

December 2021 | Addendum to the 2014-2021 Santa Ana  
Housing Element and Public Safety Element Initial Study  
State Clearinghouse No. 2013111008

# 2021-2029 Santa Ana Housing Element Addendum

City of Santa Ana

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# 1. Introduction and Background

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## 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 changes proposed by and analyzes the potential impacts of the 2021-2029 Santa Ana Housing Element and any changes to the existing conditions since the City adopted the Initial Study/Negative Declaration (State Clearinghouse [SCH] No. 2013111008) for the 2014-2021 Santa Ana Housing Element and Public Safety Element Updates, which was adopted on February 11, 2014. 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 2014 Initial Study/Negative Declaration (2014 IS/ND), and no substantial changes in circumstances under the California Environmental Quality Act (CEQA) Guidelines Section 15162(a)(2) have occurred since the adoption of the 2014 IS/ND 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 2014 IS/ND. 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

In addition, no information that was not known and could not have been known at the time of the 2014 IS/ND 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 impact of the 2014-2021 Housing Element but are 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 2014 IS/ND. In accordance with CEQA Guidelines Sections 15148 and 15150, this Addendum incorporates the 2014 IS/ND (and its constituent parts) by reference. A summary of the 2014 IS/ND is provided in Section 3, *Project Description: 2014-2021 Santa Ana Housing Element*. 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.

**Section 3. Project Description: 2014-2021 Santa Ana Housing Element.** Includes a description of the 2014-21 Housing Element, its components, its Regional Housing Needs Assessment (RHNA) requirements and allocations, and a summary of the findings of the environmental analysis.

**Section 4. 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.

## 1. Introduction

**Section 5. Environmental Review: 2021-2029 Santa Ana Housing Element.** Identifies changes made to the 2014-21 Housing Element that have the potential to result in physical environmental impacts and analyzes the impacts of those changes.

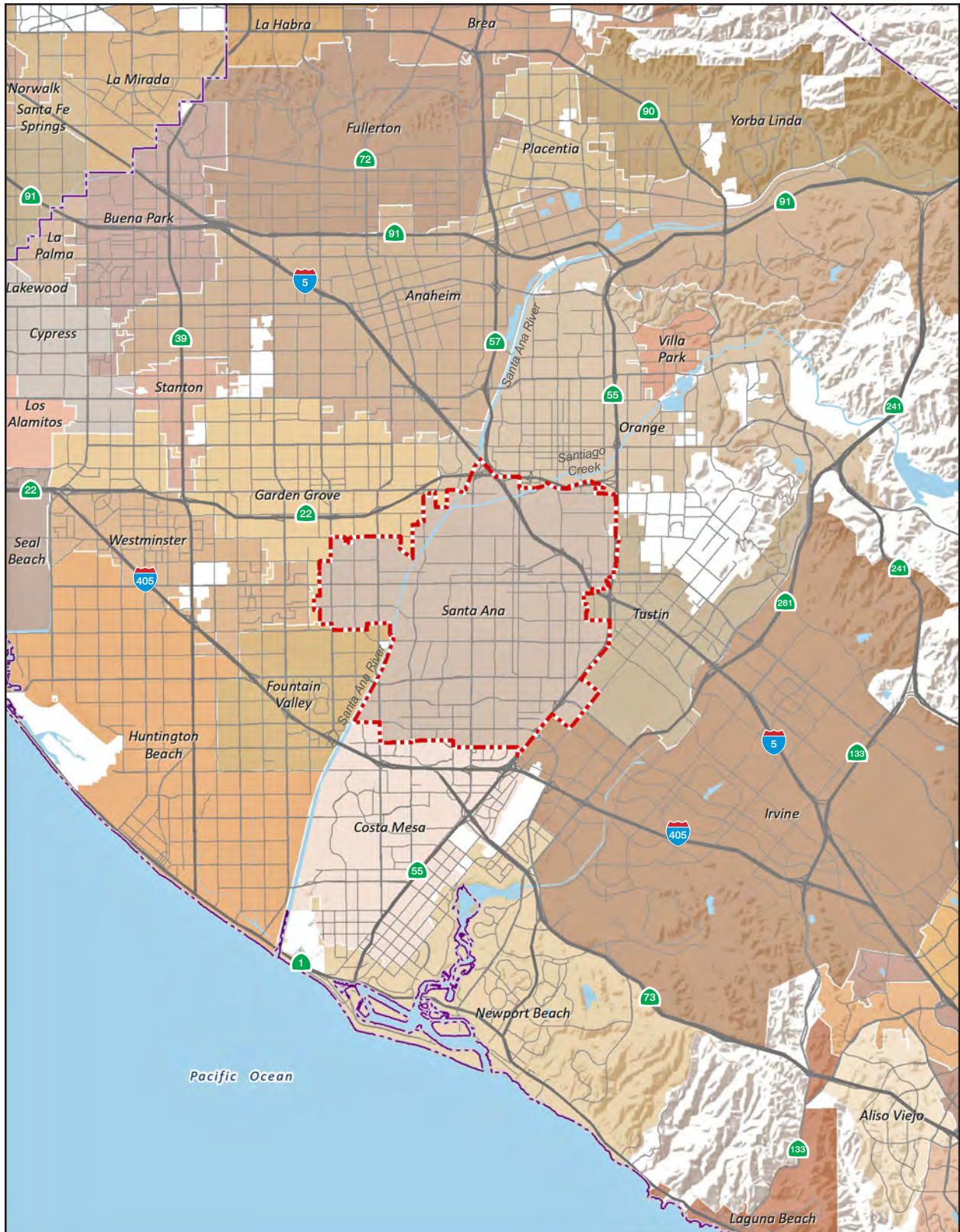
**Section 6. Conclusion.** Summarizes the findings of the environmental review and substantiates the preparation of an Addendum for the 2021-29 Housing Element.

## 1. Introduction

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Figure 1 - Regional Location  
1. Introduction



--- City of Santa Ana

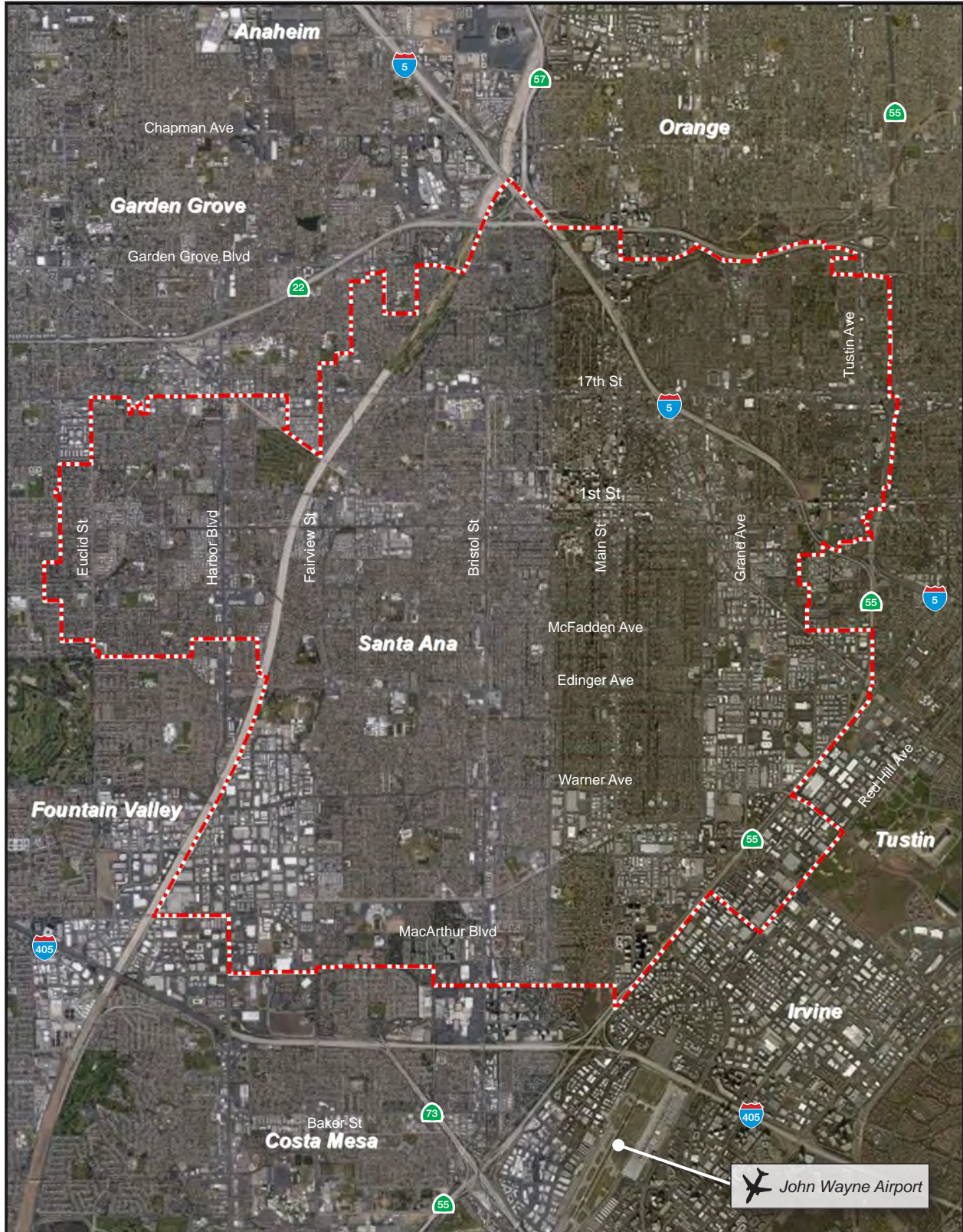


Source: ESRI, 2020

## 1. Introduction

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Figure 2 - Citywide Aerial  
1. Introduction



--- City of Santa Ana



Source: ESRI, 2020

## 1. Introduction

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## 2. CEQA Requirements

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### 2.1 PURPOSE OF AN ADDENDUM

This document is an Addendum to the previously adopted Initial Study/Negative Declaration (IS/ND) (State Clearinghouse [SCH] No. 2013111008) for the 2014-2021 Santa Ana Housing Element and Public Safety Element Updates. The purpose of this Addendum is to evaluate whether the 2021-2029 Santa Ana Housing Element would modify the previous housing element 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. This Addendum does not address the Safety Element portion of the previous IS/ND because there is no proposed update to the Safety Element.

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 2014 IS/ND 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

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 2014 IS/ND 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 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:

## 2. CEQA Requirements

- (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.
- (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.

## 2. CEQA Requirements

- (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 2014 IS/ND for the 2014-2021 Housing Element 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 2014-2021 Housing Element, 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 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 2014 IS/ND 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 2014 IS/ND.

## 2. CEQA Requirements

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## 3. Project Description: 2014–2021 Santa Ana Housing Element

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Incorporated in 1886, the city of Santa Ana has a rich historical and cultural heritage. It is the county seat, and it boasts an eclectic urban environment, burgeoning employment centers, transit hub, historic neighborhoods and downtown, and a rich history dating back to the mid-1800s. These features distinguish Santa Ana as “Orange County’s downtown.” With a current population exceeding 300,000 residents, the City ranks among the largest and most densely populated in California, and is one of the youngest by age in the County. California law requires that cities develop housing programs to meet their fair share of housing needs for the community. A key part of this goal is addressing the RHNA and state law requirements to plan, facilitate, and encourage housing production commensurate with their assigned need. The 2014-2021 Housing Element satisfied state requirements to address the eight-year planning period of 2014-2021.

The vision, goals, policies, and programs of the 2014-2021 Housing Element were designed to address the following issues:

- Adapting to changing housing market conditions.
- Meeting state-mandated regional housing needs goals.
- Furthering quality housing and neighborhoods.
- Accommodating social and economic diversity.
- Assisting residents with special housing needs.
- Supporting the city’s long-term economic development.

### 3.1 COMPONENTS OF THE 2014-2021 SANTA ANA HOUSING ELEMENT

State law prescribes the scope and content of the housing element pursuant to Section 65583 of the California Government Code. To comply with State law at the time the 2014-2021 Housing Element was prepared, the following components were included:<sup>1</sup>

- **Housing Element Framework.** This section introduced Santa Ana’s housing needs and contained an analysis of resources to address those needs. This was followed by the Policy Framework, which was a series of goals and policies, and a Housing Plan of implementation programs.

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<sup>1</sup> Section 65583 of the California Government Codes has since been segmented as described in Section 4.1 of this Addendum.

### 3. Project Description: 2014–2021 Santa Ana Housing Element

- **Appendix A: Housing Needs.** This appendix contained an analysis of demographic, economic, neighborhood, and housing characteristics; special needs of residents; and other housing needs in the community.
- **Appendix B: Housing Constraints.** This appendix contained an analysis of potential and actual market, government, and environmental constraints to the development, maintenance, and improvement of housing.
- **Appendix C: Housing Resources.** This appendix contained an inventory, analysis, and assessment of the City’s resources to address its housing needs, including land, preservation opportunities, and financial resources.
- **Appendix D: Program Evaluation.** This appendix contained a summary of progress toward meeting the City’s 2006–2014 housing goals and an evaluation of the appropriateness of those goals and programs.
- **Appendix E: Public Outreach.** This appendix detailed the venues provided to residents and stakeholders to discuss housing needs and opportunities, including workshops, stakeholders groups, study sessions, and visioning.

#### 3.1.1 Regional Housing Needs Assessment

The Southern California Association of Governments (SCAG) prepares housing construction needs goals for each city in Southern California as part of the RHNA. State law requires all local governments to identify sufficient land, adopt programs, and provide funding, to the extent feasible, to facilitate and encourage housing production commensurate with that need.

The City’s 2014-21 RHNA was 204 housing units. Within this housing goal, the City was required to plan for four income and affordability goals: very low, low, moderate, and above moderate. Table 1 categorizes the 204 units by these income levels.

**Table 1      2014-2021 RHNA Housing Needs Allocation**

Affordability Level	Number of Units
Very Low	45
Low	32
Moderate	37
Above Moderate	90
<b>TOTAL</b>	<b>204</b>

Source: Santa Ana 2013.

##### 3.1.1.1 2006-2014 RHNA CARRYOVER

In accordance with state law, the 2014-2021 Housing Element also addresses the RHNA that was not accommodated through rezoning in the previous planning period (January 1, 2006, to June 30, 2014). Of the 2006–2014 RHNA of 3,393 units, the 2009 Housing Element identified the potential to accommodate 2,406

### 3. Project Description: 2014–2021 Santa Ana Housing Element

units through construction, approval, and vacant or underutilized land adequately zoned for housing. The City had a remaining RHNA balance of 987 lower income units, which were to be accommodated through rezoning of vacant or underutilized land. The City did not need to rezone any land to accommodate moderate or above moderate income RHNA.

After the 2006-2014 Housing Element’s adoption in 2009, 292 additional affordable units were constructed or approved (or were pending approval) that were not identified in the housing element. Additionally, the City adopted the Transit Zoning Code in 2010, which provided the necessary zoning and density levels to accommodate up to 494 lower income units in accordance with Section 65583.2(c)(3)(b) of the California Government Code. Therefore, the City was able to reduce its RHNA-required housing by 786 units, leaving the City with a RHNA balance of 201 lower income units that needed to be accounted for (111 very low and 90 low income level units).

Carrying over the remaining 201 units required under the 2006-2014 RHNA, Table 2 reflects the total number of housing units that were needed to achieve both the 2006-2014 and 2014-2021 RHNA requirements. The table also categorizes the remaining housing units needed based on affordability level. The 2014-2021 Housing Element needed to accommodate a combined RHNA of 405 units to meet the 2014-2021 RHNA goals.

**Table 2 Regional Housing Needs Allocation 2014–2021**

	Very Low (0–50% of MFI)	Low (51–80% of MFI)	Moderate (81–120% of MFI)	Above Moderate (120% above MFI)	Total
2014–2021 RHNA	45	32	37	90	204
Carryover 2006– 2014 RHNA	111	90	0	0	201
<b>Combined RHNA</b>	<b>156</b>	<b>122</b>	<b>37</b>	<b>90</b>	<b>405</b>

Source: Santa Ana 2013.  
Note: Household goals based on 2010 Census County Median Family Income (\$83,735).

#### 3.1.1.2 AVAILABLE LAND FOR HOUSING

The 2014-2021 Housing Element included an inventory of land suitable for residential development that could accommodate the City’s RHNA (405 units). The assessment identified the Metro East Mixed Use Overlay Zone (MEMU), the Harbor Corridor Specific Plan (HCP), transit corridors along First Street and Fifth Street, and Transit Zoning Code (TZC) areas as areas that could accommodate RHNA-required housing. Table 3 identifies the menu of development areas that the City determined would be more than sufficient to accommodate the remaining RHNA allocation. The ultimate residential capacity of these areas was much larger than the remaining RHNA. However, to be conservative, the City only projected a portion of the development potential for the 2014-2021 planning period.

**Table 3 2014–2021 Development Potential Summary**

	Metro East Mixed Use Overlay Zone	Harbor Corridor Specific Plan	Fifth Street	First Street	TZC	Total

### 3. Project Description: 2014–2021 Santa Ana Housing Element

Total Acres	21.35	305	14.44	25.56	450	<b>816.35</b>
Density Range (du/ac)	25–98	5–50	23–35	23–35	5–90	--
Density Assumed (du/ac)	45	20–30	30	30	7–45	--
Residential Units	964	500 <sup>1</sup>	428	767	500	<b>3,159</b>

Source: Santa Ana 2013.

<sup>1</sup>. Approximately 10 acres are reserved exclusively for residential development at a minimum density of 20 units per acre.

#### 3.1.2 Housing Programs

The goals and policies of the 2014-2021 Housing Element were implemented through programs designed to encourage the maintenance, improvement, development, and conservation of housing and neighborhoods in the community. These programs were organized into functional groupings that relate to specific goals. However, in many cases a program achieves multiple goals and policies.

The programs were organized into the following four functional groupings that relate to specific goals:

- **Housing and Neighborhoods.** These programs aimed to provide financial assistance for home rehabilitation and repair, improve neighborhood infrastructure and health initiatives, and promote community-building initiative such as neighborhood safety programs. Code enforcement and historic preservation programs were also included.
- **Housing Supply and Diversity.** These programs related to planning efforts such as the establishment of the TZC, the MEMU, District Centers, the HCP, and updates to the General Plan and Zoning Ordinance. Also included were programs related to building design guidelines and development reviews, the development of a Green Building policy, and housing and regulatory incentives.
- **Housing Assistance.** These programs included rental assistance, housing preservation, and homeownership assistance.
- **Special Needs Housing.** These programs related to housing and service needs for people with disabilities, people who are homeless, seniors, and large families. Programs related to fair housing services were also included.

Many of these programs were ongoing from the 2006-2014 Housing Element and have been carried over to the 2021-2029 Housing Element.

### 3. Project Description: 2014–2021 Santa Ana Housing Element

## 3.2 APPROACH TO ENVIRONMENTAL ANALYSIS

The 2014-2021 Housing Element concluded that the entire 405-unit RHNA requirement could be met with housing opportunities identified in the MEMU, TZC, and Harbor Corridor Specific Plan. Of these, only the Harbor Corridor Specific Plan required a general plan amendment and zone change. Plans were adopted for both MEMU and TZC, and both were supported by EIRs (the 2007 City of Santa Ana Metro East Mixed Use Overlay Zone EIR [SCH No. 2006031041] and the 2010 Transit Zoning Code [SD 84A and SD 84B] EIR [SCH No. 2006071100]). At the time of the 2014-2021 Housing Element preparation, an EIR was under preparation for the Harbor Corridor Specific Plan and the project was anticipated to be approved in early 2014. It was anticipated that environmental review and any associated mitigation measure requirements would be in place for housing development within any of the three sites that together could accommodate the total 405-unit RHNA requirement.

The 2014-2021 Housing Element update identified Fifth Street and First Street as potential, future sites for affordable housing development. These sites would require general plan amendments and zone changes to allow residential development. At that time, such land use changes were not in process. Since these sites were not needed to achieve the RHNA, the potential environmental impact for those sites were not reviewed in any detail within the 2014 IS/ND. The IS/ND concluded that new housing development on those sites would be subject to future, project-specific review under CEQA at the time of a development proposal.

## 3.3 ENVIRONMENTAL ANALYSIS FINDINGS

The City of Santa Ana circulated the 2014 IS/ND for public review from November 4, 2013, to December 3, 2013. The 2014 IS/ND addressed the potential impacts of the proposed 2014-2021 Santa Ana Housing Element, including the impacts related to developing available properties to accommodate the 405 RHNA units.

Two environmental categories were found to have no impacts:

- Agriculture and Forestry Resources
- Mineral Resources

The 15 remaining environmental categories were found to have less than significant impacts upon implementation of existing regulations and standard conditions of approval. No CEQA mitigation was required for::

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning

### 3. Project Description: 2014–2021 Santa Ana Housing Element

- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

No environmental categories were found to have significant impacts requiring mitigation.

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

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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 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.

In terms of assessing housing opportunities within the City of Santa Ana, the new legislation resulted in two changes compared to the 2014-2021 Housing Element:

- In evaluating potential sites for suitability, agricultural lands could no longer be considered vacant land. However, there are no such sites in the City's inventory.
- Sites used in prior planning periods must allow development with 20 percent affordable housing by right. This would apply to some parcels in the City's inventory, but it does not increase the parcels' development potential; it is just a requirement to facilitate affordable housing on a site that already permits housing with no change in intensity required.

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.

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

- **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.
- **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 RHNA allocated by SCAG for the 2021-2029 planning period is 3,137 housing units (as shown in Table 4).

**Table 4 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

Source: Santa Ana, 2021a.  
Notes: MFI = Median Family Income

#### 4.2.1 Identified Housing Opportunities

The three primary strategies in the Housing Resources section used to address the City’s 2021-2029 RHNA allocation are pipeline projects, accessory dwelling units (ADU), and developable parcels with appropriate zoning. Collectively, through the pipeline housing units and projected ADUs, two of the four RHNA allocation



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

categories will be met, and only the very low-income (remaining 102 units) and moderate-income (remaining 232 units) need to be planned for and accommodated during this planning cycle by identifying housing opportunity sites (see Table 5). The City documents approximately 21 developable parcels that can accommodate a total of 838 units to meet the very low-income and moderate-income RHNA allocation needs.

**Table 5 RHNA Allocation for Pipeline Projects and ADUs**

	Very Low (0-50% of MFI)	Low (51-80% of MFI)	Moderate (81-120% of MFI)	Above Moderate (120% above MFI)
Pipeline Projects	414	689	205	4,861
Accessory Dwelling Units	90	155	108	7
<b>Total Available</b>	<b>504</b>	<b>844</b>	<b>313</b>	<b>4,868</b>
<b>Total 2021-2029 RHNA</b>	<b>606</b>	<b>362</b>	<b>545</b>	<b>1,624</b>
<b>Difference</b>	<b>-102</b>	<b>482</b>	<b>-232</b>	<b>3,224</b>

Source: Santa Ana, 2021a.

Notes: MFI = Median Family Income

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 6, the City documents 6,169 pipeline housing units and breaks down affordability: 414 very low (281 extremely low), 689 low, 2 moderate, and 5,064 above moderate. The affordability is based on covenants and affordability restrictions that are part of project application or entitlement.

Furthermore, a survey of rental rates of approximately 1,500 recently built multifamily units and rent projections for developments that are currently being constructed 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 sufficient to create units in the moderate-income category, with the expectation that this trend is to continue. Applying the 4 percent ratio that is drawn from the survey outcome to the total above-moderate income pipeline units (5,064) results in approximately 203 of those units being rented in the moderate-income income affordability category for a total of 205 units for moderate income units and 4,861 for above moderate units (as shown in Table 5).

All pipeline projects were either permitted by right (and thus exempt from CEQA) or covered by an environmental clearance document, as shown in Table 6. Affordability levels for pipeline projects are all based on covenants and affordability restrictions that are part of project application or entitlement.

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

### **4.2.1.2 ACCESSORY DWELLING UNITS**

The City projects the number of ADUs that will be constructed during the planning period, as shown in Table 5. The total ADU projection of 360 units is based on a conservative estimate (64 percent) of the past four-year average of 70 permitted ADUs per year, multiplied by the number of years in the planning period . The affordable category projections are based on the study prepared by SCAG on ADU affordability for Orange County that found the following percentages of units fell into each respective affordability category: 25 percent very low; 43 percent low, 30 percent moderate; and 2 percent above moderate. Per state law, ADUs are permitted by right and thus exempt from CEQA. The cumulative number of projected ADUs (360) is expected to be distributed across the city’s 64 residential neighborhoods and represent an incremental amount of growth.

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**Table 6 Pipeline Housing Projects and Associated CEQA Clearances**

Pipeline Projects <sup>1</sup>	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type <sup>2</sup>	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 6 Pipeline Housing Projects and Associated CEQA Clearances**

Pipeline Projects <sup>1</sup>	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type <sup>2</sup>	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 6 Pipeline Housing Projects and Associated CEQA Clearances**

Pipeline Projects <sup>1</sup>	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type <sup>2</sup>	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 6 Pipeline Housing Projects and Associated CEQA Clearances**

Pipeline Projects <sup>1</sup>	Affordability Level				Environmental Analysis/CEQA Compliance	Document Type <sup>2</sup>	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
<b>Total</b>	<b>414</b>	<b>689</b>	<b>2</b>	<b>5,064<sup>2</sup></b>			

Source: Santa Ana, 2021b.

<sup>1</sup> 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.

<sup>2</sup> All CEQA clearances analyze the environmental impacts of the respective general plan and zoning regulations as applicable.

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### 4.2.1.3 POTENTIAL SITES

The City documents approximately 21 parcels, which can accommodate a total of 838 units, with the appropriate zoning needed to demonstrate the capacity to accommodate the remaining RHNA allocation. The identified parcels are within three planning areas: 7 parcels regulated by the MEMU District, 12 parcels regulated by the HCP, and 2 parcels regulated by the TZC.

#### Metro East Mixed Use Overlay

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

The City has identified 14.16 acres of underutilized land that could accommodate a minimum of 637 units (see Table 7 and Figure 3, *Potential Housing Sites in the Metro East Overlay*). These sites were chosen based on their vacant status or highly underutilized nature, recent residential development interest expressed for several of the parcels, historical location within a former redevelopment project area, proximity to transit lines, and site characteristics.

**Table 7 Vacant and Underutilized Land in the Metro East Mixed-Use Overlay**

Exhibit Key	Acres	Parcel Address	Potential Units <sup>1</sup>	Site Use	Existing Zoning/GP
1a	0.50	1814 East 1st Street	23	Vacant	C1-OZ1-DC
1b	0.87	1818 East 1st Street	39	Vacant	C1-OZ1-DC
<b>Site 1</b>	<b>1.37</b>		<b>62</b>		
2	3.72	2020 East 1st Street	167	Office Building	C1-OZ1-DC
<b>Site 2</b>	<b>1.32</b>		<b>167</b>		
3a	2.29	525 Cabrillo Park Drive	103	Office Building	P-OZ1-DC
3b	2.62	515 Cabrillo Park Drive	117	Office Building	P-OZ1-DC
3c	2.39	1901 East 4th Street	108	Office Building	P-OZ1-DC
3d	1.77	1971 East 4th Street	80	Office Building	P-OZ1-DC
<b>Site 3</b>	<b>9.07</b>		<b>408</b>		
<b>Total</b>	<b>14.16</b>		<b>637</b>		

Source: Santa Ana, 2021.

Notes: C1 = Community Commercial, P = Professional, OZ1 = Metro East Mixed Use Overlay Zone, DC = District Center

<sup>1</sup> Based on multiplying 45 units per acre by the site acreage. Figures subject to rounding.

Development on all these parcels is already permitted by their respective general plan and zoning regulations and addressed in the approved 2007 City of Santa Ana Metro East Mixed Use Overlay Zone EIR and 2018 Subsequent EIR for the Metro Mixed-Use Overlay District Expansion and Elan Development Projects (SCH

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

No. 2006031041). That EIR addressed the environmental impacts of the respective general plan and zoning regulations. No rezoning will be required to accommodate the City’s RHNA allocation within the MEMU boundaries. All the required zoning is currently in place and has been addressed by prior planning efforts and associated environmental clearances.

### Harbor Corridor Specific Plan

The HCP was adopted in 2014. Orange County’s first bus rapid transit (BRT) service opened Route 543 along Harbor Boulevard in June 2013, with two more BRT lines expected to open in the coming years. A combination of vacant and underutilized land, current and future transit improvements, and nearby freeway access makes Harbor Boulevard an ideal candidate for new residential development opportunities. The City has identified a potential of up to 4,600 units that could be built on 305 acres along Harbor Boulevard. While this plan guides and emphasizes mixed-use development, one of the plan policies requires that at least 10.1 acres of land be zoned exclusively for residential to accommodate all income levels. The plan’s focus on transit supports higher density uses at transit nodes, with lower densities serving as transitions to adjacent existing residential neighborhoods. The City has identified 4.42 acres of underutilized land that could accommodate 133 units (see Table 8 and Figure 4, *Potential Housing Sites Along Harbor Boulevard*).

**Table 8 Vacant and Underutilized Land in the Harbor Corridor Specific Plan Area**

Exhibit Key	Acres	Parcel Address	Potential Units	Site Use	Existing Zoning/GP
1a	1.18	205 South Harbor Boulevard	35	Auto Sales	SP2/UN
1b	0.29	125 South Harbor Boulevard	9	Auto Services	SP2/UN
<b>Site 1</b>	<b>1.47</b>		<b>44</b>		
2a	0.15	206 North Figueroa Street	5	Auto Services	SP2/UN
2b	0.15	202 North Figueroa Street	5	Auto Services	SP2/UN
2c	0.3	114 North Figueroa Street	9	Vacant	SP2/DC
2d	0.28	3709 West Bolsa Avenue	8	Vacant	SP2/DC
2e	0.42	101 North Harbor Boulevard	13	Vacant	SP2/DC
2f	0.35	115 North Harbor Boulevard	11	Vacant	SP2/DC
2g	0.21	121 North Harbor Boulevard	6	Vacant	SP2/DC
2h	0.12	201 North Harbor Boulevard	4	Auto Services	SP2/UN
2i	0.12	205 North Harbor Boulevard	4	Auto Services	SP2/UN
<b>Site 2</b>	<b>2.1</b>		<b>63</b>		
3a	0.85	1521 North Harbor Boulevard	26	Vacant	SP2/DC
<b>Site 3</b>	<b>0.85</b>		<b>26</b>		
<b>Total</b>	<b>4.42</b>		<b>133</b>		

Source: Santa Ana, 2021.

Notes: SP2 = Harbor Mixed Use Transit Corridor Specific Plan, UN= Urban Neighborhood, DC = District Center

<sup>1</sup> Based on multiplying 30 units per acre by the site acreage. Figures subject to rounding.



Figure 3 - Potential Housing Sites in the Metro East Overlay  
1. Introduction



- Potential Housing Sites (3)
- - - City Boundary

0 575  
Scale (Feet)

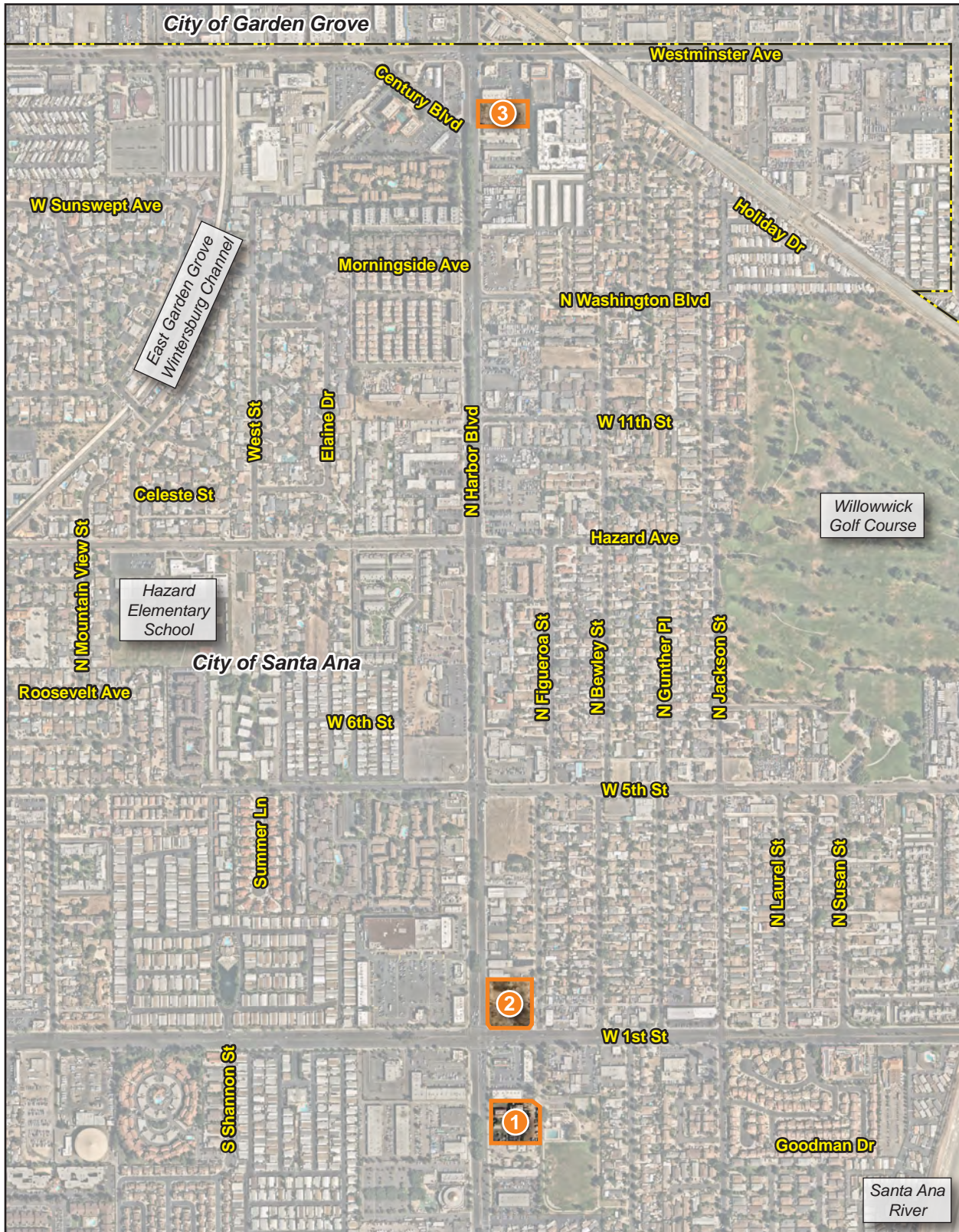


Source: Nearmap, 2021; City of Santa Ana General Plan Housing Element, 2021-2029

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

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Figure 4 - Potential Housing Sites along Harbor Boulevard  
1. Introduction



— Potential Housing Sites (3)

— City Boundary

0 800  
Scale (Feet)



Source: Nearmap, 2021; City of Santa Ana General Plan Housing Element, 2021-2029

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

Development on all these parcels is already permitted by their respective general plan and zoning regulations and addressed through the approved 2014 Harbor Blvd. Mixed Use Transit Corridor Plan EIR (SCH No. 2013061027). That EIR addressed the environmental impacts of the respective general plan and zoning regulations. Additionally, some of these parcels were previously included in the 2014 IS/ND. No rezoning will be required to accommodate the City’s RHNA allocation within the HCP area. All the required zoning is currently in place and has been addressed by prior planning efforts and associated environmental clearances.

### Transit Zoning Code

The City adopted the TZC in 2010 and updated some development standards in the plan in 2019. The TZC guides development in the central urban core of Santa Ana and consists of more than 450 acres. Recent developments in this area highlight the opportunities for both market rate and affordable residential projects. The TZC was also designed to provide the zoning necessary to support the long-term development of a transit program. The integration of the OC Streetcar, which is slated to be completed in 2022, runs through the center of the plan area and connects neighborhoods to Downtown and the Santa Ana Regional Transit Center. The OC Streetcar will strengthen existing neighborhoods and allow for a mix of uses and a variety of housing types. Based on existing buildout, the TZC could accommodate up to 4,075 housing units. The City has identified 2.25 acres of underutilized land that could accommodate 68 units (see Table 9 and Figure 5, *Potential Housing Sites in the Transit Zoning Code Area*).

**Table 9 Vacant and Underutilized Land in the Transit Zoning Code Area**

Exhibit Key	Acres	Parcel Address	Potential Units	Site Use	Existing Zoning/GP
1b	0.16	South-East Corner of East Santa Ana Boulevard and Fuller Street	5	Parking Lot	SD84/DC
1d	2.09	1143 East Fruit Street	63	Warehouse/Parking lot	SD84/DC
<b>Site 1</b>	<b>2.25</b>		<b>68</b>		
<b>Total</b>	<b>2.25</b>		<b>68</b>		

Source: Santa Ana, 2021.

Notes: SD84 = Specific Development No. 84 – Transit Zoning Code, DC = District Center

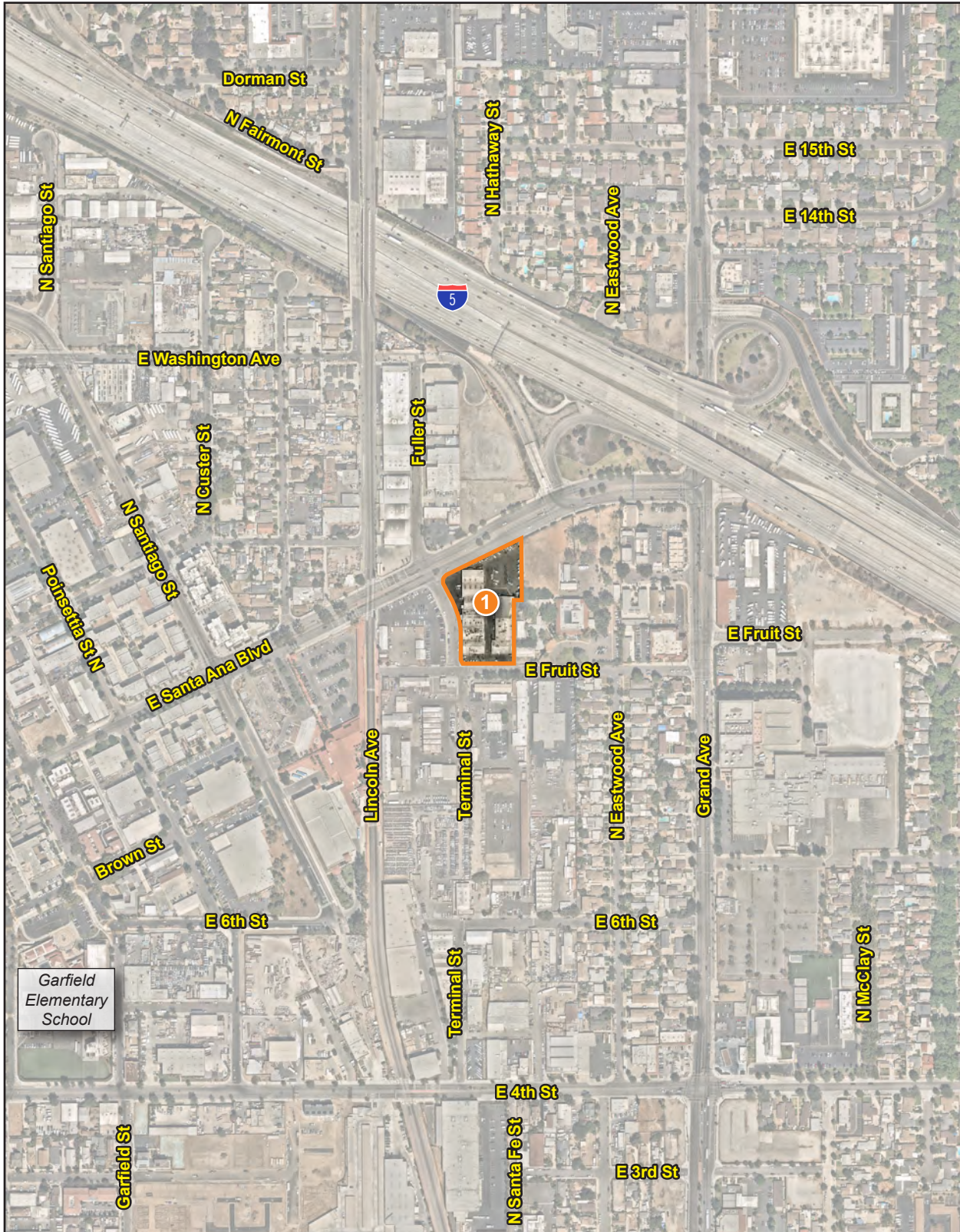
<sup>1</sup> Based on multiplying 30 units per acre by the site acreage. Figures subject to rounding.

Development on all these parcels is already permitted by their respective general plan and zoning regulations and addressed through the approved 2010 Transit Zoning Code (SD 84A and SD 84B) EIR (SCH No. 2006071100). That EIR addressed the environmental impacts of the respective general plan and zoning regulations. Additionally, some of these parcels were previously included in the 2014 IS/ND. No rezoning will be required to accommodate the City’s RHNA allocation within the TZC area. All the required zoning is currently in place and has been addressed by prior planning efforts and associated environmental clearances.

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Figure 5 - Potential Housing Sites in the Transit Zoning Code Area  
1. Introduction



— Potential Housing Site (1)

0 575  
Scale (Feet)



Source: Nearmap, 2021; City of Santa Ana General Plan Housing Element, 2021-2029

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

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

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## 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.

Most 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.

Section 5.2, *Housing Plan Changes*, discusses changes that were made to the 2014-2021 Housing Element's Housing Plan for the 2021-2029 Housing Element and any potential environmental impacts associated with these changes. The section concludes that the changes do not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Section 5.3, *Housing Resources Changes*, demonstrates that the development of new housing projects and proposed housing sites identified in

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

the Housing Resources section of the 2021-2029 Housing Element would also not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

### 5.1.1 Housing Plan Changes

CEQA requires the City to evaluate the potential impacts associated with physical direct or indirect changes to the environment. In this instance, most of the programs from the 2014-2021 Housing Element’s Housing Plan are continued to the 2021-2029 Housing Element. Table 10 includes the changes in programs between the existing 2014–2021 Housing Element and the proposed 2021–2029 Housing Element and assesses potential environmental impacts due to these changes.

As shown in Table 10, changes made to the programs in the 2021-2029 Housing Element’s Housing Plan only serve to make development more efficient and effective but would not approve more development beyond what was already allowed. Therefore, the changes made to the Housing Plan section do not have the potential to result in physical environmental impacts and would not result in a new significant environmental effect or a substantial increase in the severity of previously identified significant effects when compared to the 2014-2021 Housing Element.

**Table 10 Summary of Program Changes Between Existing Housing Element and Proposed 2021–2029 Housing Element**

Program	Continue/ Modify/ Delete	Potential Environmental Impacts
<b>Housing Rehabilitation</b>		
<ul style="list-style-type: none"> <li>• Single-Family Home Rehabilitation</li> <li>• Mobile Home Repair</li> <li>• Multi-Family Rental Rehabilitation</li> </ul>	Modify Modify Modify	These programs relate to the provision of financial assistance for home rehabilitation and repair with slight variations in funding amounts and financial assistance type. These programs do not propose any specific physical changes, and changes would not result in physical environmental impacts.
<b>Neighborhood Initiative</b>		
<ul style="list-style-type: none"> <li>• Neighborhood Improvement</li> <li>• Neighborhood Infrastructure</li> <li>• Healthy Neighborhood Initiatives</li> </ul>	Continue Continue Modify	The only change to these programs is a commitment to updating the City’s zoning code to buffer sensitive residential receptors from industrial uses. This action does not propose any specific physical changes; thus, this would not result HSP in a new significant environmental effect or a substantial increase in the severity of previously identified significant effects.
<b>Community Building</b>		
<ul style="list-style-type: none"> <li>• Santa Ana Building Healthy Communities</li> <li>• Building Community Efforts</li> <li>• Neighborhood Safety</li> </ul>	Continue Continue Modify	A new housing amnesty program was added to the 2021-2029 Housing Element. This program entails facilitating legalization of unpermitted units to address potential life safety issues. This program proposes actions that would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
<b>Code Enforcement</b>		
<ul style="list-style-type: none"> <li>• Property Maintenance Standards</li> <li>• Proactive Rental Enforcement (PREP)</li> <li>• Residential Response Team (RRT)</li> </ul>	Modify Modify Continue	A new program encouraging interaction between the public and the Orange County Health Department was added to the 2021-2029 Housing Element. None of these actions would result in physical changes that would result in physical environmental impacts.

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**Table 10 Summary of Program Changes Between Existing Housing Element and Proposed 2021–2029 Housing Element**

Program	Continue/ Modify/ Delete	Potential Environmental Impacts
<b>Historic Preservation</b>		
<ul style="list-style-type: none"> <li>• Historic Program and Ordinance</li> <li>• Historic Home Rehabilitation Incentive</li> <li>• Historic Neighborhood Preservation</li> </ul>	Continue Modify Continue	The “Historic Home Rehabilitation Incentive” is modified in the 2021-2029 Housing Element. Changes are associated with the type of funding sources the City should seek and the establishment of a new fee reduction or waiver program for low-income applicants. These actions do not propose any specific physical changes and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
<b>Housing Supply</b>		
<ul style="list-style-type: none"> <li>• Transit Zoning Code</li> <li>• Metro East Mixed-use Overlay Zone</li> <li>• Urban Villages</li> <li>• Harbor Mixed-use Transit Corridor</li> <li>• Comprehensive General Plan Update</li> <li>• Zoning Ordinance Update</li> </ul>	Continue Continue Modify Continue Continue Continue	The “Urban Villages” program was changed to encourage development of mixed-use housing in District Centers and Urban Neighborhood areas. The 2014-2021 Housing Element did not include Urban Neighborhood areas in this program. The program also includes a possible amendment of Urban Neighborhood and District Center boundaries to allow for new residential products that meet City housing goals and policies. This program upholds plans, policies, and regulations already in place and addresses modification and updates to various regulatory language but does not propose specific changes. Therefore, it would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
<b>Building Design</b>		
<ul style="list-style-type: none"> <li>• Building Design Guidelines</li> <li>• Development Review</li> </ul>	Ongoing Ongoing	The 2021-2029 Housing Element does not include any changes to these programs.
<b>Housing Incentive</b>		
<ul style="list-style-type: none"> <li>• Affordable Housing Incentives</li> <li>• Extremely Low-income Housing</li> <li>• Successor Housing Agency</li> <li>• Density Bonus Ordinance Update</li> <li>• Housing Opportunity Ordinance</li> <li>• Adaptive Reuse</li> <li>• Specific Development District</li> <li>• Variety in Household Sizes Program</li> <li>• Parking Study and Management</li> </ul>	Ongoing Modify Modify Modify Modify Modify Modify Ongoing Modify	The 2021-2029 Housing Element includes additional actions to these programs, including applying for additional funding to support the production of affordable housing for extremely-low income households, providing and leveraging Successor Housing Agency funds with other sources of funding, providing information to developers on opportunities to develop affordable housing, and considering the expansion of structures eligible for adaptive reuse. None of these actions propose any specific physical changes. Additionally, actions relating to the implementation of a parking study and the improvement of parking management were added and also do not propose any specific physical changes.  The scope of the “Housing Opportunity Ordinance” program was modified, and a provision for the collection of in-lieu fees to support production and/or rehabilitation of affordable housing was added. These modifications do not propose specific physical changes and would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

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

**Table 10 Summary of Program Changes Between Existing Housing Element and Proposed 2021–2029 Housing Element**

Program	Continue/ Modify/ Delete	Potential Environmental Impacts
<b>Rental Assistance</b>		
<ul style="list-style-type: none"> <li>Housing Choice Voucher</li> <li>Family Self-Sufficiency</li> </ul>	<p>Ongoing</p> <p>Ongoing</p>	The 2021-2029 Housing Element does not include any changes to these programs.
<b>Housing Preservation</b>		
<ul style="list-style-type: none"> <li>Preservation of At-Risk Housing</li> <li>Multiple-Family Housing Acquisition and Rehabilitation</li> <li>Local Housing</li> </ul>	<p>Ongoing</p> <p>Ongoing</p> <p>Modify</p>	The "Local Housing" program was modified to include actions to enhance the affordable housing market, adopt a rent stabilization ordinance, and identify and implement a regulatory framework and administrative structure to implement residential stabilization. None of these actions propose any specific physical changes; thus, this would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
<b>Homeownership Assistance</b>		
<ul style="list-style-type: none"> <li>Down Payment Assistance</li> <li>Homeownership Partners</li> </ul>	<p>Modify</p> <p>Modify</p>	The 2021-2029 Housing Element includes actions that modified the maximum amounts for loans and included new actions to review the down payment assistance program and identify funding and partnerships for the program. None of these actions propose any specific physical changes; thus, this would not result in new reasonably foreseeable physical environmental impacts.
<b>People with Disabilities</b>		
<ul style="list-style-type: none"> <li>Care Facilities</li> <li>Housing for People with Disabilities, including Developmental Disabilities</li> <li>Accessible Housing</li> </ul>	<p>Ongoing</p> <p>Modify</p> <p>Ongoing</p>	The 2021-2029 Housing Element includes additional actions to these programs including working with affordable housing developers and the Regional Center of Orange County to expand independent living options and reviewing and endorsing grant opportunities. None of these actions propose any specific physical changes; thus, this would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
<b>People Who Are Homeless</b>		
<ul style="list-style-type: none"> <li>Emergency Shelters and Transitional Housing</li> <li>Permanent Supportive Housing</li> <li>Supportive Services</li> </ul>	<p>Ongoing</p> <p>Modify</p> <p>Ongoing</p>	The 2021-2029 Housing Element includes a new "Permanent Supportive Housing" program to provide funding and technical assistance to provide permanent supporting housing for people experiencing homelessness, and to continue efforts to address homeless youth. The program does not propose any physical changes. Consequently, it would not result in new environmental impacts.
<b>Senior Housing</b>		
<ul style="list-style-type: none"> <li>Housing Facilities</li> <li>Senior Life Care Facilities</li> <li>Senior Services</li> </ul>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	The 2021-2029 Housing Element does not include any changes to these programs.
<b>Housing for Families</b>		
<ul style="list-style-type: none"> <li>Family Housing</li> <li>Child Care Options</li> <li>Multi-Generational Housing and Accessory Dwelling Units</li> </ul>	<p>Modify</p> <p>Ongoing</p> <p>Modify</p>	The changes made to these programs are associated with the provision of financial assistance, the creation of an ADU preapproved plan program, creation of a web page, exploring opportunities for funding, and collaborating with local jurisdiction. These modifications do not propose any physical changes.

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

**Table 10 Summary of Program Changes Between Existing Housing Element and Proposed 2021–2029 Housing Element**

Program	Continue/ Modify/ Delete	Potential Environmental Impacts
		Consequently, they would not result in physical environmental impacts.
<b>Fair Housing Services</b>		
<ul style="list-style-type: none"> <li>Fair Housing</li> <li>Reducing Second-Hand Smoke</li> </ul>	Modify Ongoing	The changes made to these programs are associated with holding workshops and partnering with legal assistance organizations. These modifications do not propose any physical changes. Consequently, they would not result in physical environmental impacts.
Sources: Santa Ana, 2021a; Santa Ana 2014.		

### 5.1.2 Housing Resources Changes

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 three strategies are pipeline projects, ADUs, and developable parcels with appropriate zoning.

The RHNA requirement for the 2014-2021 Housing Element was met with housing opportunities identified in the MEMU, TZC, and HCP—with EIRs certified for all three areas by the time housing development for the 2014-2021 planning period was anticipated to begin. These EIRs, as referenced in the 2014 IS/ND, remain applicable for the pipeline projects and potential sites noted in Tables 6, 7, 8, and 9.

Table 6 details the pipeline projects that may be counted toward the current 6<sup>th</sup> planning cycle’s RHNA allocation. As shown in Table 6, all pipeline projects have either been addressed through approved CEQA documentation, including those identified in the 2014 IS/ND, or approved by right. Mitigation within the respective CEQA documents, where applicable, mitigates impacts to the extent feasible.

ADUs were not included as a housing opportunity in the inventory for the 2014-2021 Housing Element. 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 360 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 MEMU, TZC, and HCP and, as noted under Section 4.2.1.3, are supported by the 2007 City of Santa Ana Metro East Mixed Use Overlay Zone EIR; the 2018 Subsequent EIR for the Metro Mixed-Use Overlay District Expansion; the 2014 Harbor Blvd. Mixed Use Transit Corridor Plan EIR; the 2010 Transit Zoning Code (SD 84A and SD 84B) EIR; or the 2014 IS/ND. 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.

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

### 5.1.3 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 MEMU, HCP, TZC, and the 2014 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. Almost all the city is within a Transit Priority Area<sup>2</sup> 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.

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<sup>2</sup> 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

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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 previous 2014-2021 Housing Element as evaluated in the 2014 Initial Study/Negative Declaration for that project. The components of both housing elements are reviewed with respect to their potential to result in environmental impacts. A comparison of the RHNA units environmentally cleared in the 2014 IS/ND and a detailed description of the inventory proposed to achieve the 2021-2029 RHNA are provided along with the CEQA clearances that are already in place for most of the units. 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, ADUs, and new projects in identified project sites that do not require general plan amendments or zone changes and are already covered by certified EIRs. 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

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## 8. References

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- California Department of Forestry and Fire Prevention (CAL FIRE). 2021, December 15 (accessed). Fire Hazard Severity Zone Viewer. <https://egis.fire.ca.gov/FHSZ/>.
- Santa Ana, City of. 2013. 2014-2021 Santa Ana Housing Element and Public Safety Element Updates Initial Study (SCH No. 2013111008).
- . 2014. City of Santa Ana General Plan Housing Element 2014-2021. <https://www.santa-ana.org/sites/default/files/Housing%20Element.pdf>.
- . 2021a. City of Santa Ana General Plan Housing Element 2021-2029. [https://www.santa-ana.org/sites/default/files/pb/planning/Housing%20Element/City%20of%20Santa%20Ana%206th%20Cycle%20\(2021-2029\)%20Draft%20Housing%20Element%2010.21.2021%20Web.pdf](https://www.santa-ana.org/sites/default/files/pb/planning/Housing%20Element/City%20of%20Santa%20Ana%206th%20Cycle%20(2021-2029)%20Draft%20Housing%20Element%2010.21.2021%20Web.pdf).
- . 2021b, November 30. Email correspondence with Melanie McCann, Principal Planner, City of Santa Ana Planning Division.
- Southern California Association of Governments (SCAG). 2021, December 15 (accessed). High Quality Transit Areas (HQTAs) 2045 – SCAG Region. [https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deacb369a513ca1\\_1/explore?location=34.153037%2C-117.742800%2C9.51](https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deacb369a513ca1_1/explore?location=34.153037%2C-117.742800%2C9.51).
- University of Wisconsin-Madison (UWM). 2010. Wildland-Urban Interface (WUI) Change 1990-2010. <http://silvis.forest.wisc.edu/data/wui-change/>.

## 8. References

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