

June 2022 | Addendum to the Final Program Environmental Impact Report (PEIR) for the
Santa Ana General Plan Update, October 2021
State Clearinghouse No. 2020029087

2021-2029 Santa Ana Housing Element Addendum

City of Santa Ana

Prepared for:

City of Santa Ana

Contact: Ricardo Soto, AICP
20 Civic Center Plaza, M-20
Santa Ana, California 92701
Tel: 714.667.2793

Prepared by:

PlaceWorks

Contact: JoAnn Hadfield, Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

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1. Introduction and Background

1.1 PROJECT LOCATION

The City of Santa Ana is in the western central portion of Orange County, approximately 30 miles southwest of the city of Los Angeles and 10 miles northeast of the city of Newport Beach (see Figure 1, *Regional Location*). As shown in Figure 2, *Citywide Aerial*, the city is bordered by the city of Orange and unincorporated areas of Orange County to the north, the city of Tustin to the east, the cities of Irvine and Costa Mesa to the south, and the cities of Fountain Valley and Garden Grove to the west. In November 2019, the City annexed the 17th Street Island, a 24.78-acre area in the northeast portion of the city. The 17th Street Island is bounded by State Route 55 to the east, 17th Street to the south, and North Tustin Avenue to the west. The city also includes a portion of the Santa Ana River Drainage Channel within its sphere of influence (SOI).

1.2 ENVIRONMENTAL SETTING

The City of Santa Ana is a 27.4-square-mile area developed with a variety of urban land uses. The Civic Center in Santa Ana is Orange County's main center of government. The Santa Ana River runs north to south through the northwestern part of the city. The city is a 99 percent built-out community in urbanized Orange County, bordered by a mix of land uses. The surrounding cities of Orange, Garden Grove, Fountain Valley, Costa Mesa, and Irvine all contain a variety of residential, commercial, industrial, and open space uses. These surrounding land uses are shown in Figure 2, *Citywide Aerial*.

1.3 SCOPE AND ANALYSIS FOR THIS ADDENDUM

This Addendum reviews the proposed 2021-2029 Santa Ana Housing Element relative to the 2022 General Plan for the City of Santa Ana and the potential impacts addressed in the Program Environmental Impact Report (PEIR) for the GPU certified April 20, 2022. As described in Section 2, *CEQA Requirements*, an Addendum is appropriate when a subsequent project would only require minor changes to the previous environmental document and the project would not involve substantial changes or changes in circumstances that would result in new significant environmental impacts.

Changes associated with the 2021-2029 Housing Element would not result in environmental impacts that were not evaluated under the General Plan Update PEIR and no substantial changes in circumstances under the California Environmental Quality Act (CEQA) Guidelines Section 15162(a)(2) have occurred since the certification of the 2021 PEIR that would indicate new significant impacts or substantially increase the severity of significant impacts previously identified. The background environmental conditions have not significantly changed since the certification of the 2021 PEIR. This Addendum also documents that there are no substantial changes in any circumstances that would result in new or substantially greater significant impacts.

1. Introduction and Background

In addition, no information that was not known and could not have been known at the time of the 2021 GPU PEIR shows that new or substantially greater significant impacts would result (see CEQA Guidelines Section 15162[a][3]). There are no new mitigation measures that would substantially reduce one or more significant impacts of the GPU but were not adopted. The 2021-2029 Housing Element does not identify or require adoption of any mitigation measures.

Since this Addendum does not identify new or substantially greater significant impacts, circulation for public review and comment is not necessary (CEQA Guidelines Section 15164[c]). However, the Santa Ana City Council will consider this Addendum at a public meeting prior to the adoption of the 2021-2029 Housing Element (CEQA Guidelines Section 15164[d]). If the Santa Ana City Council approves this Addendum, it must make findings by way of a resolution, including a finding that this Addendum provides the basis and substantial evidence for the decision not to prepare a subsequent EIR (CEQA Guidelines Section 15164[e]).

1.4 PREVIOUS ENVIRONMENTAL DOCUMENTATION

This Addendum relies on environmental analysis in the 2021 GPU PEIR. The original Draft PEIR for the GPU was circulated for public review from August 3, 2020 through March 27, 2020 and then extended for an additional 20 days through October 6, 2020. A Final EIR was prepared and a Planning Commission Public Hearing held on November 9, 2020. The Planning Commission directed extended public outreach and modifications to the GPU. A Recirculated Draft PEIR was prepared and circulated for public review mid-August 2021 to September 2021. A Final EIR was prepared and the 2021 Final GPU PEIR certified on April 20, 2022. The certified Final Program EIR for General Plan Update is a consolidation of the original Draft PEIR, the update Recirculated Draft PEIR, and the Final PEIR including Response to Comments and revisions to the Draft and Recirculated Draft PEIRs to address public and agency comments, and incorporate other updates. All of these environmental documents are available on the City of Santa Ana website.

In accordance with CEQA Guidelines Sections 15148 and 15150, this Addendum incorporates the 2021 Final GPU PEIR (and its constituent parts) by reference. A summary of the General Plan Update is provided in Section 3, *Project Description: Santa Ana General Plan, April 2022*. All documents incorporated by reference are available for review at the City of Santa Ana Planning Division at 20 Civic Center Plaza Santa Ana, CA 92701.

1.5 ADDENDUM FORMAT

The Addendum is structured as follows:

Section 1. Introduction and Background. Summarizes the background and scope of analysis of the Addendum, previous environmental documentation incorporated by reference, and the format of the Addendum.

Section 2. CEQA Requirements. Describes the purpose of an Addendum per CEQA and associated environmental procedures.

1. Introduction and Background

Section 3. Project Description: 2021-2029 Santa Ana Housing Element. Includes a description of the 2021-29 Housing Element, its components, its RHNA requirements, housing opportunities identified to meet the City's RHNA allocations, and environmental clearances for identified development sites and projects.

Section 4. Project Description: Santa Ana General Plan, Final, April 2022 Includes a description of the City's recently adopted, comprehensive General Plan update and environmental findings.

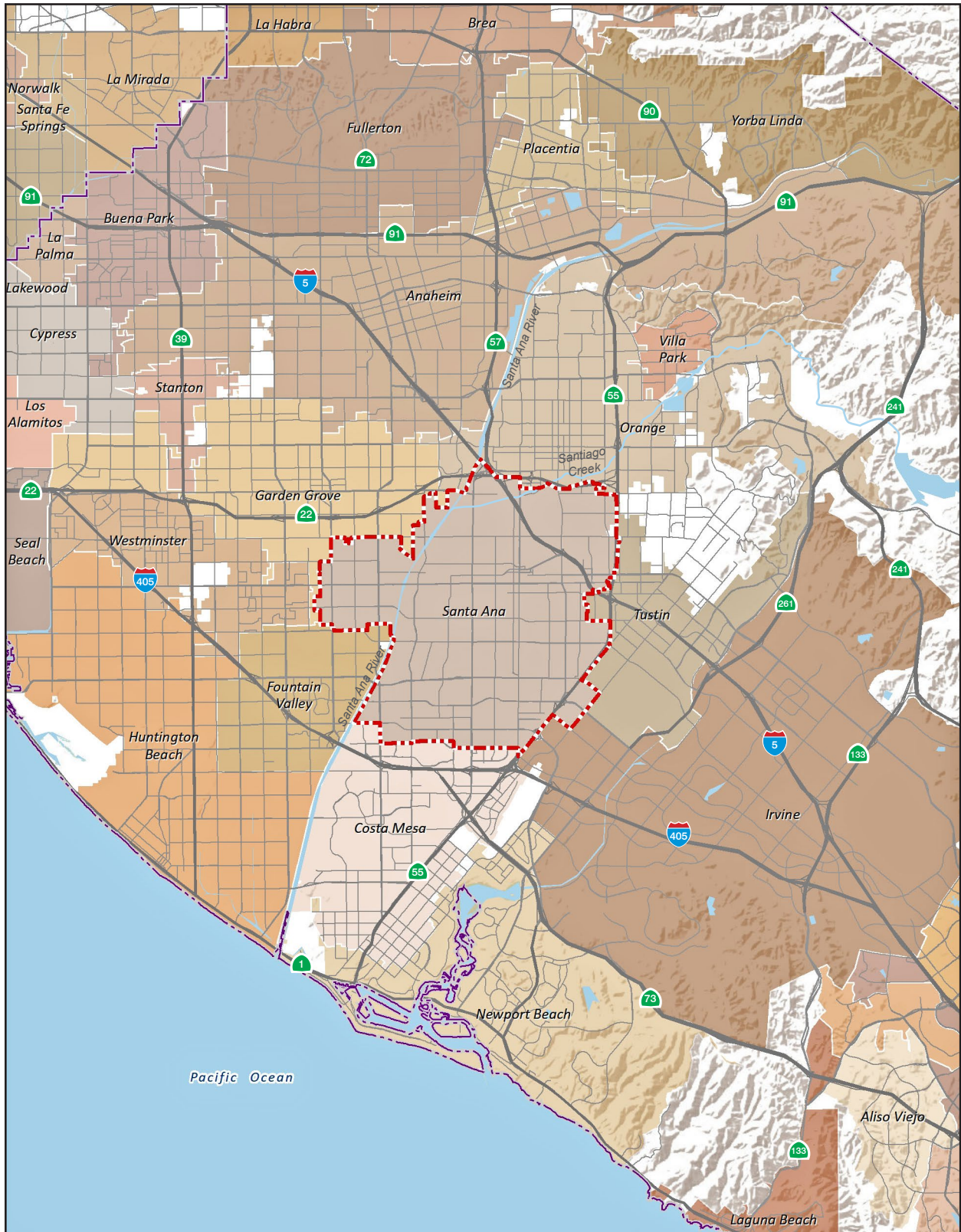
Section 5. Environmental Review: 2021-2029 Santa Ana Housing Element. Reviews the proposed Housing Element for consistency with the 2022 General Plan and evaluates whether the proposed actions are within the scope and the analysis of the Program EIR prepared for the General Plan Update.

Section 6. Conclusion. Summarizes the findings of the environmental review and substantiates the preparation of an Addendum for the 2021-29 Housing Element.

1. Introduction and Background

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Figure 1 - Regional Location



--- City of Santa Ana

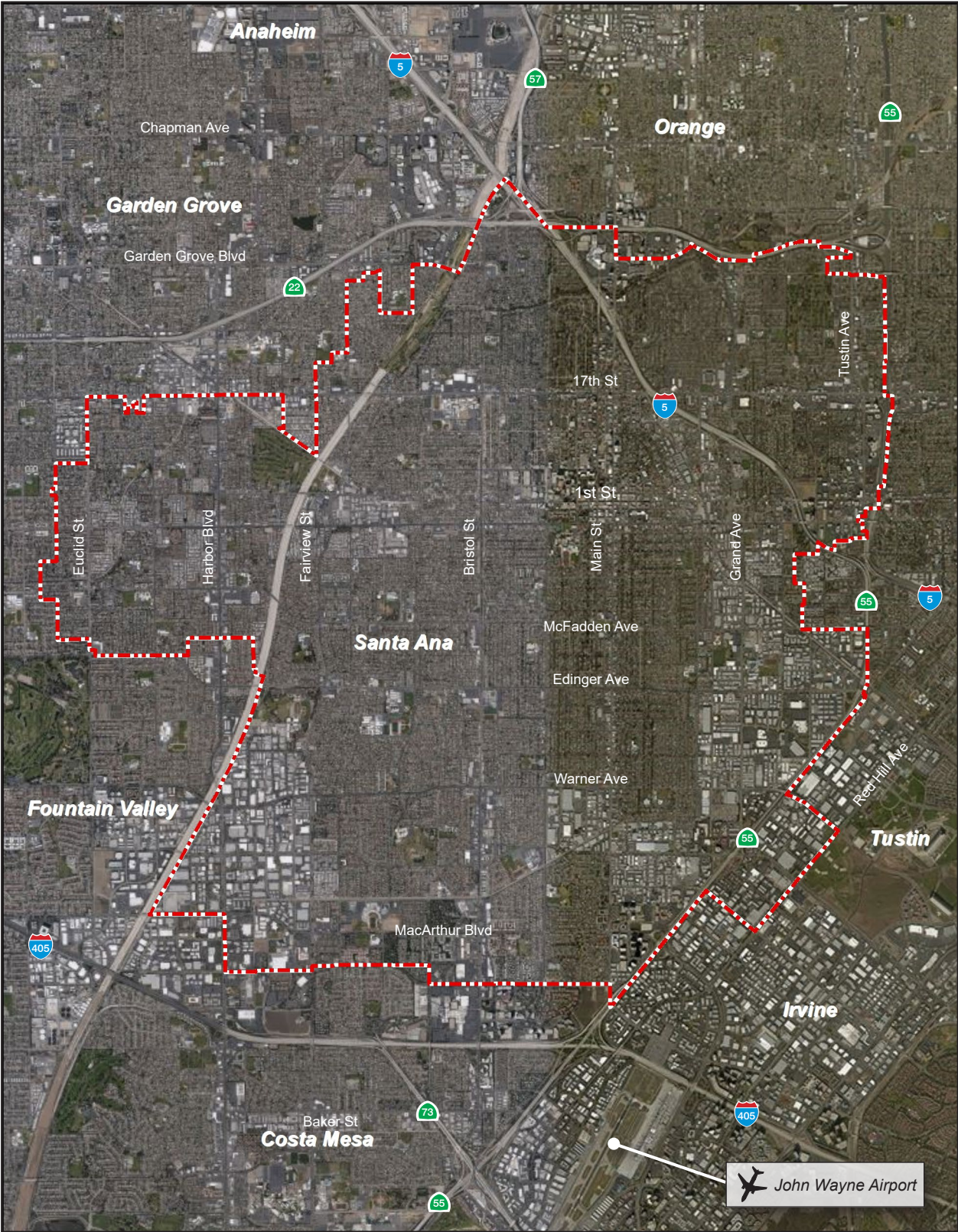


Source: ESRI, 2020

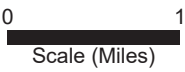
1. Introduction and Background

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Figure 2 - Citywide Aerial



--- City of Santa Ana



Source: ESRI, 2020

1. Introduction and Background

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2. CEQA Requirements

2.1 PURPOSE OF AN ADDENDUM

This document is an Addendum to the Program EIR (October 2021) (State Clearinghouse [SCH] No. 2020029087) certified April 2022 for the Santa Ana General Plan Update. The purpose of this Addendum is to evaluate whether the proposed 2021-2029 Santa Ana Housing Element would modify the General Plan Update in such a way as to result in new environmental impacts or a substantial increase in the severity of previously identified significant effects, or would otherwise trigger a need for subsequent environmental review.

The housing element is one of the eight general plan elements mandated by the State of California in Sections 65580 to 65589.8 of the Government Code. To comply with state law, Santa Ana prepares a housing element every eight years or in conjunction with the release of the RHNA. The last housing element adopted for the city was in February 2014. 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 element pursuant to Section 65583 of the California Government Code. The housing element also provides a comprehensive evaluation of programs and regulations related to priority goals, objectives, and program actions that directly address the needs of Santa Ana residents. The housing element is only one facet of the City's overall planning program.

The City of Santa Ana, as lead agency for the housing element, is responsible for preparing environmental documentation in accordance with CEQA, as amended, to determine if approval of the discretionary actions requested could have a significant impact on the environment. The 2021 GPU Program EIR and this Addendum serve as the environmental review for the 2021-2029 Housing Element, as required by CEQA, Public Resources Code Sections 21000 et seq., and the State CEQA Guidelines (California Code of Regulations Title 14, Sections 15000 to 15387).

2.2 ENVIRONMENTAL PROCEDURES

The City's 2021 General Plan Update did not include an updated Housing Element, but integrated the previous 2014-2021 Housing Element. It was recognized that an updated Housing Element would be prepared in 2022 in accordance with State law, and that applicable environmental review of the updated Housing Element would occur at that time. Pursuant to CEQA and the State CEQA Guidelines Section 15162, this Addendum focuses on whether implementation of the 2021-2029 Housing Element would require major revisions to the 2021 GPU Program EIR due to the potential for new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Pursuant to Section 21166 of CEQA and Section 15162 of the Guidelines, when an environmental impact report (EIR) has been certified or a negative declaration adopted for a project, no subsequent or supplemental

2. CEQA Requirements

EIR or negative declaration shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. (CEQA Guidelines Section 15162[a])

If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if any of the above criteria apply. Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

In the absence of the need to prepare a subsequent EIR, an addendum to a previously adopted negative declaration may be prepared. CEQA Guidelines Section 15164 states:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

2. CEQA Requirements

- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence (CEQA Guidelines Section 15164).

This Addendum to the 2021 GPU Program EIR has been prepared because the evaluation of the 2021-2029 Housing Element has not indicated any of the circumstances requiring a subsequent EIR. As demonstrated in Section 5 of this Addendum, the 2021-2029 Housing Element would not result in impacts that differ from the environmental impacts addressed in the GPU Program EIR, and it would not trigger the need for preparation of a subsequent EIR under the criteria in Sections 15162(b). The 2021-2029 Housing Element is consistent with the Final 2022 General Plan and zoning ordinance. This Addendum demonstrates that no substantial changes are proposed to the 2014-2021 Housing Element or have occurred in the city that would require major revisions to the 2021 GPU Program EIR or substantially increase the severity of previously identified significant effects. Thus, the impacts of the 2021-2029 Housing Element are within the levels and types of environmental impacts disclosed in the 2021 GPU PEIR.

2. CEQA Requirements

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3. Project Description: Santa Ana General Plan, April 2022

In March 2014, the City Council adopted the Santa Ana Strategic Plan. The Strategic Plan was the result of an extensive community outreach process and established specific goals, objectives, and strategies to guide the City’s major efforts. One of the key strategies identified was to complete a comprehensive update of the existing General Plan. The GPU provides long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the Santa Ana community through 2045. The General Plan update identifies areas of opportunity and provides options to enhance development potential in key areas of the city. It also brings the city into compliance with recent State laws, reflects current conditions, and incorporates input from the general public, City staff, and other stakeholders.

The GPU is organized into three sections: I, Services and Infrastructure; II, Natural Environment; and III, Built Environment. It addresses the eight topics required by state law as well as five optional topics. State law gives jurisdictions the discretion to incorporate optional topics and to address any of these topics in a single element or across multiple elements of the general plan. The 12 proposed elements of the GPU replace the 16 elements of the previous General Plan. The General Plan update incorporates the current 2014–2021 housing element, and no substantive changes are anticipated. As noted above, this Addendum provides the environmental review required for the discretionary approval of the updated Housing Element (2021-2029). The topic of environmental justice was incorporated throughout the General Plan update, with goals and policies incorporated into multiple elements. The 12 elements of the General Plan update are:

Mandatory Topics

- Land Use Element
- Circulation Element
- Housing Element
- Open Space Element
- Conservation Element
- Safety Element
- Noise Element

Optional Topics

- Public Services Element
- Urban Design Element
- Community Element
- Economic Prosperity Element
- Historic Preservation Element

The General Plan update is comprehensive both in its geography and subject matter. It addressed the entire territory within the plan area’s boundary and the full spectrum of issues associated with management of the plan area. The General Plan update also included forecasts of long-term conditions and outlines development goals and policies; exhibits and diagrams; and the objectives, principles, standards, and plan proposals throughout its various elements. The GPU can be found online at <https://www.santa-ana.org/departments/general-plan/>.

3. Project Description: Santa Ana General Plan, April 2022

Coordination and consistency are essential between the elements of the GPU, but in particular with the land use element. The circulation element, which identifies proposed improvements to the transportation system, may impact surrounding land uses and future development. The urban design element sets forth policies and programs to improve the city’s design and urban form. The conservation element protects and maintains the city’s natural, cultural, and other resources, with a focus on preserving aesthetics and the environmental quality of the city.

3.1 UPDATED LAND USE ELEMENT

The updated land use element will guide growth and development (e.g. infill development, redevelopment, use and revitalization/restoration) within the plan area by designating land uses as shown in the proposed land use map (see Figure 3, *Proposed General Plan Land Uses*). Figure 3 shows the 13 proposed land use designations of the General Plan update, and Table 1, *Land Use Designations and Statistics* gives a general description of the land use designations that were added to the GPU and were not in the current General Plan. Land use designations define the type and nature of development that would be allowed in a given location of the plan area. The land use designations and patterns shown in Figure 3 are intended to provide the basis for more detailed zoning designations and development intensities, requirements, and standards established in the City’s development code.

Table 1 Land Use Designations and Statistics

Land Use Designation	Acres	% of Total
Grand Avenue/17th Street	171.5	100%
District Center	23.7	13.8
General Commercial	19.9	11.6
Industrial/Flex	7.1	4.1
Open Space	1.1	0.6
Urban Neighborhood	119.7	69.8
55 Freeway/Dyer Road	354.5	100%
District Center	158.0	44.6
General Commercial	68.0	19.2
Industrial/Flex	127.4	35.9
Open Space	1.1	0.3
South Bristol Street	199.9	100%
District Center	108.3	54.2
Open Space	6.0	3.0
Urban Neighborhood	85.7	42.9
South Main Street	312.2	100%
Industrial/Flex	29.0	9.3
Institutional	19.2	66.1
Low Density Residential	162.3	845.8
Urban Neighborhood	101.7	62.7

3. Project Description: Santa Ana General Plan, April 2022

Table 1 Land Use Designations and Statistics

Land Use Designation	Acres	% of Total
West Santa Ana Boulevard	481.6	100%
Corridor Residential	10.0	2.1
General Commercial	21.5	4.5
Industrial/Flex	87.9	18.3
Institutional	45.5	9.4
Low Density Residential	108.1	22.4
Low-Medium Density Residential	6.8	1.4
Medium Density Residential	27.0	5.6
Open Space	133.6	27.7
Professional and Administrative Office	6.2	1.3
Urban Neighborhood	35.0	7.3
Balance of City	11,598.8	100%
District Center	124.2	1.1
General Commercial	424.2	3.7
Industrial	2,159.6	18.6
Institutional	886.7	7.6
Low Density Residential	6,173.3	53.2
Low-Medium Density Residential	429.0	3.7
Medium Density Residential	335.3	2.9
One Broadway Plaza District Center	4.1	0.0
Open Space	793.8	6.8
Professional and Administrative Office	260.4	2.2
Urban Neighborhood	4.1	0.0
Not Specified	4.1	0.0
TOTAL	13,118.5	—

Source: Figures aggregated and projected by PlaceWorks, 2020.

3.2 UPDATED CIRCULATION ELEMENT

The circulation element update is integrally related to federal, state, and regional transportation programs as well as local plans and regulations. The City’s role in transportation planning has become increasingly important, because recent legislation in the areas of growth management, congestion management, and air quality require more active local coordination to meet regional objectives. Furthermore, the circulation element update is intended to guide future development of the city’s transportation system in a manner consistent with the updated land use element.

3. Project Description: Santa Ana General Plan, April 2022

The *Master Plan of Streets and Highways (MPSH)* as included in the General Plan, Final 2022 details street classifications to reflect buildout of the city's roadway system.

3.3 FOCUS AREAS

The City identified five focus areas suited for new growth and development under the GPU: South Main Street, Grand Avenue/17th Street, West Santa Ana Boulevard, 55 Freeway/Dyer Road, and South Bristol Street. These five areas are along major travel corridors, the future OC Streetcar line, and/or linked to the city's downtown area. The five focus areas of the plan area are shown in Figure 4, *Focus Areas and Special Planning Areas*, and described below.

- South Main Street Focus Area
- Grand Avenue/17th Street Focus Area
- West Santa Ana Boulevard Focus Area
- 55 Freeway/Dyer Road Focus Area
- South Bristol Street Focus Area

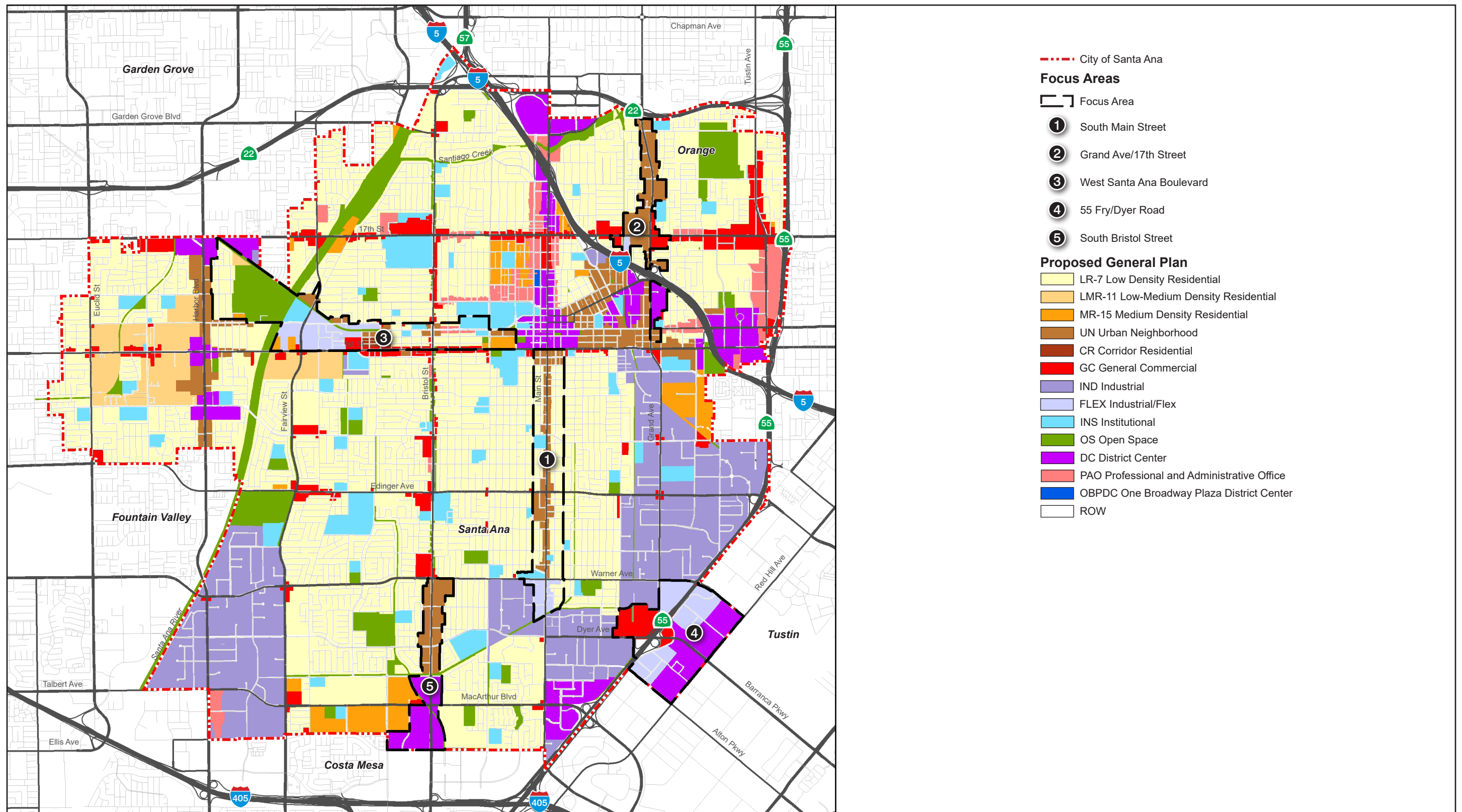
3.4 SPECIFIC PLANS/SPECIAL ZONING

There are seven planning areas that represent specific plans and other special zoning areas that were previously adopted: Adaptive Reuse Project Incentive Area (2014), Bristol Street Corridor Specific Plan (1991/2018), Harbor Mixed Use Transit Corridor Specific Plan (2014), MainPlace Specific Plan (2019), Metro East Mixed-Use Overlay Zone (2007/2018), Midtown Specific Plan (1996), and Transit Zoning Code Specific Development (2010). The boundaries of these areas are included in Figure 4, *Focus Areas and Special Planning Areas*.

3.5 GENERAL PLAN BUILDOUT SCENARIO

The GPU Program EIR analyzed the potential environmental impacts of the General Plan Update land use designations as shown in Table 2, *Existing Conditions, Potential Growth, and Buildout Conditions: Housing Units, Nonresidential Square Footage, and Jobs*. The analysis assumed full buildout in the year 2045. The certified GPU PEIR provides the conclusions regarding impact significance for this assumed buildout.

Figure 3 - General Plan Land Use Plan



- City of Santa Ana
- Focus Areas**
- ① South Main Street
- ② Grand Ave/17th Street
- ③ West Santa Ana Boulevard
- ④ 55 Fry/Dyer Road
- ⑤ South Bristol Street
- Proposed General Plan**
- LR-7 Low Density Residential
- LMR-11 Low-Medium Density Residential
- MR-15 Medium Density Residential
- UN Urban Neighborhood
- CR Corridor Residential
- GC General Commercial
- IND Industrial
- FLEX Industrial/Flex
- INS Institutional
- OS Open Space
- DC District Center
- PAO Professional and Administrative Office
- OBPDC One Broadway Plaza District Center
- ROW

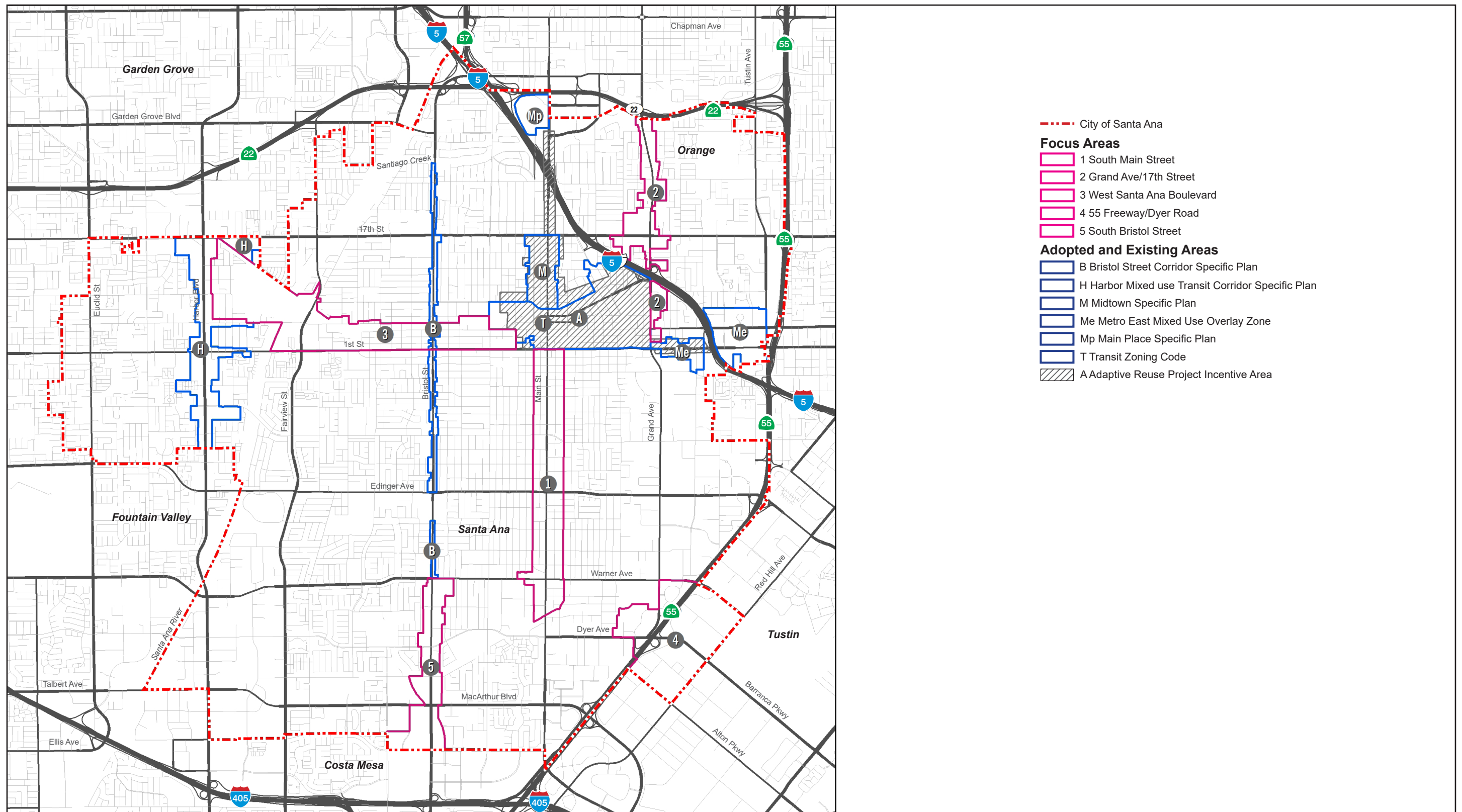
Source: City of Santa Ana, 2017



3. Project Description: Santa Ana General Plan, April 2022

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Figure 4 - Focus Areas and Special Planning Areas



- City of Santa Ana
- Focus Areas**
- 1 South Main Street
- 2 Grand Ave/17th Street
- 3 West Santa Ana Boulevard
- 4 55 Freeway/Dyer Road
- 5 South Bristol Street
- Adopted and Existing Areas**
- B Bristol Street Corridor Specific Plan
- H Harbor Mixed use Transit Corridor Specific Plan
- M Midtown Specific Plan
- Me Metro East Mixed Use Overlay Zone
- Mp Main Place Specific Plan
- T Transit Zoning Code
- ▨ Adaptive Reuse Project Incentive Area

Source: City of Santa Ana, 2019



3. Project Description: Santa Ana General Plan, April 2022

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3. Project Description: Santa Ana General Plan, April 2022

Table 2 Existing Conditions, Potential Growth, and Buildout Conditions: Housing Units, Nonresidential Square Footage, and Jobs

PLANNING AREA	EXISTING ¹			GROWTH ²			BUILDOUT		
	Housing Units	Bldg. Sq. Ft. ³	Jobs	Housing Units	Bldg. Sq. Ft. ³	Jobs	Housing Units	Bldg. Sq. Ft. ³	Jobs
FOCUS AREAS	6,380	13,421,155	28,428	17,575	2,263,130	6,616	23,955	15,684,285	35,044
55 Freeway/Dyer Road	1,221	5,666,453	8,898	8,731	475,830	4,404	9,952	6,142,283	13,302
Grand Avenue/17th Street	561	1,400,741	3,568	1,722	-696,847	-1,946	2,283	703,894	1,622
South Bristol Street	220	1,577,511	3,337	5,272	3,505,130	7,855	5,492	5,082,641	11,192
South Main Street	1,720	1,685,978	3,455	588	-739,316	-1,304	2,308	946,662	2,151
West Santa Ana Boulevard	2,658	3,090,472	9,170	1,262	-281,667	-2,393	3,920	2,808,805	6,777
SPECIFIC PLAN / SPECIAL ZONING	4,685	13,924,891	38,548	15,839	3,033,554	1,154	20,524	16,958,445	39,702
Adaptive Reuse Overlay Zone ⁴	260	976,935	3,043	1,000	0	-476	1,260	976,935	2,567
Bristol Street Corridor Specific Plan	136	140,348	294	-1	2,791	-12	135	143,139	282
Harbor Corridor Specific Plan	1,324	1,767,937	3,286	3,298	200,045	-1,708	4,622	1,967,982	1,578
Main Place Specific Plan	0	1,108,080	2,216	1,900	1,318,843	3,164	1,900	2,426,923	5,380
Metro East Overlay Zone	844	2,516,056	7,524	4,707	2,169,891	4,734	5,551	4,685,947	12,258
Midtown Specific Plan	607	1,885,065	4,824	0	-66,812	-209	607	1,818,253	4,615
Transit Zoning Code	1,514	5,530,470	17,361	4,935	-591,204	-4,339	6,449	4,939,266	13,022
ALL OTHER AREAS OF THE CITY⁵	67,727	39,772,550	92,004	2,847	552,536	3,666	70,574	40,325,086	95,670
CITYWIDE TOTAL	78,792	67,118,596	158,980	36,261	5,849,220	11,436	115,053	72,967,816	170,416

Source: Santa Ana 2020.

¹ Existing represents conditions as of December 2019 as derived from the City of Santa Ana Planning Information Network and projects already under construction per the January 2020 monthly development project report.

² The potential growth for new development in specific plan / special zoning areas is based on the forecast buildout at the time of the respective zoning document's adoption, minus the amount of new development built between its adoption date and 2019.

³ Only includes nonresidential building square footage.

⁴ The figures shown on the row for the Adaptive Reuse Overlay represent parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

⁵ The City has included an assumption for growth on a small portion (5 percent) of residential parcels through the construction of second units, which is distributed throughout the City and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline; an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan; and the commercial and retail along 1st Street south of the West Santa Ana Boulevard focus area.

3. Project Description: Santa Ana General Plan, April 2022

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3. Project Description: Santa Ana General Plan, April 2022

3.6 ENVIRONMENTAL ANALYSIS FINDINGS

The 2021 GPU Program EIR addressed the potential impacts of the proposed GPU and provided mitigation measures, as necessary, for impacts determined to be potentially significant.

Two environmental categories were found to have no impacts:

- Agriculture and Forestry Resources
- Wildfire

The following environmental categories were found to have less than significant impacts upon implementation of General Plan policies, existing regulations and standard conditions of approval: No CEQA mitigation was required for:

- Aesthetics
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Public Services
- Transportation
- Utilities and Service Systems

The following impacts were determined to be less than significant upon implementation General Plan policies, existing regulations and standard conditions of approval, and recommended CEQA Mitigation Measures:

- Biological Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Tribal Cultural Resources

Implementation of the GPU was determined to result in significant, unavoidable impacts, even with feasible mitigation, for the following categories:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Noise
- Population and Housing
- Recreation

3. Project Description: Santa Ana General Plan, April 2022

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4. Project Description: 2021–2029 Santa Ana Housing Element

The 2021-2029 Housing Element is the 6th Cycle housing element prepared by the City and contains goals, policies, and programs to facilitate the development, improvement, and preservation of housing. It addresses the Regional Housing Needs Assessment (RHNA) and state law requirements for the eight-year planning period of 2021 to 2029.

4.1 COMPONENTS OF THE 2021-2029 SANTA ANA HOUSING ELEMENT

Section 65583 of the California Government Code was augmented after the 2014-2021 Housing Element was completed and prescribes a slightly different scope and content for housing elements pursuant to the adoption of Assembly Bill (AB) 686, adopted September 30, 2018. AB 686, *Housing Discrimination: Affirmatively Further Fair Housing*, requires that housing elements take meaningful actions to overcome the patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. When assessing the City's housing inventory to meet the RHNA allocation, housing elements need to now evaluate access to employment, schools, transit, housing mobility, and a healthy living environment. The analysis must also assess any disparities such as further distance to jobs, proximity to hazardous environmental conditions, or limitations in the ability to move between neighborhoods.

To comply with State law, including AB 686, the 2021-2029 Housing Element includes the following components:

- **Policy Framework.** Describes key topic areas for the housing element, such as designing and maintaining livable and affordable neighborhoods, expanding housing supply and diversity, providing housing assistance, responding to people with special needs, and affirmatively furthering fair housing. The Policy Framework has goals and policies to provide a foundation for the Housing Plan and does not propose any physical development.
- **Housing Plan.** Identifies the programs, actions, and resources the City will take and/or make available to address existing and future housing needs. The programs are organized into four functional groupings that relate to specific goals: Housing and Livable Neighborhoods, Housing Supply and Diversity, Housing Assistance, and Special Needs Housing.
- **Appendix A: Housing Needs.** 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.

4. Project Description: 2021–2029 Santa Ana Housing Element

- **Appendix B: Housing Constraints.** 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.
- **Appendix C: Housing Resources.** Provides an inventory, analysis, and assessment of the City’s resources to address the City’s fair share of potential future housing growth and demonstrates how the City will achieve its total RHNA planning goal.
- **Appendix D: Program Evaluation.** Describes progress in meeting objectives during the 2014–2021 planning period that, in combination with the public outreach section, summarizes new initiatives proposed.
- **Appendix E: Assessment of Fair Housing.** Addresses the fair housing requirements for housing elements. This section begins with an overview of key requirements, describes outreach efforts to date, and provides the requisite analysis. Programs to address concerns are detailed in the Housing Plan.
- **Appendix F: Public Outreach.** Describes the public outreach process that was the foundation of the 2021-2029 Housing Element, the City’s housing vision, and programs.

4.2 REGIONAL HOUSING NEEDS ASSESSMENT

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. 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. The RHNA allocated by SCAG for the 2021-2029 planning period is 3,137 housing units (as shown in Table 3).

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

Table 3 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.

Notes: MFI=Median Family Income

4. Project Description: 2021–2029 Santa Ana Housing Element

4.2.1 Identified Housing Opportunities

The proposed 2021-2029 Housing Element focuses on accessory dwelling units (ADUs) and pipeline projects to comply with its RHNA. However, while ADUs and pipeline projects together meet the 2021-2029 RHNA, the Housing Element contains a section evaluating additional development opportunities on vacant and underutilized sites that are not being used to satisfy the RHNA, but are meant to highlight additional opportunities in the city to develop housing in the future. Table 4, *RHNA Allocation for Pipeline Projects and ADUs*, provides a summary of compliance with the RHNA, showing that the City can satisfy its RHNA by income category without the need to rezone sites for housing.

Table 4 RHNA Allocation for Pipeline Projects and ADUs

	Lower	Moderate	Above	Total
Pipeline Projects	1,144	237	5,533	6,914
Accessory Dwelling Units	492	217	14	723
Total Available	1,636	454	5,547	6,986
Total 2021-2029 RHNA	968	545	1,624	3,137
Difference	668	-91¹	3,923	4,500

Source: Santa Ana, 2021a.

Note: MFI = Median Family Income

¹ As needed, the City will transfer surplus Lower Income units to the Moderate Income units to address the 91 unit shortfall shown in the table .

The following sections provide specific information for each housing resource, including the status of environmental clearance of the pipeline projects and potential sites.

4.2.1.1 PIPELINE PROJECTS

Housing projects that have been approved, permitted, or received a certificate of occupancy after June 30, 2021 (pipeline), may be counted toward the current, 6th-cycle RHNA allocation. As shown in Table 5 *Pipeline Housing Projects*, the City documents 6,914 pipeline housing units and breaks down affordability: 443 very low , 701 low, 6 moderate, and 5,764 above moderate. The affordability is based on covenants and affordability restrictions that are part of project application or entitlement. The types of housing units are varied and include single-family detached and attached, duplexes, townhomes, condominiums, apartments, permanent supportive housing, and accessory dwelling units.

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

1

4. Project Description: 2021–2029 Santa Ana Housing Element

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

All pipeline projects were either permitted by right (and thus exempt from CEQA) or covered by an environmental clearance document, as shown in Table 5. Affordability levels for pipeline projects are all based on covenants and affordability restrictions that are part of project application or entitlement.

4.2.1.2 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 ADUs as a tool for expanding the supply of affordable housing. ADUs come in many sizes and styles.

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

As detailed in Table 6, *Accessory Dwelling Unit Projection*, the RHNA credit for the 2021-2029 housing element is 723 units, with affordability levels as follows: 181 very low-income units, 311 low-income units, 217 moderate-income units, and 14 above moderate-income units. These unit estimates are included in the next section detailing credit for the 2021-2029 RHNA.

4. Project Description: 2021–2029 Santa Ana Housing Element

Table 5 Pipeline Housing Projects and Associated CEQA Clearances

Pipeline Projects ¹	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type ²	Project Status
	Very Low (0-50% of MFI)	Low (51-80% of MFI)	Moderate (81-120% of MFI)	Above Moderate (120% above MFI)			
Westview Housing	63	21		1	A Mitigated Negative Declaration (MND) was prepared for this project	MND	Entitled
Saint Thomas 3-Lot Subdivision				3	Categorically Exempt per Section 15315 (Class 15 - Minor Land Divisions) of the CEQA Guidelines	Categorically Exempt	Site Plan Review
Main Place Residential Community @ 2727 N. Main Drive				309	An Environmental Impact Report (EIR) was prepared for this project which covers MainPlace Specific Plan	EIR	Under Construction
2700 Main Street Apartments				312	An MND will be prepared for this project	MND	Site Plan Review
Dante's North Olive Subdivision				4	Categorically Exempt per Section 15315 (Class 15 - Minor Land Divisions) of the CEQA Guidelines	Categorically Exempt	Site Plan Review
One Broadway Plaza				415	An Environmental Impact Report (EIR) was prepared for this project	EIR	Under Construction
Craftsman Residential Duplex				2	Project permitted by right, not subject to CEQA	N/A	Plan Check
The Orleans Adaptive Reuse Apartments				24	Project permitted by right, not subject to CEQA	N/A	Under Construction
Broadway Live/Work Units				3	Categorically Exempt per Section 15303 (Class 3 - New Construction or Conversion of Small Structures) of the CEQA Guidelines	Categorically Exempt	Under Construction
North Harbor Village	89			2	Covered under EIR prepared for Harbor Mixed Use Transit Corridor Specific Plan	EIR	Under Construction
Lam Residential				6	Categorically Exempt per Section 15332 (Class 32 - In-Fill Development Projects) of the CEQA Guidelines	Categorically Exempt	Plan Check
Civic Center 4-Lot Subdivision				6	Categorically Exempt per Section 15315 (Class 15 - Minor Land Divisions) of the CEQA Guidelines	Categorically Exempt	Site Plan Review
Habitat for Humanity			2		Project permitted by right, not subject to CEQA	N/A	Site Plan Review

4. Project Description: 2021–2029 Santa Ana Housing Element

Table 5 Pipeline Housing Projects and Associated CEQA Clearances

Pipeline Projects ¹	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type ²	Project Status
	Very Low (0-50% of MFI)	Low (51-80% of MFI)	Moderate (81-120% of MFI)	Above Moderate (120% above MFI)			
Central Pointe				644	Covered under EIR prepared for Metro East Mixed-Use Overlay Zone	EIR	Entitled
Innovative Housing Opportunities Mixed-Use (South)		80			Covered under EIR prepared for Metro East Mixed-Use Overlay Zone	EIR	Site Plan Review
Innovative Housing Opportunities Mixed-Use (North)		80			Covered under EIR prepared for Metro East Mixed-Use Overlay Zone	EIR	Site Plan Review
West Fifth Villas				8	Covered under EIR prepared for Harbor Mixed Use Transit Corridor Specific Plan	EIR	Entitled
Bewley Townhomes				10	An MND was prepared for this project	MND	Entitled
John Le 5-Unit Development				5	Project permitted by right, not subject to CEQA	N/A	Plan Check
Bewley Townhomes 2				17	Project permitted by right, not subject to CEQA	N/A	Entitled
Hue-Vo Two Unit Development				2	Project permitted by right, not subject to CEQA	N/A	Site Plan Review
Fifth and Harbor Mixed-Use Apartments				94	Covered under EIR prepared for Harbor Mixed Use Transit Corridor Specific Plan	EIR	Entitled
Crossroads at Washington	85			1	Covered under EIR prepared for Transit Zoning Code / Specific Development No. 84 (SD-84)	EIR	Entitled
Midros LLC Train Station Lofts				5	Covered under EIR prepared for Transit Zoning Code / Specific Development No. 84 (SD-84)	EIR	Built
Legacy Square Mixed-Use Development	75	17		1	An MND was prepared for this project	MND	Under Construction
Bui 8-Unit Development				8	An MND was prepared for this project	MND	Plan Check
Francis Xavier/ FX Residences	16			1	Covered under EIR prepared for Transit Zoning Code / Specific Development No. 84 (SD-84)	EIR	Under Construction

4. Project Description: 2021–2029 Santa Ana Housing Element

Table 5 Pipeline Housing Projects and Associated CEQA Clearances

Pipeline Projects ¹	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type ²	Project Status
	Very Low (0-50% of MFI)	Low (51-80% of MFI)	Moderate (81-120% of MFI)	Above Moderate (120% above MFI)			
3rd & Broadway	19			152	An Addendum to EIR for SD-84 was prepared for this project	EIR	Entitled
4th and Mortimer (Block A)				99	An Addendum to EIR for SD-84 was prepared for this project	EIR	Entitled
4th and Mortimer (Block B)				70	An Addendum to EIR for SD-84 was prepared for this project	EIR	Entitled
First American Mixed-Use Development	11			209	An Addendum to EIR for SD-84 was prepared for this project	EIR	Under Construction
Lacy Crossing Development				117	Covered under EIR prepared for Transit Zoning Code / Specific Development No. 84 (SD-84)	EIR	Under Construction
Madison Project				260	An EIR was prepared for this project	EIR	Entitled
AMG First Point Family Apartments	56	491		5	Covered under EIR prepared for Metro East Mixed-Use Overlay Zone	EIR	Under Construction
610 Newhope Condos				9	An MND was prepared for this project	MND	Under Construction
Nguyen McFadden 6-Unit Development				6	Project permitted by right, not subject to CEQA	N/A	Site Plan Review
King Street Five Home Subdivision				5	Categorically Exempt per Section 15332 (Class 32 - In-Fill Development Projects) of the CEQA Guidelines	Categorically Exempt	Under Construction
Elan Mixed-Use Development				603	Covered under EIR prepared for Metro East Mixed-Use Overlay Zone	EIR	Under Construction
City Ventures Townhomes				23	Covered under EIR prepared for Harbor Mixed Use Transit Corridor Specific Plan	EIR	Site Plan Review
Haphan Housing				18	An MND was prepared for this project	MND	Plan Check

4. Project Description: 2021–2029 Santa Ana Housing Element

Table 5 Pipeline Housing Projects and Associated CEQA Clearances

Pipeline Projects ¹	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type ²	Project Status
	Very Low (0-50% of MFI)	Low (51-80% of MFI)	Moderate (81-120% of MFI)	Above Moderate (120% above MFI)			
Our Lady of Guadalupe Office/Residence				1	Categorically Exempt per Section 15303 (Class 3 - New Construction or Conversion of Small Structures) of the CEQA Guidelines	Categorically Exempt	Entitled
Redhill/Warner				1100	An EIR was prepared for this project (SCH# 2019080011)	EIR	Entitled
Legado at the MET				278	An MND was prepared for this project	MND	Plan Check
Legacy Sunflower				226	An MND was prepared for this project	MND	Under Construction
322 N. Harbor		4		18	Covered under EIR prepared for Harbor Mixed Use Transit Corridor Specific Plan (SCH#2013061027)	EIR	Site Plan Review
Wisepace	28				Exempt per Section 15194 (Affordable Housing Exemption)	Exempt	Entitled
The Westerly	86				Covered under EIR prepared for Metro East Mixed-Use Overlay Zone (SCH# 2006031041).	EIR	Site Plan Review
Warmington		8		43	Exempt per Section 15194 (Affordable Housing Exemption)	Exempt	Site Plan Review
4 th and Grand	1			15	Covered under EIR prepared for Transit Zoning Code / Specific Development No. 84 (SD-84) (SCH#2006071100)	EIR	Site Plan Review
Cabrillo Crossing			4	31	Covered under EIR prepared for Metro East Mixed-Use Overlay Zone (SCH# 2006031041).	EIR	Site Plan Review
Cabrillo Town Center					Covered under EIR prepared for Metro East Mixed-Use Overlay Zone (SCH# 2006031041).	EIR	Site Plan Review
Total	443	701	6	6914			

Source: Santa Ana, 2021b, 2022a.

¹ Pipeline projects include projects that were 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 All CEQA clearances analyze the environmental impacts of the respective general plan and zoning regulations as applicable.

4. Project Description: 2021–2029 Santa Ana Housing Element

Table 6 Accessory Dwelling Unit Projection

Accessory Dwelling Unit Projection	Very Low	Low	Moderate	Above	Total
Accessory Dwelling Units / Junior Accessory Dwelling Units - Citywide	181	311	217	14	723

4.2.1.3 ADDITIONAL LAND USE INVENTORY SUITABLE FOR RESIDENTIAL

As shown in Table 5, *RHNA Allocation for Pipeline Projects and ADUs*, the housing credits identified satisfy the RHNA requirement in its entirety and provides surplus opportunities in each income category. The identified pipeline projects and ADU projections totaling 7,637 units would provide 4,500 units over the required 3,137 RHNA. In addition, however, the Housing Element highlights additional development opportunities on vacant and underutilized sites to further housing options in the community. The Housing Element does not utilize these sites to satisfy the RHNA.

Housing Element Table C-3, *Vacant and Underutilized Land Summary* highlights additional development opportunities on vacant and underutilized sites within the Harbor Corridor Plan and Transit Zoning Code areas, totaling 68 potential units. The potential units identified are consistent with the General Plan land use designation and existing zoning for the respective project sites. Therefore, it is anticipated that they would fall under the scope of the GPU Program EIR which would provide environmental clearance for these future units.

4. Project Description: 2021–2029 Santa Ana Housing Element

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5. Environmental Review: 2021–2029 Santa Ana Housing Element

5.1 EVALUATION OF ENVIRONMENTAL IMPACTS

This chapter discusses the following three conditions pursuant to CEQA Guidelines Section 15162:

Condition 1. Whether or not the proposed project represents a substantial change that will require major revisions to the negative declaration due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

Condition 2. Whether or not substantial changes in the circumstances under which the proposed project is being undertaken will require major revisions to the negative declaration due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

Condition 3. If new information shows that the proposed project would have one or more new significant effects; that significant effects would be substantially more severe than previously described; that mitigation measures or alternatives previously found not to be feasible would be feasible and substantially reduce impacts, but project proponents decline to adopt them; or that new or previously rejected mitigation measures or alternatives would be feasible and would substantially reduce one or more project impacts, but project proponents decline to adopt them.

If none of the above conditions is met, the analysis identifies where impacts of the 2021-2029 Housing Element would result in a less than significant impact or no impact.

5.1.1 Housing Element Components

The proposed 2021-2029 Housing Element has been reviewed to determine whether any of the three conditions described above would trigger the potential for a new significant or more severe significant impact, to the environment, and therefore, trigger the requirement for additional review under CEQA. Much of the 2021-2029 Housing Element documents the socioeconomic and demographic makeup of the city, past trends related to fair housing, current regulations for housing and similar uses, and the performance of the city's past housing programs. This information is purely a restatement of historical patterns and the existing setting. Additionally, the goals and policies of the housing element are planning tools that do not propose any physical development. The only two sections of the element that reflect potential physical changes are the Housing Plan and the Housing Resources sections.

5. Environmental Review: 2021–2029 Santa Ana Housing Element

5.1.1.1 HOUSING PLAN

Based on the Housing Element Framework, a series of goals and policies, the Housing Plan sets forth numerous implementation programs. The Housing Plan also quantifies the objectives of the Housing Element, including quantified goals for each affordability levels for the following:

- New Housing Construction (RHNA)
- Single Family Housing Rehabilitation
- Acquisition and/or Rehabilitation
- Preservation of At-Risk Units
- Rental Assistance
- Homeowner Assistance

An implementation plan as summarized in Housing Element Table 2, *Housing Implementation Summary*, describes specific actions and the responsible agency, funding and time frame for the respective program. The individual programs are:

- Housing Rehabilitation
- Neighborhood Initiatives
- Community Building
- Code Enforcement
- Historic Preservation
- Housing Supply
- Building Design
- Housing Incentive
- Rental Assistance
- Housing Preservation
- Homeownership Assistance
- People with Disabilities
- People Who Are Homeless
- Senior Housing
- Housing for Families
- Fair Housing Services

Most of these programs are continuations, and/or slight modifications/improvements from the previous Housing Element (2014-2021). As previously noted, the previous Housing Element was incorporated into the 2021 GPU and its PEIR. The program updates do not introduce major changes that would have the potential to result in new, significant, environmental impacts. Moreover, the programs would not directly approve new physical changes to the environment that could result in significant impacts. The programs are primarily financial, coordination, and planning activities. Any related physical disturbance to the environment would be subject to individual CEQA review. The Housing Plan, therefore, would not result in new significant, or more severe significant impacts than addressed in the GPU Program EIR.

5. Environmental Review: 2021–2029 Santa Ana Housing Element

5.1.1.2 HOUSING RESOURCES

Section 4.2.1 details the three primary strategies in the Housing Resources section of the 2021-2029 Housing Element used to address the City's RHNA. The strategy focuses on Pipeline Projects and ADUs. Additional developable and vacant properties that would provide residential development opportunities are available, but not required to achieve the City's RHNA.

Table 6, *Pipeline Housing Projects and Associated CEQA Clearances* details the pipeline projects that may be counted toward the current planning cycle's RHNA allocation. As shown in Table 6, all pipeline projects have either been addressed through approved CEQA documentation, or approved by right. Mitigation within the respective CEQA documents, where applicable, mitigates impacts to the extent feasible. These projects are consistent with the land use designations and allowed densities as evaluated in the GPU Program EIR. As such, in addition to their individual CEQA clearances, each of these projects was included in the comprehensive environmental analysis included in the GPU Program EIR and is therefore, also included in the cumulative environmental analysis and findings Citywide.

The total ADU development is also within the scope of the buildout assumptions for the GPU Program EIR. Specific environmental clearance, however, is no longer required for ADU development. With the approval of SB 35 in September 2017, the Government Code was modified to stipulate that approval of ADUs shall be considered a ministerial action, not subject to discretion. Ministerial actions are exempt from CEQA. Moreover, the 723 projected ADUs would be distributed across the city and assumed to be developed within previously disturbed lands, with no potential to create substantial environmental impacts.

The potential developable housing sites for the 2021-2029 Housing Element are all in the TZC and HCP and, as noted under Section 4.2.1.3, are supported by the 2014 Harbor Blvd. Mixed Use Transit Corridor Plan EIR; the 2010 Transit Zoning Code (SD 84A and SD 84B) EIR. These sites are already designated and zoned to accommodate the housing units. Mitigation within the respective CEQA documents, where applicable, mitigates impacts to the extent feasible. Development of the parcels identified in the Housing Element for an additional 68 units (see Section 4.2.1.3, *Additional Land Use Inventory Suitable for Residential*) would be consistent with the General Plan land use designations for these sites, and therefore, the potential impacts associated with residential development is addressed in the GPU Program EIR. CEQA Changes Since the 2014 IS/ND

In 2019, the CEQA Guidelines were amended to shift the analysis of transportation impacts from a level of service (LOS) analysis to a vehicle miles traveled (VMT) analysis. LOS review is focused on a project's contribution to the amount of vehicle delay, or traffic, in its surrounding area. The amended guidelines stated that vehicle delay will no longer be considered a significant environmental impact. Instead, transportation analyses must study the amount and distance of automobile travel attributable to a project to encourage greenhouse gas reduction and promote dense infill development. The amendment also added energy and wildfire impacts as new topics in the CEQA Guidelines Appendix G.

The EIRs for the HCP, TZC, and the 2014 Housing Element IS/ND did not include these new CEQA amendments, although some of the newer CEQA clearances shown in Table 6 did. However, the 2021-2029 Housing Element would not result in significant impacts related to these new topics and significance thresholds.

5. Environmental Review: 2021–2029 Santa Ana Housing Element

Almost all the city is within a Transit Priority Area² or an area with low VMT, precluding a requirement to analyze VMT (SCAG 2021). Transit in the city consists of Orange County Transportation Authority bus service, Southern California Regional Rail commuter and passenger rail service, and Amtrak passenger rail. Furthermore, none of the city is in a wildfire area. The nearest Fire Hazard Severity Zone to the city is about 3.8 miles at the southern tip of the Peters Canyon Regional Park (CAL FIRE 2021). No area in the city is a wildland-urban interface (UWM 2010). Additionally, prior to the 2019 amendment, the CEQA Guidelines included Appendix F, *Energy Conservation*, that outlined energy impact possibilities and potential conservation measures designed to assist in the evaluation of potential energy impacts of proposed projects. This appendix was functionally replaced by the new energy thresholds in the Appendix G checklist. Energy use and conservation were addressed in CEQA documents prepared prior to the 2019 amendment either in a section that discussed the elements of Appendix F or in the utilities and service system section.

² Transit Priority Areas are areas within one-half mile of an existing or planned major transit stop or along a high-quality transit corridor. A major transit stop means a site containing a bus transit station, or the intersection of two or more major bus routes with a service frequency of 15 minutes or less during the peak morning and evening peak hours. High-quality transit corridor means a corridor with fixed bus route service with a service frequency of 15 minutes or less during the peak morning and evening peak hours

6. Conclusion

This Addendum was prepared to substantiate that implementation of the 2021-2029 Housing Element would not result in conditions requiring a supplemental or subsequent EIR. It would not result in new significant impacts in comparison to the certified GPU Program EIR. Moreover, all of the pipeline projects identified to achieve the RHNA have already been environmentally cleared under CEQA. The remaining RHNA is proposed to be met with ADUs that will be ministerial approvals and exempt from CEQA (per SB35 adopted in September 2017). The detail provided substantiates that the housing programs do not have the potential to result in physical environmental impacts, and that the housing inventory can be met with a combination of pipeline projects and ADUs. Compliance with the mitigation measures in the respective EIRs would substantially mitigate project impacts, and development consistent with the 2021-2029 Housing Element and general plan designation would not have the potential to result in new significant or more substantially severe environmental impacts.

6. Conclusion

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7. List of Preparers

7.1 PLACEWORKS

JoAnn Hadfield, Principal

Dina El Chammas Gass, Senior Associate I

7.2 CITY OF SANTA ANA

Ricardo Soto, Senior Planner

Jerry Guevara, Associate Planner

7. List of Preparers

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