



## ASIAN AMERICAN SENIOR CITIZENS SERVICE CENTER

850 N. Birch Street, Santa Ana, California 92701-3477

[www.aascsc.org](http://www.aascsc.org)

4/5/2022

City Council  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

### **Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members,

The Asian American Senior Citizens Service Center (AASCSC) is a non-profit organization founded in 1989 with the philosophy “caring for elders as if they were our own”. AASCSC is entrusted to serve, protect, and celebrate our elders, youth, and families as they progress through different stages of life. AASCSC believes in an intergenerational approach to building a stronger and healthier community through direct services, advocacy, and capacity building.

**We are writing to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies.** The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.

The City of Santa Ana is a renter majority city and despite the City’s progress towards meeting its Regional Housing Needs Assessment (RHNA) allocation for very low- and low- income housing, there continues to be a great need for housing that is affordable to its residents. The current pandemic has increased the economic and housing pressures on low-income families in Santa Ana. As incomes are decreasing and jobs are being lost, many low-income families are struggling to remain housed. This is especially true for

*“Caring for elders as if they were our own”*

the majority of Santa Ana's low-income households that are suffering with the impacts of housing cost and economic uncertainty. According to the City's local data, 70 % of Santa Ana renters are low and very low-income renters. 80% of renters in Santa Ana fall into the moderate, low- and very low-income categories and 84 % of residents hold low-income occupations that pay less than \$53,500 per year. Santa Ana's households are predominantly families comprising 81% of households. These households are also rent burdened and live-in overcrowded conditions.

While the City has seen increased production of affordable housing there has been a disproportionate production of above moderate housing with a total of 3,274 above moderate units produced between 2013-2021, the City exceeded its RHNA allocation by 3,638% per the City's RHNA progress reports submitted to the state. With average rents of \$2000 - \$4000, none of these above market rental units are affordable to most of Santa Ana's working families. Housing costs in Santa Ana have been out of reach and will continue to be out of reach in this current economic climate. Households in Santa Ana must earn \$44.83 an hour to afford two-bedroom housing. The proposed amendments further incentivize housing units with market rate rents and are not affordable to the majority of the City's residents.

**The Commission supports the amendments to update the in-lieu fee to \$15 per sq ft to be in line with a fee that is fair and allows the City to fund much needed affordable housing for Santa Ana residents. The in-lieu fees have generated over \$21 million in funding (and helped leverage millions of federal and state housing resources) to help the City fund the development of new housing opportunities and address housing insecurity. The City's February 2021 Quarterly Report for Housing Division demonstrated that, some of these in lieu fees supported the Santa Ana Arts Collective, Tiny Tim Plaza, Link Interim Emergency Shelter, Legacy Square, Habitat for Humanity "Lacy & Vance", Westview House, Wise Place Steps to Independence Public Service Program, and the City's Down Payment Assistance Program.**

We also support the wider application of the Housing Opportunities Ordinance in the City of Santa Ana. This will continue to facilitate the development of affordable housing in various areas of the city. The Commission also recommends that the HOO apply to all residential developments in the City. At a minimum the HOO affordable housing requirements should apply to all residential and mixed use developments that are asking for zone changes, upzonings, following city initiated specific plans, general plan updates or those asking for other development incentives.

In addition, the HOO should apply to all developments taking advantage of City initiated land use and zoning changes, specific plans and general plan updates and amendments. Land use changes may create higher land values, profit, and incentives for market rate developers. At the same time many of these market developments are not affordable to the majority of Santa Ana's residents. In exchange for these development incentives, new affordable housing for Santa Ana residents must be created.

*"Caring for elders as if they were our own"*

The City must also ensure that the Inclusionary Housing Fund monies prioritize the construction of affordable housing for extremely low- and very low-income families. These are the families that have the most pressing needs in the City of Santa Ana. In addition, the fund should also prioritize addressing housing insecurity, eviction prevention, and housing legal assistance for residents that would directly help current Santa Ana residents with the exception of code enforcement. Diversion of these funds to other programs unrelated to housing and direct help for families would not increase or improve the supply of affordable housing.

We urge you to take into consideration the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.

**Sincerely,**

A handwritten signature in black ink, appearing to read "Jennifer S. Wang". The signature is fluid and cursive, written in a professional style.

**Jennifer S. Wang**

**Chief Operating Officer**

***“Caring for elders as if they were our own”***



4/5/2022

City Council  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

**Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members:

We are a non-profit pro bono law firm that provides access to justice for low-income and vulnerable residents in Orange County. In our Housing and Homelessness Prevention Unit, we represent low-income families in housing-related matters and advocate for sensible strategies to end houselessness in Orange County. We also collaborate with community organizations, statewide advocates, and law firms to push Orange County jurisdictions to create and maintain effective housing policies for lower-income working families.

Along with other organizations, we write to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies. The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.

The City of Santa Ana is a renter majority city and despite the City's progress towards meeting its Regional Housing Needs Assessment (RHNA) allocation for very low- and low- income housing, there continues to be a great need for housing that is affordable to its residents. The current pandemic has increased the economic and housing pressures on low-income families in Santa Ana. As incomes are decreasing and jobs are being lost, many low-income families are struggling to remain housed. This is especially true for the majority of Santa Ana's low-income households that are suffering with the impacts of housing cost and economic uncertainty. According to the City's local data, 70 % of Santa Ana renters are low and very low-income renters. 80% of renters in Santa Ana fall into the moderate, low- and very low-income categories

and 84 % of residents hold low-income occupations that pay less than \$53,500 per year<sup>1</sup>. Santa Ana’s households are predominantly families comprising 81% of households.<sup>2</sup> These households are also rent burdened and live-in overcrowded conditions<sup>3</sup>.

While the City has seen increased production of affordable housing there has been a disproportionate production of above moderate housing with a total of 3,274 above moderate units produced between 2013-2021, the City exceeded its RHNA allocation by 3,638% per the City’s RHNA progress reports submitted to the state. With average rents of \$2000 - \$4000, none of these above market rental units are affordable to most of Santa Ana’s working families. Housing costs in Santa Ana have been out of reach and will continue to be out of reach in this current economic climate. Households in Santa Ana must earn \$44.83 an hour to afford two-bedroom housing.<sup>4</sup> The proposed amendments further incentivize housing units with market rate rents and are not affordable to the majority of the City’s residents.

Further, the amendments to update the in-lieu fee to \$15 per sq ft are in line with a fee that is fair and allows the City to fund much needed affordable housing for Santa Ana residents. The in-lieu fees have generated over \$21 million in funding (and helped leverage millions of federal and state housing resources) to help the City fund the development of new housing opportunities and address housing insecurity. The City’s February 2021 Quarterly Report for Housing Division demonstrated that, some of these in lieu fees supported the Santa Ana Arts Collective, Tiny Tim Plaza, Link Interim Emergency Shelter, Legacy Square, Habitat for Humanity “Lacy & Vance”, Westview House, Wise Place Steps to Independence Public Service Program, and the City’s Down Payment Assistance Program<sup>5</sup>.

We also support the wider application of the Housing Opportunities Ordinance in the City of Santa Ana. This will continue to facilitate the development of affordable housing in various areas of the city. The Commission also recommends that the HOO apply to all residential developments in the City. At a minimum the HOO affordable housing requirements should apply to all residential and mixed-use developments that are asking for zone changes, upzonings, following city initiated specific plans, general plan updates or those asking for other development incentives.

In addition, the HOO should apply to all developments taking advantage of City initiated land use and zoning changes, specific plans and general plan updates and amendments. Land use changes may create higher land values, profit, and incentives for market rate developers. At the same time many of these market developments are not affordable to the majority of Santa Ana’s residents. In exchange for these development incentives, new affordable housing for Santa Ana residents must be created.

The City must also ensure that the Inclusionary Housing Fund monies prioritize the construction of affordable housing for extremely low- and very low-income families. These are the families that have the most pressing needs in the City of Santa Ana. In addition, the fund should also

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<sup>1</sup> City of Santa Ana General Plan Housing Element 2014-2021, p. 14, January 2014.

<sup>2</sup> City of Santa Ana General Plan Housing Element 2014 – 2021 page 11

<sup>3</sup> City of Santa Ana General Plan Housing Element 2014 – 2021 page 20

<sup>4</sup> National Low Income Housing Coalition. Out of Reach The High Cost of Housing 2021,pg.18. [Out of Reach 2021 \(nlihc.org\)](https://www.nlihc.org/out-of-reach-2021)

<sup>5</sup> City of Santa Ana Quarterly Report for Housing Division page. 4. February 2021.

prioritize addressing housing insecurity, eviction prevention, and housing legal assistance for residents that would directly help current Santa Ana residents with the exception of code enforcement. Diversion of these funds to other programs unrelated to housing and direct help for families would not increase or improve the supply of affordable housing.

We urge you to take into consideration the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.

Sincerely,

/s/ Ugochi Anaebere-Nicholson

Directing Attorney, Housing and Homelessness Prevention Unit



# The Cambodian Family Community Center

*A Multi-Ethnic Human Services Agency Promoting Social Health*

1626 East Fourth Street, Santa Ana, CA 92701 (714) 571-1966

[www.cambodianfamily.org](http://www.cambodianfamily.org)

4/5/2022

City Council  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

## **Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members,

TCFCC is a 501(c) (3) non-profit, multi-ethnic, human services agency that has been serving the refugee and immigrant communities of Orange County, California for over 42 years. We were established in 1980 by a group of Cambodian refugees who had escaped the Khmer Rouge regime in their native country. Since then, we have expanded our services to immigrants and refugees from around the world, all the while establishing deep roots in our community. We serve a unique population that need a variety of mental health services, but usually have trouble navigating the health care system, or suffer from the stigma mental health. The culturally and linguistically competent resources in mental health care services/navigation that SB 1019 is a crucial step in achieving health equity for all Californians, and especially for the immigrant and refugee communities we serve.

**We are writing to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies.** The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.

The City of Santa Ana is a renter majority city and despite the City's progress towards meeting its Regional Housing Needs Assessment (RHNA) allocation for very low- and low- income housing, there continues to be a great need for housing that is affordable to its residents. The current pandemic has increased the economic and housing pressures on low-income families in Santa Ana. As incomes are decreasing and jobs are being lost, many low-income families are struggling to remain housed. This is especially true for the majority of Santa Ana's low-income households that are suffering with the impacts of housing cost and economic uncertainty. According to the City's local data, 70 % of Santa Ana renters are low and very low-income renters. 80% of renters in Santa Ana fall into the moderate, low- and very low-income categories and 84 % of residents hold low-income occupations that pay less than \$53,500 per year. Santa Ana's households are predominantly families comprising 81% of households. These households are also rent burdened and live-in overcrowded conditions.

While the City has seen increased production of affordable housing there has been a disproportionate production of above moderate housing with a total of 3,274 above moderate units produced between 2013-2021, the City exceeded its RHNA allocation by 3,638% per the City's RHNA progress reports submitted to the state. With average rents of \$2000 - \$4000, none of these above market rental units are affordable to most of Santa Ana's working families. Housing costs in Santa Ana have been out of reach and will continue to be out of reach in this current economic climate. Households in Santa Ana must earn \$44.83 an hour to afford two-bedroom housing. The proposed amendments further incentivize housing units with market rate rents and are not affordable to the majority of the City's residents.

**The Commission supports the amendments to update the in-lieu fee to \$15 per sq ft to be in line with a fee that is fair and allows the City to fund much needed affordable housing for Santa Ana residents. The in-lieu fees have generated over \$21 million in funding (and helped leverage millions of federal and state housing resources) to help the City fund the development of new housing opportunities and address housing insecurity. The City's February 2021 Quarterly Report for Housing Division demonstrated that, some of these in lieu fees supported the Santa Ana Arts Collective, Tiny Tim Plaza, Link Interim Emergency Shelter, Legacy Square, Habitat for Humanity "Lacy & Vance", Westview House, Wise Place Steps to Independence Public Service Program, and the City's Down Payment Assistance Program.**

We also support the wider application of the Housing Opportunities Ordinance in the City of Santa Ana. This will continue to facilitate the development of affordable housing in various areas of the city. The Commission also recommends that the HOO apply to all residential developments in the City. At a minimum the HOO affordable housing requirements should apply to all residential and mixed use developments that are asking for zone changes, upzonings, following city initiated specific plans, general plan updates or those asking for other development incentives.

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The City must also ensure that the Inclusionary Housing Fund monies prioritize the construction of affordable housing for extremely low- and very low-income families. These are the families that have the most pressing needs in the City of Santa Ana. In addition, the fund should also prioritize addressing housing insecurity, eviction prevention, and housing legal assistance for residents that would directly help current Santa Ana residents with the exception of code enforcement. Diversion of these funds to other programs unrelated to housing and direct help for families would not increase or improve the supply of affordable housing.

We urge you to take into consideration the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.

Sincerely,



Vattana Peong, MPH  
Executive Director



4/5/2022

City Council  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

**Re: Item 40: SUPPORT Zoning Ordinance Amendment No. 2021-03 - Housing Opportunity Ordinance**

Dear Mayor and City Council Members,

Chispa is a brave organizing political home for young Latinx identifying peoples. Chispa seeks to engage with excluded peoples to uproot systems of oppression and cultivate systems grounded in community accountability, solidarity, and self-determination for our communities to thrive.

**We are writing in support of a strengthened Housing Opportunity Ordinance (HOO).**

The changes to the HOO will ensure that new development in the City of Santa Ana (City) addresses the housing needs of residents of all income levels in a balanced manner. The City is a renter majority city and despite the City's progress towards meeting its Regional Housing Needs Assessment (RHNA) allocation for very low- and low- income housing, there continues to be a great need for housing that is affordable to its residents. The COVID-19 pandemic increased economic and housing pressures on Santa Ana's low-income families.

New affordable housing is vital to our COVID-19 pandemic recovery; and can provide stability for residents that continue to struggle with decreasing housing availability and increasing housing costs, issues that existed long before the pandemic. It is crucial that the City strengthen the HOO to ensure that housing opportunities are available for all residents in Santa Ana.

According to the City's local data, 70% of renters have low and very low-incomes with 84% of residents holding low-income occupations paying less than \$53,500 per year<sup>1</sup>.

While the City has seen increased production of affordable housing, new housing development has been overwhelmingly for units with market-rate rents. There has been a disproportionate

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<sup>1</sup> City of Santa Ana General Plan Housing Element 2014-2021, p. 14, January 2014.

production of above moderate housing with a total of 3,274 above moderate units produced between 2013-2021, the City exceeded its RHNA allocation by 3,638% per the City's RHNA progress reports submitted to the state. With average rents of \$2000 - \$4000, none of these above market rental units are affordable to most of Santa Ana's working families. Housing costs in Santa Ana have been out of reach and will continue to be out of reach in this current economic climate. Households in Santa Ana must earn \$44.83 an hour to afford two-bedroom housing.<sup>2</sup>

Chispa supports the amendments increasing the in-lieu fee to \$15 per square foot. This is a fair fee that allows the City to fund much needed affordable housing for Santa Ana residents without impeding development. The HOO in-lieu fees are essential as they have generated over \$21 million in funding (and helped leverage millions of federal and state housing resources) to help the City fund new housing opportunities such as the Legacy Square development in the Lacy neighborhood and the expansion of the City's Down Payment Assistance Program. and address housing insecurity.

**We urge you to adopt Zoning Ordinance Amendment No. 2021-03 that will strengthen the Housing Opportunity Ordinance.** These recommendations will help the city increase affordable housing options for residents and help the City develop new housing in an equitable manner.

Sincerely,  
Chispa  
Penélope Lopez  
Organizing Director

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<sup>2</sup> National Low Income Housing Coalition. Out of Reach The High Cost of Housing 2021,pg.18. [Out of Reach 2021 \(nlihc.org\)](https://www.nlihc.org/out-of-reach-2021)

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**Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members,

Vecindario Lacy en Acción (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 of Santa Ana. All with the purpose of creating more opportunities for families to succeed.

**We are writing to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies.** The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.

The City of Santa Ana is a renter majority city and despite the City's progress towards meeting its Regional Housing Needs Assessment (RHNA) allocation for very low- and low- income housing, there continues to be a great need for housing that is affordable to its residents. The current pandemic has increased the economic and housing pressures on low-income families in Santa Ana. As incomes are decreasing and jobs are being lost, many low-income families are struggling to remain housed. This is especially true for the majority of Santa Ana's low-income households that are suffering with the impacts of housing cost and economic uncertainty. According to the City's local data, 70 % of Santa Ana renters are low and very low-income renters. 80% of renters in Santa Ana fall into the moderate, low- and very low-income categories and 84 % of residents hold low-income occupations that pay less than \$53,500 per year. Santa Ana's households are predominantly families comprising 81% of households. These households are also rent burdened and live-in overcrowded conditions.

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**We support the amendments to update the in-lieu fee to \$15 per sq ft to be in line with a fee that is fair and allows the City to fund much needed affordable housing for Santa Ana residents. The in-lieu fees have generated over \$21 million in funding (and helped leverage millions of federal and state housing resources) to help the City fund the development of new housing opportunities and address housing insecurity. The City's February 2021 Quarterly Report for Housing Division demonstrated that, some of these in lieu fees supported the Santa Ana Arts Collective, Tiny Tim Plaza, Link Interim Emergency Shelter, Legacy Square, Habitat for Humanity "Lacy & Vance", Westview House, Wise Place Steps to Independence Public Service Program, and the City's Down Payment Assistance Program.**

We also support the wider application of the Housing Opportunities Ordinance in the City of Santa Ana. This will continue to facilitate the development of affordable housing in various areas of the city. We also recommend that the HOO apply to all residential developments in the City. At a minimum the HOO affordable housing requirements should apply to all residential and mixed use developments that are asking for zone changes, upzonings, following city initiated specific plans, general plan updates or those asking for other development incentives.

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Sincerely,

Vecindario Lacy en Acción (VeLA)

4/5/2022

City Council  
City of Santa Ana  
20 Civic Center Plaza  
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Santa Ana, CA 92701

**Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members,

The Kennedy Commission (the Commission) is a broad-based coalition of residents and community organizations that advocates for the production of homes affordable for families earning less than \$27,000 annually in Orange County. Formed in 2001, the Commission has been successful in partnering and working with Orange County jurisdictions to create effective housing and land-use policies that has led to the new construction of homes affordable to lower-income working families.

**We are writing to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies.** The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.

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The City must also ensure that the Inclusionary Housing Fund monies prioritize the construction of affordable housing for extremely low- and very low-income families. These are the families that have the most pressing needs in the City of Santa Ana. In addition, the fund should also prioritize addressing housing insecurity, eviction prevention, and housing legal assistance for residents that would directly help current Santa Ana residents with the exception of code enforcement. Diversion of these funds to other programs unrelated to housing and direct help for families would not increase or improve the supply of affordable housing.

We urge you to take into consideration the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Cesar", followed by a long horizontal line extending to the right.

Cesar Covarrubias

Executive Director



Latino Health Access  
450 W. Fourth Street, Suite 130  
Santa Ana, CA 92701  
714-542-7792  
[www.latinohalthaccess.org](http://www.latinohalthaccess.org)

Apr 5, 2022

Mayor Sarmiento and City Council Members  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

Re: Item 40 Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures

Dear Mayor and City Council Members,

Latino Health Access partners with community members to improve the social determinants of health in the City of Santa Ana through service delivery and advocacy for policies that provide equitable access to resources. For Santa Ana families with low, very low and extremely low incomes, finding affordable housing is very challenging and many are left resorting to overcrowded living conditions, being rent burdened and sacrificing basic necessities in exchange for shelter. **It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.**

We are writing to support the amendments to the HOO and Affordable Housing Funds Policies. The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic.

The City of Santa Ana is a renter majority city and despite the City's progress towards meeting its Regional Housing Needs Assessment (RHNA) allocation for very low- and low- income housing, there continues to be a great need for housing that is affordable to its residents. The current pandemic has increased the economic and housing pressures on low-income families in Santa Ana. As incomes are decreasing and jobs are being lost, many low-income families are struggling to remain housed. This is especially true for the majority of Santa Ana's low-income households that are suffering with the impacts of housing cost and economic uncertainty. According to the City's local data, 70% of Santa Ana renters are low and very low-income renters. 80% of renters in Santa Ana fall into the moderate, low- and very low-income categories and 84% of residents hold low-income occupations that pay less than \$53,500 per year. Santa Ana's households are predominantly families comprising 81% of households. These households are also rent burdened and live-in overcrowded conditions.

While the City has seen increased production of affordable housing there has been a disproportionate production of above moderate housing with a total of 3,274 above moderate units produced between 2013-2021, the City exceeded its RHNA allocation by 3,638% per the City's RHNA progress reports submitted to the state. With average rents of \$2000 - \$4000, none of these above market rental units are affordable to most of Santa Ana's working families. Housing costs in Santa Ana have been out of reach and will



Latino Health Access  
450 W. Fourth Street, Suite 130  
Santa Ana, CA 92701  
714-542-7792  
[www.latinohalthaccess.org](http://www.latinohalthaccess.org)

continue to be out of reach in this current economic climate. Households in Santa Ana must earn \$44.83 an hour to afford two-bedroom housing. The proposed amendments further incentivize housing units with market rate rents and are not affordable to the majority of the City's residents.

Latino Health Access supports the following amendments:

1. Update the in-lieu fee to \$15 per sq ft to be in line with a fee that is fair and allows the City to fund much needed affordable housing for Santa Ana residents. The in-lieu fees have generated over \$21 million in funding (and helped leverage millions of federal and state housing resources) to help the City fund the development of new housing opportunities and address housing insecurity. The City's February 2021 Quarterly Report for Housing Division demonstrated that, some of these in lieu fees supported the Santa Ana Arts Collective, Tiny Tim Plaza, Link Interim Emergency Shelter, Legacy Square, Habitat for Humanity "Lacy & Vance", Westview House, Wise Place Steps to Independence Public Service Program, and the City's Down Payment Assistance Program.
2. The wider application of the HOO. At a minimum the HOO affordable housing requirements should apply to all residential and mixed use developments that are asking for zone changes, upzonings, following city initiated specific plans, general plan updates or those asking for other development incentives.
3. The HOO should apply to all developments taking advantage of City initiated land use and zoning changes, specific plans and general plan updates and amendments. Land use changes may create higher land values, profit, and incentives for market rate developers. At the same time many of these market developments are not affordable to the majority of Santa Ana's residents. In exchange for these development incentives, new affordable housing for Santa Ana residents must be created.

The City must also ensure that the Inclusionary Housing Fund monies prioritize the construction of affordable housing for extremely low- and very low-income families. These are the families that have the most pressing needs in the City of Santa Ana. The fund should also prioritize addressing housing insecurity through services that would directly help current Santa Ana tenants with the exception of code enforcement. Diversion of these funds to other programs unrelated to housing and direct help for families would not increase or improve the supply of affordable housing.

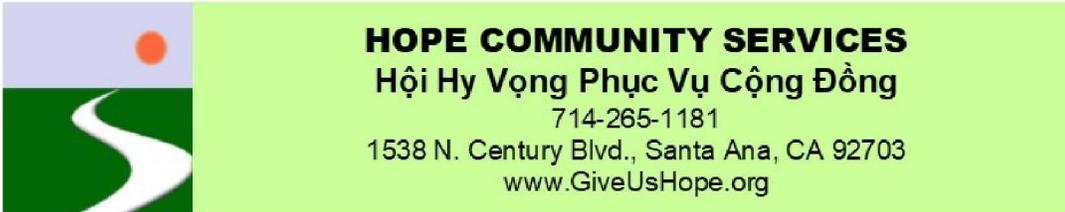
**We urge you to take into consideration the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.**

Nancy Mejia, MPH, MSW  
Chief Program Officer  
[nmejia@latinohalthaccess.org](mailto:nmejia@latinohalthaccess.org)

**Orozco, Norma**

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**From:** Hope Community <info@giveushope.org>  
**Sent:** Tuesday, April 05, 2022 8:00 AM  
**To:** eComment  
**Subject:** Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures



4/5/2022

City Council  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

**Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members,

**We are Hope Community Services, an organization that serves and supports Vietnamese Americans and the neighboring communities in Orange County so they may grow and excel, through our educational, cultural, social, and charitable activities.**

**We are writing to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies.** The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.

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low-income families are struggling to remain housed. This is especially true for the majority of Santa Ana's low-income households that are suffering with the impacts of housing cost and economic uncertainty. According to the City's local data, 70 % of Santa Ana renters are low and very low-income renters. 80% of renters in Santa Ana fall into the moderate, low- and very low-income categories and 84 % of residents hold low-income occupations that pay less than \$53,500 per year. Santa Ana's households are predominantly families comprising 81% of households. These households are also rent burdened and live-in overcrowded conditions.

While the City has seen increased production of affordable housing there has been a disproportionate production of above moderate housing with a total of 3,274 above moderate units produced between 2013-2021, the City exceeded its RHNA allocation by 3,638% per the City's RHNA progress reports submitted to the state. With average rents of \$2000 - \$4000, none of these above market rental units are affordable to most of Santa Ana's working families. Housing costs in Santa Ana have been out of reach and will continue to be out of reach in this current economic climate. Households in Santa Ana must earn \$44.83 an hour to afford two-bedroom housing. The proposed amendments further incentivize housing units with market rate rents and are not affordable to the majority of the City's residents.

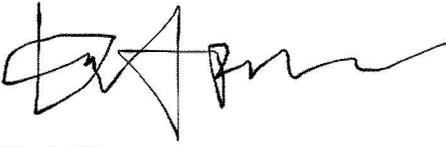
**The Commission supports the amendments to update the in-lieu fee to \$15 per sq ft to be in line with a fee that is fair and allows the City to fund much needed affordable housing for Santa Ana residents. The in-lieu fees have generated over \$21 million in funding (and helped leverage millions of federal and state housing resources) to help the City fund the development of new housing opportunities and address housing insecurity. The City's February 2021 Quarterly Report for Housing Division demonstrated that, some of these in lieu fees supported the Santa Ana Arts Collective, Tiny Tim Plaza, Link Interim Emergency Shelter, Legacy Square, Habitat for Humanity "Lacy & Vance", Westview House, Wise Place Steps to Independence Public Service Program, and the City's Down Payment Assistance Program.**

We also support the wider application of the Housing Opportunities Ordinance in the City of Santa Ana. This will continue to facilitate the development of affordable housing in various areas of the city. The Commission also recommends that the HOO apply to all residential developments in the City. At a minimum the HOO affordable housing requirements should apply to all residential and mixed use developments that are asking for zone changes, upzonings, following city initiated specific plans, general plan updates or those asking for other development incentives.

In addition, the HOO should apply to all developments taking advantage of City initiated land use and zoning changes, specific plans and general plan updates and amendments. Land use changes may create higher land values, profit, and incentives for market rate developers. At the same time many of these market developments are not affordable to the majority of Santa Ana's residents. In exchange for these development incentives, new affordable housing for Santa Ana residents must be created.

The City must also ensure that the Inclusionary Housing Fund monies prioritize the construction of affordable housing for extremely low- and very low-income families. These are the families that have the most pressing needs in the City of Santa Ana. In addition, the fund should also prioritize addressing housing insecurity, eviction prevention, and housing legal assistance for residents that would directly help current Santa Ana residents with the exception of code enforcement. Diversion of these funds to other programs unrelated to housing and direct help for families would not increase or improve the supply of affordable housing.

We urge you to take into consideration the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.

A handwritten signature in black ink, appearing to read 'Katie Tran', with a stylized, cursive script.

Katie Tran  
Chief Operating Officer  
Hope Community Services

April 4, 2022

City Council  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

**Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members,

Born of the War on Poverty, Community Action Partnership of Orange County (CAP OC) has worked to enhance the quality of life here since 1965. Through our broad network of community partners, we boldly address the root causes of poverty and advocate for change through systemic reforms, social justice, and racial equity. We live and work in the neighborhoods we so passionately serve—coming together from all backgrounds and experiences to stabilize, sustain and empower individuals and families so they may build stronger communities.

Every two years, we conduct a Community Needs Assessment (CNA) to capture the problems and conditions of poverty in Orange County. Our last CNA conducted in 2021 determined the *lack of access to affordable housing* to be a top concern for our respondents. With many respondents feeling as if they were "one check away from homelessness".

**We are writing to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies.** The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana along with new housing options being created in the City.

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are asking for zone changes, upzonings, following city initiated specific plans, general plan updates or those asking for other development incentives.

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We urge you to take into consideration the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.

Sincerely,



Curtis Gibbs  
Director of Planning



Fighting for a future of abundant housing in Orange County  
peopleforhousing.org

**Hon. Vicente Sarmiento, Mayor**

City of Santa Ana  
22 Civic Center Plaza  
Santa Ana, CA 92701

April 4th, 2022

**RE: Comment on Item #40: Housing Opportunity Ordinance**

Dear Mayor Sarmiento and City Councilmembers,

People for Housing Orange County is a network of housing advocates organized to advocate for more homebuilding, lower housing costs, and more inclusive housing policies across all of Orange County's communities. By legalizing the construction of multifamily housing, streamlining permitting, and increasing funding for subsidized, affordable housing, we believe a future of abundant housing is possible. We envision an integrated society where every person has access to a safe, affordable home near jobs, services, and opportunity.

I am writing to express concerns regarding the union labor requirement in the proposed housing opportunity ordinance (HOO). If the Santa Ana City Council follows through on the proposal to require privately funded, unsubsidized housing development to use union labor, it will distort the regional labor market in Orange County and make it harder to build unsubsidized housing in Santa Ana. Under a

union labor requirement, the cost to build market-rate housing will become prohibitive in Santa Ana, especially because a similar project will have lower labor costs across the city line in Irvine or Costa Mesa, where rents are actually higher.

Perhaps some would see the reduction in market rate housing development in Santa Ana as a positive outcome. However, those market rate developments bring in-lieu fees paid to the city to help defray the cost to build affordable housing for lower income households, and it is those market-rate developments paying in-lieu fees that are targeted by this union labor requirement in the HOO.

The City of Santa Ana is counting on those fees to serve as the local matching funds when affordable housing projects compete for the tax credits that fund their development. If no new market-rate housing is built, no new fees are paid, and the city has no funds with which to compete. Lastly, in cities with union labor requirements for all residential projects, it takes longer to approve new housing and rates of homelessness are higher. While these relationships are not causal, their correlation is noteworthy.

To be clear, I am not contesting paying union-level wages on housing projects that are subsidized with public funds; this policy is already required. Nor am I opposing monitoring construction sites to ensure safe working conditions and preventing wage theft; compliance with Cal/OSHA regulations and workers' compensation policies are critical. I am pushing back against the city bestowing a "most favored status" upon union contractors when there is already a shortage of construction labor, and there are not enough workers to elicit multiple bids from union shops. Project contracts



should be given to the company that can negotiate a deal that works for both parties when appropriate labor, health, and safety codes are followed.

I encourage the Santa Ana City Councilmembers to enact policies that will expedite project approvals and shore up the city's ability to provide the subsidized, affordable housing residents need, but they should avoid at all costs policies that create a monopoly on construction within the city. We have seen how devastating that level of control has been to the building of individual housing developments in places like San Francisco and Los Angeles. Do not let it take root in Orange County.

Sincerely,

Elizabeth Hansburg  
Co-Founder & Director





7101 Wyoming Street, Westminster, CA 92683  
Telephone (714) 893-3581 Fax (714) 893-4819

April 2, 2022  
City Council  
City of Santa Ana  
20 Civic Center Plaza  
P.O. Bo 1988, M31  
Santa Ana, CA 92701

**Re: Item 40: Strengthen Housing Opportunity Ordinance and Affordable Housing Funds Policies and Procedures**

Dear Mayor and City Council Members,

Abrazar (means to Embrace in Spanish) is a 501 (c) 3 non-profit organization. Abrazar is dedicated to embracing the diversity of families in our community, educating them on the resources we provide through our community collaborations, and empowering them to improve the quality of their life. Abrazar's goals are to Embrace, Educate and Empower children, families, and individuals with the necessary tools to attain financial stability; physical, dental, and mental health; educational success; engage citizens in civic participation; provide or facilitate access to affordable and decent housing and prevent hunger and malnutrition. Diversity and delivery of collaborative services are critical to the success of our programs.

**We are writing to support the amendments to the Housing Opportunity Ordinance and Affordable Housing Funds Policies.** The changes will ensure that development in the City addresses housing needs for all residents in a balanced manner. Many working families in Santa Ana continue to be impacted by the rising cost of housing and the scarce housing opportunities available at rents they can afford. In addition, many continue to face economic uncertainty because of the ongoing COVID-19 pandemic. The creation of housing at all income levels is vital to our recovery and will provide stability for the majority of Santa Ana residents that are struggling with housing availability and cost that existed long before the pandemic. It is crucial that the City strengthen the Housing Opportunity Ordinance (HOO) to ensure that housing opportunities are available for all residents in Santa Ana and new housing options are being created in the City.

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**7101 Wyoming Street, Westminster, CA 92683**  
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We urge you to consider the amendments and proposed recommendations to the Housing Opportunity Ordinance. These recommendations will help the city increase affordable housing options for residents and help the city meet equitable housing production goals.

Sincerely,

**Mario Ortega**  
**Chief Executive Officer**  
**Work: (714) 278-4672**  
**Fax: (714) 893-4819**  
**Email: [m.ortega@abrazarinc.com](mailto:m.ortega@abrazarinc.com)**