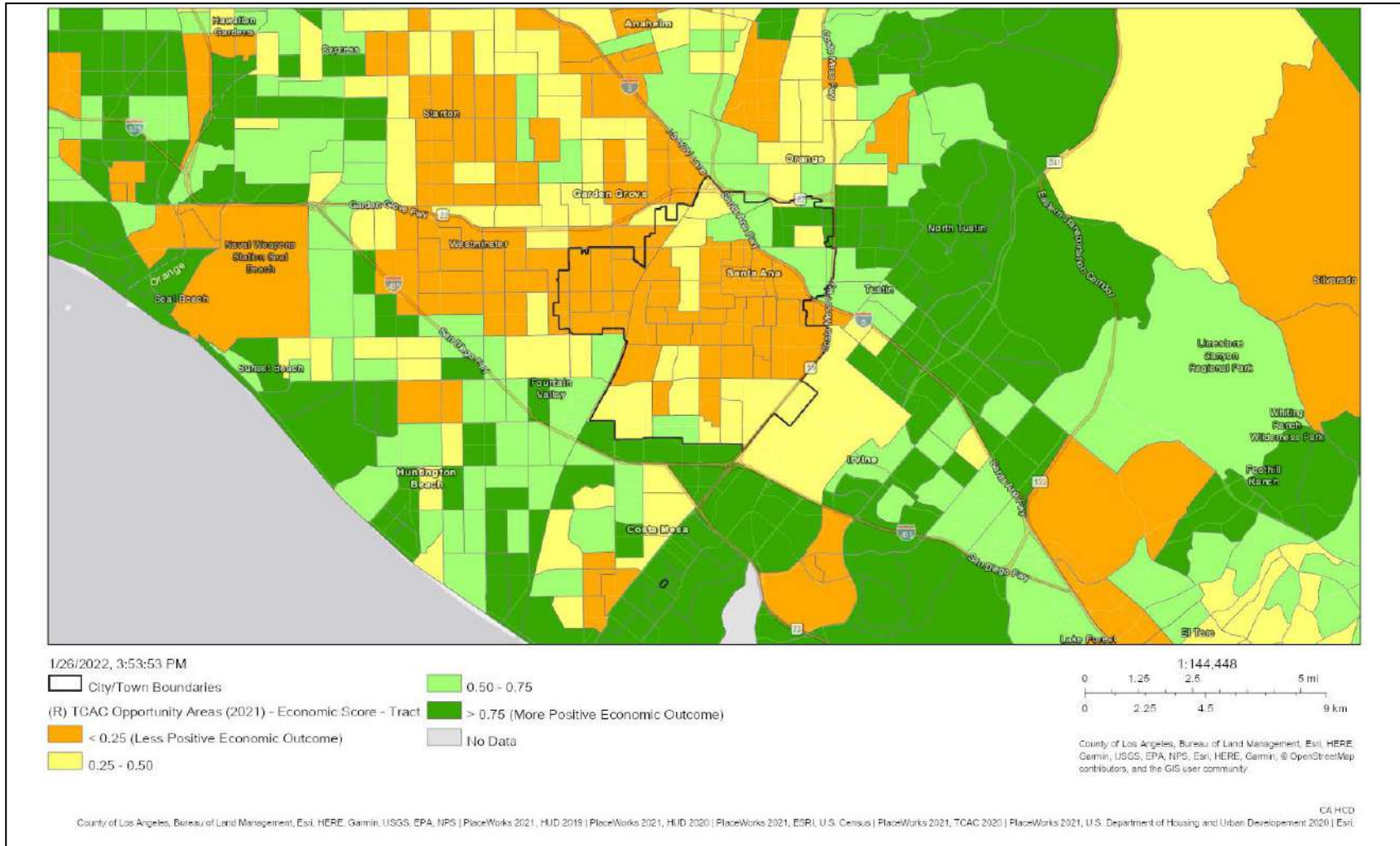
As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. See Table E-10 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend. As presented in Table E-12 above, in Orange County, White residents have the highest labor market participation, while 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, and areas around Irvine and the unincorporated community of North Tustin. Tracts with economic scores in the lowest quartile are concentrated in the 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 the I-5 freeway, are the tracts in the City with the highest economic scores in the third and fourth highest quartiles. As discussed previously, the tracts along the southeastern and southwestern City boundaries are comprised 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% (see Figure E-4), as well as scoring in the lowest quartile for economic opportunity (See Figure E-20).

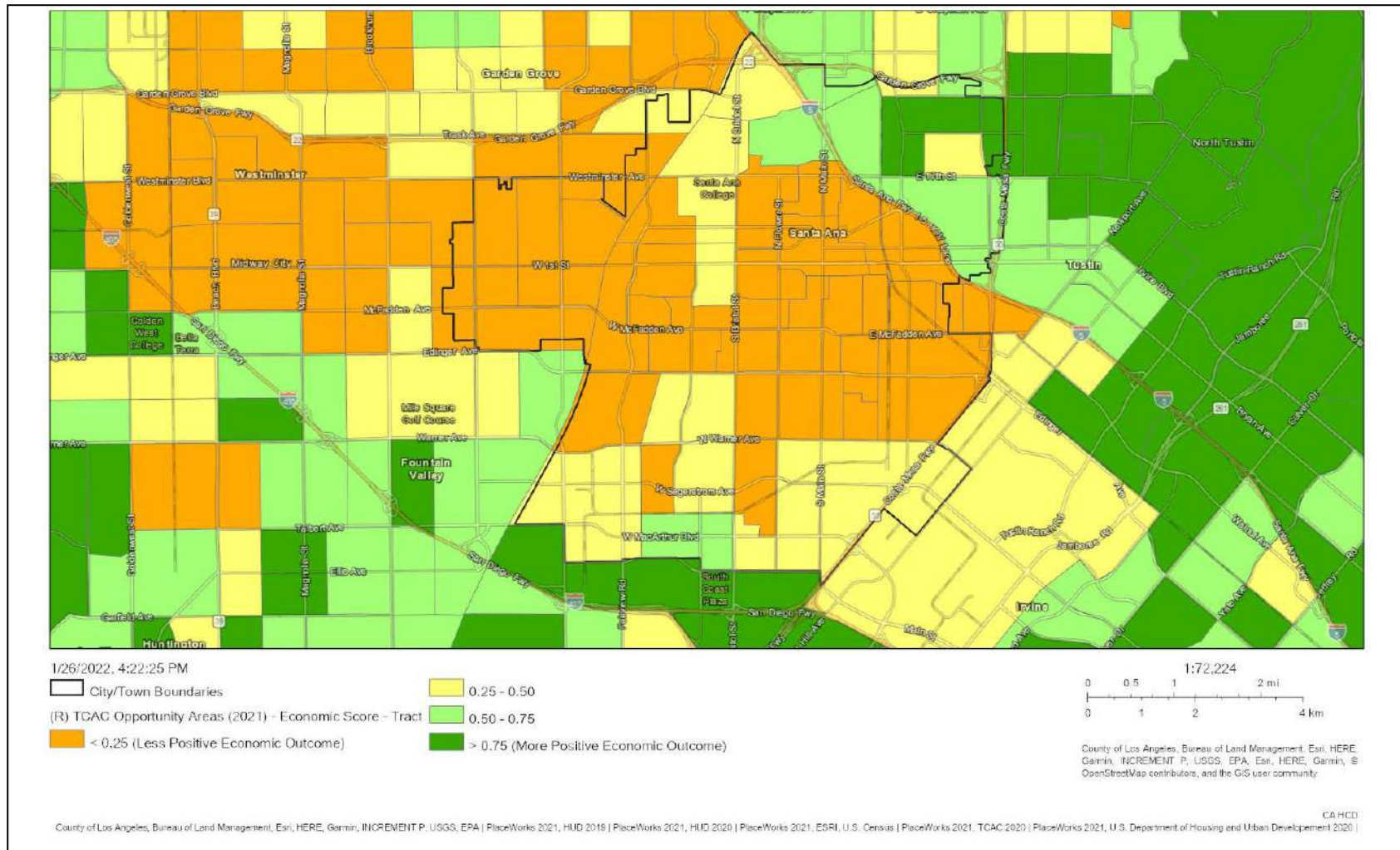


Figure E-19: Regional TCAC Opportunity Area Economic Scores by Tract



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.



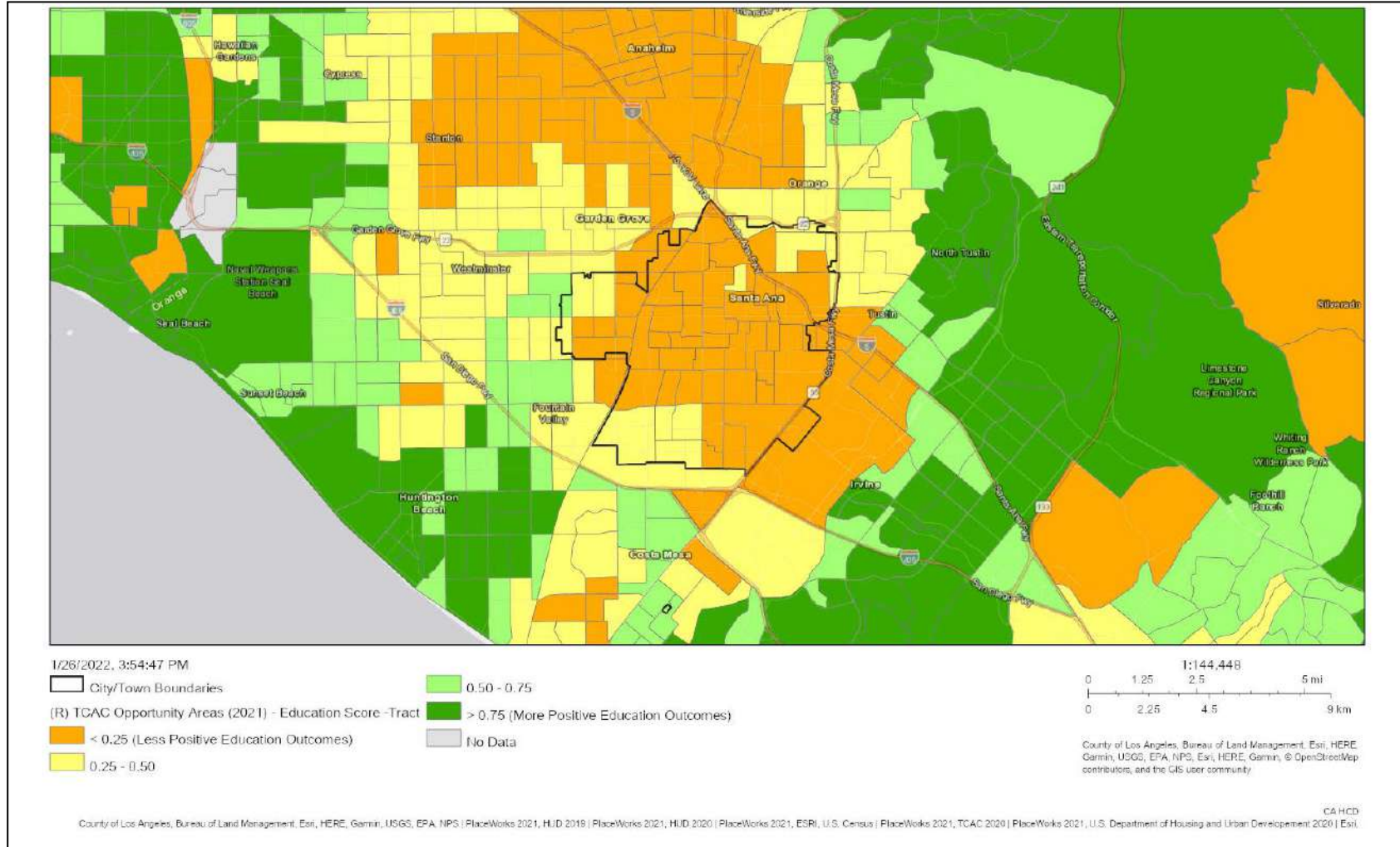
Education

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-11 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend. As presented in Table E-12 previously, White Orange County communities are located closest to the highest quality school systems, while 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 between 0.50 and 0.75), which is the highest scoring tract in the City.

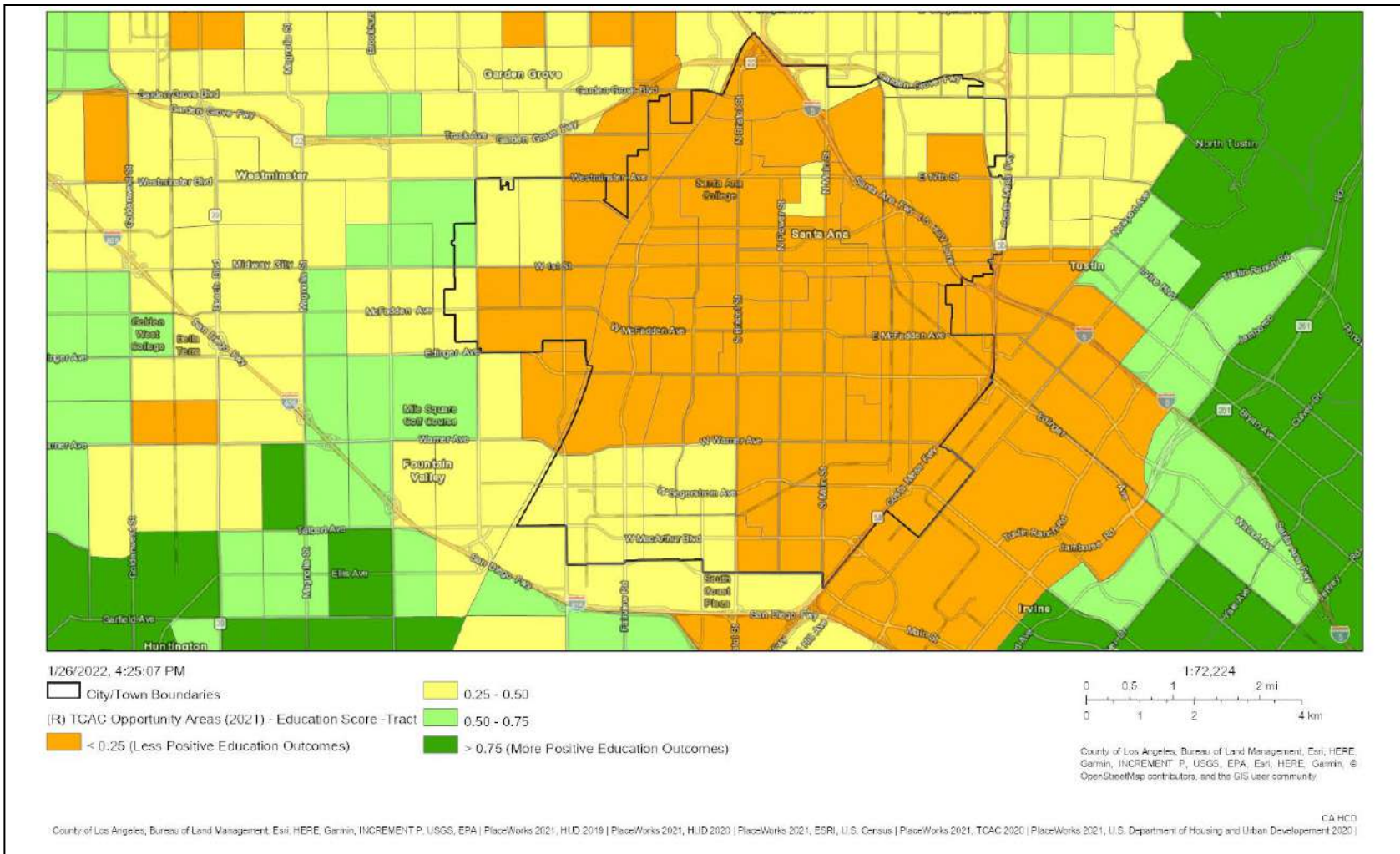
Figure E-21: Regional TCAC Opportunity Area Education Scores by Tract



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

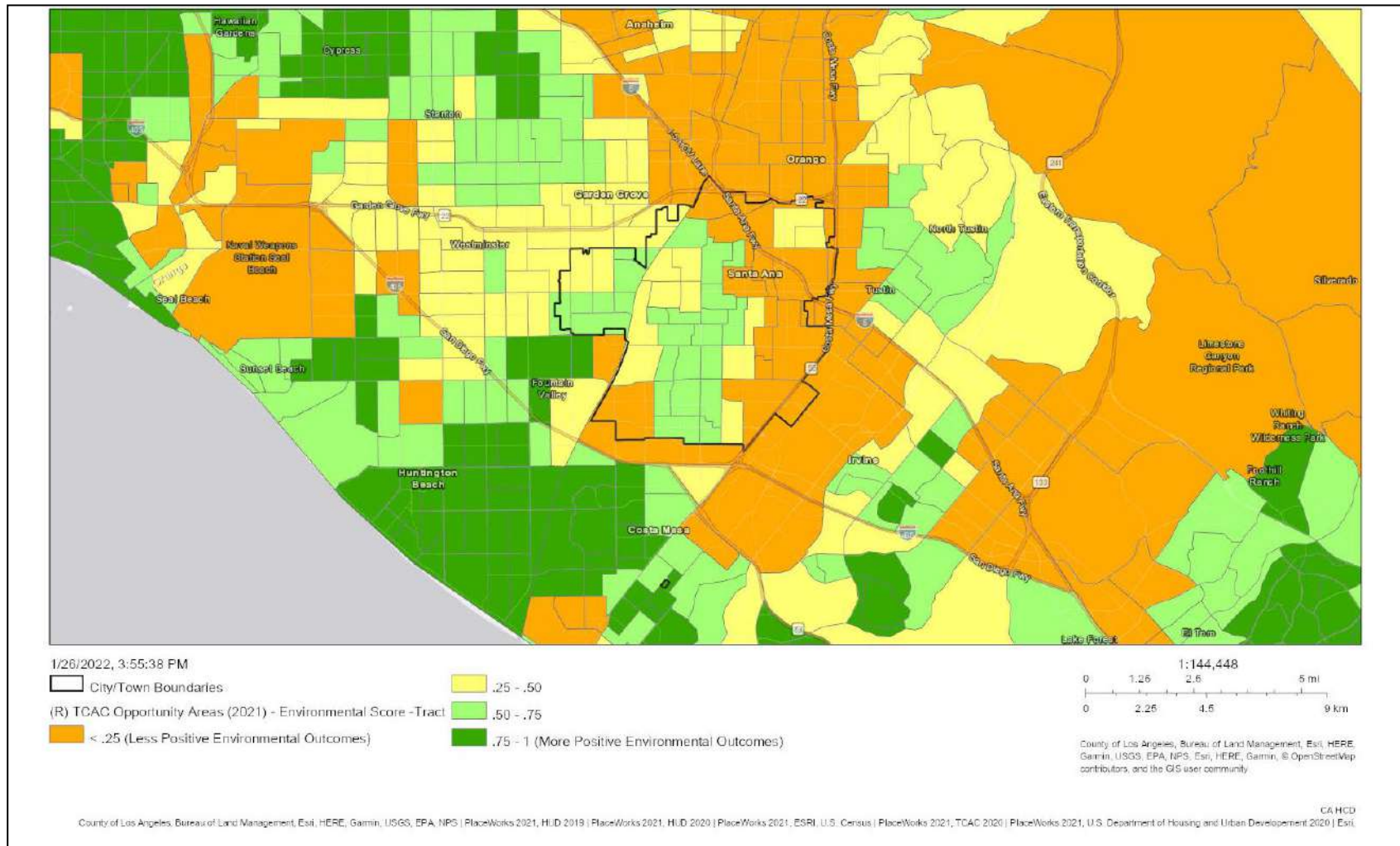
TCAC environmental health scores are determined by the Fair Housing Task Force based on 12 of the indicators that are used in the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen 3.0 tool under the “exposures” and “environmental effect” subcomponents of the “pollution 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. These 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.” Disadvantage 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 (Table E-12). The central part of the County in the areas generally located around the I-5 freeway and State Route 55 have the lowest environmental TCAC scores (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) and 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 located 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, above 0.75. According to the CalEnviroScreen, there are 24 census tracts in Santa Ana that are in the top 75th percentile, or 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 freeway, around the downtown area south of the I-5 freeway, 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.

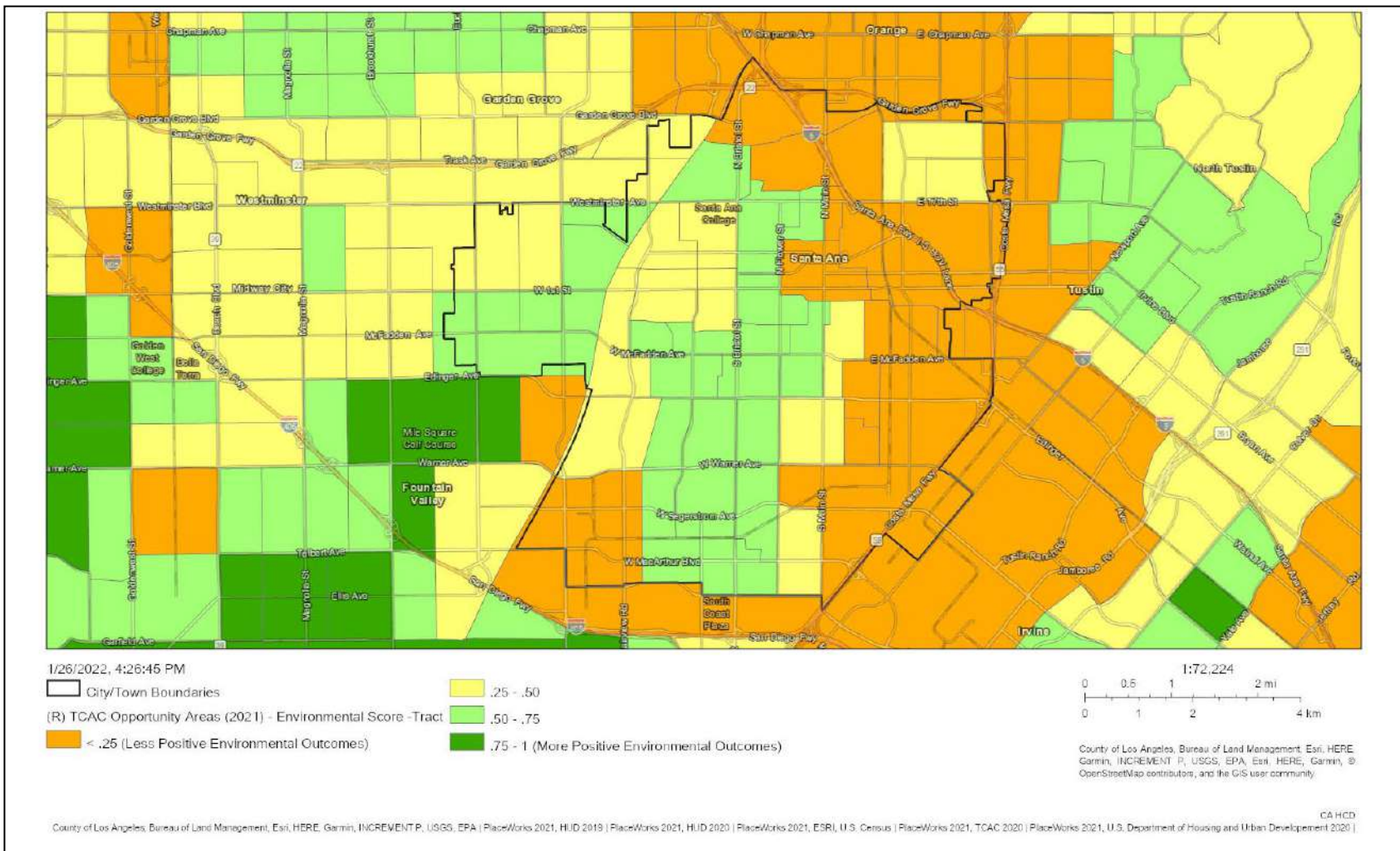


Figure E-23: Regional TCAC Opportunity Area Environmental Scores by Tract



Source: HCD AFFH Data Viewer, TCAC 2021, 2021

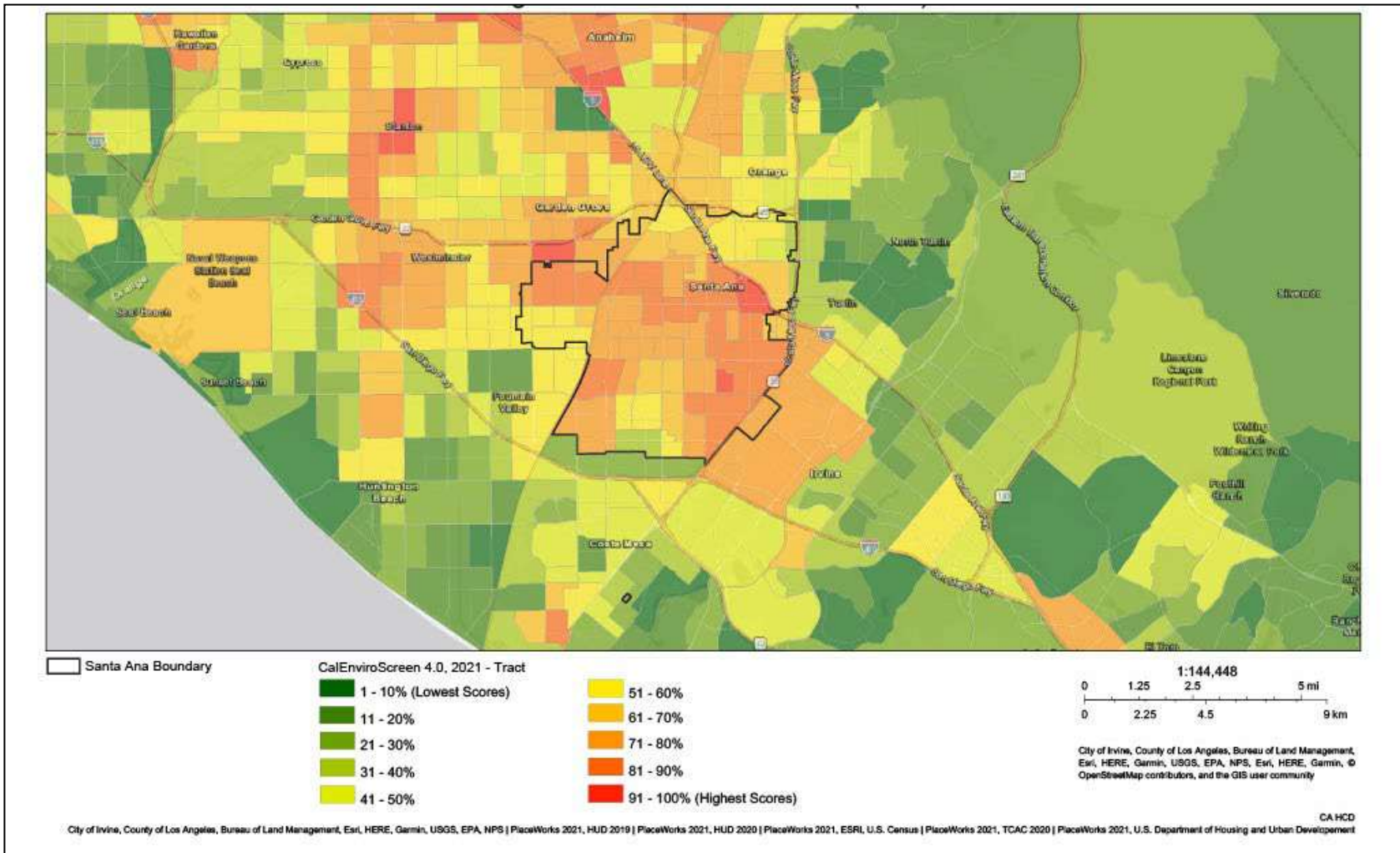
Figure E-24: TCAC Opportunity Area Environmental Scores by Tract



Source: HCD AFFH Data Viewer, TCAC 2021, 2021.

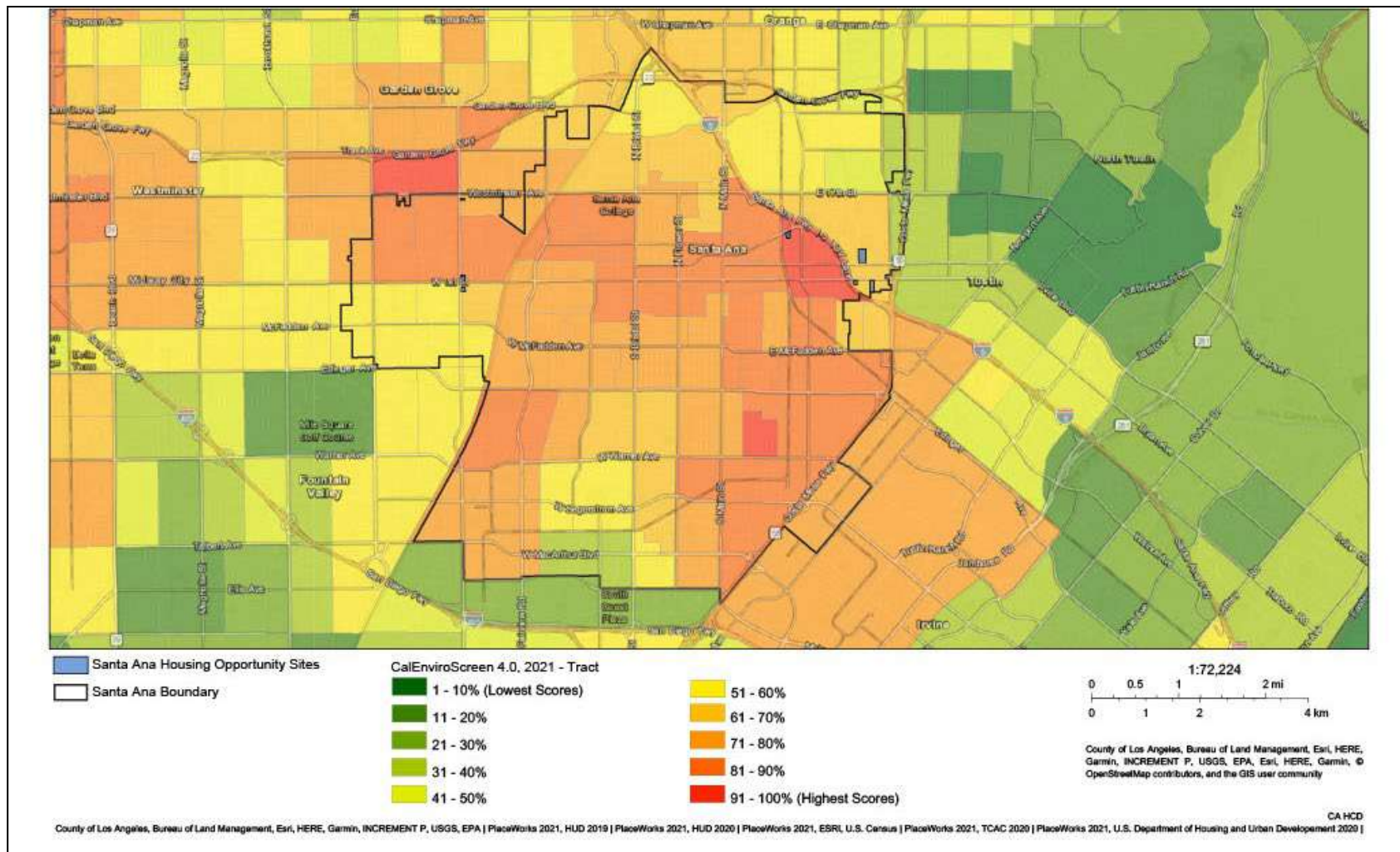


Figure E-25: Regional CalEnviroScreen Scores by Tract



Source: HCD AFFH Data Viewer, CalEnviroScreen, 4.01, 2021

Figure E-26: CalEnviroScreen Scores by Tract



Source: HCD AFFH Data Viewer, CalEnviroScreen, 2021

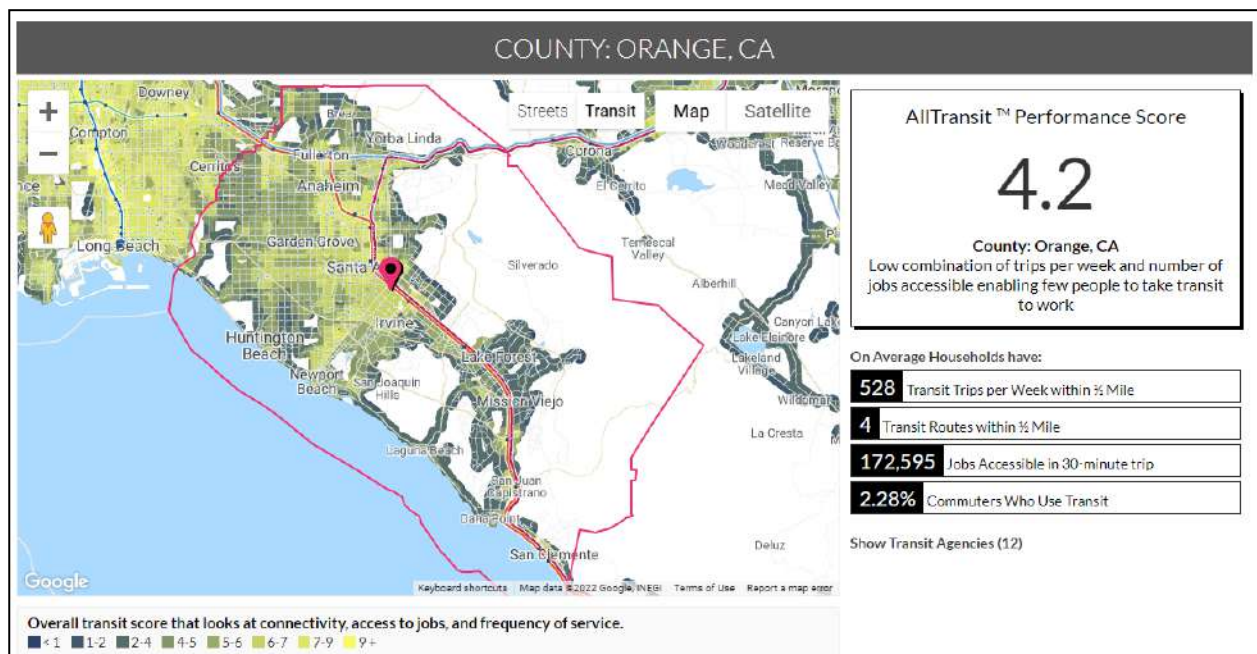


Transportation

HUD's Job Proximity Index, shown in Table E-12, 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, 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% of jobs and 87.4% of workers in Orange County are located within ½ a mile from transit.

Figure E-27: Orange County All Transit Metrics



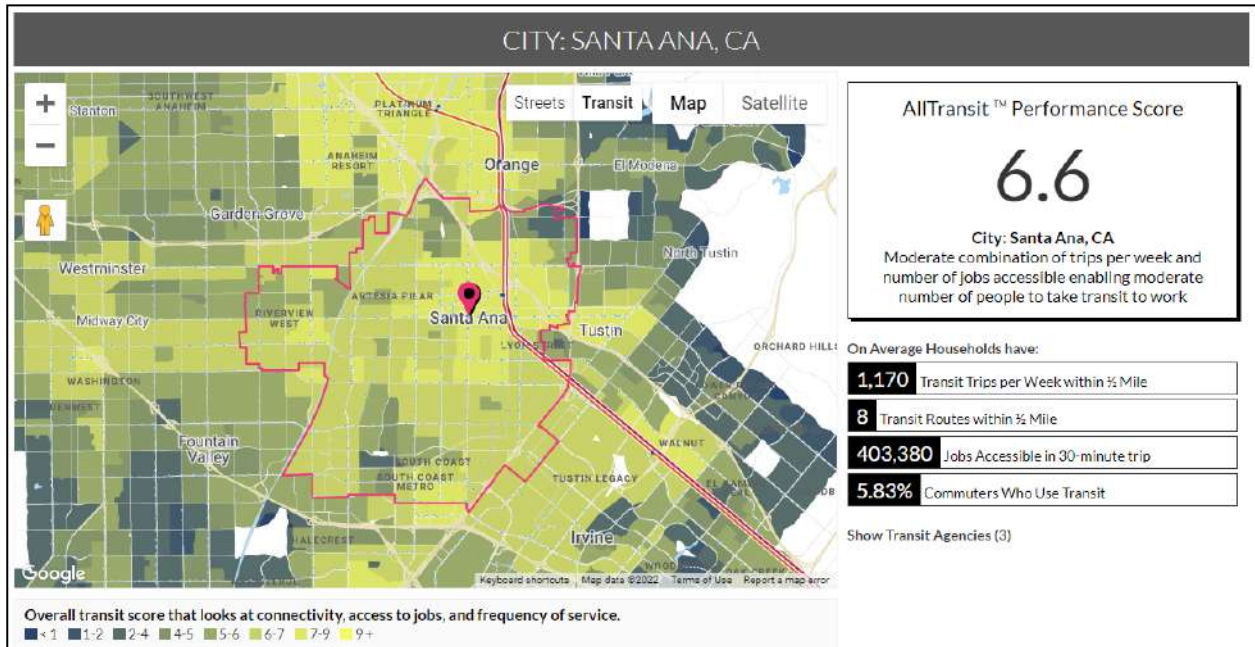
Source: All Transit Metrics: All Transit Performance Score – Orange County, 2019.

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, and Stanton, and parts of the

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% of jobs and 99.9% of workers in Santa Ana are within ½ 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 are considered an HQTA (Figure E-29).

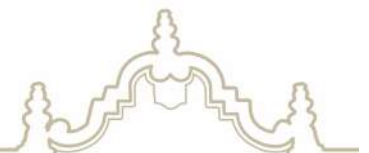
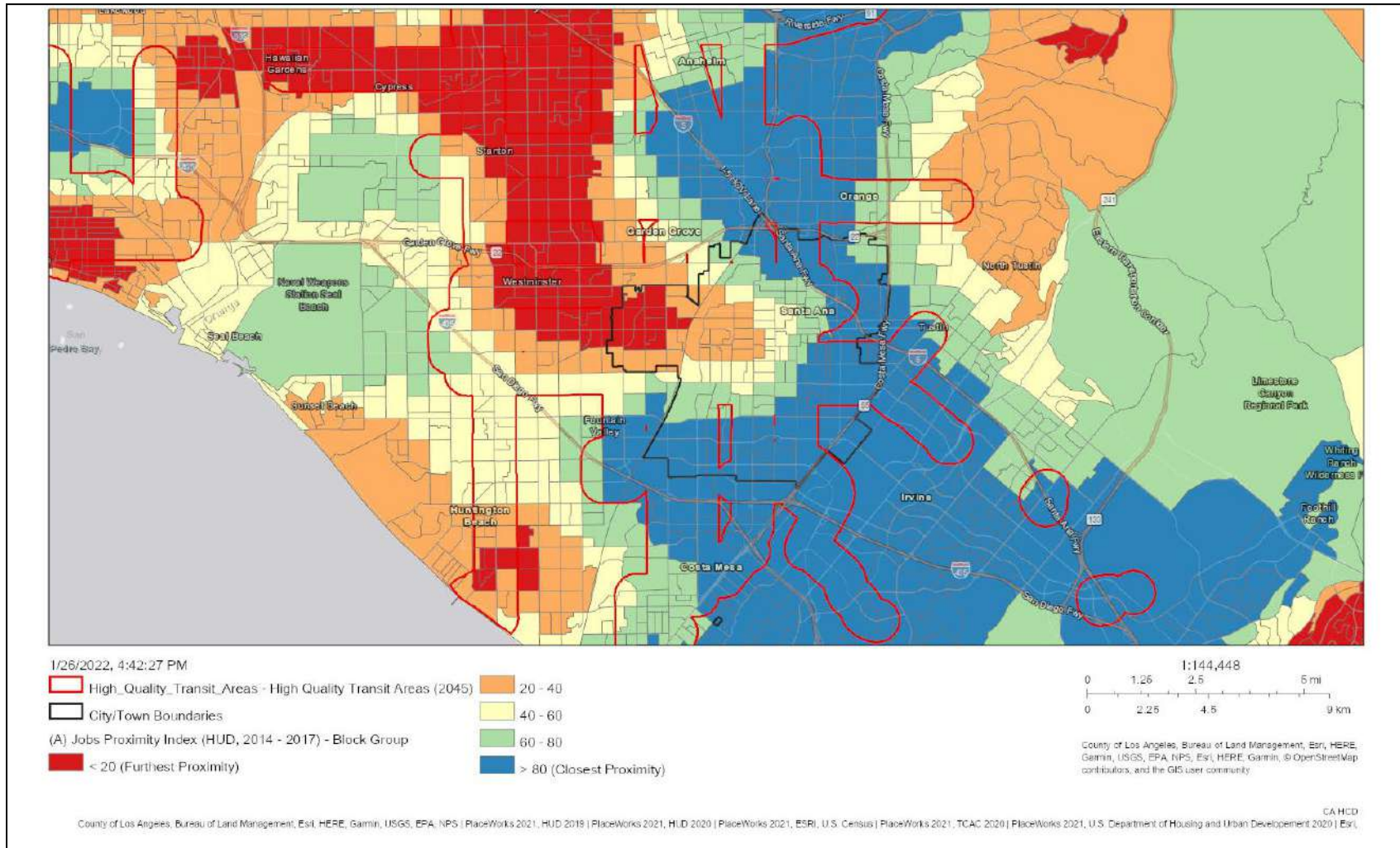
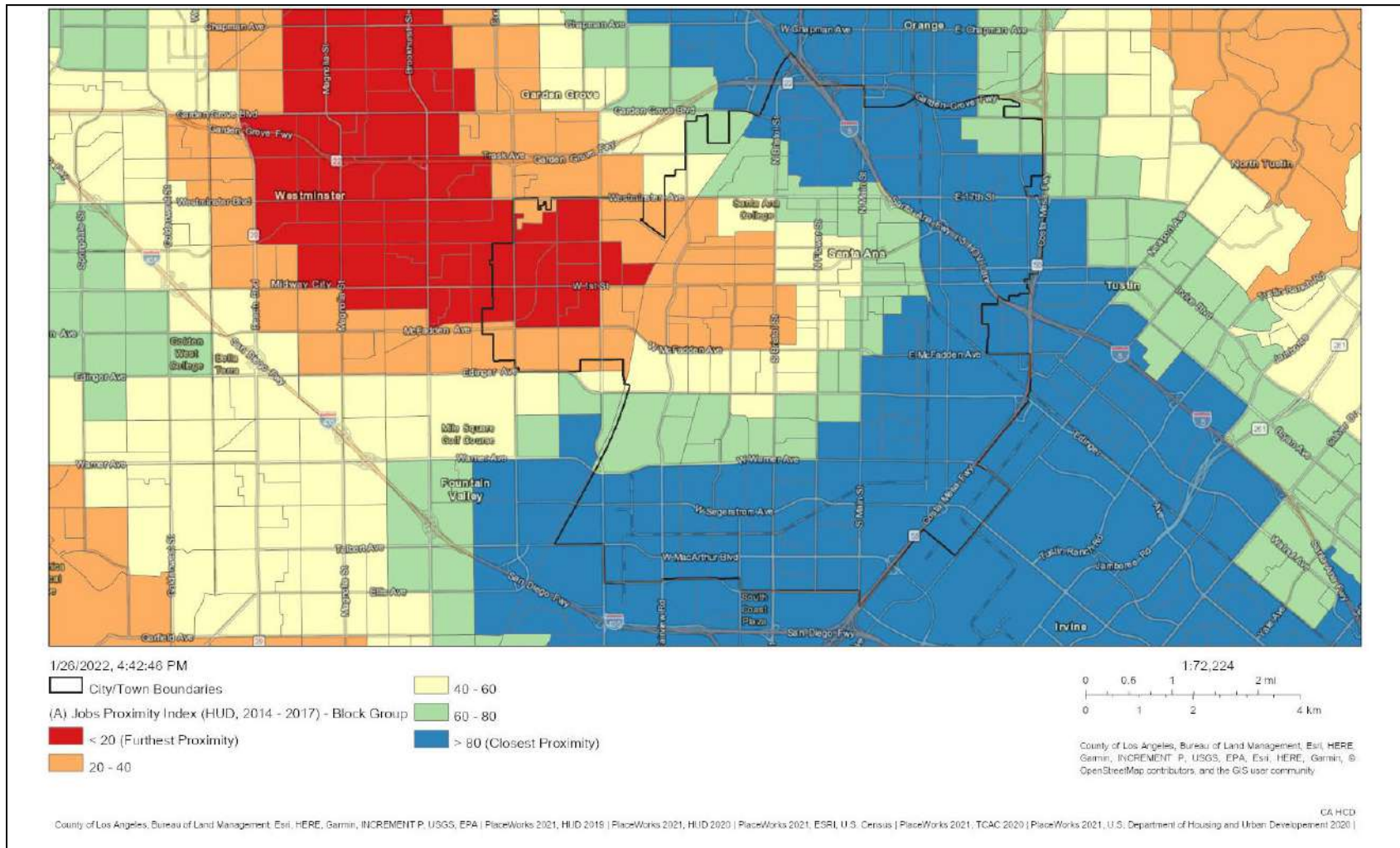


Figure E-29: Regional HUD Jobs Proximity Index by Block Group and HQTAs



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-14 breaks down households by race and 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%)

In Santa Ana, 21.1% of owner-occupied households and 41.6% 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% of owner-households experience a housing problem and 25.6% 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-14: Housing Problems by Race/Ethnicity

	<u>Santa Ana</u>		<u>Orange County</u>	
	<u>Owner</u>	<u>Renter</u>	<u>Owner</u>	<u>Renter</u>
<u>White</u>	<u>2,045</u>	<u>2,915</u>	<u>108,370</u>	<u>95,605</u>
<u>Black</u>	<u>220</u>	<u>245</u>	<u>1,975</u>	<u>6,095</u>
<u>Asian</u>	<u>2,820</u>	<u>2,760</u>	<u>42,735</u>	<u>43,745</u>
<u>American Indian</u>	<u>--</u>	<u>69</u>	<u>325</u>	<u>705</u>
<u>Pacific Islander</u>	<u>10</u>	<u>80</u>	<u>270</u>	<u>840</u>
<u>Hispanic</u>	<u>10,870</u>	<u>25,365</u>	<u>44,310</u>	<u>109,950</u>
<u>Other</u>	<u>125</u>	<u>230</u>	<u>3,655</u>	<u>5,895</u>
<u>All</u>	<u>34,470</u>	<u>41,510</u>	<u>588,550</u>	<u>436,425</u>

Note: -- = 0 households in category.

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

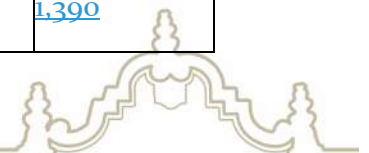
Cost Burden

Households are considered cost burdened if housing costs exceed 30% of their gross income for housing, and severely cost burdened if housing costs exceed 50% 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 Table E-15. Approximately 41% of Orange County households are cost burdened, including 31.4% of owner-occupied households and 52.9% of renter-occupied households. Hispanic renter households have the highest rate of cost burden of 59.8%. Non-Hispanic American Indian and non-Hispanic Pacific Islander owner households have the lowest rate of cost burden of 23.3% and 27.8%, respectively. Cost burden is more common among renter households than owner households regardless of race or ethnicity.

Table E-15: Cost Burden by Race/Ethnicity and Tenure – Orange County

	<u>Cost Burdened (>30%)</u>	<u>Severely Cost Burdened (>50%)</u>	<u>Total Households</u>
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.			

Cost burden 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% to 60% of owners are cost burdened. Tracts where more than 60% 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-16. Approximately 48.1% of households in the City are cost burdened, including 32.5% of owner-occupied households and 61% of renter-occupied households. Further, 22.3% of households in Santa Ana are severely cost burdened. The owner-occupied rate is similar to the County as a whole, while the renter-occupied rate being 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% and 64.2%, 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% and 26%, respectively. More households as a percentage are cost burdened in Santa Ana compared to the County.

Table E-16: Cost Burden by Race/Ethnicity and Tenure – Santa Ana

	Cost Burdened (>30%)	Severely Cost Burdened (>50%)	Total Households
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.			

Cost burden 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 is 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, however tracts near the downtown and around the Grand and Edinger avenues intersection have high concentrations of renter and owner cost burdened households.

Sites Inventory. As discussed above, approximately 48.1% of households overpay for housing in all Santa Ana tracts. The distribution of RHNA units for the opportunity sites and pipeline projects by cost burdened renters is shown below. A majority of the RHNA units are in tracts where 40% to 60% 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% and 80% of renters are cost burdened in a majority of the City. The location of the RHNA sites does not exacerbate existing conditions.

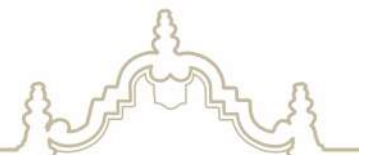


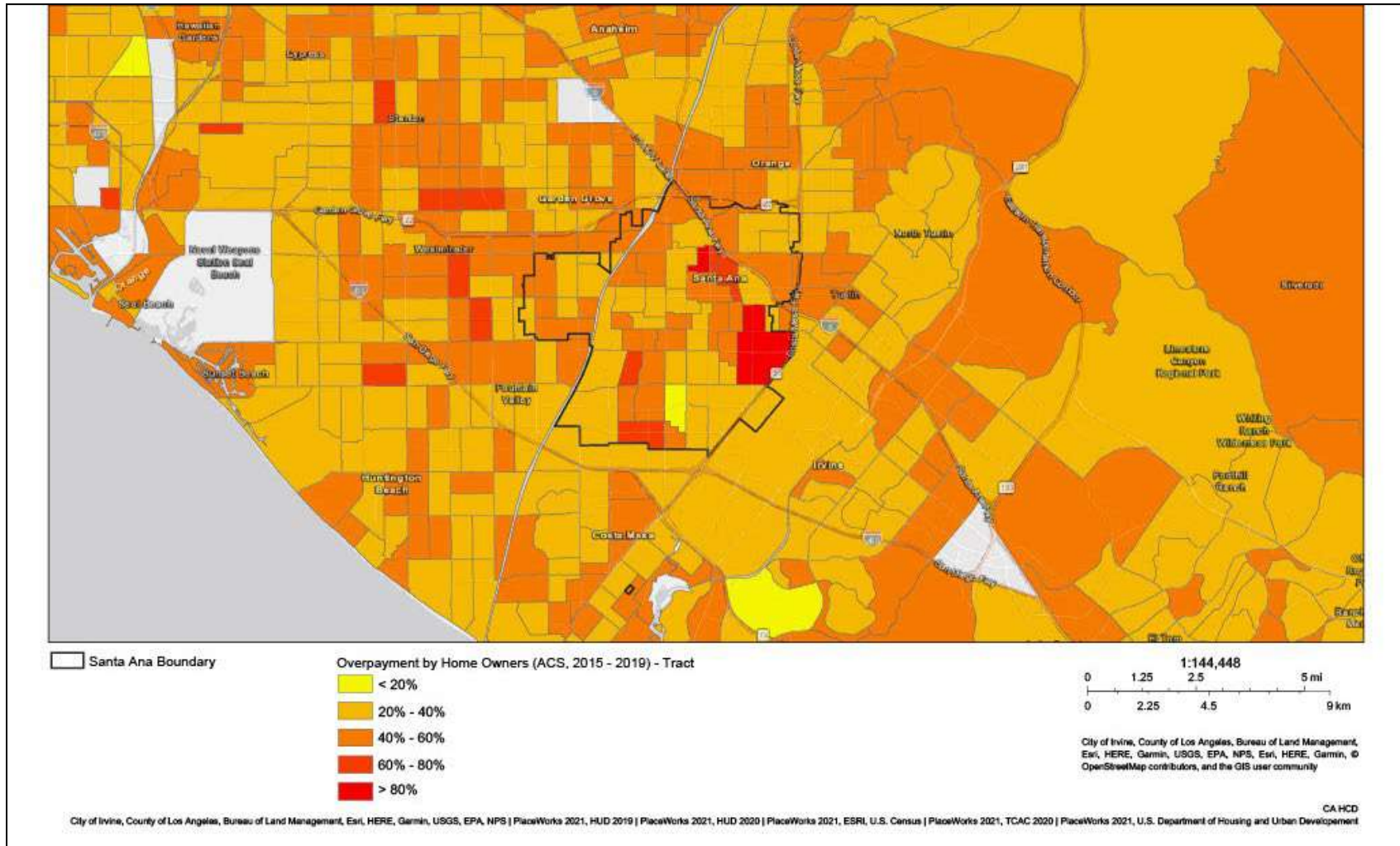
Table E-17: Distribution of RHNA Units by Percent of Cost Burdened Renters: Opportunity Sites

<u>Percent of Cost Burdened Renters (Tract)</u>	<u>Lower Income</u>	<u>Moderate Income</u>	<u>Total</u>
20-40%	0.0%	0.0%	0.0%
40-60%	78.3%	100.0%	92.3%
60-80%	21.7%	0.0%	7.7%
80-100%	0.0%	0.0%	0.0%
Total	300	540	840

Table E-18: Distribution of RHNA Units by Percent of Cost Burdened Renters: Pipeline Projects

<u>Percent of Cost Burdened Renters (Tract)</u>	<u>Lower Income</u>	<u>Moderate Income</u>	<u>Above Mod. Income</u>	<u>Total</u>
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	1,103	2	5,064	6,169

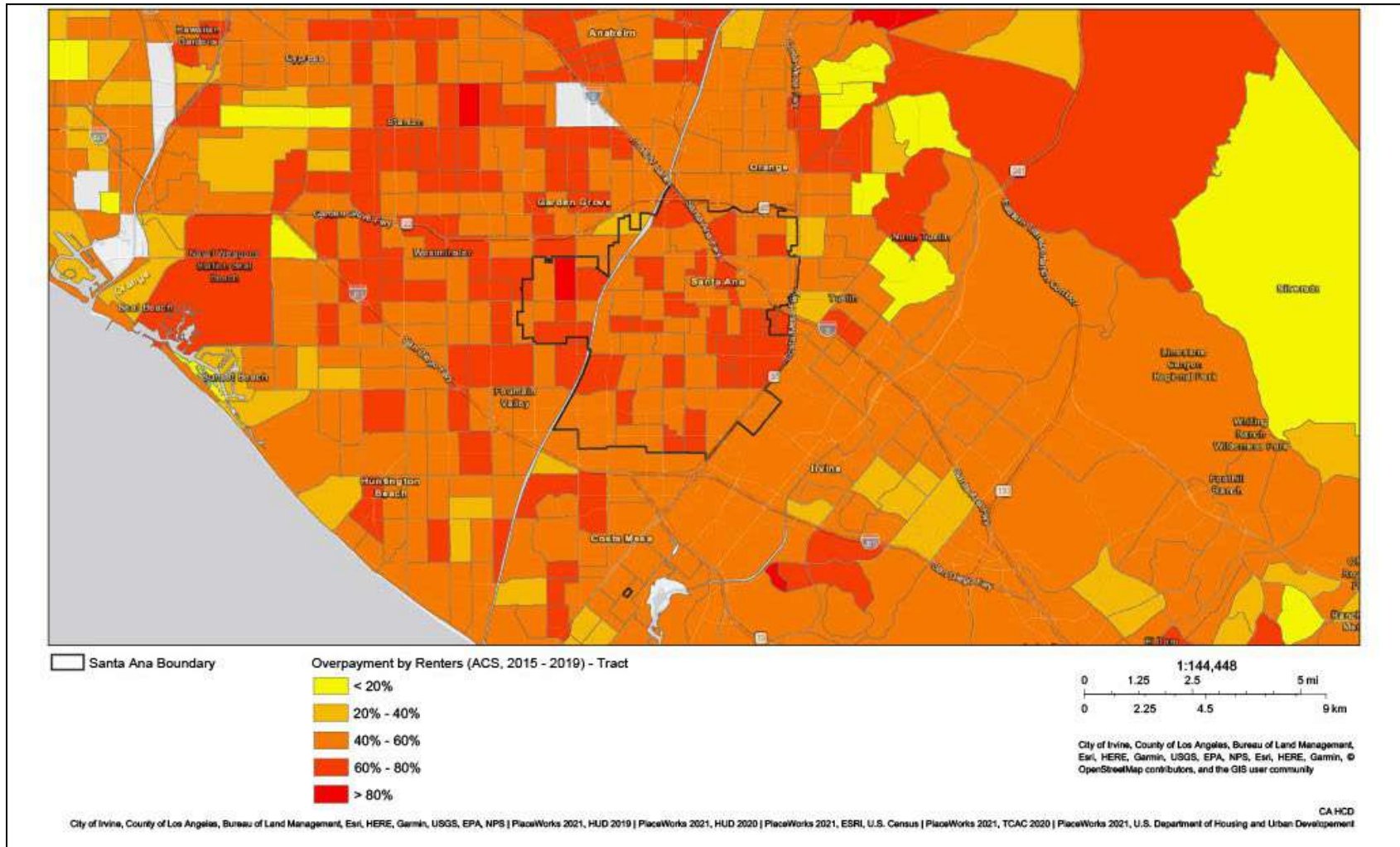
Figure E-31: Regional Cost Burdened Owners by Tract (2019)



Source: HCD AFFH Data Viewer, 2010-2014 ACS, 2021.

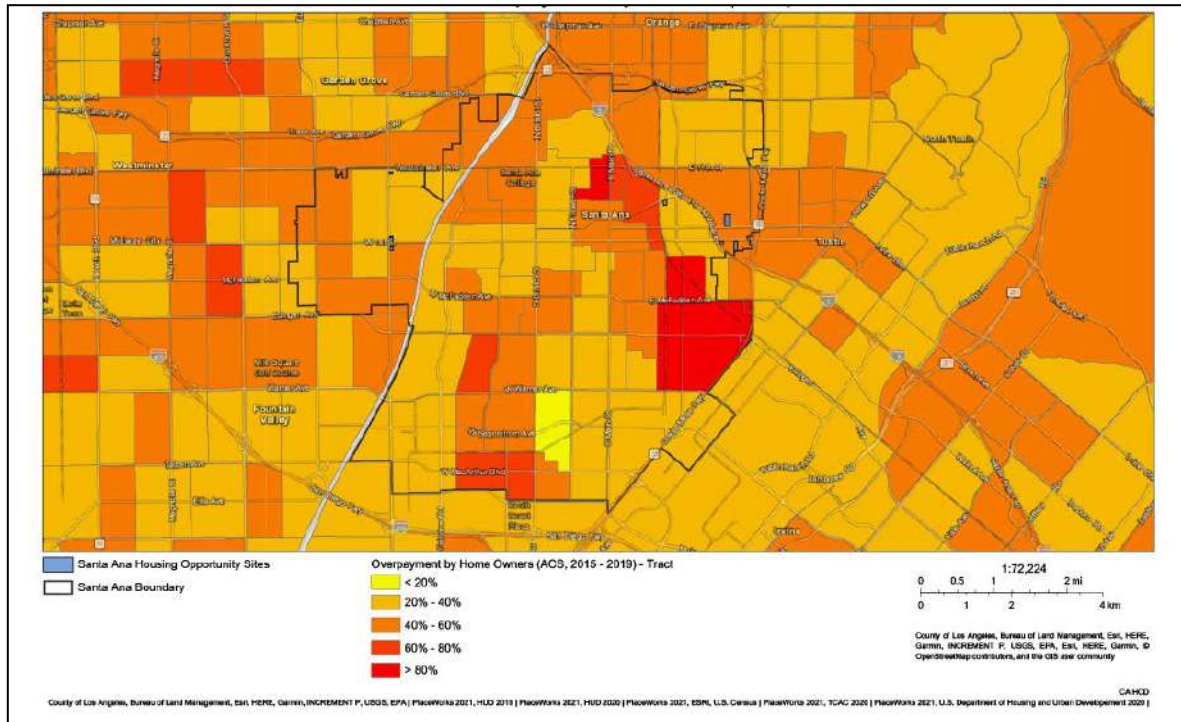


Figure E-32: Regional Cost Burdened Renters by Tract (2019)



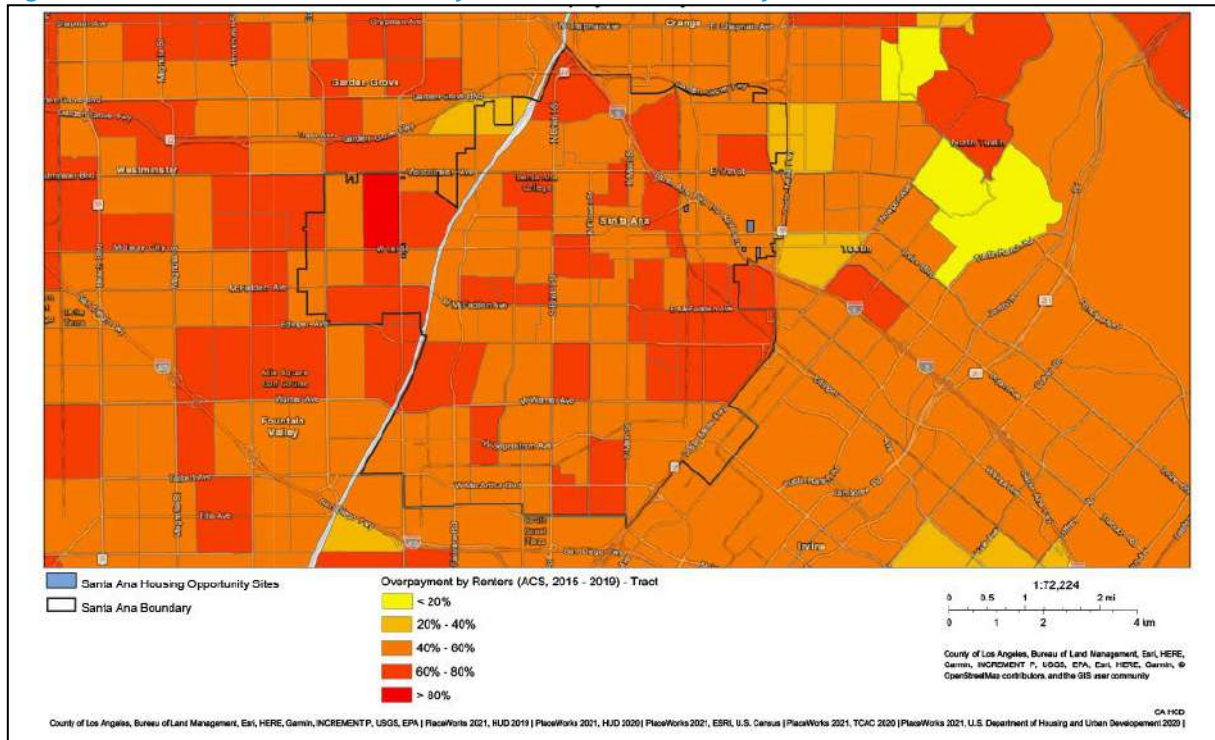
Source: HCD AFFH Data Viewer, 2010-2014 ACS, 2021.

Figure E-33: Cost Burdened Owners by Tract and Sites Inventory (2019)

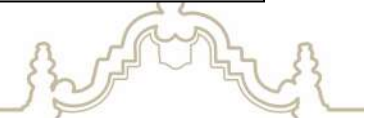


Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure E-34: Cost Burdened Renters by Tract and Sites Inventory (2019)



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.



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) is used to show overcrowding in Santa Ana and Orange County.

Regional Trend. As shown in Table E-19, 3.7% of owner-occupied households and 16.0% of renter-occupied households in the County are overcrowded. Severe overcrowding is slightly less of an issue in the County. Approximately 1% of owner households and 5.9% of renter households are severely overcrowded.

Table E-19: Overcrowding by Tenure

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 persons per room)		Total Households
	Households	Percent	Households	Percent	
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-19 above, a larger share of households in Santa Ana are overcrowded compared to the countywide average. Nearly 19% of owner-occupied households and 42% of renter-occupied households in the City have more than one person per room, which are significantly higher than surrounding areas in the County. Moreover, 6.4% of owner households and 20.1% 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 in the City have 20% or greater 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%.

Sites Inventory. 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 located in these tracts. The majority of the City’s RHNA units are located in tracts with 8.3% to 12% overcrowded households or more than 20%. 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.

Table E-20: Distribution of RHNA Units by Percent of Overcrowded Households: Opportunity Sites

<u>Percent of Overcrowded Households (Tract)</u>	<u>Lower Income</u>	<u>Moderate Income</u>	<u>Total</u>
<u><= 8.2% (Statewide Average)</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
<u>8.3-12%</u>	<u>55.7%</u>	<u>87.0%</u>	<u>75.8%</u>
<u>12-15%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
<u>15-20%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
<u>> 20%</u>	<u>44.3%</u>	<u>13.0%</u>	<u>24.2%</u>
<u>Total</u>	<u>300</u>	<u>540</u>	<u>840</u>

Table E-21: Distribution of RHNA Units by Percent of Overcrowded Households: Pipeline Projects

<u>Percent of Overcrowded Households (Tract)</u>	<u>Lower Income</u>	<u>Moderate Income</u>	<u>Above Mod. Income</u>	<u>Total</u>
<u><= 8.2% (Statewide Average)</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
<u>8.3-12%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>12.6%</u>	<u>10.3%</u>
<u>12-15%</u>	<u>64.1%</u>	<u>0.0%</u>	<u>22.4%</u>	<u>29.9%</u>
<u>15-20%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>22.2%</u>	<u>18.2%</u>
<u>> 20%</u>	<u>35.9%</u>	<u>100.0%</u>	<u>42.9%</u>	<u>41.6%</u>
<u>Total</u>	<u>1,103</u>	<u>2</u>	<u>5,064</u>	<u>6,169</u>

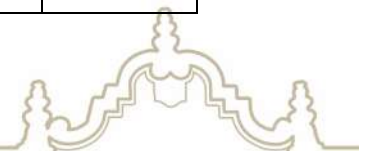
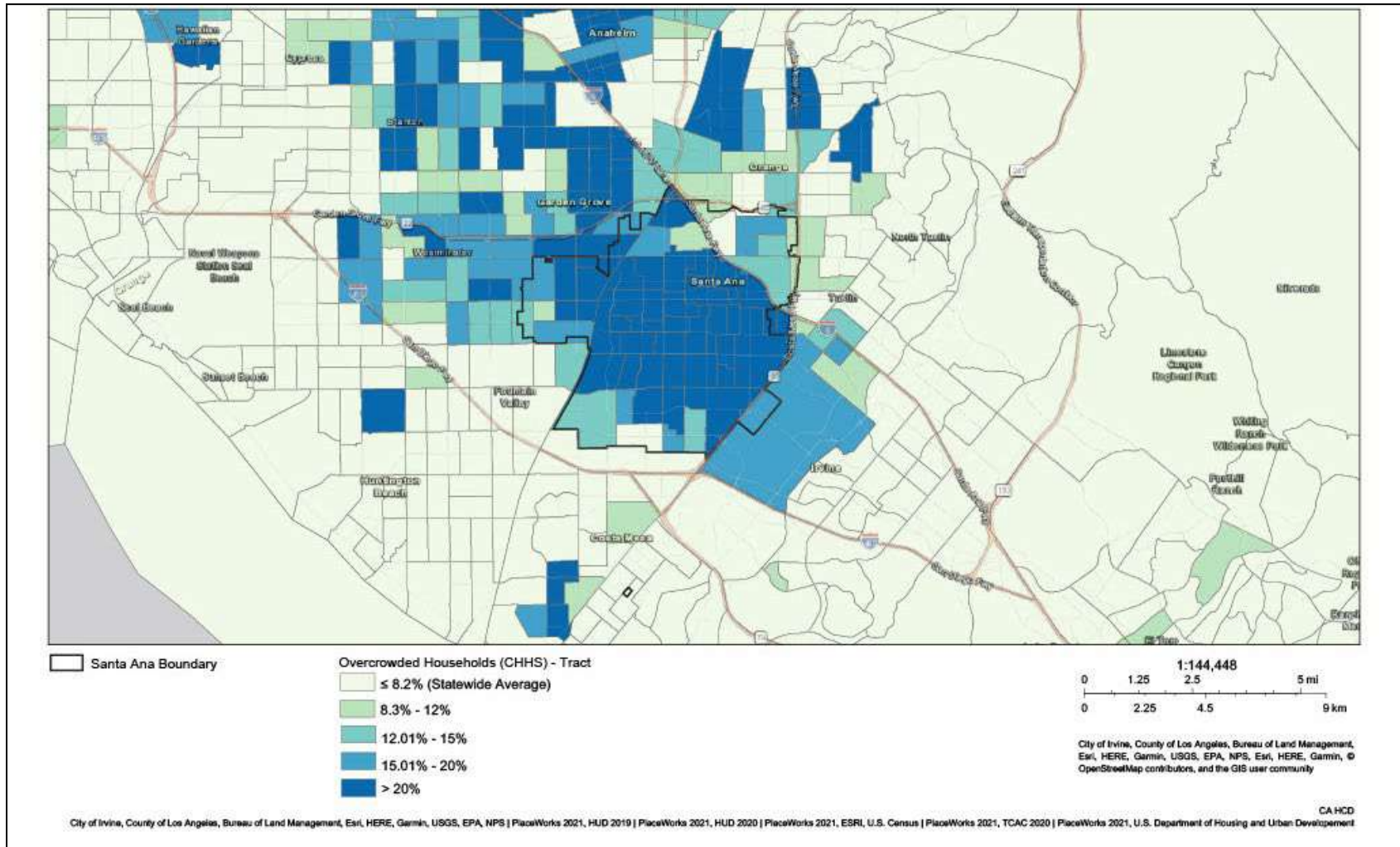
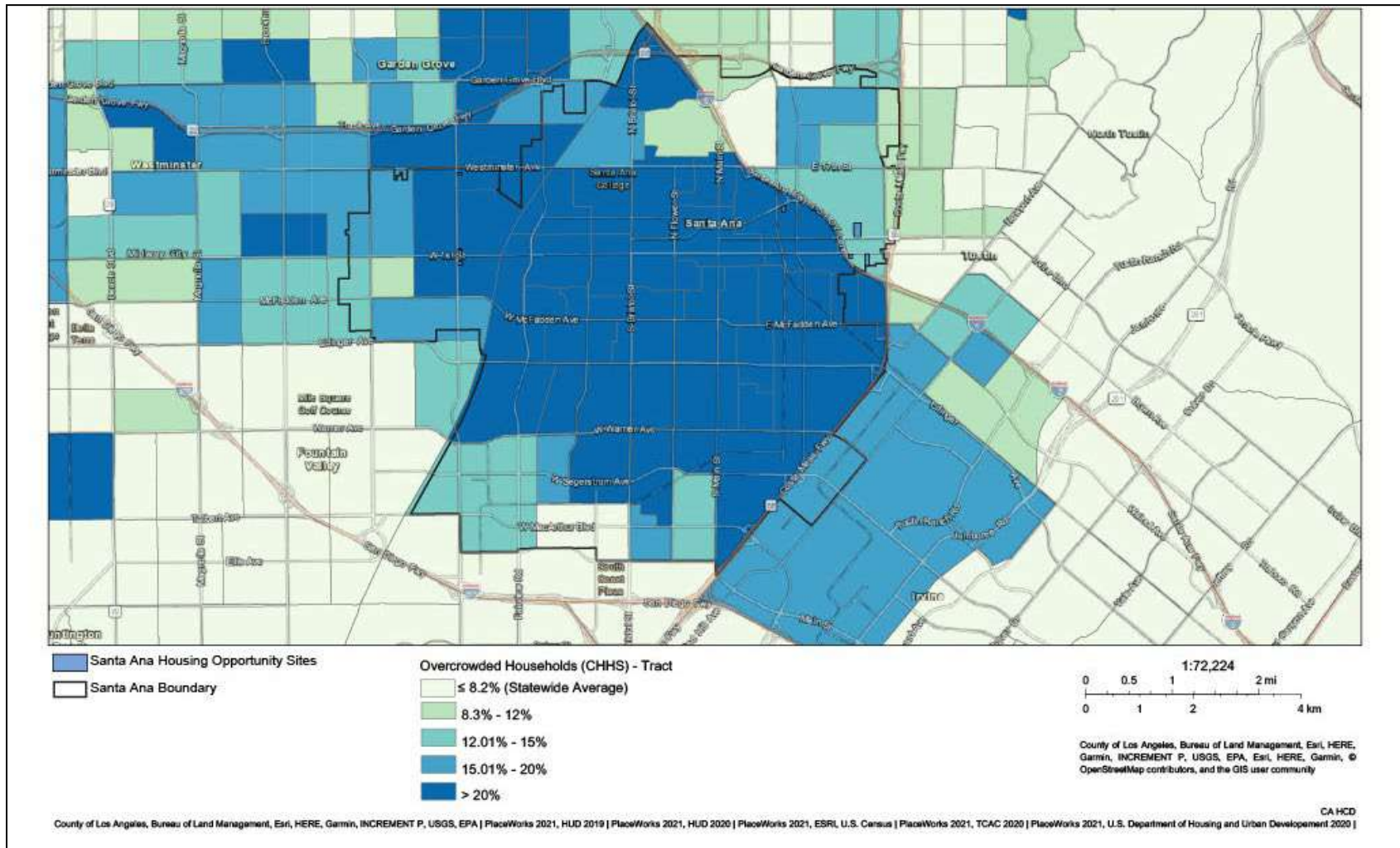


Figure E-35: Regional Overcrowded Households by Tract



Source: HCD AFFH Data Viewer, 2020 HUD CHAS data, 2021.

Figure E-36: Overcrowded Households by Tract



Source: HCD AFFH Data Viewer, 2020 HUD CHAS data, 2021.



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). 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.

Regional Trend. Approximately 1% of households in the County lack complete plumbing or kitchen facilities. Incomplete facilities are more common among renter-occupied households. Only 0.4% of owner households lack complete plumbing or kitchen facilities compared to 2.6% of renters (Table E-22).

Table E-22: Incomplete Facilities

	<u>Lacking Complete Plumbing or Kitchen Facilities</u>		<u>Total Households</u>
	<u>Households</u>	<u>Percent</u>	
<u>Santa Ana</u>			
<u>Owner-Occupied</u>	<u>218</u>	<u>0.6%</u>	<u>34,470</u>
<u>Renter-Occupied</u>	<u>590</u>	<u>1.4%</u>	<u>41,510</u>
<u>Total</u>	<u>808</u>	<u>1.1%</u>	<u>75,980</u>
<u>Orange County</u>			
<u>Owner-Occupied</u>	<u>2,135</u>	<u>0.4%</u>	<u>588,550</u>
<u>Renter-Occupied</u>	<u>11,135</u>	<u>2.6%</u>	<u>436,425</u>
<u>Total</u>	<u>13,270</u>	<u>1.3%</u>	<u>102,4975</u>
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% of the housing stock was built prior to 1990, including 37.1% built prior to 1970.

Local Trend. Less than 1% of owner-occupied households in Santa Ana lack complete plumbing or kitchen facilities (Table E-22). A slightly larger proportion of renter-occupied units compared to the share of owner-occupied units lack complete facilities in Santa Ana. Overall, the percentages of owner-occupied households that lack complete facilities in Santa Ana (0.6%) is

similar to the County rate (0.4%), while Santa Ana’s rate of renter units of 1.4% is less than the countywide rate of 2.6%.

Nearly 90% 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. Units produced during that construction boom make up 64.5% of the housing stock in the City. Units built prior to 1970 make up 56.4% 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 as well.

Table E-23: Santa Ana Housing Stock – Year Structure Built

<u>Year Built</u>	<u>Santa Ana</u>	<u>Orange County</u>
	<u>Number of Units</u>	<u>Number of Units</u>
<u>2014 or later</u>	<u>682</u>	<u>29,369</u>
<u>2010 to 2013</u>	<u>549</u>	<u>22,261</u>
<u>2000 to 2009</u>	<u>2,606</u>	<u>91,455</u>
<u>1990 to 1999</u>	<u>4,076</u>	<u>128,774</u>
<u>1980 to 1989</u>	<u>7,983</u>	<u>163,803</u>
<u>1970 to 1979</u>	<u>18,533</u>	<u>256,739</u>
<u>1960 to 1969</u>	<u>16,961</u>	<u>214,045</u>
<u>1950 to 1959</u>	<u>15,472</u>	<u>143,431</u>
<u>1940 to 1949</u>	<u>6,006</u>	<u>23,121</u>
<u>1939 or earlier</u>	<u>6,156</u>	<u>27,451</u>
<u>Total:</u>	<u>79,024</u>	<u>1,100,449</u>

Source: 2015-2019 ACS (5-Year Estimate). *Data sets for each year period have distinct margins.

Displacement Risk

HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low-income residents is above 20%; and
- The tract meets two of the following criteria:

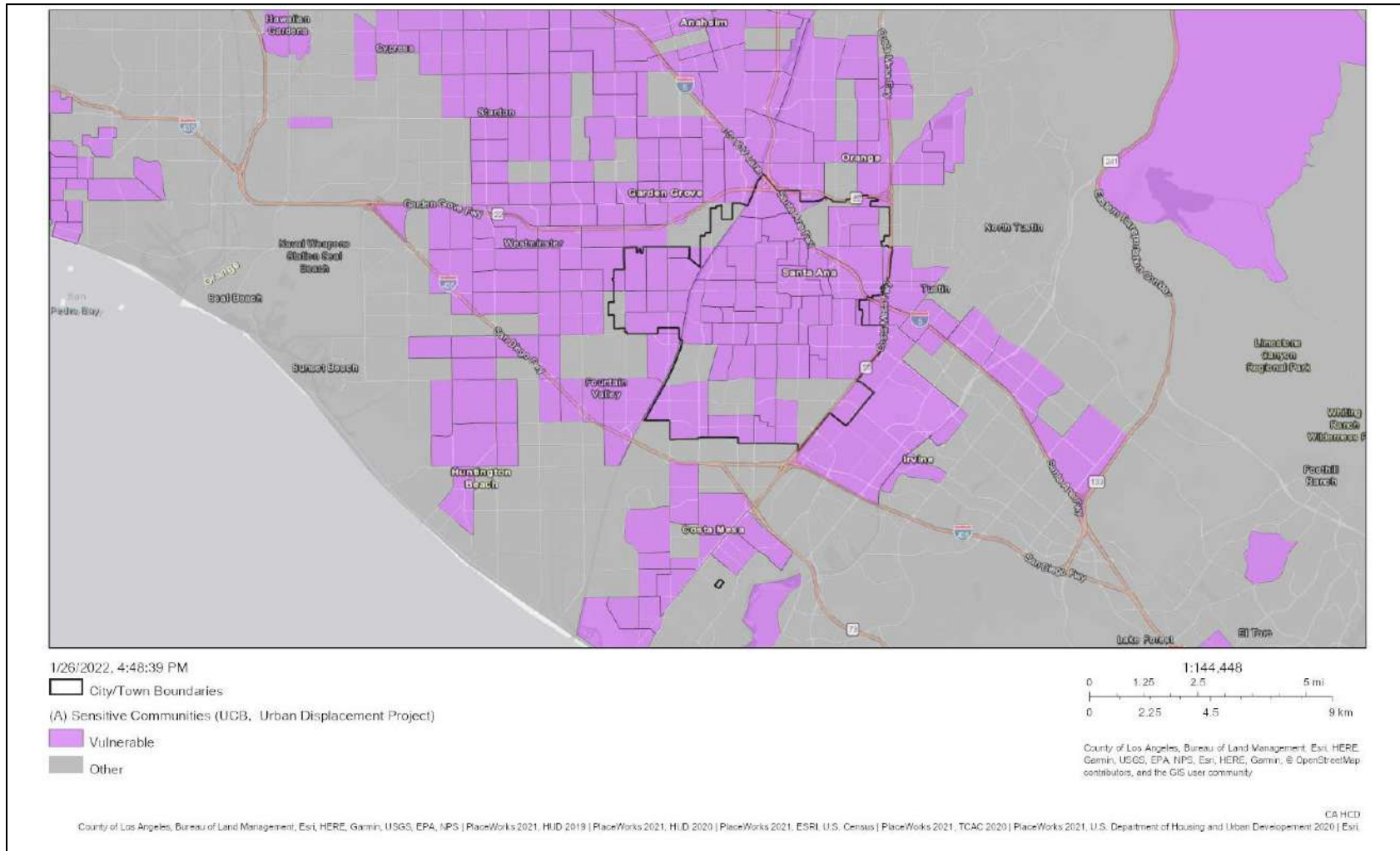


- Share of renters is above 40%.
- Share of people of color is above 50%.
- Share of very low-income households that are severely rent burdened households is above the county median.
- The area or areas in close proximity have recently experienced displacement pressures (percent change in rent above County median for rent increases), or
- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

Regional Trend. Figure E-37 shows sensitive communities at risk of displacement in the region. Vulnerable communities are most concentrated in the central County areas around the cities of Santa Ana, Garden Grove, Westminster, Anaheim, and Stanton. There are also concentrations in the cities of Costa Mesa, Tustin, and Huntington Beach. There are fewer vulnerable communities in coastal areas from Seal Beach, coastal Huntington Beach, and Newport Beach.

Local Trend. As shown in Figure E-38, a majority census tracts in Santa Ana are designated sensitive communities at risk of displacement. Only a few census tracts along the northern City boundary and in the southern portion of the City are not considered vulnerable.

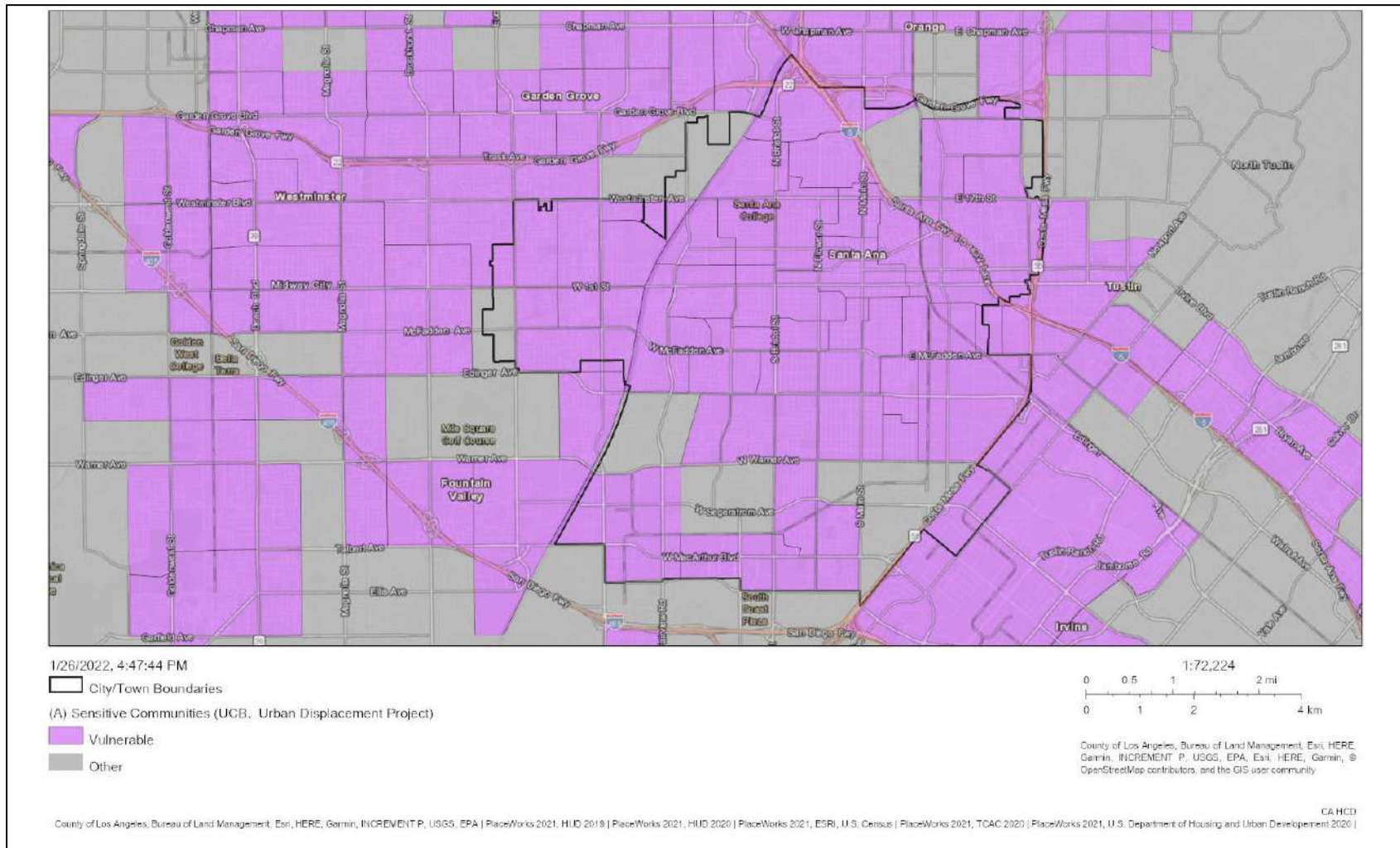
Figure E-37: Regional Sensitive Communities At Risk of Displacement



Source: HCD AFFH Data Viewer, 2020 Urban Displacement Project, 2021.



Figure 38: Sensitive Communities At Risk of Displacement



Source: HCD AFFH Data Viewer, 2020 Urban Displacement Project, 2021.

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, 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 on-line, many residents have expressed there being a lack of affordable housing options. As demonstrated by [figures E-33 and E-34](#), considerable percentages of owners and renters in the City are overpaying for housing, [while](#) 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 that new development and overpaying for housing may cause](#), the City employs three strategies: stabilizing rents, updating the Housing Opportunity Ordinance ([i.e., Santa Ana's inclusionary housing ordinance](#)), and instituting a local preference program. The Housing Plan provides programs for:

- **Housing Stabilization.** [Adopt a rent stabilization ordinance\(s\) to preserve affordable housing through regulating rent increases and establishing just cause eviction regulations. \(e.g., program 37\)](#)
- **Housing Opportunity Ordinance.** Require eligible rental and ownership housing projects to include affordable units. [\(e.g., program 28\)](#)
- **Housing Priority.** Administer local preference for affordable housing created under the Housing Opportunity Ordinance or with City funding. [\(e.g., program 37\)](#)

- [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. \(e.g., programs 37 and 39\)](#)

Issue 2: Safe and Sanitary Housing

Safe, sound, and healthy housing conditions are essential to fair housing opportunity. Due to the age of the housing stock in the City, much of it is in need of repair ([Table E-23](#)). Many of the areas with lower median incomes are often 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, or, for owners, that they lack the finances to regularly maintain and rehabilitate their homes.

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 52)
- **Code Enforcement.** Enforce building and property maintenance standards and remove blight, unhealthy or dangerous housing conditions, [and work with County Health Department to identify violations and streamline resolutions.](#) (e.g., programs 10 and 11)
- **Low-interest Loans.** [Provide low-interest loans to assist in the repair and rehabilitation of single- and multi-family homes for lower-income households.](#) (e.g., programs 1 and 3)

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-16, nearly 19% of owner-occupied households and 42% of renter-occupied households in the City are considered overcrowded.](#) -In addition, [during the workshops and community feedback opportunities](#) many residents expressed a form of residential overcrowding known as "doubling up"—whereby 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% of households experiencing overcrowding, [while](#) 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.

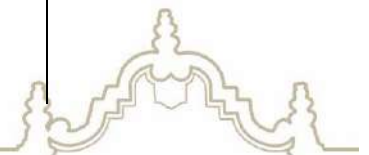
To address the housing overcrowding issue, the City employs the following strategies: promote construction of accessory dwelling units, permit diverse housing types, and create additional affordable housing. The Housing Plan provides programs for:

- **Overcrowding Conditions.** Facilitate development of accessory dwelling units and additions to existing homes to alleviating overcrowded housing conditions. [\(e.g., program 51\)](#)
- **Diverse Housing Types.** Facilitate diverse types, prices, and sizes of housing for the different needs in the community. [\(e.g., program 31\)](#)
- **Affordable Component.** Continue applying Housing Opportunity Ordinance to include affordable units as part of new housing developments. [\(e.g., program 28\)](#)

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 whole](#) is a critical component for evaluating housing [access and affordability](#). According the 2015-2019 ACS 5-year Estimates, the [City's](#) median household income was approximately \$66,145. The City's median household income is [considerably](#) below the County's median income [of](#) \$103,000. Among neighboring cities, the median household incomes ranged from a low of \$69,278 in Garden Grove to a high to \$105,126 in Irvine. [This issue is directly correlated with Issue 1: Displacement Risk since lower earning households in Santa Ana are vying and compete for housing units in a highly competitive housing market 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, and fund homeownership opportunities. The Housing Plan provides programs for:](#)



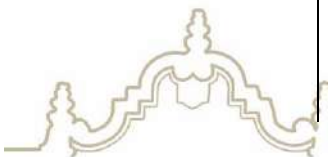
- **Affordable Housing Production.** Provide financial assistance to support the production and/or rehabilitation of affordable housing for extremely low, very-low and low-income families. (e.g., program 24)
- **Rent Stabilization and Just Cause Eviction.** Adopt a rent stabilization ordinance(s) to preserve affordable housing through regulating rent increases and establishing just cause eviction regulations. (e.g., program 37)
- **Down Payment Assistance.** Assist low-income households with down payment assistance loans to facilitate ownership opportunities. (e.g., program 38)

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) area (Figure E-24).

To address EJ issues, the City underwent an extensive multi-years long engagement effort as part of its comprehensive General Plan update (Program 20), with the last year focusing on engaging EJ communities and listen 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 one in-person community forums, each focusing on a specific EJ area in the City. Feedback received 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

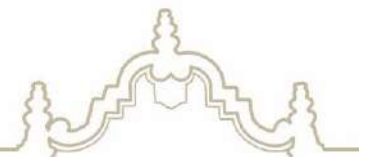


model that are in the upper quartile rank in the identified EJ areas. As is indicated in Program 20, the comprehensive General Plan update is scheduled to be completed Spring of 2022 and will begin the process of addressing the disproportionate environmental burden that residents in these communities have experienced.

Issue 6: Education and Workforce Development

As stated in Issue 4: Household Income, median incomes in Santa Ana lag behind that of 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 (Table E-12). 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 (Program 20). 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.



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, 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.



F

- **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-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)

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-1](#)



[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.

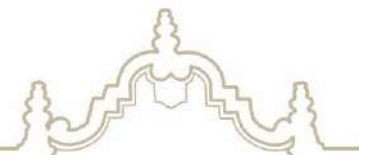
GENERAL PLAN UPDATE OUTREACH

Outreach conducted as part of the General Plan Update, which is currently ongoing, included reaching out to residents, local leaders, and community stakeholders to participate in the development of the draft plan. Feedback received forms 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, two 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 comprised 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. The core values are described in the following manner:

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 wellbeing

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 multi-faceted 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.

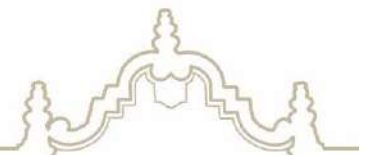
MAJOR THEMES

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.

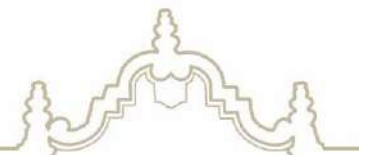
OUR COMMUNITY

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 images 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 (COSAS), 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. Survey results indicated that 87 percent of respondents are City of Santa Ana residents, with only 13

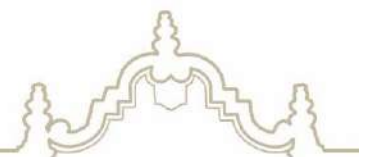


percent reporting that they are a combination of stakeholders (i.e., nonprofit members, students, local government officials, etc.). The majority of the respondents were long-term residents that have lived in Santa Ana for 10 or more years (73 percent). Respondents selected Santa Ana as their home for 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%). Most respondents reside in the 92701 (28 percent), 92704 (16 percent), 92707 (16 percent) and 92703 (15 percent) zip code areas.

Respondents were asked a series of questions related to existing housing conditions. When asked what housing type they currently reside in, the most common response was single-family homes (42 percent) and apartments (29 percent), and the most common household reported is couple living with children under 18 (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 their reasons for their last change in housing or move, the top three reasons are due to their housing needs changing (21 percent), unaffordability (19 percent), and their circumstances improving (18 percent). When asked about how much they spend on housing, more than half of the respondents (71 percent) said they spend more than one-third of their household income on housing every month. These respondents are considered being cost burdened; the Department of Housing and Urban Development (HUD) 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 how to address homelessness. When asked about the main housing challenges in Santa Ana, respondents describe affordability (55 percent) as the predominant housing challenge Santa Ana currently 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 which 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 (i.e., 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), as well as support to purchase a home (6 percent) any 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 selected: single-family homes (53 percent), townhomes (29 percent), and apartments/multi-family 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 barrier 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 key and a necessary component of the plan to address housing issues for this planning period. Survey respondents provided

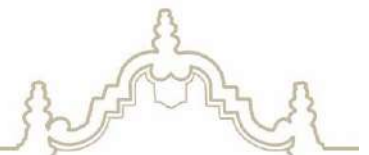


important insights for different housing topics, such as housing challenges, homelessness, affordable housing, and the future of housing in the City of Santa Ana. Respondents stressed the importance of addressing the issues of homelessness, housing affordability, and the need for community-centered solutions 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 (Date) 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 in creating housing opportunities through the adoption of several Specific Plan that currently has zoning in place to accommodate the City's RHNA. Planning Commission was supportive of 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. Additional comments received prior to the adoption of the Element, Staff will incorporate comments as appropriate and correspond with the commented. 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.



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

6^o CICLO DE ACTUALIZACIÓN DEL **ELEMENTO DE VIVIENDA**



**ENCUESTA ABIERTA HASTA:
SEPT. 9, 2021**

¡Llene la encuesta y podría ganar una tarjeta de \$50!



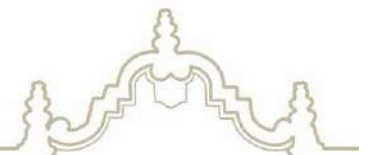
Complete la encuesta y díganos acerca de sus experiencias con las necesidades y prioridades de VIVIENDA en Santa Ana. Comparta su visión para el tipo de VIVIENDA y servicios que son más importantes para garantizar una alta calidad de vida en Santa Ana.



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 KỲ 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 Ana is 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](#)

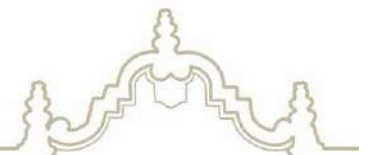


Housing Element Update



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>



PUBLIC OUTREACH



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 >](#)



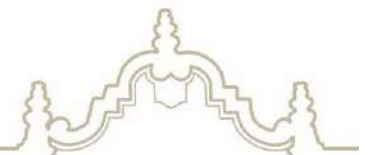
Mon
Sep. 27 - Sep. 27

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-1
List of Stakeholders Involved During Roundtables & Workshops**

Name of Participant	Organization	Summary of Organization
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 non-profit trade association representing 1100 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 Prijatel Ryan Aeh	City Ventures	City Ventures is a homebuilder focused on repositioning underutilized real estate into residential housing and focuses 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 district.
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 who train community workers, to educate their own neighbors about



Table F-1
List of Stakeholders Involved During Roundtables & Workshops

Name of Participant	Organization	Summary of Organization
		diabetes, breast cancer, obesity, domestic violence, parenting and more, and operate 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 non-partisan forum to promote the exchange of ideas and information between neighborhoods and community leaders. Com-Link partners with the City of Santa Ana in order to communicate the positive aspects of Santa Ana and to enhance a sense of community. Com-Link, originally comprised of five neighborhood associations, 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 2nd 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 non-profit 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 non-profit 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 unites communities across Orange County.
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. The dedicated themselves in building community wealth and healthy neighborhoods through land stewardship and multi-generational resident leadership, and work with community members on neighborhood needs assessments, data analysis, and community



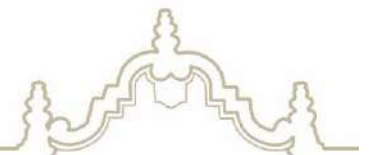
**Table F-1
List of Stakeholders Involved During Roundtables & Workshops**

<u>Name of Participant</u>	<u>Organization</u>	<u>Summary of Organization</u>
		<u>visioning -- promoting dialogue between residents and the City about local, unmet needs including housing, micro-farms, community spaces, and local small businesses.</u>
<u>Erica Heras</u>	<u>Vecindario Lacy en Accion (VeLA)</u>	<u>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.</u>
<u>Tracy La</u>	<u>VietRISE</u>	<u>VietRISE is a community organization based in Orange County. Thier 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.</u>
<u>Ray Diaz</u> <u>Irlanda Martinez</u> <u>Isuri Ramos</u> <u>Alan Wood</u>	<u>City Commissioners</u>	<u>Memebers of the Youth, Community Development and Planning commissions in the City.</u>



Table F-1
List of Stakeholders Involved During Roundtables & Workshops

<u>Name of Participant</u>	<u>Organization</u>	<u>Summary of Organization</u>
<u>Jesus Santana</u>	<u>City Residents</u>	<u>Residents of the City of Santa Ana</u>
<u>Alejandra Luciano</u>		
<u>Jaden Kim</u>		
<u>Leticia Moreno</u>		
<u>Maribel Alducin</u>		
<u>Maricela Castro</u>		
<u>Mireya Gutierrez</u>		
<u>Silvia Hernandez</u>		
<u>Yanely Matute</u>		
<u>Leticia Roque</u>		
<u>Rosario Garcia</u>		
<u>Sergio Cantu</u>		
<u>Dinh Nguyen</u>		
<u>Christopher Le</u>		



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MAYOR
Vicente Sarmiento
MAYOR PRO TEM
Phil Bacerra
COUNCILMEMBERS
David Penalzoza
Johnathan Ryan Hernandez
Jessie Lopez
Nelida Mendoza
Thai Viet Phan



CITY MANAGER
Kristine Ridge
CITY ATTORNEY
Sonia R. Carvalho
CLERK OF THE COUNCIL
Daisy Gomez

CITY OF SANTA ANA

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February 24, 2022

ATTN Melinda Coy, Senior Housing Accountability Manager
Department of Housing and Community Development
C/O Land Use and Planning Unit
2020 W. El Camino Ave, Suite 500
Sacramento, CA 95833

RE: CITY OF SANTA ANA'S 6th Cycle (2021-2029) HOUSING ELEMENT UPDATE CLARIFICATIONS & REVISIONS

Dear Melinda Coy:

The City of Santa Ana submitted its 6th Cycle (2021-2029) draft Housing Element to the State Department of Housing and Community Development (HCD) for review on October 21, 2021. HCD provided the City with comments on December 20, 2021.

The City of Santa Ana revised its draft Housing Element to address all of HCD's comments and, in compliance with AB 215 transparency requirements, posted the revised draft for public review and emailed interested parties and commenters a link to the document on February 12, 2022. In addition, notice of publication of the revised draft was included in a bi-monthly electronic newsletter (COSAS) that is widely shared on social media platforms to ensure greater reach.

Enclosed, please find a link below to the revised February 2022 draft Housing Element for HCD's review. Text added to the document addressing HCD comments is included in a track-change format. For your convenience, the attached table provides an annotated summary of the modifications to the document in response to HCD comments, as well as the page number where the respective changes can be found.

The City of Santa Ana will subsequently mail a hard copy of the document for your reference. In addition, the revised draft is posted to the City's [Housing Element Update webpage](#).

SANTA ANA CITY COUNCIL

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If you have any questions regarding these revisions, please contact myself at (714) 667-2746, MMcCann@santa-ana.org, or Senior Planner Ricardo Soto at (714) 667-2793, RSoto@santa-ana.org.

Sincerely,



Melanie G. McCann, AICP
Principal Planner

S:\InterAgency Projects\Housing Element 2021-2029\ReSubmittal - Feb 24\HCD City of Santa Ana Draft Housing Element Re-Submittal Letter 2.24.22.docx

Link: [Link to February 2022 Draft 6th Cycle \(2021-2029\) Housing Element](#)

Attachment: Summary Table of Document Modifications/Response to Comments

cc: John Buettner, HCD Reviewer

Document Modifications/Response to Comments

HCD Comment	Summary of Response	Section and Page
A. 1 Housing Needs, Resources, and Constraints		
<p>Enforcement and Outreach. The element states that the City coordinates with the Orange County Fair Housing Council to provide fair housing services (page E-5), but does not generally address this requirement. The element must include the City’s ability to provide enforcement and outreach capacity which can consist of actions such as the City’s ability to investigate complaints, obtain remedies, or the City’s ability to engage in fair housing testing. Additionally, the analysis must also describe compliance with existing fair housing laws and regulations, include information on fair housing outreach capacity, and discuss any past or current fair housing lawsuits, findings, settlements, judgements, or complaints.</p>	<p>A new section was added to Appendix E which includes the analysis of the compliance with fair housing laws.</p>	<p>Appendix E, page E-4</p>
<p>Regional Analysis and Patterns. The element generally describes local patterns and trends but must also analyze Santa Ana relative to the rest of the region regarding integration and segregation, disparities in access to opportunity, particularly relating to access to educational opportunities, and disproportionate housing needs and displacement risks. In addition, while the element provides data and some analysis regarding the patterns of various socio-economic characteristics, it should also generally discuss and analyze trends over time for the various socio-economic characteristics.</p>	<p>Appendix E was modified to include regional patterns and trends as compared to Santa Ana, as well as including additional data and patterns of various socio-economic characteristics over time.</p>	<p>Appendix E, pages 9 - 76</p>
<p>Local Data and Knowledge. The element generally does not address this requirement. The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. The analysis should also consider other relevant factors that contribute to fair housing issues in the jurisdiction,</p>	<p>Local data and knowledge inserted throughout Appendix E on a topical basis.</p>	<p>Appendix E</p>

HCD Comment	Summary of Response	Section and Page
such as public participation, past policies, practices, and investments and demographic trends. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.		
<p>Integration and Segregation.</p> <p>While the element contains analysis for segregation and integration of race and ethnicity, income, and persons with disabilities, it must also include analysis for familial status.</p>	Additional analysis for familial status included in Appendix E.	Appendix E, pages 13 - 26
<p>Racial/Ethnic Areas of Concentration of Poverty (R/ECAP).</p> <p>The element includes information relative to R/ECAP, but the analysis must be complemented by quantitative evidence for the local and regional comparison. In addition, the City should also analyze the racial concentrations as it relates to areas of affluence if the City does not have areas of concentrated poverty. The combination in the R/ECAP and areas of affluence analyses will help guide goals and actions to address fair housing issues.</p>	Analysis augmented to include quantitative evidence and a section analyzing racial concentrations as it relates to areas of affluence.	Appendix E, pages 31 - 36
<p>Disproportionate Housing Needs and Displacement Risk.</p> <p>While the element does include data on overcrowded households, substandard housing conditions, and cost burdened households, it must also include data and analysis for persons experiencing homelessness and displacement risk.</p>	Data and analysis for persons experiencing homelessness and displacement risk were included.	Appendix E, pages 60, 73 - 76; Appendix A, pages A-33 – A-36; and Appendix B, pages B-11 – B-14
<p>Contributing Factors.</p> <p>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 furthering fair housing (AFFH). The element should re-assess contributing factors upon completion of analysis and make revisions as appropriate.</p>	Issues and identified programs to affirmatively further fair housing revised based on additional analysis completed Appendix E.	Appendix E, pages 77 - 81

HCD Comment	Summary of Response	Section and Page
<p>Site Inventory. While the element includes a brief discussion on the location of sites related to transit amenities (page E-18), it does not address this requirement. The element must include an analysis demonstrating whether sites identified to meet the regional housing needs allocation (RHNA) are distributed throughout the community in a manner that AFFH. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that effects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies).</p>	<p>Analysis demonstrating how sites identified to meet RHNA are distributed throughout the community in a manner that affirmatively furthers fair housing.</p>	<p>Appendix E, pages 11 - 12</p>
<p>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 and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.</p>	<p>Actions/programs in the Housing Plan revised to include more specificity, commitments, metrics, and milestones.</p>	<p>Housing Plan, pages 37 - 46</p>
<p>A. 2 Housing Needs, Resources, and Constraints</p>		
<p>Housing Conditions. The element estimates the age of the housing stock and also provides an estimate of rehabilitation needs using ACS data from 2014- 2018 (beginning on Page A-36). However, the City should also use local data to estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent</p>	<p>Local data from the City’s Code Enforcement Division added to analysis.</p>	<p>Appendix A, page A-39</p>

HCD Comment	Summary of Response	Section and Page
windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including non-profit housing developers or organizations.		
A. 3 Housing Needs, Resources, and Constraints		
<p>Pipeline Projects Credited Toward RHNA. The element assumes credit for 6,178 units which had been approved, permitted, or received a certificate of occupancy after June 30, 2021 of which 414 units are for very low-income, 689 units are for low-income, 205 units are for moderate-income, and 4,870 are for above moderate income. This leaves a remaining need of 192 very-low income, and 340 moderate-income units. Table C-2, Pipeline Housing Projects, list all projects the City is using toward crediting the RHNA needs. However, the status of each pipeline project is unclear. The element should be revised to state when the projects are expected to be constructed and whether the units will be available within the planning period.</p>	<p>Element revised to include projected completion date of each project on Pipeline Projects list demonstrating the units will be available during the planning period.</p>	<p>Appendix C, pages C-4 –C-6</p>
<p>Sites Inventory. The sites inventory assigns all site capacity to lower-income levels but does not assign sites to cover the remaining moderate-income RHNA need. The element should be revised to provide a clear analysis on how the City intends on meeting its moderate-income RHNA needs and adjust the sites inventory accordingly.</p>	<p>Sites inventory tables revised to indicate how affordability of potential units on each identified opportunity site will be assigned.</p>	<p>Appendix C, pages C-10, C-19, and C-27</p>
<p>Realistic Capacity. While the element provides basic analysis on calculating capacity on sites zoned for nonresidential uses, e.g., commercial, and mixeduse zones, the estimate must also account for land use controls such as allowing 100 percent nonresidential uses. To demonstrate the likelihood for residential development in nonresidential zones, the element could describe any performance standards mandating a specified portion of residential and any factors increasing the potential for residential development such as incentives for residential use, and residential development trends in the same nonresidential zoning districts.</p>	<p>Additional analysis included for each plan area where opportunity sites are located demonstrating likelihood for residential development, potential constraints from development standards, and trends in vicinity.</p>	<p>Appendix C, Pages C-15, C-16, C-23, C-24, and C-31</p>

HCD Comment	Summary of Response	Section and Page
<p>Suitability of Nonvacant Sites. The element gives each site in the inventory a site rating, however it does not discuss what factors are used in the rating system and ratings indicate. Additionally, the analysis should describe why and how the factors demonstrate that these sites are suitable for addition residential development within the planning period. Furthermore, the element should describe any other factors considered in determining the potential for development such as expressed interest in redevelopment, any environmental factors that would inhibit development within the planning period, and incentives to facilitate development on these sites.</p>	<p>Narrative explaining the site inventory rating methodology was added. Additionally, other factors that were considered in selecting the sites are included in the site description narratives.</p>	<p>Appendix C, pages C-8, C-9, C-10, C-18, C-22, and C-26</p>
<p>Small Sites. The element identifies several lower-income sites at less than a half-acre towards its lower-income need, particularly in the Harbor Corridor Specific Plan. If the City continues to rely on sites smaller than a half-acre in size to accommodate the lower-income housing needs it must demonstrate, with sufficient evidence, that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless other evidence is provided. The element must provide specific examples with the densities and affordability. For sites expected to be aggregated, the element must describe circumstances leading to consolidation, such as common ownership, the City’s role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, specific examples of projects that were built for lower-income households on similarly sized sites, densities and affordability and relate those examples back to the sites inventory. Based on a complete analysis, the City should consider adding or revising programs to include incentives for facilitating development on small sites.</p>	<p>Element revised to identify smaller sites toward moderate income need. In addition, analysis provided demonstrating track record of consolidation of smaller parcels to enable development.</p>	<p>Appendix C, pages C-11, C-19, and C-22,</p>
<p>Suitability and Availability of Infrastructure. While the element describes water and sewer infrastructure, it must also demonstrate sufficient</p>	<p>Element revised to demonstrate that there is</p>	<p>Appendix C, pages C-15, C-23, and C-30</p>

HCD Comment	Summary of Response	Section and Page
existing or planned dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the City’s regional housing need for the planning period (Gov. Code, § 65583.2, subd. (b).).	sufficient existing or planned dry utilities supply capacity.	
<p>Sites with Zoning for a Variety of Housing Types -- Emergency Shelters:</p> <p>The element states that the City will amend the separation criteria and introduce an Emergency Shelter Overlay to various zones (page B-13). However, it is unclear as to where emergency shelters are currently allowed without discretionary approval and current required development standards. Additionally, the element does not state if the City intends on complying with AB 139 parking requirements. The element should be revised to clarify what the City is doing and to specifically state development standards and compliance with AB 139.</p>	Element revised to include description of where emergency shelters are allowed, as well as the City’s intent to fully comply with state law.	Appendix B, pages B-12, and B-13
<p>Sites with Zoning for a Variety of Housing Types -- Transitional and Supportive Housing:</p> <p>The element states that the City will need to amend its zoning ordinance to address current laws pertaining supportive housing as a by-right use (page 27). However, the element must describe and analyze the City’s transitional and supportive housing standards and codes and demonstrate consistency with Government Code section 65583, subdivision (a)(5) or add or revise programs which comply with the statutory requirements.</p>	Analysis of the City’s transitional and supportive housing standards included.	Appendix B, pages B-12 – B-14
<p>Sites with Zoning for a Variety of Housing Types -- Accessory Dwelling Units (ADU):</p> <p>The element indicates the City implemented an ordinance for the development of ADU’s. However, after a cursory review of the City’s ordinance, the department discovered several areas which were not consistent with State ADU law. The Department will provide a complete listing of ADU non-compliance issues under a separate cover. As a result, the element should add a program to update the City’s ADU ordinance to comply with State law. For more information, please consult HCD’s ADU Guidebook, published in December 2020, which provides detailed information on new state requirements surrounding ADU development.</p>	Additional information and program to update City’s ADU ordinance added.	Appendix B, pages B-9 and B-10; Housing Plan, page 46

HCD Comment	Summary of Response	Section and Page
A. 4 Housing Needs, Resources, and Constraints		
<p>Mixed-Use Zones. While the element provides some description and analysis for development standards in the Metro East, Harbor Corridor, and Transit zones, the element should be revised to describe if 100 percent residential uses are allowed in these zones and describe the approval process for residential developments including how are applications processed.</p>	<p>Element revised to describe permitted uses and approval processes for residential developments.</p>	<p>Appendix B, pages B-24 - B-30</p>
<p>Housing Opportunity Ordinance. While the element generally describes the affordability requirements for the City’s Housing Opportunity Ordinance (page B-34), the analysis must describe and evaluate ordinance’s implementation framework, including levels of mandated affordability and the types of options and incentives offered to encourage and facilitate compliance with the inclusionary requirements.</p>	<p>Analysis revised to include description and implementation framework or Housing Opportunity Ordinance, as well as providing the required affordability levels of applicable projects.</p>	<p>Appendix B, page B-21 and B-22</p>
<p>Zoning and Fees Transparency. The element must clarify its compliance with new transparency requirements for posting all zoning and development standards for each parcel and fees on the jurisdiction’s website pursuant to Government Code section 65940.1(a)(1).</p>	<p>Element revised to include section on how the City is in compliance with transparency requirements.</p>	<p>Appendix B, page B-38</p>
<p>On/Off-Site Improvements. While the element provides an analysis of the City’s requirements under Article III of the Municipal Code, the element must also identify subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability.</p>	<p>Additional analysis included identifying subdivision level improvement requirement.</p>	<p>Appendix B, pages B-32 and B-23</p>
<p>Codes and Enforcement. While the element provides an analysis regarding various codes and standard adopted by the City pursuant to state law, the element must also describe the City’s building and zoning code enforcement processes and procedures, including any local amendments to the building code, and analyze their impact as potential constraints on housing supply and affordability.</p>	<p>A new section describing the City’s enforcement processes and procedures was added.</p>	<p>Appendix B, pages B-31 and B-32</p>
<p>Constraints on Housing for Persons with Disabilities.</p>	<p>Analysis of discretionary actions (e.g., CUPs) included as</p>	<p>Appendix B pages B-35 and B-40</p>

HCD Comment	Summary of Response	Section and Page
<p>The element currently details that residential care facilities serving six or fewer persons are permitted in all residential zones. However, residential care facilities serving seven or more persons are limited to the same zones with the approval of a conditional use permit. The element should analyze the process as a potential constraint on housing for persons with disabilities and add or modify programs as appropriate to ensure zoning permits group homes objectively with approval certainty.</p>	<p>well as constraint that may present to care homes.</p>	
<p>Reasonable Accommodations. While the element provides an analysis of reasonable accommodation process, the City should provide further analysis on Item 8 on Page B-37 and analyze this item as a potential 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 requests.</p>	<p>Additional analysis and program to re-evaluate the reasonable accommodation ordinance was added.</p>	<p>Appendix B, page B-41</p>
<p>A. 5 Housing Needs, Resources, and Constraints</p>		
<p>Approval Time and Requests for Lesser Densities. The element must include analysis of requests to develop housing at densities below those identified, the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially. The element must address any hindrance on the development of housing and include programs as appropriate.</p>	<p>Analysis of requests to develop housing at densities below those identified provided.</p>	<p>Appendix B, page B-5</p>
<p>A. 6 Housing Needs, Resources, and Constraints</p>		
<p>Farmworkers. The element states that as of 2018 there were 1,454 agricultural workers but does not fully analyze the breakdown in number of farmworkers in the City or their housing needs. The element should be revised to clarify the number of farmworkers in the City by providing USDA data. The element should also be revised to provide a complete analysis of needs for this population group.</p>	<p>Element revised to clarify number of farmworkers using USDA data.</p>	<p>Appendix A, page A-33</p>

HCD Comment	Summary of Response	Section and Page
<p>Homeless. 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 be revised to provide a complete analysis including types of shelters beds that are available and, if known, the population subgroups served.</p>	<p>Analysis revised to provide types of shelter beds and subgroups served.</p>	<p>Appendix A, pages A-33 - A36</p>
<p>A. 7 Housing Needs, Resources, and Constraints</p>		
<p>At-Risk Housing. The element states that there are currently no deed-restricted at-risk units (page A-39), however this is inconsistent with the analysis provided on page C-25 and inconsistent with Table C-7 showing 808 at-risk units. The element should reconcile the information provided in these two sections of the housing element. Additionally, the element must provide cost estimates for replacement of units versus preservation of units and include a complete listing of public and private non-profit corporations known to the City to have the legal and managerial capacity to acquire and manage at-risk units</p>	<p>Element revised to provide consistent number of at risk units. Element also revised to provide analysis of cost estimates for replacement versus replacement of units.</p>	<p>Appendix A, page A-41; Appendix C, pages C-36 - C-40</p>

HCD Comment	Summary of Response	Section and Page
B. 1 Housing Programs		
<p>To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City’s specific role in implementation; (2) definitive implementation timelines (e.g., month, year); (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:</p> <p>The element must provide discrete timing for all programs (e.g., month, year) to account for how often the action will occur as well as to ensure a beneficial impact throughout the planning period and quantify objectives where feasible. Examples include but are not limited to the following programs: Program 1 (Single-Family Home Rehabilitation), Program 2 (Mobile Home Repair), and Program 3 (Multiple-Family Rental Rehabilitation), Program 9 (Neighborhood Safety), Program 38 (Down Payment Assistance Program), Program 44 (Permanent Supportive Housing), Program 45 (Supportive Services), and Program 49 (Family Housing).</p>	<p>Housing Plan actions/programs revised to include discrete timing of programs were applicable.</p>	<p>Housing Plan, pages 37 - 46</p>
B. 2 Housing Programs		
<p>As noted in Finding B-3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:</p> <p><u>Previously Identified Nonvacant and Vacant Sites:</u> The element identifies six nonvacant sites from the previous cycle and five vacant sites from the previous two planning cycles. If nonvacant sites identified in a prior adopted housing element or vacant sites identified in two or more consecutive planning periods, the sites are inadequate to accommodate housing for lower-income households unless:</p>	<p>A section analyzing previously identified sites and how they comply with state law was added. Additionally, programs in Housing Plan revised to clarify how City will encourage or facilitate development in the plan areas where the opportunity sites are located.</p>	<p>Appendix C, page C-32; Housing Plan, page 40</p>

HCD Comment	Summary of Response	Section and Page
<ul style="list-style-type: none"> • The site’s current zoning is appropriate for the development of housing affordable to lower-income households by either including analysis or meeting the appropriate density, and • The site is subject to a housing element program that requires rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households (Gov. Code, § 65583.2, subd. (c)). <p>Program 16 (Transit Zoning Code), Program 17 (Metro East Mixed-Use Overlay), and Program 19 (Harbor Mixed-Use Transit Corridor Specific Plan): The programs should include specific provisions and incentives to facilitate the development of housing on the sites identified in the sites inventory. The programs could commit to provide financial assistance, regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites especially for housing affordable to lower-income households.</p> <p>Program 18 (Urban Villages): This program should be revised to clarify what amendments are being considered and how those amendments will facilitate development and to provide concrete actions City intends on taking other than consideration.</p>		
B. 3 Housing Programs		
<p>Program 31 (Variety in Household Sizes): This program should be revised to clarify how the City will encourage the development of larger rental households for low- and very low-income families as the objective only points to the extremely low-income program.</p>	<p>Program 31 revised to clarify how the City will encourage development of larger households for low- and very low-income households.</p>	<p>Housing Plan, page 44</p>

HCD Comment	Summary of Response	Section and Page
B. 4 Housing Programs		
<p>As noted in Finding(s) B-4 and B-5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p> <p>Program 40 (Care Facilities): This program commits to amending the zoning codes to provide definitions for Community Care Facilities and impose regulatory measures. Zoning should simply implement a barrier-free definition of family instead of subjecting, potentially persons with disabilities, to special regulations. These housing types in many cases are subject to a conditional use permit, potentially subjecting housing for persons with disabilities to higher discretionary standards where an applicant must demonstrate compatibility with the neighborhood, unlike other residential uses.</p>	<p>Program revised to include care facilities and plan for update of the City’s municipal code to ensure compliance with state law.</p>	<p>Housing Plan, page 44</p>
B. 5 Housing Programs		
<p>As noted in Finding A1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a complete analysis. The element must include actions that promote and AFFH opportunities. For example, the element could include a program committing to implement Government Code section 8899.50(b) which requires the City to administer its programs and activities relating to housing and community development in a manner to AFFH and take no action that is materially inconsistent with its obligation to AFFH. In addition, the element could revise the program section to incorporate AFFH throughout tying program actions to addressing trends and patterns identified in the analysis. For example, Program 5 (Neighborhood Infrastructure), Program 6 (Health Neighborhood Initiatives), and Program 8 (Building Community Efforts) could be revised to include prioritization for lower-resourced, underserved areas per the AFFH analysis.</p>	<p>Appendix E was revised to provide complete analysis of AFFH. Based on new analysis, contributing factors and programs addressing them revised.</p>	<p>Appendix E, pages 77 – 81; Housing Plan, pages 37 - 46</p>

HCD Comment	Summary of Response	Section and Page
B. 6 Housing Programs		
<p>Program 35 (Preservation of At-Risk Units) should incorporate state preservation notice law (Gov. Code § 65863.10, 65863.11, and 65863.13) as well as should commit to proactive outreach to property owners regarding interest in renewing affordability restrictions and inform them about the notice requirements.</p>	<p>Element revised to include text regarding HCD’s database on notifying qualified entities interested in participating in California’s right of first refusal.</p>	<p>Appendix C, page C-39</p>
B. 7 Housing Programs		
<p>Programs must be expanded to include incentives to promote the creation and affordability of ADUs. Examples include exploring and pursuing funding, modifying development standards, and reducing fees beyond state law, increasing awareness, pre-approved plans and homeowner/applicant assistance tools. In addition, given the City’s assumptions for ADUs exceed recent trends, the element should include a program to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified timeframe (e.g., 6 months).</p>	<p>Element includes a program for the creation of a pre-approved ADU plan program as well as affordability monitoring program.</p>	<p>Housing Plan, page 46</p>

HCD Comment	Summary of Response	Section and Page
C. Public Participation		
<p>The element states that outreach was conducted with community leaders and stakeholders. To demonstrate diligent efforts were made to involve all economic segments of the community, the element should provide a listing of those community leaders or stakeholders that were outreached to and describe the groups they represent. In addition, HCD understands the City made the element available to the public concurrent with its submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.</p>	<p>A list of community engagement participants has been included in the Element. The City first published its Draft Housing Element on October 11, 2021. Subsequently, a revised version that incorporated community input was published on October 21, 2021. The October 21, 2021 draft was what was originally submitted to HCD for its first review. The City then published its revised February 2022 draft on February 12, 2022, providing members of the public more than the state mandated seven days of public review.</p>	<p>Appendix F, pages F-19 - F-22</p>
D. Consistency with General Plan		
<p>The element does not meet this requirement. The element must be revised to describe how consistency was achieved and how it will be maintained during the planning period. For example, the element could include a program to conduct an internal consistency review of the General Plan as part of the annual General Plan implementation report required by Government Code section 65400. The annual report can also assist future updates of the housing element.</p>	<p>Element revised to state how the it will be consistent with the City's General Plan.</p>	<p>Introduction, page 3</p>