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Regina Celestin Williams
*Executive Director***Via Email**

April 10, 2024

Paul McDougall, Senior Program Manager
California Department of Housing and Community Development
Division of Housing Policy Development

RE: City of Santa Clara Housing Element

Paul McDougall,

We appreciate this opportunity to share our comments, and support for the City of Santa Clara's Housing Element Update submitted to you on March 26. We believe the plan, and the embrace of the process by city staff, and elected leadership has come a very long way since the release of the first draft over a year ago. We are excited by the progress. We feel that Santa Clara has turned an important corner that gives us confidence in the implementation and impact of the Housing Element submitted to you for certification.

Silicon Valley @ Home is a nonprofit advocacy organization that supports housing and affordable housing development throughout Santa Clara County. SV@Home works with a broad coalition of strategic partners to address the urgent housing needs of the diverse residents across all our communities. We advocate for solutions including increasing production of homes at all income levels, especially affordable housing; preserving existing affordable housing; and protecting our community's most vulnerable residents from displacement. We have been engaged with and tracking the status of Housing Element preparation and housing programs for each of the mid-sized and large cities in the County, and have been engaged with the City of Santa Clara's process since it began - attending community meetings, council study sessions, stakeholder focus groups, and sharing our perspective through both written and verbal comments.

Since our [initial comments were formally submitted in August, 2022](#), the city has taken significant steps to lean into this work. We believe this is most evident in the focus on proactively identifying and engaging often hard to reach communities with the greatest housing needs and explicit programming to address housing instability and displacement risks. We also appreciate the commitments to mid-course evaluation of progress with the clear expectations that there will be additional actions taken where they are falling short of the planned impact.

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Below are a few specific reflections on the positive changes we see since our August 2022 comments. We believe these are reflective of the public input, show the proactive commitments of city staff, and are responsive to the comments received from your agency during this planning process.

In our initial letter, we expressed concern about the **outreach and engagement process**, particularly as it reflected shortcomings in the requirement of Affirmatively Furthering Fair Housing (AFFH) to target people and communities where the needs are the greatest. We also express a related concern that the city had fallen short on the AFFH requirement to **assess the differences in experiences by race/ethnicity and across neighborhoods within the city**, particularly the Latinx residents whose greater incidents of housing instability and overlapping housing needs was evident in the analysis included in the draft.

The work in both the areas for subsequent draft was significant: **local outreach was improved, programs and policies are reflective of this additional input and deeper analysis of housing needs**. In a follow-up letter we shared a range of tenant and community protection **policies to address housing instability and displacement** that we have supported in other jurisdictions - some of these **were included** directly, and work items were added to pursue a comprehensive response.

We also expressed real **concern with the sites inventory's overdependence on a few Specific Plan areas** and the failure to incorporate **AFFH requirements to spread housing opportunities throughout the City, including higher-resourced areas**. This needed to include both an update of the identified sites, and programs to further this integration requirement.

Significant work has been done to expand the sites inventory to include parcels and properties outside of the specific plan areas in the northern part of the city. While some of the new sites identified in subsequent drafts, particularly along El Camino Real, have been removed from the final plan, the current plan shows an **effort to identify sites in higher resource areas** and within established residential areas closer to existing amenities.

There is action to **reduce or remove lot coverage restrictions where they create, in combination with other design guidelines, cumulative constraints on development** in R3-18 and R3-36 zones. The impact of these changes remains to be seen, but the recognition of governmental constraints is important.

We also appreciate the **investment in ADU programming, support for SB9 development, and efforts to catalyze affordable development on faith lands**. We see in many of our cities that these strategies are proposed as **solutions to the integrative challenges of AFFH mandates**. This will not be easy, but we believe the city has expressed a **more substantive commitment** than most peer cities.

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The city has recognized that the Housing Element Update is both an exercise in planning to meet RHNA production goals and a process of identifying and programming around housing needs in the community that are often just as important to address. Santa Clara has been a leader regionally in planning for, entitling, and building housing. The current pipeline will increase the number of homes in the city by over 40% - we believe this is the highest in the county. More fully engaging with housing preservation and tenant protection challenges will be newer to the city. We are excited to see housing built and committed to supporting the city in keeping people housed.

Sincerely,



Regina Celestin Williams

Executive Director

