

5. Environmental Analysis

5.13 POPULATION AND HOUSING

This section of the updated Draft Program Environmental Impact Report (PEIR) examines the potential for population and housing impacts of the proposed General Plan Update (GPU) in the City of Santa Ana and its sphere of influence (plan area), including changes in population, employment, and demand for housing, particularly housing cost/rent ranges defined as “affordable.” The analysis in this section is based, in part, on sources of information from:

- United States Census Bureau
- California Department of Finance
- Orange County Council of Governments

5.13.1 Environmental Setting

5.13.1.1 REGULATORY BACKGROUND

State

California Housing Element Law

California planning and zoning law requires each city and county to adopt a general plan for future growth (California Government Code Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department (HCD) estimates the relative share of California’s projected population growth in each county based on California Department of Finance (DOF) population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments (COG), the HCD provides the RHNA to the council. The council then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares gives cities and counties the opportunity to comment on the proposed allocations. The HCD oversees the process to ensure that the council of governments distributes its share of the state’s projected housing need.

State law recognizes the vital role local governments play in the supply and affordability of housing, and California Government Code requires that the housing element achieve legislative goals to:

- Identify adequate sites to facilitate and encourage the development, maintenance, and improvement of housing for households of all economic levels, including persons with disabilities.
- Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for persons of all incomes, including those with disabilities.
- Assist in the development of adequate housing to meet the needs of low- and moderate-income households.

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- Conserve and improve the condition of housing and neighborhoods, including existing affordable housing.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Preserve for lower income households the publicly assisted multifamily housing developments in each community.

California housing element law (Sections 65580 to 65589 of the California Government Code) requires that each city and county identify and analyze existing and projected housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs.

Housing Accountability Act

The Housing Accountability Act (HAA) requires that cities approve applications for residential development that are consistent with a city's general plan and zoning code development standards without reducing the proposed density. Examples of objective standards are those that are measurable and have clear criteria that are determined in advance, such as numerical setback, height limit, universal design, lot coverage requirement, or parking requirement. Under the HAA, an applicant is entitled to the full density allowed by the zoning and/or general plan provided the project complies with all objective general plan, zoning, and subdivision standards and provided that the full density proposed does not result in a specific, adverse impact on public health and safety and cannot be mitigated in any other way.

Amendment to the Housing Accountability Act (AB 678)

AB 678 amends the HAA by increasing the documentation and standard of proof required for a local agency to legally defend its denial of low- to moderate-income housing development projects. This bill, if the local agency considers the housing development project to be inconsistent, not in compliance, or not in conformity, would require the local agency to provide the applicant with written documentation identifying the provision or provisions, and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity within specified time periods. If the local agency fails to provide this documentation, the housing development project would be deemed consistent, compliant, and in conformity with the applicable plan, program, policy, ordinance, standard, requirement, or other similar provision.

Reasonable Person Standard (AB 1515)

This bill specifies that a housing development project is deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision if there is substantial evidence that would allow a reasonable person to conclude that the housing development project or emergency shelter is consistent, compliant, or in conformity. This bill added additional findings related to the Housing Accountability Act in this regard.

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Regional

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) represents Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. It is a regional planning agency and serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment.

SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted in April 2016 (SCAG 2016). Major themes in the 2016 RTP/SCS include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increasing capacity through improved systems managements; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce and economic growth and opportunity; promoting the links between public health, environmental protection, and economic opportunity; and incorporating the principles of social equity and environmental justice.

Local

City of Santa Ana Housing Element

To comply with state law, Santa Ana prepares a housing element every five years. 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. Santa Ana has adopted a series of implementation tools—specific plans, overlay zones, and other plans—to guide future development in focused areas. These include the Metro East Mixed-Use Overlay Zone, Transit Zoning Code, Specific Development Districts, and similar efforts. The housing element is designed to serve as an overarching policy document that bridges specific implementation plans with the goals and policies in the general plan. The housing element provides a guiding framework for housing citywide, and specific implementation tools provide guidance for specific areas of the city.

City of Santa Ana Housing Opportunity Ordinance

The Housing Opportunity Ordinance (HOO) establishes standards and procedures to encourage the development of housing that is affordable to a range of households with varying income levels. The purpose of the ordinance is to encourage the development and availability of affordable housing by requiring the inclusion of affordable housing units within new developments or the conversion of rental units to condominium ownership when the number of units exceed the densities permitted under the General Plan.

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5.13.1.2 EXISTING CONDITIONS

Methodology

The plan area's demographics are examined in the context of existing and projected population for the Orange County region and the City of Santa Ana. Information on population, housing, and employment for the planning area is available from several sources:

- **California Department of Finance.** The DOF prepares and administers California's annual budget. Other duties include estimating population demographics and enrollment projections. DOF's Table E-5, "City/County Population and Housing Estimates," reports on population and housing estimates for the state, counties, and cities, benchmarked to base year 2010.
- **Orange County Council of Governments.** Employment, housing, and population projections data for 2016-2045 for the 2018 Orange County Projections dataset were prepared by the Center for Demographic Research (CDR). The CDR is the entity through which jurisdictions in Orange County distribute and generate population, housing, and employment projections for Orange County. This includes the use of Orange County Projection figures to communicate expected growth for the regional transportation plan.
- **United States Census Bureau.** The official United States Census is described in Article I, Section 2 of the Constitution of the United States. It calls for an actual enumeration of the people every 10 years, to be used for apportionment among the states of seats in the House of Representatives. The United States Census Bureau publishes population and household data gathered in the decennial census.

Population Trends

Table 5.13-1 shows population growth trends in Santa Ana and Orange County collected by the DOF. According to the data, population steadily decreased in Santa Ana from 2000 to 2008, with no net change from 2009 to 2010. After 2011, the population increased till 2017, after which it started decreasing. Orange County has been experiencing a population increase since the year 2000. Between 2000 and 2019, Santa Ana experienced a net decrease in population of 0.1 percent. Orange County experienced a population increase of 12.4 percent during that same time.

It should be noted that the 17th Street Island area (see Figure 3-3) was not annexed into the city until November 2019, and therefore is not accounted for in the DOF numbers from the years 2005 to 2018. It should also be noted that this area is 24.79 acres, which is quite small compared to the rest of the city and consists of single family residential, multi-family residential, and commercial uses. The 17th Street Island area had a population of 275 in 2019 (LAFCO 2019).

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Table 5.13-1 Population Growth Trends in the City of Santa Ana and Orange County

Year	City of Santa		Orange County	
	Population	Percent Change	Population	Percent Change
2000	337,977	NA	2,846,289	NA
2001	337,883	0.0	2,871,926	0.9%
2002	337,077	-0.2	2,902,207	1.0%
2003	336,961	0.0	2,927,118	0.9%
2004	335,434	-0.5	2,948,135	0.7%
2005	332,878	-0.8	2,956,847	0.3%
2006	329,470	-1.0	2,956,334	0.0%
2007	326,817	-0.8	2,960,659	0.1%
2008	324,653	-0.7	2,974,321	0.5%
2009	325,564	0.3	2,990,805	0.6%
2010	324,647	-0.3	3,010,232	0.6%
2011	327,063	0.7	3,040,125	1.0%
2012	331,062	1.2	3,076,373	1.2%
2013	335,683	1.4	3,109,213	1.1%
2014	336,746	0.3	3,131,411	0.7%
2015	338,011	0.4	3,155,578	0.8%
2016	338,250	0.1	3,174,945	0.6%
2017	339,865	0.5	3,199,509	0.8%
2018	339,192	-0.2	3,213,275	0.4%
2019	334,774 ¹	-1.3	3,222,498	0.3%

Source: DOF 2012, 2019; PlaceWorks 2020.

¹ From Table 3-7 of this Draft PEIR.

Housing

Housing Trends

According to Table 5.13-2, the rate of housing growth in the city increased steadily from 2001 to 2003, after which the city experienced three years of high growth followed by lower growth rates until 2008. The city experienced its highest housing growth in the year 2009. Growth rates after 2009 stabilized at an average of 0.3 percent. Orange County’s housing grew at a higher rate than Santa Ana’s. Housing growth rates in Orange County dropped in the year 2006 and continued to decrease till the year 2013. From 2013 onward, the housing growth rate gradually increased. Santa Ana gained 3,975 dwelling units, and Orange County gained 134,680 dwelling units between 2000 and 2019, an increase of approximately 5.1 and 12.2 percent, respectively. Comparing Tables 5.13-1 and 5.13-2, population and housing grew in proportions with each other.

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Table 5.13-2 Housing Growth Trends in Santa Ana and Orange County

Year	City of Santa Ana		Orange County	
	Dwelling Units	Percent Change	Dwelling Units	Percent Change
2000	74,588	NA	969,484	NA
2001	74,682	0.1	977,272	0.8
2002	74,810	0.2	987,752	1.1
2003	75,173	0.5	996,832	0.9
2004	75,362	0.3	1,006,708	1.0
2005	75,673	0.4	1,017,428	1.1
2006	75,838	0.2	1,023,604	0.6
2007	75,978	0.2	1,030,692	0.7
2008	76,159	0.2	1,037,103	0.6
2009	76,686	0.7	1,042,526	0.5
2010	76,919	0.3	1,046,118	0.3
2011	76,937	0.0	1,050,157	0.4
2012	76,976	0.1	1,052,346	0.2
2013	76,991	0.0	1,056,222	0.4
2014	77,133	0.2	1,063,092	0.6
2015	77,477	0.4	1,069,645	0.6
2016	77,610	0.2	1,076,198	0.6
2017	77,891	0.4	1,084,474	0.8
2018	78,068	0.2	1,094,254	0.9
2019	78,792 ¹	0.6	1,104,164	0.9

Source: DOF 2012, 2019; PlaceWorks 2020.

¹ From Table 3-8 of this Draft PEIR.

The DOF housing numbers from the years 2000 to 2018 do not include the 17th Street Island area. In 2018 this area included 40 single-family units and 32 multifamily units and a population of 275 (Santa Ana 2018).

Existing Housing Units

Table 5.13-3 compiles the housing unit types in Santa Ana and Orange County. According to 2019 data, the majority of housing units in the city and county are single-family detached units.

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Table 5.13-3 Housing Units in Santa Ana and Orange County by Type (2019)

Type	City of Santa		Orange County	
	Number of Units	Percent	Number of Units	Percent
Single-Family Detached	35,692	45.4%	554,030	50.2%
Single-Family Attached	5,799	7.4%	131,446	11.9%
Multifamily (2–4 Units)	7,563	9.6%	94,403	8.5%
Multifamily (5 or More Units)	25,460	32.4%	290,766	26.3%
Mobile Homes	4,049	5.2%	33,519	3.0%
Totals	78,563¹	100%	1,104,164	100%
	Percent Vacant = 4.1%		Percent Vacant = 5.2%	
	Household Size = 4.42		Household Size = 3.03	

Source: DOF 2019.

¹ This number is slightly less than the number calculated by PlaceWorks and shown in Table 5.13-2.

The vacancy rate is approximately 4.1 and 5.2 percent in Santa Ana and Orange County, respectively. These vacancy rates are not abnormally high or low, which indicates that the population and number of housing units are growing at a similar pace; oversupply is not an issue.

Regional Housing Needs Assessment

Santa Ana’s RHNA for the 2014–2021 planning period is 204 units with a carryover from the previous planning period of 201 lower-income units, for a combined RHNA of 405 units divided into four income groups (as shown in Table 5.13-4).

Table 5.13-4 City of Santa Ana 2014–2021 Regional Housing Needs Assessment

Income Category	Very Low	Low	Moderate	Above Moderate	Total
2014–2021 RHNA	45	32	37	90	204
Carryover 2006–2014 RHNA	111	90	0	0	201
Combined RHNA	156	122	37	90	405

Source: Santa Ana 2014.

Employment

Employment Trends

The California Employment Development Department provides labor market statistics for the state and different geographic regions of California as a way to analyze California’s economic health. Table 5.13-5 illustrates Santa Ana and Orange County employment trends from 2013 to 2019. The city and county both experienced yearly increases in employment from 2013 until 2019. Overall, the city gained 9,400 jobs and Orange County gained 115,900 jobs between 2013 and 2019. It should be noted that the 2019 employment

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numbers include the 17th Street Island area, and the previous years did not. In 2019, there were 78 employees in 17th Street Island area.

Table 5.13-5 Employment Growth Trends in Santa Ana and Orange County

Year	City of Santa Ana		Orange County	
	Employment (Persons)	Percent Change	Employment (Persons)	Percent Change
2013	144,400	NA	1,462,400	NA
2014	146,700	1.6%	1,485,700	1.6%
2015	149,900	2.2%	1,518,000	2.2%
2016	151,900	1.3%	1,538,000	1.3%
2017	154,600	1.8%	1,562,600	1.6%
2018	153,000	1.4%	1,569,800	2.0%
2019	158,980 ¹	3.9%	1,578,300	0.5%

Source: EDD 2020; PlaceWorks 2020.

¹ From Table 3-8 of this Draft PEIR.

Existing Employment

Based on the 2014–2018 American Community Survey (ACS) conducted by the US Census Bureau, the city’s employment is organized by occupation and industry sectors shown in Table 5.13-6. According to the data, an estimated 28.5 percent of the employees in Santa Ana worked in service occupations, and 21.1 percent worked in sales and office occupations. The largest industry sector in 2018 was educational services, health care, and social assistance, which accounted for approximately 14.7 percent of civilian jobs. According to the ACS, the City of Santa Ana had an employed civilian labor force (16 years and older) of 164,903 persons in 2018. However, it should be noted that ACS survey estimates have margins of error. For example, Santa Ana’s total employed civilian labor force of 164,903 has a margin of error of $\pm 4,210$ persons. Thus, employment analysis for the Santa Ana plan area under the “Jobs-Housing Ratio” subsection uses employment data from Table 5.13-5.

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Table 5.13-6 City of Santa Ana Employment by Sector (2018)

Occupation/Industry	Number	Percent
Occupation		
Management, business, science, and arts occupations	36,499	22.1
Service occupations	47,050	28.5
Sales and office occupations	34,792	21.1
Natural resources, construction, and maintenance occupations	16,297	9.9
Production, transportation, and material moving occupations	30,294	18.4
Total	164,903	100
Industry		
Agriculture, forestry, fishing and hunting, and mining	1,850	1.1
Construction	13,945	8.5
Manufacturing	20,550	12.5
Wholesale trade	6,403	3.9
Retail trade	16,372	9.9
Transportation and warehousing, and utilities	6,956	4.2
Information	1,151	0.7
Finance and insurance, and real estate and rental and leasing	9,784	5.9
Professional, scientific, and management, and administrative and waste management services	25,633	15.5
Educational services, and health care and social assistance	24,306	14.7
Arts, entertainment, and recreation, and accommodation and food services	22,416	13.6
Other services, except public administration	12,398	7.5
Public administration	3,139	1.9
Total	164,903	100

Source: US Census 2018.

Jobs-Housing Ratio

The jobs-housing ratio is a general measure of the total number of jobs and housing units in a defined geographic area, without regard to economic constraints or individual preferences. The balance of jobs and housing in an area, in terms of the total number of jobs and housing units as well as the type of jobs versus the price of housing, has implications for mobility, air quality, and the distribution of tax revenues. The jobs-housing ratio is one indicator of a project’s effect on growth and quality of life in the project area. No ideal jobs-housing ratio is adopted in state, regional, or city policies. However, the DOF provides a quantitative definition by estimating that a healthy jobs-housing balance is one new home built for every 1.5 jobs created (Little Hoover Commission 2013).

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Jobs-housing balance in Santa Ana and Orange County, calculated from DOF, EDD, and Orange County COG data,¹ is shown in Table 5.13-7. As shown, Santa Ana is jobs-rich, with a 2018 jobs-housing ratio of 2. In comparison, Orange County has a balanced jobs-housing ratio at 1.4. Projections for 2045 are provided by Orange County COG and show that both Santa Ana's and Orange County's jobs-housing ratios are anticipated to increase from 2018 ratios to 2.1 and 1.6, respectively.

Table 5.13-7 Population and Employment Projections for Santa Ana and Orange County

	City of Santa Ana Plan Area		Orange County	
	2019	2045	2019	2045
Population	334,774	360,077	3,222,498	3,534,620
Housing Units	78,792	83,385	1,104,164	1,206,257
Employment	158,980	172,398	1,578,300	1,980,433
Jobs-Housing Ratio	2.0	2.1	1.4	1.6

Notes: The Southern California Association of Government projects population, housing units, and employment numbers for 2045 for the City based on CDR's projections. The Demographics and Growth Forecast document on which the 2020/2045 Regional Transportation Plan is based projects a population for the City of 360,100, a housing projection of 80,100, and an employment projection of 172,400 (SCAG 2020a). These numbers are very close to the numbers shown for the City in this table. Source: DOF 2019; EDD 2020; CDR 2018, 2019.

5.13.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would normally have a significant effect on the environment if the project would:

- P-1 Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- P-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

5.13.3 Regulatory Requirements and General Plan Policies

5.13.3.1 REGULATORY REQUIREMENTS

No existing regulations are applicable to population and housing impacts.

5.13.3.2 GPU POLICIES

The following are relevant policies of the Santa Ana GPU, which may contribute to reduce potential impacts to population and housing as a result of implementation of the GPU.

¹ Orange County COG data is prepared by the Center for Demographic Research (CDR).

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Conservation Element

- **Policy 1.7. Housing and Employment Opportunities:** Improve the City's jobs/housing balance ratio by supporting development that provides housing and employment opportunities to enable people to live and work in Santa Ana.

Land Use Element

- **Policy 1.2. Homeownership Opportunities:** Support innovative development policies to expand homeownership opportunities at all income levels.
- **Policy 1.5. Diverse Housing Types:** Incentivize quality infill residential development that provides a diversity of housing types and accommodates all income levels and age groups.
- **Policy 2.1. Employment Opportunities:** Provide a broad spectrum of land uses and development that offer employment opportunities for current and future Santa Ana residents.
- **Policy 2.5. Benefits of Mixed Use:** Encourage infill mixed-use development at all ranges of affordability to reduce vehicle miles travelled, improve jobs/housing balance, and promote social interaction.

Housing Element

- **Policy 2.3. Rental Housing:** Encourage the construction of rental housing for Santa Ana's residents and workforce, including a commitment to very low, low, and moderate-income residents and moderate income Santa Ana workers.
- **Policy 2.4. Diverse Housing Types:** Facilitate diverse types, prices, and sizes of housing, including single-family homes, apartments, townhomes, mixed/multiuse housing, transit-oriented housing, multigenerational housing, and live-work opportunities.
- **Policy 2.6. Affordable Component:** Pursuant to the Housing Opportunity Ordinance, require eligible rental and ownership housing projects to include at least 15 percent of the housing units as affordable for lower and moderate-income households.
- **Policy 2.8. Housing Authority-Owned Sites.:** Maximize affordable housing on Authority-owned properties that is of high quality, sustainable, and available to various income levels.

Economic Prosperity Element

- **Policy 2.5. Sufficient Industrial Land:** Ensure sufficient availability of industrial zoned properties and businesses that provide employment opportunities for the City's resident population.
- **Policy 2.7. Infrastructure as an Amenity:** Provide state-of-the-art infrastructure systems with sufficient capacity to attract emerging businesses, encourage efficient public service delivery, and foster a sustainable community.

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5.13.4 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Notice of Preparation disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

It is important to note the differences between the GPU’s buildout projections and Orange County COG projections. Buildout of Santa Ana under the GPU is not linked to a development timeline and is based on a conservative buildout of the parcels in the city as identified in the proposed land use plan.² In addition, the GPU provides policy-level guidance and does not contain specific project proposals. On the other hand, Orange County COG projections are based on annual increments to develop regional growth projections for land use and transportation planning over a 25-year horizon to the year 2045. Nevertheless, a comparison of the GPU buildout to Orange County COG’s population, housing, and employment projections does assist in providing a general context for comparison.

Impact 5.13-1: The GPU would directly induce substantial unplanned population growth [Threshold P-1]

Population increases at full buildout (to 2045) due to development in accordance with the GPU are shown in Table 5.13-8.

Table 5.13-8 General Plan Update Existing and Buildout Population

Planning Area	Existing Population	Buildout Population	Percentage Growth (%)
FOCUS AREAS	36,777	77,650	111
55 Freeway/Dyer Road	9,034	31,050	244
Grand Avenue/17th Street	2,079	7,129	243
South Bristol Street	8,390	19,176	129
South Main Street	6,970	7,643	10
West Santa Ana Boulevard	10,304	12,652	23
ALL OTHER AREAS OF THE CITY	297,997	353,979	19
CITYWIDE TOTAL¹	334,774	431,629	29

Source: Figures aggregated and projected by PlaceWorks 2020.

¹ Total population includes all individuals living in households, institutional group quarters, and non-institutional group quarters.

Population

As shown in Table 5.13-8, the forecast population in 2045 for the entire city would be 431,629. Therefore, the development pursuant to the GPU would increase the population by 29 percent within the plan area. The 55 Freeway/Dyer Road focus area would experience the highest percentage of growth at 244 percent, followed by the Grand Avenue/17th Street focus area that would experience a 243-percent growth. In total, the entire plan area would experience a population increase of 96,855 by 2045.

² Buildout to the maximum levels permitted by the proposed land use is not anticipated.

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Orange County COG’s 2045 population projection for the city is 360,077 persons (see Table 5.13-7). The city’s 2045 population growth under the GPU would be approximately 20 percent greater than the Orange County COG’s 2045 projections. Thus, the population anticipated in the plan area at full buildout of the proposed GPU would be substantial and potentially significant.

Jobs-Housing Ratio

The buildout projections and jobs-housing ratio due to development in accordance with the GPU are shown in Table 5.13-9.

Table 5.13-9 Comparison of Orange County COG 2045 and GPU Buildout Projections

	Existing Conditions (2019)	Orange County COG 2045 Projection	Full Buildout ¹
Population	334,774	360,077	431,629
Housing Units	78,792	83,385	115,053
Employment	158,980	172,398	170,416
Jobs-Housing Ratio	2.0	2.1	1.5

Source: CDR 2018, PlaceWorks 2020.

¹ From Tables 3-7 and 3-8 and of this Draft PEIR.

The GPU would result in an increase of 36,490 residential units in the city. At buildout, there would be 115,053 units. The forecast housing units at GPU buildout would exceed the Orange County COG growth projections (83,385 housing units, see Table 5.13-9) by 38 percent. It should be noted that the State of California has a shortage of housing. In 2019, Governor Newsom signed several bills aimed to address the need for more housing, including the Housing Crisis Act of 2019 (Senate Bill 330). The GPU addresses the need for additional housing to accommodate population growth in the city. Furthermore, SCAG is in the process of developing the sixth-cycle RHNA allocation plan, which will cover the planning period October 2021 through October 2029. It is planned for adoption by SCAG in October 2020. The final RHNA Allocation Methodology was adopted on March 5, 2020, and included estimated RHNA allocations for the 2021–2029 planning period. The City’s allocation is 3,087 housing units (SCAG 2020b). The Housing Element includes several policies to support a variety of housing types and densities to accommodate the requirements of the RHNA. However, even with a statewide shortage in housing and the requirements of the RHNA, exceeding the Orange County COG’s housing projection by 38 percent would be a potentially significant impact.

Furthermore, according to Table 5.13-9, Orange County COG projects the City’s jobs-housing ratio to be 2.1 in 2045. Under the GPU, development based on the GPU’s land use designations would result in a jobs-housing ratio of 1.5, which is lower than the City’s existing ratio (2.0) and the ratio projected by Orange County COG (2.1). A ratio of 1.5 would bring the City closer to a more equal distribution of employment and housing. Thus, the population growth resulting directly from the proposed GPU would be offset by the level of employment opportunity provided to the City’s residents and workers commuting into Santa Ana.

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Conclusion

Implementation of the GPU would directly induce population and employment growth in the area but would improve the jobs-housing balance in the city. Furthermore, the purpose of general plan updates is to accommodate increased growth in a responsible manner. The GPU accommodates future growth in the City by providing for infrastructure and public services to accommodate the projected growth (see Section 5.10, *Hydrology and Water Quality*, Section 5.15, *Public Services*, Section 5.17, *Transportation*, and Section 5.19, *Utilities and Service Systems*). Proposed policies under the GPU and the HOO also ensure that the City provides adequate housing choices for various income levels. For example, Policies 2.3, 2.4, 2.6, and 2.8, of the Housing Element, call for the improvement of housing to provide access to affordable housing to lower- and moderate-income households. However, the increase in population and housing units at buildout exceeds the Orange County COG projections by approximately 20 and 38 percent, respectively, and impacts are considered potentially significant.

Level of Significance Before Mitigation: Impact 5.13-1 is considered potentially significant.

Impact 5.13-2: The proposed GPU would provide more housing opportunities than currently exist. Therefore, implementation of the GPU would not displace people and/or housing. [Threshold P-2]

The purpose of the GPU is to provide orderly growth in the City of Santa Ana through the distribution, location, balance, and extent of land uses. Under the 2045 buildout scenario, the GPU would change the land use designations of ~~584,483.7~~ acres of existing nonresidential land uses to residential uses (see Table 5.13-10). The proposed land use map (see Figure 3-7) identifies land use designations for a variety of housing types and provides for additional residential opportunities in areas that currently do not allow residential uses.

Table 5.13-10 Existing and Proposed Land Use Designations

Area	Existing Residential (Acres)	GPU Residential (Acres)	Increase (Acres)
Grand Avenue/17th Street	28,929.1	119,7143.4	90,8114.3
55 Freeway/Dyer Road	018.7	044.6	025.9
South Bristol Street	16.7	85,7194.0	69,0177.3
South Main Street	455,7159.2	264.0	408,3104.8
West Santa Ana Boulevard	457,7158.3	476,9186.9	19,228.6
Balance of City	6,647,96,677.1	6,941,77,065.9	293,8388.8
		Total	584,4839.7

Note: Existing residential acreage includes multifamily residential, single-family residential, and mobile homes and trailer parks.
Proposed GPU residential acreage includes the following land use designations: Corridor Residential, Urban Neighborhood, Low-Density Residential, Low- to Medium-Density Residential, and Medium-Density Residential.

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Furthermore, pursuant to Assembly Bill X1 26,³ passed in 2011, local governments in California cannot seize private property through eminent domain for private development or economic development projects. Local governments can only seize private property through eminent domain for public works projects. Therefore, the GPU would provide more housing opportunities than currently exist and there would be no impact.

Level of Significance Before Mitigation: There would be no impact related to Impact 5.13-2.

5.13.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and GPU policies, Impact 5.13-2 would have no impact.

Without mitigation, Impact 5.13-1 would be considered **potentially significant**:

5.13.6 Mitigation Measures

Impact 5.13-1

Full buildout of the GPU would result in a population of 431,629 and the City's 2045 population growth would be approximately 20 percent greater than the Orange County COG's 2045 projections. Furthermore, the City's housing units at buildout would be 115,053, which exceeds the Orange County COG's projection by 38 percent. There are no feasible mitigation measures to mitigate the population and housing growth for the buildout of the GPU.

5.13.7 Level of Significance After Mitigation

Impact 5.13-1

Impacts would be significant and unavoidable at full buildout.

5.13.8 References

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