

December 20, 2021

Planning Commissioners
City of Santa Ana
Santa Ana CA 92702

Subject: Housing Element 2021-2029

Some of my comments are minor but there are those which need to be addressed prior to sending the Housing Element to City Council. I recommend the Planning Commission return this element for review and correction prior to bringing it back to the Planning Commission.

Comments are listed in the order in which they appear in the document.

Page 9: "Housing will incorporate sustainable "green" practices in design, site planning, and construction." It is commonly accepted that repurposing a building is more "green" than tearing it down and creating a new structure due to the particulate pollution and non-bio degradable waste, etc. generated during the destruction and waste disposal phases of a project. I hope the City keeps this in mind when approving future projects.

Page 10: Starting on page 10, the phrase "extremely low-income" is used. HE-2-4 states it will, "***provide rental housing for extremely low, very-low, and low income residents as well as moderate-income Santa Ana workers.***" Page B-19 text discussing the Housing Opportunity Ordinance mentions "eligible rental projects are required to set aside at least (15) percent of the units to low-income households, ten (10) percent rented to very low-income households, ***or 5 percent for extremely low-income households....***". Page A-36, Table A-17, Regional Housing Needs Allocation, 2021-2029, lists 4 income group categories, 1) very low, 2) low, 3) moderate, 4) above moderate. ***Extremely low-income is not one of the categories used by RHNA so why does Santa Ana use a category of "extremely low-income"?***

Page 11: Insert a paragraph break prior to HE-2.8 Entitlement Process.

Page 14: SPECIAL NEEDS section. ***Replace "female headed households" with page A1 text "single-parent families" as inclusion in this category is not limited by gender in today's society and may open the City to lawsuits.*** Page A1 text: "Special Needs. Special needs in the City, including seniors, people with disabilities, large families, single-parent families, people who are experiencing homelessness, and other special needs groups."



Page 15: HE-4.5 Healthy Homes states, “Support efforts to make homes healthier by addressing health hazards... and prohibit smoking in multi-family projects” [How will this be addressed/enforced?](#) Does the City currently have a policy to prohibit smoking in multi-family projects? Section 53 Reducing Second-Hand Smoke in Multifamily Housing of the Housing Element only states, “This may include crafting an ordinance, educating property managers and owners, and building community consensus around this important health consideration”. This will not prohibit smoking in multi-family projects!

Page 32: “In addition, to combat increasing rents and potential displacement, the City **will adopt** a rent stabilization ordinance and a just cause eviction ordinance.” Should change this to **“has adopted”**.

Page A-2: Table A-1 Population Growth Trends states the 2045 population will increase to 360,100, an 8.6% increase. I find this interesting because the OC Register has been using a population of 470,00 to 595,000 for calculating COVID data for the past several months. At one of the community Focus meetings for the General Plan Update, it showed 431,629 as the 2045 buildout population. [Why is the 2045 population in this document only 360,100, and why can't we be consistent in population numbers throughout the General Plan?](#)

Page A-3: Table A-1 Race and Ethnicity. [You should check the data again and then revise the paragraph preceding it. Table shows the White population declined by 11.7%, not the 29% listed in the preceding paragraph.](#)

Page A-19: I think the City is presenting an incomplete view of the data when it states: *“The average Santa Ana apartment rent is approximately \$1,971. The average apartment rent in Santa Ana was \$1,497 in 2013, **a 31 percent increase over 8 years.**”* Change to read: *“The average apartment rent in Santa Ana was \$1,497 in 2013, **a 31 percent increase, or 4% over 8 years.**”* FYI...if the new rent stabilization law was applied to this issue, the rent would have increased to \$1841 at the end of 8 years.

Page B-6: Table B-1 General Plan Designations Allowing Housing. At least part of this table requires a revision.

| Table B-1 General Plan Designations Allowing Housing: | | | |
|---|--|--|--|
| Designation | Description | Corresponding Zones | Maximum Density |
| Urban Neighborhood | Primarily a mix of residential uses with pedestrian oriented commercial, schools and small parks | SD – Specific Development Zone SP – Specific Plan | 0.5 to 1.5 FAR 5 to 30 units per acre |
| Source: City of Santa Ana, General Plan Land Use Element, September 2021 | | | |
| Land Use Element, Table LU-3. DENSITY AND INTENSITY STANDARDS [Page LU 17] | | | |
| Urban Neighborhood | | UN-20 UN-30 UN-40 UN-50 | 1.0 FAR or 20 du/ac 1.5 FAR or 30 du/ac 1.5 FAR or 40 du/ac 1.5 FAR or 50 du/ac |

Page B-15: [Random or incomplete note on right side of page.](#)





Page B-16: Table B-5 Residential Parking Standards

| <i>Residential Type</i> | <i>Parking Standards Basic Requirement</i> |
|--------------------------|---|
| Accessory Dwelling Units | One parking space per unit as allowed under state law |

Are there other requirements or, is this really true?

Page B-17: Parking Standards. Does not take into consideration/is silent on, the impact SB-9 will have on the City. If I read SB-9 correctly, parking is not required when building in accordance with SB-9. From B-17, last paragraph:

“These efforts will inform programs and policies to address parking issues caused by changes automobile ownership rates and the number of adults who drive per household, which have led to certain neighborhoods being parking impacted, and parking standards and regulations for new residential development to ensure they are not an undue constraint to development and minimize parking impacts to the surrounding neighborhoods.”

Page B-18: Other standards as allowed by the Planning Commission: It then goes on to say the City Council, Planning Commission, or Zoning Administrator has the authority to grant a minor exception or variances when specific criteria are met. These exceptions have no standard and it will be impossible to maintain any consistent implementation. I question who has the authority to grant these minor exception or variances.

Page C-5:

I think the result of the table below speaks volumes. Using the current Pipeline Housing Projects numbers, the City will exceed the RHNA numbers by 3404 units or, 208%. For the previous RHNA cycle the City exceeded RHNA numbers by over 2300%, receiving an A+ grade in all levels. **At some point in time, as in now, we need to just meet the goals or we will run out of land.** Keeping at the current pace could subject the City to a \$600,000/month fine. See <https://www.santa-ana.org/general-plan/housing-element-update-2021>, Housing for All - Part 1, presented by the Orange County Council of Governments [time 1:40].

| Table C-2 Pipeline Housing Projects | | | | | |
|---|----------------------------|------------|------------------------|--------------|---------------|
| | <i>Affordability Level</i> | | | | |
| | <i>Very Low</i> | <i>Low</i> | <i>Moderate Income</i> | <i>Above</i> | <i>Total</i> |
| RHNA Allocation by Affordability Category | 606 | 362 | 545 | 1624 | 3137 |
| Balance of RHNA to Accommodate | 102 | -482 | 232 | -3,253 | -3,401 |
| For Comparison 2014–2021 RHNA objectives | | | | | |
| Units | 407 | 1,084 | 28 | 3,184 | 4,703 |
| % Exceeding RHNA Allocation | 904% | 3,388% | 76% | 3,538% | 2,305% |



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Page E-24: Exhibit E-2 – Predominant Population – Hispanic Majority Tracts

[It should reference what this is based upon, the 2020 Census?](#)

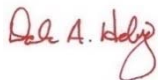
Page E-25: Exhibit E-3 – Predominant Population – Asian Majority Tracts

[It should reference what this is based upon, the 2020 Census?](#)

Some of these comments are minor but there are comments that need to be addressed prior to sending it to City Council. I recommend the Planning Commission return the Housing Element for correction and review prior to bringing it back to the Planning Commission. Let's live by the theme of having a "Shared Vision for Santa Ana".

Thank you for your thoughtful consideration. Stay safe, stay healthy.

Respectfully,



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