

INITIAL STUDY

FOR:

2014–2021 SANTA

ANA HOUSING

ELEMENT AND

PUBLIC SAFETY

ELEMENT UPDATES

prepared for:

CITY OF SANTA ANA

Contact:

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**THE PLANNING
CENTER|DC&E**

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Principal, Environmental
Services*

NOVEMBER 2013

UPDATED

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**SNT-14.0
NOVEMBER 2013
UPDATED
DECEMBER 2013**

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1. Introduction

The City of Santa Ana is proposing an update to the Housing Element of its General Plan. The Housing Element is one of the seven General Plan Elements mandated by the State of California, as articulated in Sections 65580 to 65589.8 of the Government Code. To comply with state law, Santa Ana prepares a housing element every five years or in conjunction with the release of the Regional Housing Needs Assessment (RHNA). The last Housing Element adopted for the City was in October 2009. 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 Codes. The 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 California Government Code requires that General Plans contain an integrated, consistent set of goals and policies. The Housing Element is, therefore, affected by development policies contained in other elements of the General Plan.

The City of Santa Ana, as Lead Agency for the project, is responsible for preparing environmental documentation in accordance with the California Environmental Quality Act (CEQA), as amended, to determine if approval of the discretionary actions requested could have a significant impact on the environment. This Initial Study will provide the City of Santa Ana with information to document potential impacts of the 2014-2021 Santa Ana Housing Element and Public Safety Element Updates (proposed project).

1.1 PROJECT LOCATION

Figure 1, *Regional Location*, shows the location of the City of Santa Ana in the Orange County region. Santa Ana is in Central Orange County and bordered by the cities of Orange to the north, Garden Grove to the north and west, Fountain Valley to the west and southwest, Costa Mesa to the south, Irvine to the southeast, and Tustin to the east. State Route 22 (SR-22) parallels the City on the north, Interstate 5 (I-5) and State Route 55 (SR-55) run through the northeastern corners of the City, and Interstate 405 (I-405) is just south of the City boundaries.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

The City of Santa Ana is a 27.2-square-mile area developed with a variety of urban land uses. Based on the 1998 General Plan Land Use Element, 58 percent of the land area is devoted to residential development, 15 percent to commercial uses, 14 percent to industrial, 11 percent to public and institutional uses, and 2 percent

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to public parkland and open space. 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.

1.2.2 Surrounding Land Use

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, *Local Vicinity* and Figure 3, *Aerial Photograph*.

1.3 PROJECT DESCRIPTION

The City of Santa Ana's General Plan Housing Element (Housing Element) details the City's eight-year strategy for enhancing and preserving the community's character; sets forth strategies for expanding housing opportunities for the City's various economics segments; and provides the primary policy guidance for local decision making related to housing. The Housing Element provides the implementation strategies for effectively addressing the housing needs of Santa Ana residents through the planning period that ends in 2021.

The City of Santa Ana has seen significant changes in its housing market and housing conditions during the last two decades. Housing prices tripled from 1998 to 2007 and then significantly declined with the market recession. During that time, apartment rents also continued to increase steadily. As an urban center, the revitalization of housing and neighborhoods is also a critical concern. The Housing Element recognizes the community's housing needs and the complexity of programs needed to address existing housing stock and future needs. The vision, goals, policies, and programs are designed to maintain quality housing near community amenities, diversity in housing stock, opportunities to provide housing assistance, and adequate housing for residents with special needs. The Housing Element Update would also meet state-mandated regional housing needs goals, support the City's long-term economic development, and work with other City goals and policies to further the City's long-term vision as "Downtown Orange County."

The update to the City's General Plan Housing Element consists of an updated determination of housing needs within the City and revisions to policies and programs the City would implement to address those needs. The draft 2014–2021 Housing Element identifies adequate sites for potential residential/mixed-use development that could accommodate the Regional Housing Need Assessment (RHNA) by 2021. The discretionary "project" for this Initial Study is the Housing Element, not the individual, subsequent housing development projects or required General Plan Amendments, and/or zone changes needed to implement the respective projects. This Initial Study, therefore, is not required to provide a detailed evaluation of the subsequent projects or provide mitigation for the impacts that may be associated with implementation of those projects. This Initial Study, does, however, provide an overall evaluation of the impacts that would likely occur to successfully implement the proposed Housing Element. Each individual development project, General Plan Amendment, and/or zone change required to implement the Housing Element would be subject to its own subsequent review and processing under CEQA.

Figure 1 Regional Location



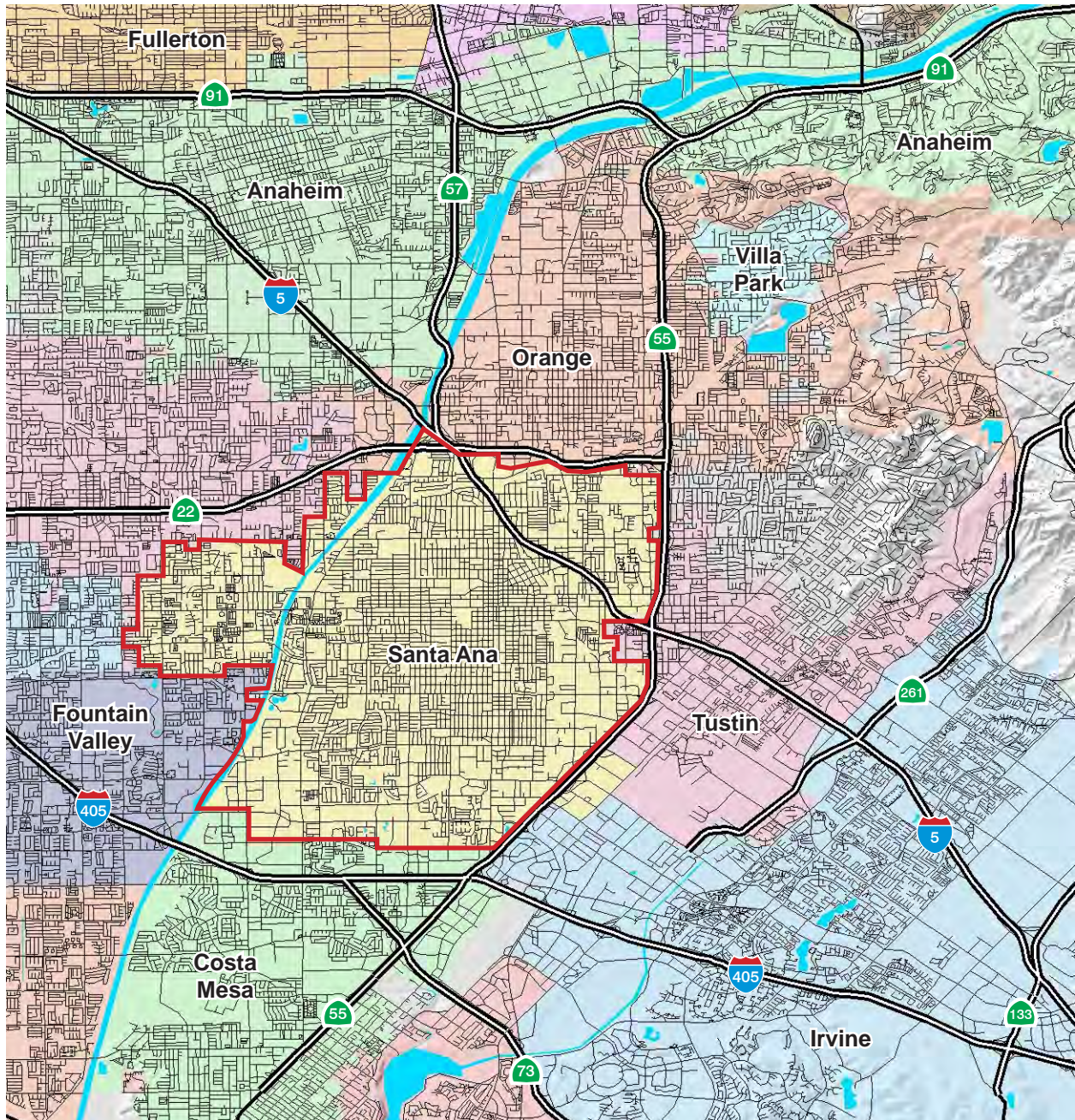
— City Boundary



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Figure 2 Local Vicinity



— City Boundary

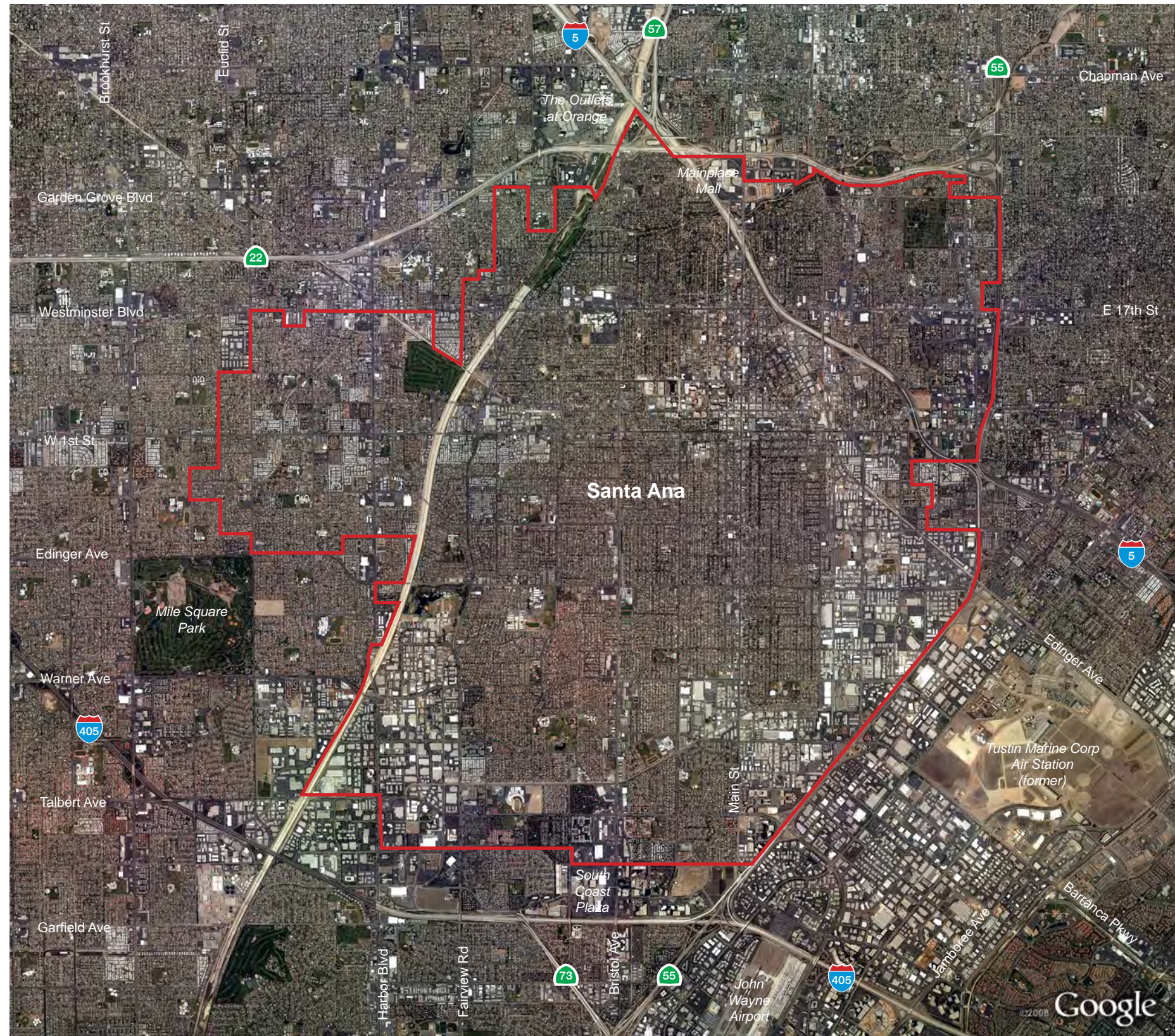
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Figure 3 Aerial Photograph



— City Boundary

Source: Google Earth Pro 2008

December 2013

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Scale (Miles)



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1.3.1 Consistency with other General Plan Elements

The State law requires that a General Plan be internally consistent. Goals, policies, and implementation measures in the General Plan Elements must support and be consistent with one another. Therefore, the City of Santa Ana's Housing Element builds on the other elements in its General Plan and is consistent with goals and policies set forth therein. The 16 elements of the General Plan include:

- Airport Environs Element
- Circulation Element
- Conservation Element
- Economic Development Element
- Education Element
- Energy Element
- Growth Management Element
- Housing Element
- Land Use Element
- Noise Element
- Open Space, Parks and Recreation Element
- Public Facilities Element
- Public Safety Element
- Scenic Corridors Element
- Seismic Safety Element
- Urban Design Element

The City aims to maintain consistency between General Plan elements by ensuring that proposed changes in one element would be reflected in other elements through amendments of the General Plan. The Housing Element, in particular, 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 City-wide, and detailed implementation tools for specific areas of the City.

1.3.2 Santa Ana Housing Element

The Housing Element must contain goals, policies, and programs to facilitate the development, improvement, and preservation of housing. The following are the goals in the Housing Element, which provide a foundation for the Housing Plan.

- Goal 1: Livable and complete neighborhoods of quality housing conditions, ample parks and community services, well-maintained infrastructure, well-maintained infrastructure, and public facilities that inspire neighborhood pride and ownership.
- Goal 2: A diversity of quality housing, affordability levels, and living experiences that accommodate Santa Ana's residents and workforce of all household types, income levels, and age groups to foster an inclusive community.
- Goal 3: Increased opportunities for low and moderate income individuals and families to find quality housing opportunities and afford a greater choice of rental or homeownership opportunities.
- Goal 4: Adequate rental and ownership housing opportunities and supportive services for seniors, people with disabilities, families with children, and people needing emergency, transitional, or supportive housing.

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1.3.3 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. As set forth in state law, all local governments are required to identify sufficient land, adopt programs, and provide funding, to the extent feasible, to facilitate and encourage housing production commensurate with that need.

2014-2021 RHNA

The City’s RHNA is 204 housing units for the 2014–2021 planning period. Within this housing goal, the City is required to plan for four income and affordability goals: very low, low, moderate, and above moderate. The following table categorizes the 204 units by these income levels.

Affordability Level	Number of Units
Very Low	45
Low	32
Moderate	37
Above Moderate	90
TOTAL	204

According to Table 1, the City’s RHNA by affordability level, is 45 units of housing affordable to very low income households, 32 units of housing affordable to low income households, 37 units of housing affordable to moderate income households, and 90 units of housing affordable to above moderate income households.

2006-2014 RHNA Carryover

In accordance with state law, this 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 original 2006–2014 RHNA of 3,393 units, the 2009 Housing Element identified the potential to accommodate 2,406 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 (see Table 2). The City did not need to rezone any land to accommodate moderate or above moderate income RHNA.

After the Housing Element’s adoption in 2009, 292 additional affordable units were constructed or approved (or are 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). Originally, the City planned on rezoning land along Harbor Boulevard and accommodating its remaining RHNA by adopting the Harbor Mixed Use Transit Corridor Specific Plan (Harbor Corridor Specific Plan) within the 2006–2014 planning period. However, the City determined

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that the importance of the project and the need for extensive public outreach warranted more time and the project timeline was extended. Adoption of the Harbor Corridor Specific Plan is now anticipated in early 2014. These 201 remaining units would be accommodated through land rezoned in the specific plan area exclusively for residential development. A breakdown of the completed rezoning and constructed or pending affordable housing projects between 2009 and 2012 is provided in Table 2.

Table 2 Housing Projects and Sites Approved between 2009 and 2012 to Accommodate the 2006-2014 Carryover

Projects	Affordability Level				Total
	Very Low	Low	Moderate	Above	
Built Units¹					
Transit Zoning Code	247	247			494
Triada Garden: Station District Phase 1 (TZC) 801 East Brown Street	12				12
Triada Garden: Station District Phase 2 (TZC) 714 East Santa Ana Boulevard	13				13
Birch Street Courtyards 217-437 South Birch Street	4				4
Habitat for Humanity Infill Edinger Avenue & Cypress Avenue		2			2
Triada Court: Station District (TZC) 618 East Minter Street	73			1	74
Bush Street Courtyards 2034-2038 North Bush Street	5				5
Terraces at Santiago 605 East Washington Avenue	35			1	36
Subtotal – Units Built	389	249		2	640
Pipeline Projects²					
Depot at Santiago (TZC)	49	20		1	70
Harbor Corridor Specific Plan: 815 N. Harbor	49	20		1	70
City Ventures 5 th & 4226 W. Fifth Street			5	23	28
The Academy Family Housing 1901 N. Fairview Street				8	8
Town & Country Manor ³ 555 E. Memory Lane				174	174
The 301 301 E. Jeanette Lane				182	182
Lyon Communities 1901 E. First Street		10		254	264
Sexlinger Homes 1584 E. Santa Clara Avenue				24	24
The Marke 100-130 E. MacArthur Boulevard				300	300
The MET 200 E. First American Way				272	272
Skyline Phase II ³				150	150

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Table 2 Housing Projects and Sites Approved between 2009 and 2012 to Accommodate the 2006-2014 Carryover

Projects	Affordability Level				Total
	Very Low	Low	Moderate	Above	
10 E. Hutton Centre					
Subtotal – Units in Pipeline	98	50	5	1,390	1,542
Remaining Balance of 2006-2014 RHNA Allocation	987		--	--	--
Units not Accounted in 2009 Housing Element (Built Units + Pipeline Projects)	786		--	--	--
2006–2014 Carryover	111	90			201

Source: Santa Ana 2013.

¹ A project or zoning change that was not counted in the previous housing element, but was entitled or adopted prior to the end of the 2006–2014 planning period. The units are counted toward the remaining 2006–2014 RHNA.

² These projects are in the development pipeline and are pending entitlements. Affordable units are counted toward the remaining 2006–2014 RHNA.

³ While these projects were identified in the 2006–2014 Housing Element, they are expected to be constructed in 2014–2021 planning period.

Carrying over the remaining 201 units required under the 2006-2014 RHNA, Table 3 reflects the total number of housing units needed to achieve both the 2006-2014 and 2014-2021 RHNA requirements. The table also categorizes the remaining housing unit need based on affordability level. The proposed project would need to accommodate a combined RHNA of 405 units to meet the 2014-2021 RHNA goals.

Table 3 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
Combined RHNA	156	122	37	90	405

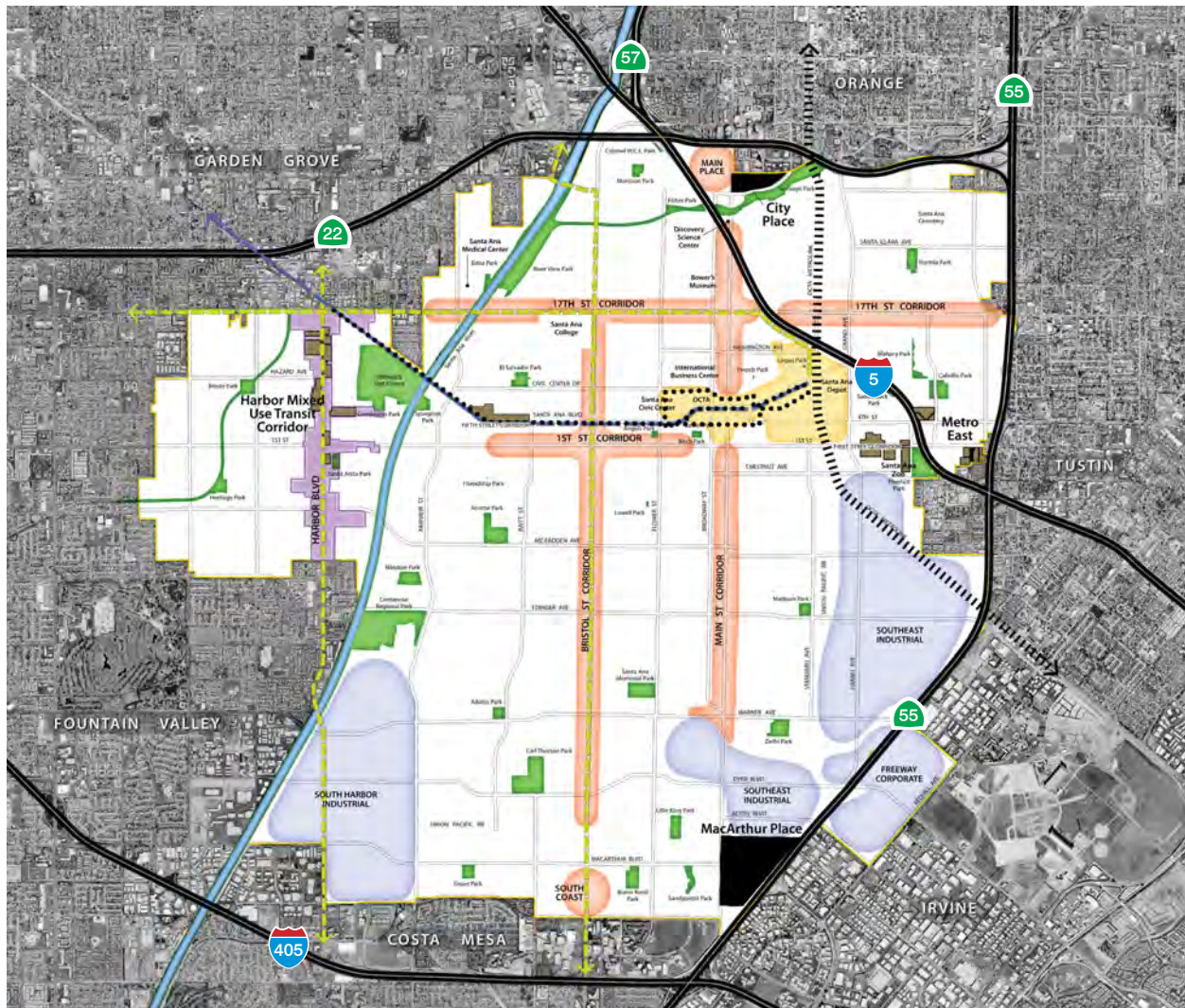
Source: SCAG 2012.

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

Available Land for Housing

The 2014-2021 Housing Element Update must identify available sites in the City that can accommodate the remaining RHNA (405 units). The first step in identifying adequate sites is preparing an inventory of land suitable for residential development that includes vacant and underutilized land. The assessment, as described in the proposed Housing Element, has identified the Metro East area, the Harbor Corridor Specific Plan, transit corridors along First Street and Fifth Street, and Transit Zoning Code (TZC) areas as areas that could accommodate RHNA required housing. These areas can be seen in Figure 4, *Development Focus Areas in Santa Ana*. Table 4 identifies the menu of development areas that the City has determined would be more than sufficient to accommodate the remaining RHNA allocation. The ultimate residential capacity of these areas is much larger than the remaining RHNA. However, to be conservative, the City only projects a portion of the development potential for the 2014-2021 planning period. Additionally, the units in Table 4 are in addition to the number of units shown in Table 2 that accommodate the 2006-2014 carryover.

Figure 4 Development Focus Areas in Santa Ana



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- | | | |
|---|------------------------------------|--|
| Residential Opportunity | Parks/Open Space | Fixed Guideway (Streetcar) |
| Harbor Mixed Use Transit Corridor Specific Plan | District Centers | Pacific Electric ROW/ Transit Corridor |
| Transit Zoning Code | Santa Ana River | |
| Office/Industrial | OCTA BRT Alignment | |
| Commercial | Metrolink and Amtrak Commuter Rail | |

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Scale (Miles)



Sources: 1. Draft Circulation Element, 2013; 2. Transit Zoning Code, 2010; Metro East Mixed-Use Overlay Zone, March 2007.

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Table 4 2014-2021 Development Potential Summary

	Metro East	Harbor Corridor Specific Plan	Fifth Street	First Street	TZC	Total
Total Acres	21.35	305	14.44	25.56	450	816.35
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 ¹	428	767	500	3,159

Source: Santa Ana 2013.

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

1.3.4 Public Safety Element Update

Assembly Bill (AB) 162 strengthens flood protections by requiring jurisdictions to update flood related information in its General Plan during the mandatory revision to the housing element. More specifically, the legislation requires that “upon the next revision of the housing element, on or after January 1, 2009, the safety element to identify, among other things, information regarding flood hazards and to establish a set of comprehensive goals, policies, and objectives, based on specified information for the protection of the community from, among other things, the unreasonable risks of flooding.”

Flood hazard information is discussed in the City of Santa Ana General Plan Public Safety Element and was last updated in 1982. In order to comply with AB 162, the Public Safety Element has been updated concurrently with the Housing Element to include a more recent narrative about flood hazards, control, and improvements implemented since 1982, and policies or programs addressing updated Federal Emergency Management Agency (FEMA) maps. This update is included as part of the “proposed project” addressed in this Initial Study and the Negative Declaration will serve as the CEQA clearance for both the Housing Element and Public Safety Element Updates to the City’s General Plan.

The City’s General Plan Public Safety Element sets forth policies and implementation programs for the following safety topics: Crime Management and Protection, Fire Safety, Emergency Medical Services, Hazardous Materials, Emergency Preparedness, and Flood Safety. Specific to flood hazards, the draft Public Safety Element includes programs that require developments within the 100-year flood zone to implement mitigation measures to minimize risks associated with flood hazards; collect, maintain, and make available information regarding flooding hazards to remain aware of potential hazards and serve as an educational resource for the community; and actively cooperate with FEMA regarding amendments to local Flood Insurance Rate Maps, recognizing the importance of redesignation of the 100- and 500-year flood plains within the City boundaries as facility improvements are completed. To supplement the programs, the Public Safety Element Update also includes a flood hazard map, shown in Figure 5, *Flood Hazard Map*. According to the figure, the entire City of Santa Ana is outside of the 100-year flood plain with the exception of a small portion of the City’s western corner and the City is not within any CalFire designated fire hazard area (CAL FIRE 2011). Regardless, AB 162 requires the Public Safety Element to be updated concurrently with the Housing Element to ensure future development would be planned with public safety issues in mind.

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1.3.5 Environmental Review Background

In 2009, an Initial Study/Negative Declaration (2009 IS/ND) was prepared for the 2006-2014 Santa Ana Housing Element (SCH No. 2009041128). The analysis in the 2009 IS/ND covered many of the same areas that would also accommodate the 2014-2021 RHNA allocation. Table 5 provides an overview of the areas previously addressed in the environmental analysis for the 2009 IS/ND in comparison to the areas currently proposed as accommodating sites for the 2014-2021 RHNA. As seen in the table, the allocations for the Metro East, Fifth Street and First Street locations have not changed since the previous Housing Element and supporting Initial Study/Negative Declaration.

The Renaissance Specific Plan evaluated in the 2009 IS/ND represents the same area designated as the Transit Zoning Code (TZC) in the proposed Housing Element update. An Environmental Impact Report (EIR) was prepared and certified for the TZC which was adopted by the City in 2010.

As with the currently proposed Housing Element update, the Harbor Corridor Specific Plan was identified to accommodate a portion of the RHNA units. For the updated Housing Element, the units allocated to this area have been reduced from 1,260 to 500 units. A portion of this allocation is proposed to be accommodated within 10 acres exclusively reserved for residential development at a minimum of 20 units per acre.

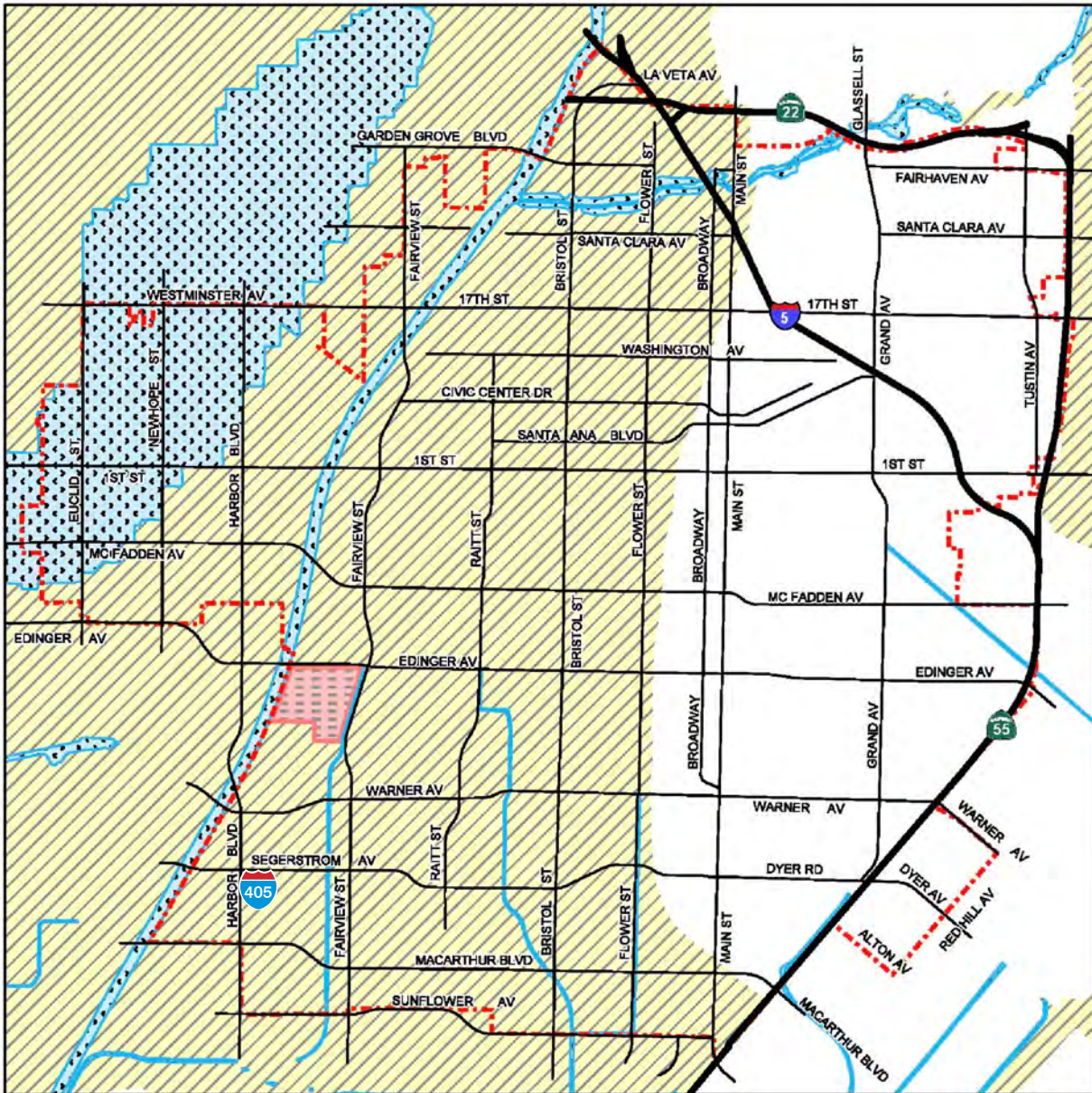
Table 5 Comparison of 2009 Initial Study/Negative Declaration to Proposed Project

	Metro East	Harbor Corridor Specific Plan	Fifth Street	First Street	Renaissance Specific Plan/TZC	Total
2009 Initial Study/Negative Declaration						
Total Acres	21.35	42.00	14.44	25.56	13.22	116.57
Density Range (du/ac)	25-98	23-35	23-35	23-35	5-90	-
Density Assumed (du/ac)	45	30	30	30	7-45	-
Residential Units Available for RHNA	964	1,260	428	767	238	3,657
2013 Initial Study/Negative Declaration						
Total Acres	21.35	305	14.44	25.56	450	816.35
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 Available for RHNA	964	500 ¹	428	767	500	3,159




Source: Santa Ana 2013.

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

Figure 5 Flood Hazard Map



Legend

-  100-Year Flood Risk
-  500-Year Flood Risk
-  Undetermined Flood Hazard

Not to Scale



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Approach to Environmental Analysis of the Proposed Project

The entire 405 unit RHNA requirement can be met with housing opportunities identified within the following sites: Metro East, TZC and Harbor Corridor Specific Plan. As detailed in the following discussion of each site, of these locations, only the Harbor Corridor Specific Plan would require a General Plan Amendment and Zone Change. Recent plans have been adopted for both Metro East and TZC and both are supported by EIRs. An EIR is currently under preparation for the Harbor Corridor Specific Plan and the project is anticipated to be approved in early 2014. At that time, environmental review and any associated mitigation measure requirements will be in place for housing development within any of the three sites that together can accommodate the total 405 unit RHNA requirement.

The Housing Element update identifies Fifth Street and First Street as potential, future sites for affordable housing development. These sites would require General Plan Amendments (GPAs) and Zone Changes (ZCs) to allow residential development. At this time, such land use changes are not in process. Since these sites are not needed to achieve the RHNA, the potential environmental impact for these sites is not reviewed in any detail within this Initial Study. Moreover, as with any new housing development, these sites would be subject to future, project-specific review under CEQA at the time of a development proposal.

As required by AB 162, the Public Safety Element has been updated with the Housing Element and is also analyzed as part of this Initial Study. The Public Safety Element Update is essentially a technical update focusing on the updated flood hazard map, and technical refinement to policies and narrative. These impacts would not affect the majority of the CEQA topics. The updates, however, are reviewed in the following topical sections pertaining to flooding: Hazards and Hazardous Materials, Hydrology and Water Quality, and Public Services. The Public Safety Element Update would not result in environmental impacts associated with the remaining topical sections and therefore is not further discussed.

Metro East Overlay

The City of Santa Ana adopted the Metro East Mixed Use (MEMU) Overlay Zone 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 highly amenitized pedestrian linkages. Located between the I-5 and SR-55 surrounding First Street and Fourth Street, the plan proposes three mixed-use districts and supporting policies and programs to facilitate an ultimate buildout of 5,551 residential units.

The City has identified 21 acres of underutilized land that could accommodate a minimum of 964 units. These sites were chosen based on their vacant status or highly underutilized nature, recent residential development interest expressed for several of these parcels, historical location within a former redevelopment project area, proximity to transit lines, and general site characteristics.

An environmental impact report for the MEMU Overlay Zone, certified in 2007, documents potential environmental and infrastructure constraints, and identifies assessments required at the time of specific project development within the zone.

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Transit Zoning Code (TZC) Areas

The City adopted the Transit Zoning Code (TZC) in 2010. The TZC guides development in the central urban core of Santa Ana and consists of more than 450 acres of land. Recent developments in this area highlight the opportunities for both affordable and market rate residential projects. Furthermore, much of the TZC area is suitable for housing at densities of at least 20 units per acre.

The TZC was also designed to provide the zoning necessary to support the long-term development of a transit program. The integration of new transit infrastructure and infill development will strengthen existing neighborhoods and allow for a mix of uses and a variety of housing types. The TZC is estimated to accommodate up to 4,075 housing units at buildout. As shown in Table 2, new zoning and recent residential projects demonstrate the ability of the TZC to accommodate 50 percent of the City's remaining 2006–2014 RHNA.

As part of the technical studies for the TZC, significant infrastructure improvements were identified for the 20-year buildout horizon. Furthermore, the EIR for the Transit Zoning Code (2010) detailed the potential environmental and infrastructure impacts of the project and implementation measures to address the presence of any impacts. The TZC EIR indicates that future development in accordance with the code:

- would not be constrained by any significant biological, seismic, geological, or hazard constraints (TZC EIR, Sections 4.3 and 4.5);
- could alter the existing drainage pattern and potentially result in increased downstream flooding through the addition of impervious surfaces, or exceeding the capacity of existing or planned stormwater drainage systems, additional mitigation will be necessary (TZC EIR, Sections 4.6);
- would not require or result in the construction of new water treatment facilities, the expansion of existing water treatment facilities, or the expansion of the existing network of water lines (TZC EIR Sections 4.12.1-4.12.4); and
- would not increase wastewater generation such that treatment facilities would be inadequate to serve the projected demand in addition to the provider's existing commitments (TZC EIR Sections 4.12.5–4.12.9).

To address the required improvements to and/or replacement of infrastructure, the City's requires all developers to pay a pro rata share of the costs to improve or replace the infrastructure. This is in addition to the on- and offsite improvements that are required under the Municipal Code (Article III) to serve individual projects.

Harbor Boulevard Mixed Use Transit Corridor Plan

The Harbor Corridor Specific Plan is anticipated to be adopted in early 2014. The section of north Harbor Boulevard guided by this specific plan is a gateway to Santa Ana. Orange County's first bus rapid transit service (Bravo! BRT operated by OCTA), opened Route 543 along Harbor Boulevard in June 2013, with two more BRT lines (Bristol/State College and Westminster/17th Street) expected to open in the coming

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years. The City has identified a potential of up to 4,600 units that could be built on 305 acres of land along Harbor Boulevard. While this plan guides and emphasizes mixed-use development, the plan contains a policy that requires approximately 10 acres of land be zoned exclusively for residential to accommodate all income levels of housing. This acreage within the Harbor Corridor Specific Plan would have a minimum density of 20 units per acre. Approximately 500 units are anticipated to be available for the RHNA allocation throughout the planning period.

Development within the Harbor Corridor Specific Plan area will be subject to the City's Housing Opportunity Ordinance. This ordinance requires that at least 15 percent of the units in an eligible ownership project be set aside as affordable to moderate income households for at least 45 years. For eligible rental projects, at least 15 percent must be affordable to very low or lower income households for at least 55 years.

The Harbor Corridor Specific Plan will be supported by a programmatic environmental impact report, also anticipated to be certified in early 2014. The EIR, currently under preparation will include technical reports for traffic, air quality, greenhouse gases, noise, hazards, drainage, sewer and water systems. A 1993 report (Boyle Engineering Report) concluded that the existing stormwater system is deficient and unable to convey current runoff. The recommendations made in the Boyle Engineering Report indicate upgrades to the existing conditions may be needed in order to convey existing runoff as well as future flows from the Harbor Corridor Specific Plan. The City's practice is to require all developers to pay a pro rata share of the costs to improve or replace the infrastructure (Santa Ana Municipal Code, Part II, Chapter 39, Water and Sewers, Article III, Sewers).

Transit Corridors – Fifth Street and First Street

The City of Santa Ana has identified two transportation corridors that could provide residential/mixed-use housing: Fifth Street and First Street. As previously noted, these sites are not required to achieve RHNA requirements and are not currently designated or zoned for residential development and would require GPAs and ZCs prior to housing development. These areas have been selected for the Housing Element because the placement of housing in these locations would improve mobility, reduce traffic congestion, and provide needed residential opportunities along the corridors while also serving to replace existing land uses that are less compatible with adjacent uses. The City may create a new general plan land use designation(s), zoning district, and development standards as part of an upcoming general plan update to allow for new residential/mixed-use and to encourage voluntary lot consolidation along these corridors.

As summarized in Table 4, there is potential for up to 1,195 units to be built on 40 acres of land along Fifth Street and First Street. These sites were identified as candidates during the planning period due to their underutilized or vacant status, proximity to neighborhoods, housing developer interests, proximity to transit lines, and historic location within a former redevelopment project area.

The presence of environmental constraints for Fifth Street and First Street parcels has not been thoroughly assessed. Along Fifth Street, which contains a number of industrial parcels, the potential for environmental contamination is possible and should be determined through future project approvals. The transportation infrastructure supports residential development along these corridors. Sites along Fifth Street are adjacent to the Pacific Electric right-of-way.

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As required by CEQA, the rezoning of sites along First Street and Fifth Street would require the preparation of environmental documentation that clarifies the impacts of residential/mixed uses to infrastructure, the existence of any environmental constraints, and programs to mitigate impacts as required.

Housing Preservation

State law requires that housing elements include an analysis of “assisted multiple-family housing” projects regarding their eligibility to change from low income housing to market rates by 2024 (10 years from the start of the planning period). Assisted housing is multiple-family rental housing that receives government assistance under federal, state, and/or local programs. Santa Ana currently (2013) has over 2,500 assisted housing units.

If there are units at risk of converting to market rate rents by 2024, the element must include a detailed inventory and analysis, including the following information:

- Each development by project name and address
- Type of governmental assistance received
- Earliest possible date of conversion from low income use to market rates
- Total elderly and nonelderly units that could be converted
- An analysis of costs of preserving and/or replacing those units at risk in the current planning period.
- Resources that could be used to preserve the at-risk units
- Programs for preservation of at-risk units and quantified objectives

There are 798 units at risk of being converted to market rate between 2014 and 2021 and 880 units at risk between 2014 and 2024. This includes all projects that have received public subsidies and are deed restricted to be affordable to lower income households in Santa Ana.

1.4 GENERAL PLAN AND ZONING

Figure 6, *General Plan Land Use Map*, shows existing land use designations within the City of Santa Ana. The update to the City’s General Plan Housing Element consists of an updated determination of housing needs within the City and revisions to policies and programs the City would implement to address those needs. The draft 2014–2021 Housing Element identifies adequate sites for potential residential/mixed-use development that could accommodate unmet portions of the RHNA by 2021. The entire housing need can be accommodated within three of the identified areas: Metro East Overlay, Harbor Corridor Specific Plan, and the TZC. Of these areas, only the Harbor Corridor Specific Plan area requires a General Plan Amendment and Zone Change to modify allowed land uses. At this time, the Harbor Corridor Specific Plan and EIR are being prepared and are anticipated to be approved in early 2014.

1. Introduction

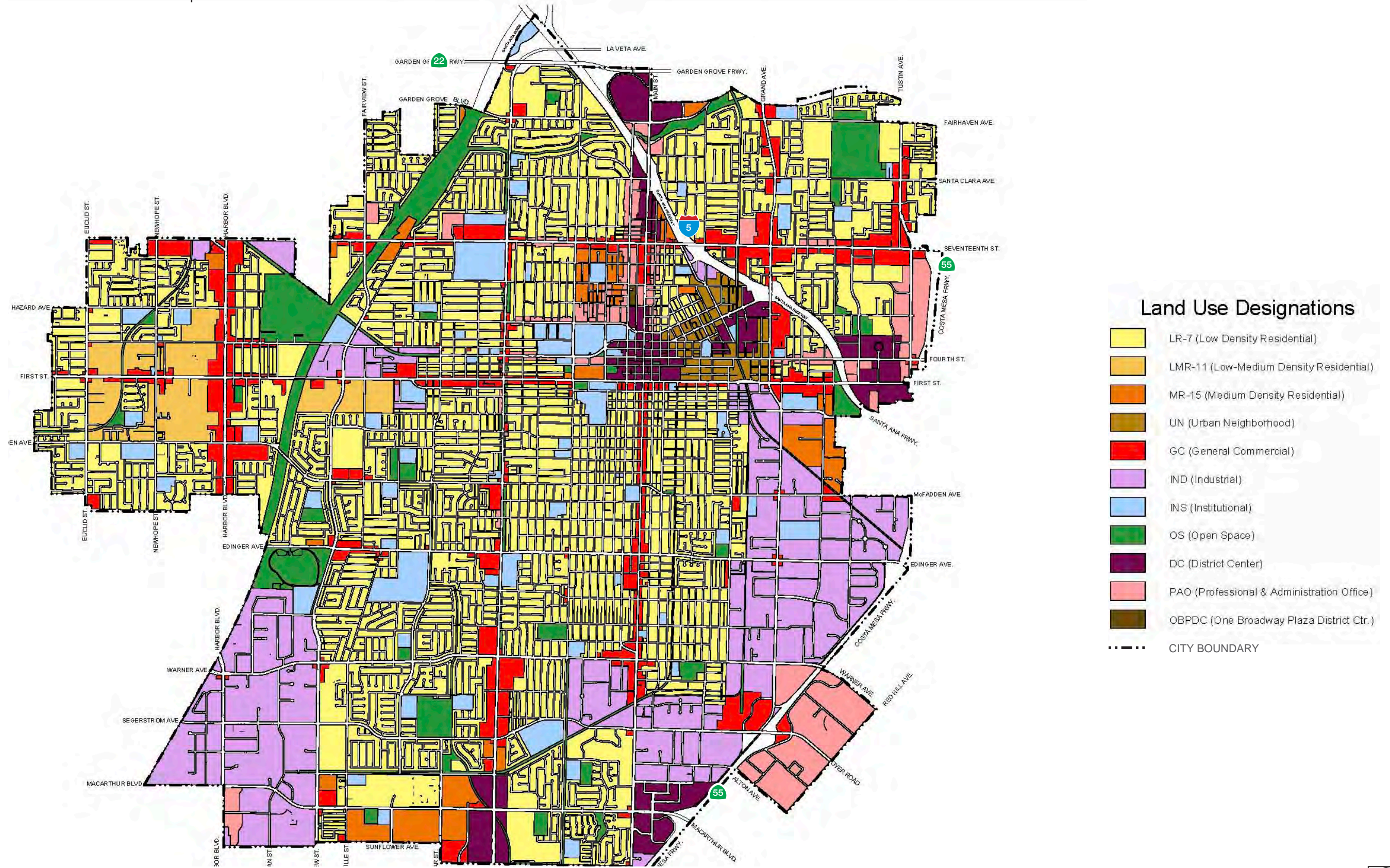
1.5 CITY ACTION REQUESTED

The Santa Ana City Council is the City's legislative body and the approving authority for the City of Santa Ana General Plan Housing Element. In order to implement the proposed project and comply with CEQA requirements, the City Council must approve the General Plan Housing Element and adopt the project's Negative Declaration.

1. Introduction

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Figure 6 General Plan Land Use Map



Land Use Designations

- LR-7 (Low Density Residential)
- LMR-11 (Low-Medium Density Residential)
- MR-15 (Medium Density Residential)
- UN (Urban Neighborhood)
- GC (General Commercial)
- IND (Industrial)
- INS (Institutional)
- OS (Open Space)
- DC (District Center)
- PAO (Professional & Administration Office)
- OBPC (One Broadway Plaza District Ctr.)
- CITY BOUNDARY



1. Introduction

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2. Environmental Checklist

2.1 BACKGROUND

1. Project Title: 2014-2021 Santa Ana Housing Element Update

2. Lead Agency Name and Address:

City of Santa Ana
Planning Division
20 Civic Center Plaza, M20
Santa Ana, CA 92701

3. Contact Person and Phone Number:

Melanie McCann, Associate Planner
(714) 667-2746

4. Project Location: The City of Santa Ana is in central Orange County, bordered by the cities of Orange to the north, Garden Grove to the north and west, Fountain Valley to the west and southwest, Costa Mesa to the south, Irvine to the southeast, and Tustin to the east. State Route 22 (SR-22) parallels the City on the north, Interstate 5 (I-5) and State Route 55 (SR-55) run through the northeastern corners of the City, and Interstate 405 (I-405) is just south of the City boundaries.

5. Project Sponsor's Name and Address:

City of Santa Ana
Planning Division
20 Civic Center Plaza, M20
Santa Ana, CA 92701

6. General Plan Designation: Implementation of the General Plan Housing Element as proposed would involve all residential and mixed-use General Plan land use designations within the City.

7. Zoning: Implementation of the General Plan Housing Element as proposed would involve all residential zoning districts and all districts that allow mixed-use development within the City.

8. Description of Project: The City of Santa Ana's General Plan Housing Element details the City's eight-year strategy for enhancing and preserving the community's character; sets forth strategies for expanding housing opportunities for the City's various economics segments; and provides the primary policy guidance for local decision making related to housing. The Housing Element also accommodates the required housing balance per the Regional Housing Needs Assessment (RHNA). Per state requirements, the City must accommodate 204 housing units for the 2014–2021 planning period (45 very low income housing units, 32 low income housing units, 37 moderate income housing units, and 90 above moderate

2. Environmental Checklist

income housing units) plus a carryover balance of 203 housing units from the 2006-2014 RHNA (111 very low and 92 low income housing units).

9. Surrounding Land Uses and Setting: 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.

10. Other Public Agencies Whose Approval Is Required: No other public agencies have approval authority over the project. However, the California Department of Housing and Community Development has the authority to review and comment on the project.

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2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forest Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology / Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

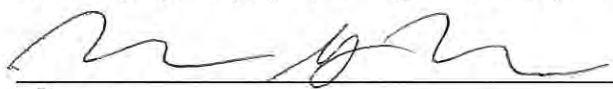
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

11/11/13

Date

Melanie G. McCann

Printed Name

City of Santa Ana

For

2. Environmental Checklist

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) **Earlier Analyses Used.** Identify and state where they are available for review.
 - b) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

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- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significant.

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?				X
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
d) Disturb any human remains, including those interred outside of formal cemeteries?			X	
VI. GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site			X	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			X	
f) Otherwise substantially degrade water quality?			X	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
j) Inundation by seiche, tsunami, or mudflow?				X
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
XII. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial 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)?			X	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?			X	
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Parks?			X	
e) Other public facilities?			X	
XV. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e) Result in inadequate emergency access?			X	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			X	
g) Result in inadequate parking capacity?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or waste water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?			X	
e) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			X	
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

3. Environmental Analysis

Section 2.3 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

a) Have a substantial adverse effect on a scenic vista?

No Impact. The proposed project consists of an updated determination of housing needs within the City and revisions to policies and programs the City would use to address those needs. Development anticipated by the Housing Element would be located in urbanized areas that are not part of scenic vistas. The City does not have any identified scenic vistas or public viewpoints. Furthermore, no scenic vistas are located in the vicinity of any proposed development locations. Therefore, the project would not create any significant impacts and no mitigation measures are necessary.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. According to the California Scenic Highway Mapping System of the California Department of Transportation, the City of Santa Ana is not located near any major state-designated scenic highway (Caltrans 2011). Since the Housing Element designates adequate sites within the City's boundaries that would accommodate any unmet portion of the RHNA for development. Therefore, no impact would occur.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. California housing element law allows local governments to obtain construction credits toward its RHNA housing goals in three ways: housing construction, available land for housing, and housing preservation. The City will pursue each of these strategies to achieve the regional housing needs production goals. The City has set forth a strategy for addressing its housing needs by identifying areas for future residential and mixed uses within its District Centers and transit corridors. These areas include the Metro East area, the Harbor Corridor Specific Plan, and Transit Zoning Code (TZC) areas.

- **Metro East.** Santa Ana adopted the Metro East (MEMU) Overlay Zone in 2007. Future development in accordance with the MEMU Overlay Zone must comply with the specific building requirements, qualitative design principles, specific design guidelines, and the master sign program as outlined in the zoning document.
- **Harbor Boulevard Mixed Use Transit Corridor Plan.** The Harbor Corridor Specific Plan currently being prepared and is anticipated to be adopted in early 2014. All future development would be required

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to comply with the specific building requirements and qualitative design principles as outlined in the specific plan.

- **Transit Zoning Code.** The TZC, adopted in 2010, guides development in the central urban core of Santa Ana and consists of more than 450 acres of land. The development standards for residential development are applied throughout the TZC areas. Future development within these areas must comply with the applicable development standards.

To minimize potential impacts, future residential development identified in the Housing Element would be required to comply with the Citywide Design Guidelines and/or the specific design guidelines set forth in the MEMU Overlay Zone, the Harbor Corridor Specific Plan, and the TZC. Thus, development in accordance to the Housing Element would result in less than significant impacts to the visual character of these areas.

- d) **Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?**

Less Than Significant Impact. Development of projects in accordance with the City's Housing Element would create new sources of light and glare in the City. As potential units are developed, greater intensity and density of residential development would result in increased light and glare in the City due to exterior lighting, lighting of streets and walkways, and interior lighting that could be visible from the outside of the homes. To minimize potential light and glare impacts, future development proposed by the Housing Element would be required to comply with the Citywide Design Guidelines and/or the specific design guidelines set forth in the MEMU Overlay Zone, the Harbor Corridor Specific Plan, and the TZC. Therefore, impacts to light and glare due to the adoption of the Housing Element would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. According to the California Resource Agency's Department of Conservation "Orange County Important Farmland 2010" map, the City does not have any significant agricultural resources (DLRP 2011). Thus, the City of Santa Ana does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Although vacant and underutilized land throughout the City may be developed with

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housing units under the proposed project the land is not designated Farmland of any type. Therefore, no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The City of Santa Ana does not contain any land designated for agricultural use. Furthermore, there is no land zoned for agricultural purposes or covered by a Williamson Act contract in the City. Therefore, no impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. Public Resources Code Section 12220 defines forest land as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”

Timberland is defined in Public Resources Code Section 4526 as “land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.”

A Timberland Production Zone is defined in Government Section Code CCC as “...an area which has been zoned pursuant to [Government Code] Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, ‘timberland preserve zone’ means ‘timberland production zone.’”

The City of Santa Ana does not have any land that is used for forest land as defined by these criteria. No impacts to forest land would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The City of Santa Ana is mostly built out with urban land uses. Forest land is not present within the City.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The vacant and underutilized land identified in the Housing Element for potential residential development does not contain any agricultural or forestry land uses. Therefore, the project would not involve any changes to land uses and any changes to the environment that would result in the conversion of farmland or forest land to residential land use. No impact would occur.

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3.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The City of Santa Ana lies in the South Coast Air Basin (SoCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SoCAB is a nonattainment area under the federal and state air quality standards (AAQS) for ozone (O₃), fine inhalable particulate matter (PM_{2.5}), coarse inhalable particulate matter (PM₁₀), and lead (Los Angeles County only) and nonattainment for nitrogen dioxide (NO₂) under the California AAQS.¹ The federal and California Clean Air Acts require areas designated nonattainment to reduce emissions until standards are met. SCAQMD has adopted attainment plan(s) for nonattainment pollutants to meet these standards. Projects are consistent with the AQMPs if they are consistent with the existing land use plans used to forecast emissions.

The air quality plan in effect in the SoCAB is the SCAQMD's 2012 Air Quality Management Plan (AQMP). The regional emissions inventory for the SoCAB is compiled by the SCAQMD and SCAG. Regional population, housing, and employment projections developed by SCAG, which are based on the land use designations of the City's General Plan form, in part, the foundation for the emissions inventory of the AQMP. These demographic trends are incorporated into the Regional Transportation Plan compiled by SCAG, to determine priority transportation projects and determine vehicle miles traveled within the SCAG region. Zoning changes, specific plans, general plan amendments and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or increase vehicle miles traveled are also deemed to be consistent with the AQMPs.

The Housing Element designates adequate sites for development that could potentially accommodate any unmet portion of the RHNA through 2021. Since the housing assessment in the RHNA is determined by SCAG, the proposed project would accommodate increases in population based on SCAG's demographic projections. Development as proposed to meet the RHNA goals is based on the approval of the draft Harbor Corridor Specific Plan, which includes a General Plan Amendment to create a new residential land use designation and zoning district on approximately 10 acres within the specific plan area. Therefore, while the housing and population growth for the Harbor Corridor Specific Plan is not yet in the 2010 Orange County Projections (OCP) growth forecast used by SCAG, the specific plan is anticipated to be adopted in early 2014 and will then be incorporated into the next OCP and SCAG growth forecast update. Furthermore, the specific plan will have completed its own CEQA environmental review. After the adoption of the Harbor Corridor Specific Plan's General Plan Amendment, the Housing Element will be consistent with the AQMP, based on new demographic projections reflecting the specific plan, for the City of Santa Ana from which SCAQMD creates the regional emissions inventory. In addition, the City is also consistent with the overall

¹ CARB approved the SCAQMD's request to redesignate the SoCAB from serious nonattainment for PM₁₀ to attainment for PM₁₀ under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM₁₀ standards during the period from 2004 to 2007. However, the EPA has not yet approved this request.

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recommendations of the AQMP with regards to integrating land use and transportation and increasing density proximate to major transportation corridors and job centers. Therefore, no impacts would occur.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. New development could potentially generate pollutant emissions due to new vehicle trips, use of equipment, and off-site power and natural gas generation. During the construction phases of individual development projects, emissions would also be generated by construction vehicles and activities. Air pollutant emissions associated with the project could occur over the short term for demolition, site preparation, and construction activities. In addition, emissions could result from the long-term operation of the potential additional units.

Construction Impacts

Construction projects can produce nuisance dust emissions. Air quality impacts may occur during the site preparation and construction activities of individual projects as anticipated under the Housing Element. Major sources of emissions during this phase include exhaust emissions generated during demolition of an existing structure, site preparation, and subsequent structure erection, and fugitive dust generated as a result of soil disturbances. To minimize construction-related air quality impacts, future development projects would be required to comply with SCAQMD Rules and Regulations, including Rule 403 for Fugitive Dust Control. Additionally, any future development projects would be subject to CEQA review and evaluated for potential construction-related air quality impacts. Furthermore, at the time of specific project-level environmental review, the lead agency would ensure compliance with mitigation measures, through placement of conditions of approval on applicable projects, to reduce impacts.

Operational Impacts

Long-term air quality impacts are those associated with the emissions produced from project-generated vehicle trips as well as from stationary sources related to the use of natural gas for heating and electricity for lighting and ventilation. Future developments would be subject to CEQA review on a project-by-project basis, and impacts would be disclosed and mitigated as feasible. However, impacts to any air quality standard due to the adoption of the Housing Element would result in a less than significant impact.

The Housing Element is a policy-level document that is consistent with existing general plan land use designation and zoning and therefore does not include specific development proposals. Adoption of the Housing Element would, therefore, not directly result in any pollutant emissions. The Housing Element establishes City direction for facilitating housing development pursuant to adopted land use plans. Residential development facilitated by implementation of Housing Element programs has the potential to result in pollutant emissions. These impacts have been evaluated at a program or policy-level in the CEQA documents. Any future development of vacant sites identified in the Housing Element would comply with all SCAQMD requirements as well as any mitigation measures required as a result of project-level CEQA analysis, including those applicable to short-term construction activities. Therefore, impacts would be less than significant.

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- c) **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. New development would generate pollutant emissions due to new vehicle trips, use of equipment, and off-site power and natural gas generation. Future projects would be subject to CEQA review and modeling would be completed for each development to track whether any emissions would be in excess of federal or state AAQS. Additionally, any new development would be required to comply with SCAQMD regulations to mitigate or prevent the generation of criteria pollutant emissions or GHG emissions. Impacts to air quality due to the adoption of the Housing Element would be less than significant.

- d) **Expose sensitive receptors to substantial pollutant concentrations?**

Less Than Significant Impact. Approval of the Housing Element would not modify land uses and would not result in an air quality impact. Implementation of the Housing Element relies, however, on future development assumptions. The potential future development of additional housing units through 2021 could lead to fugitive emissions and other pollutants affecting adjacent sensitive land uses. Increased traffic volumes on City streets could also lead to increases in associated vehicle emissions. Air quality analysis would be completed on a project-by-project basis to determine whether emissions from proposed development would expose sensitive receptors to substantial pollutant concentrations. Impacts to air quality due to the adoption of the Housing Element would be less than significant.

- e) **Create objectionable odors affecting a substantial number of people?**

No Impact. Land uses that are sources of objectionable odors that may affect substantial numbers of people include wastewater treatment facilities, landfills, refineries, chemical manufacturing facilities, feed lots, and dairies. Approval of the Housing Element would not create objectionable odors and would not result in an impact. Implementation of the Housing Element is reliant, however, on future development assumptions. It is unlikely that any future residential/mixed use development proposed would create objectionable odors, however, any project would be subject to CEQA review. Adoption of the housing element would not create odors and no impact would occur.

3.4 BIOLOGICAL RESOURCES

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

No Impact. Since the City is urbanized, most vacant and underutilized parcels are surrounded by existing development in the form of residential, commercial, industrial, and governmental properties, and are therefore unlikely to contain any sensitive species. Future development projects would be subject to CEQA review and potentially significant impacts to biological resources would be analyzed. Adoption of the

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Housing Element would have no impact on any species identified as a candidate, sensitive, or special status species.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. The potential housing sites are located throughout the City and are surrounded by urbanized development. It is unlikely that the potential development sites contain riparian habitat or other sensitive natural communities. Additionally, the potential sites are not located by the Santa Ana River (see Figure 4, *Development Focus Areas in Santa Ana*). However, future development would be subject to CEQA review evaluated for potential impacts to biological resources on an individual basis. Impacts due to the adoption of the Housing Element would be less than significant.

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. The potential housing sites as proposed under the Housing Element are located throughout the City and surrounded by urbanized development. The proposed areas identified to achieve RHNA goals—the Metro East Overlay Zone area, the Harbor Corridor Specific Plan, and Transit Zoning Code (TZC) areas—do not have any federally protected wetlands in the area, based on the US Fish and Wildlife National Wetlands Inventory (USFWS 2013). Furthermore, should any new development be located within or adjacent to wetland areas, state and federal laws and regulations would be implemented to protect resources through the Corps Section 404 permitting process and the California Wetlands Conservation Policy, which ensures that no net loss of wetlands would occur within the state. Thus, the proposed project would have no impact on federally protected wetlands.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. The potential housing sites are located throughout the City and are surrounded by urbanized development. It is unlikely that the potential development sites contain any native resident or migratory fish or wildlife species or other sensitive natural communities. Additionally, the potential sites are not located by the Santa Ana River. However, future development would be evaluated for potential impacts to biological resources on an individual basis as they are proposed. Impacts on wetlands due to the adoption of the Housing Element would be less than significant.

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e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. Pursuant to Chapter 33 (Streets, Sidewalks, and Public Works), Article VII (Regulation of the Planting, Maintenance, and Removal of Trees) of the City's Code of Ordinances, public street trees are to be maintained and protected to preserve the City's urban forest. The article outlines policies regulating tree planting and pruning standards, specifying allowable tree species, and requiring site plan reviews of new developments to ensure street trees are planted appropriately. However, the project itself would not involve clearance of vegetation or ground-disturbing activities. Therefore, the Housing Element would not conflict with any local policies or ordinances protecting biological resources and impacts would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The City is not located within any Habitat Conservation Plan or Natural Community Conservation Plan (CDFW 2013). Therefore, the project would not conflict with any habitat conservation plans and no impact would occur.

3.5 CULTURAL RESOURCES

a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Less Than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered to be "historically significant," if it meets one of the following criteria:

- i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- ii) Is associated with the lives of persons important in our past;
- iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. The anticipated development would occur on either vacant or underutilized parcels throughout the City. Underutilized parcels in the City may currently contain historic structures. According to the City of Santa Ana Historic Resources Map, the Transit Zoning Code area includes a majority of the French Park National Register District, which was listed on the National Register of Historic Places in 1999 (Santa Ana 2004). The historic structures within the French Park Historic District

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are protected through zoning conditions under Specific Development Plan No. 19, which outlines standards and regulations for architectural design and land uses within the district (Santa Ana 1996). The remaining opportunity areas are not within a historic district or adjacent to any historic resources (Santa Ana 2004). Each future development would be reviewed to determine potential impacts to historical resources. If necessary, appropriate mitigation measures designed to protect historic structures would be implemented. Furthermore, pursuant to the City's Code of Ordinances Chapter 30 (Places of Historical and Architectural Significance) requires all modification or demolition of historic properties to be reviewed and approved by the City's Historic Resource Commission and/or Planning and Building Agency. Thus, impacts to historical resources due to the adoption of the Housing Element would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact. Given the largely built-out nature of the City, the possibility is low that undiscovered archeological resources may be found in the future. Furthermore, Approval of the Housing Element itself would not authorize any ground-disturbing activities and would have no potential to adversely affect archaeological resources. Future ground-disturbance associated with potential housing development as identified in the Housing Element through 2021, could potentially disturb archaeological resources. Through the City's environmental review process, future development projects would be evaluated for potential impacts to archaeological resources and projects would comply with applicable mitigation measures and regulations. Impacts to archaeological resources due to the adoption of the Housing Element would be less than significant.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Due to the past agricultural uses and current urbanized character of the City, it is unlikely that any paleontological resource would be uncovered by future development. Each development that occurs as anticipated by the Housing Element would be considered on an individual basis to determine potential impacts to any paleontological resources. Impacts to paleontological resources due to the adoption of the Housing Element would be less than significant.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Due to the past agricultural uses and current urbanized character of the City, it is considered unlikely that any human remains would be uncovered due to implementation of the Housing Element. Any future development that occurs as anticipated by the Housing Element Update would be subject to subsequent review under CEQA on a project-by-project basis to determine if any human remains exist. Moreover, California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code Section 7050.5 requires that in the event that human remains are discovered within the project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner and cause of any death, and the recommendations concerning the treatment and

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disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Although soil-disturbing activities associated with development in accordance with the Housing Element could result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would not occur. Therefore, adoption of the Housing Element would result in a less than significant impact on human remains disturbance.

3.6 GEOLOGY AND SOILS

- a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

No Impact. The entire southern California region is considered to be seismically active. Santa Ana is in a high seismic risk zone subject to seismic activity from various nearby faults, including the El Modeno Fault and the Newport-Inglewood-Rose Canyon faults (CGS 2010). However, none of these faults are zoned under the guidelines of the Alquist-Priolo Earthquake Fault Zoning Act. Thus, there are no Alquist-Priolo fault zones within the vicinity of the City and no impact would occur.

ii) **Strong seismic ground shaking?**

Less Than Significant Impact. The City of Santa Ana is located in southern California, which is known to be seismically active. More specifically, the Newport-Inglewood-Rose Canyon fault lies approximately eight miles southwest of the City and would likely generate the most severe ground shaking. Any future development that occurs in conjunction with the proposed project would be required to adhere to the most recent seismic standards in the California Building Code (CBC) adopted by the City of Santa Ana and would be subject to CEQA review. The City has also adopted the CBC 2010 Edition based on the 2009 International Building Code as published by the International Code Council under the City's Code of Ordinances Chapter 8 (Buildings and Structures), Article II (Building Code). The CBC includes building design standards for the construction of new buildings and/or structures and specific seismic engineering design and construction measures to avoid the potential for adverse ground shaking impacts. Thus, by adhering to state and local regulations, development in accordance with the Housing Element would result in less than significant impacts to seismic ground shaking.

iii) **Seismic-related ground failure, including liquefaction?**

Less Than Significant Impact. Liquefaction is the phenomenon in which uniformly sized, loosely deposited, saturated, granular soils with low clay content undergo rapid loss of shear strength through the development of excess pore pressure during strong groundshaking. Soils with these properties that

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undergo sufficient duration and intensity of groundshaking may behave as a fluid for a short period of time. According to the Department of Conservation Seismic Hazard Zones Maps for the Newport Beach, Anaheim, Orange, and Tustin Quadrangle (in which Santa Ana is located in the intersection of these four quadrangles), the City is zoned as an area where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements (DOC 1997; 1998; 1998; 2001). In addition, according to Exhibit 5 of the City's General Plan Seismic Safety Element, the potential for liquefaction hazards ranges from very low in the northeastern portion of the City to very high in the southwestern portion of the City. The Harbor Corridor Specific Plan area has medium risk of liquefaction while the Metro East and Transit Zoning Code areas have very low risk of liquefaction.

Nevertheless, as stated above, any future development that occurs under the Housing Element would be subject to future CEQA review and consideration of potential soil related impacts. New developments would also be subject to CBC standards and local building code regulations for seismic-design features. Thus, impacts to seismic ground failure due to the adoption of the Housing Element would be less than significant.

iv) Landslides?

No Impact. The City is relatively flat and there are no significant slopes or hills in the vicinity of future development sites. Thus, Santa Ana has low vulnerability for landslide, mudslide, or rock fall events induced by seismic activity or excessive rainfall. It is anticipated that cut-and-fill grading would be necessary during project development, but no significant slopes are anticipated to occur as a result of project development. Additionally, future projects would be required to comply with CBC standards as previously stated. Therefore, the adoption of the Housing Element would have no impact on exposing people or structures to adverse effects involving landslides.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. As described above, Santa Ana is located primarily on flat lands. The City is also 99 percent built out and does not feature substantial undeveloped areas where new development would disturb topsoil. Due to the City's flat topography, soil erosion would not be an issue. New developments on sites larger than 1.0 acres are also required to comply with the National Pollution Discharge Elimination System (NPDES) program's General Construction Permit (GCP) requirements, which include development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). SWPPPs also require the design and implementation of best management practices (BMPs), which would ensure discharge of pollutants from project sites be reduced to the minimum amount as to not cause or contribute to an exceedance of water quality standards. BMPs that can prevent or minimize impacts on soil erosion include practices such as, sediment control, stabilizing slopes, and minimizing soil disturbance. By adhering to the federal and local regulations, development in accordance to the proposed project would not result in significant impacts relating to soil erosion or the loss of topsoil.

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- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Less Than Significant Impact. Soils within the Orange County portion of the Coastal Basin are characterized by medium-grained sandy sediment. Soil survey implementation from the U.S. Department of Agriculture, Web Soil Survey, shows that there are a wide variety of soils in the City, including those from the Bolsa Series, the Chino Series, the Hueneme Series, and the Metz Series. Soils within the City are characterized by deep alluvial deposits (USDA 2013). Alluvium is composed of stiff to very stiff, medium dense to very dense, light brown, dark brown, light gray and moist to saturated sandy clay, silty sand, sand, and gravelly sand. These materials are primarily fine grained and exhibit slight to moderate plastic and expansive properties. The soils are typically loose in their native state, with varying reported relative compactions ranging between approximately 55 to 75 percent.

Any future development that occurs under the Housing Element would be subject to CEQA review, consideration of potential soil-related impacts, and any necessary improvements to ensure long-term geotechnical stability. Furthermore, all new development is required to comply with CBC standards that include details to construction design and earthwork and foundation preparations to ensure soil and site stability. Therefore, adherence to CBC standards on a project-by-project basis would ensure maximum protection against unstable soils and geologic units and impacts would be less than significant.

- d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Less Than Significant Impact. See response to Section 3.6(c). Expansive soils shrink or swell as the moisture content decreases or increases. Structures built on these soils may experience shifting, cracking, and breaking as soils shrink and subside or expand. Any future development that occurs under the Housing Element would be subject to future CEQA review and CBC standards. Necessary improvements to ensure long-term geotechnical stability would also be required. Thus, impacts related to soil due to the adoption of the Housing Element would be less than significant.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

No Impact. Future developments that occur in conjunction with the proposed project would utilize the local sewer system. Therefore, no significant impacts would result from septic tanks or other on-site wastewater disposal systems.

3.7 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHG) emissions, into the atmosphere. The primary source of these GHG emissions is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHG emissions—water vapor, carbon dioxide (CO₂), methane (CH₄), and

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ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. New development could potentially generate pollutant emissions due to new vehicle trips, use of stationary equipment, natural gas use, and indirect emissions from use of electricity, water demand and wastewater treatment, and solid waste disposal. Any future developments would be subject to CEQA review on a project-by-project basis, and impacts would be disclosed and mitigated as feasible.

The Housing Element is a policy-level document that is consistent with existing general plan land use designation and zoning and therefore does not include specific development proposals. Adoption of the Housing Element would, therefore, not directly result in any GHG emissions. The Housing Element establishes City direction for facilitating housing development pursuant to adopted land use plans. Residential development facilitated by implementation of Housing Element programs has the potential to result in GHG emissions. These impacts have been evaluated at a program or policy-level in the CEQA documents.

Any future development of vacant sites identified in the Housing Element would comply with all SCAQMD requirements for GHG emissions as well as any mitigation measures required as a result of project-level CEQA analysis, including those applicable to short-term construction activities. Implementation of the mitigation measures required from past program-level and future project-level CEQA analyses would ensure that GHG emissions from construction and long-term operation of the future project would be minimized. Therefore, impacts would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. Assembly Bill 32, the Global Warming Solutions Act of 2006 (AB 32) requires the state to reduce GHG emissions to 1990 levels by 2020. The California Air Resources Board (CARB) adopted the Scoping Plan to identify state regulations and programs that would be adopted by state agencies to achieve the 1990 target of AB 32. In addition, Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008 (SB 375) was adopted by the legislature to reduce per capita vehicle miles traveled and associated GHG emissions from passenger vehicles. The Southern California Association of Government's (SCAG) 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) identifies the per capita GHG reduction goals for the SCAG region.

Development projects, including projects exempt from CEQA are subject to the applicable state requirements (e.g., California Building Code) and SCAQMD requirements for GHG emissions as well as any mitigation measures required as a result of project-level CEQA analysis. Implementation of the mitigation measures

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required from past program-level and future project-level CEQA analyses would ensure that GHG emissions from construction and long-term operation of the future projects would be minimized. Therefore, impacts would be less than significant.

SCAG's 2012 RTP/SCS is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light duty trucks in the Southern California region. The 2012 RTP/SCS incorporates local land use projections and circulation networks in the cities' and counties' general plans. The projected regional development pattern, including location of land uses and residential densities included in local general plans, when integrated with the proposed regional transportation network identified in the 2012 RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the subregional GHG reduction per capita targets for the SCAG region. The Housing Element designates adequate sites for development that could potentially accommodate any unmet portion of the RHNA through 2021.

While the housing and population growth for the Harbor Corridor Specific Plan is not yet in the 2010 Orange County Projections (OCP) growth forecast used by SCAG, the specific plan is anticipated to be adopted in early 2014 and will then be incorporated into the next OCP and SCAG growth forecast update. After the adoption of the Harbor Corridor Specific Plan's General Plan Amendment and the OCP/SCAG update, the proposed project will be consistent with the 2012 RTP/SCS and will not conflict with the 2012 RTP/SCS goals. Therefore, impacts would not occur.

3.8 HAZARDS AND HAZARDOUS MATERIALS

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. The potential areas for development are located throughout the City and are surrounded by urbanized development. Although it is not expected that significant amounts of hazardous materials would be transported, used, or disposed of in conjunction with development of future properties to implement the housing element, such projects would be subject to subsequent CEQA review and regulatory requirements. For example, all new developments that may handle hazardous materials would be required to comply with regulations established by the EPA, State, Orange County, and City of Santa Ana. Both federal and state governments require all businesses that handle a specified amount of hazardous materials to submit a business plan that details the types of hazardous materials handled, appropriate emergency response plans and procedures to be used in the case of an emergency scenario, locations of local emergency medical assistance, and training programs for employees (California Health and Safety Code, Chapter 6.95, Article 1, Sections 25500-25520). Pursuant to Chapter 18 (Health and Sanitation) in the City's Code of Ordinance, the Orange County Fire Authority is authorized to administer and enforce such rules and regulations. Therefore, impacts would be less than significant.

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- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less Than Significant Impact. Future developments anticipated by the Housing Element may be located in the vicinity of sites where hazardous materials are contained. Releases of hazardous materials may occur during a natural disaster. Likewise, improperly stored containers of hazardous substances may overturn or break, pipelines may rupture, and storage tanks may fail. However, future development projects would be subject to CEQA review and analyzed for the potential release of hazardous materials into the environment. Impacts associated with hazardous materials due to the adoption of the Housing Element would be less than significant.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Less Than Significant Impact. The proposed project consists of an updated determination of housing needs within the City, and revisions to the policies and procedures the City uses in addressing those needs. In total, the identified housing opportunity areas encompass over 800 acres and portions of these sites are within one-quarter mile of existing and/or proposed schools.

The proposed project itself would not directly emit hazardous emissions, and would not involve the handling of hazardous or acutely hazardous materials. Residential development in accordance with the Housing Element, is not characterized by the use of hazardous materials. Future projects, however, would be subject to CEQA review as well as compliance with regulatory requirements. Impacts associated with hazardous materials due to the adoption of the Housing Element would be less than significant.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Less Than Significant Impact. Future developments anticipated by the Housing Element may be located in the vicinity of known hazardous materials sites. Through the City's environmental review process, it would be determined if a potential development site is on or within the immediate vicinity of any known hazardous material site. Where appropriate, mitigation measures would be required for specific projects to reduce potential hazards to the public. Impacts associated with hazardous materials due to the adoption of the Housing Element would be less than significant.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. The John Wayne Airport is approximately one mile southeast of the City of Santa Ana. In 1975 the Airport Land Use Commission (ALUC) of Orange county adopted an Airport Environs Land Use Plan (AELUP, amended April 17, 2008). The AELUP is a land use compatibility plan that is intended to protect the public from adverse effects of aircraft noise, to ensure the people and facilities are not concentrated in

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areas susceptible to aircraft accidents, and to ensure that no structures or activities adversely affect navigable space. If a General Plan Amendment (GPA) or Zone Change (ZC) is proposed for land within the ALUC planning area, the City is required to submit the GPA/ZC plans to ALUC for consistency review with the AELUP. However, the residential opportunity areas identified in the Housing Element – Harbor Corridor Specific Plan area, Metro East, and the TZC area – are outside of the John Wayne Airport’s AELUP. Thus, future development anticipated by the Housing Element that would require a GPA or ZC (only Harbor Corridor Specific Plan area) would not be subject to review by the ALUC. Thus, no impact would occur.

Although future housing projects would be outside the Airport Planning Area, development proposals which include the construction or alteration of a structure more than 200 feet above ground level would require filing with the Federal Aviation Administration (FAA). Structures meeting this threshold must comply with procedures provided by Federal and State law, with the referral requirements of ALUC, and all conditions of approval imposed or recommended by FAA and ALUC, including filing a Notice of Proposed Construction or Alteration (FAA Form 7460-1).

Heliports are also under the jurisdiction of ALUC. Any proposed heliports must be submitted through the City to the ALUC for review and action pursuant to Public Utilities Code Section 21661.5. Proposed heliport projects must comply fully with the state permit procedure provided by law and with all conditions of approval imposed or recommended by FAA, by the ALUC for Orange County and the Caltrans/Division of Aeronautics. The City would comply with the aforementioned requirements, and no impacts would occur relative to public use airports.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. There are no private airstrips located within or adjacent to the City of Santa Ana; therefore, the proposed project would not result in any significant safety hazards from airstrip/airport related activity. The project would not cause safety hazards related to people residing or working in Santa Ana. No impact would occur.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Implementation of the Housing Element would not conflict with the City of Santa Ana’s emergency response or evacuation plans. Additionally, future development would be subject to CEQA review and be evaluated regarding interference with adopted emergency response and evaluation plans. Adoption of the Housing Element would have a less than significant impact on emergency response plans.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The City is built out with urban uses and does not contain wildland vegetation. Land immediately surrounding the City is likewise developed with urban uses and lacks wildland vegetation.

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According to the CalFire “Orange County Very High Fire Hazard Severity Zones in LRA” map, the entire City of Santa Ana as well as its neighboring cities of Fountain Valley, Garden Grove, Orange, Tustin, and Costa Mesa are all out of the Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2011). Therefore, the project would not create any hazards arising from wildland fires and no impact would occur.

3.9 HYDROLOGY AND WATER QUALITY

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. As these potential sites are developed, wastewater would be discharged into the local sewer system and on-site drainage would flow into the City’s existing storm drain system. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges. Future development would be required to comply with the NPDES program and the standards under the Santa Ana Regional Water Quality Control Board (SARWQCB). Additionally, through the City’s development review process, future projects would be evaluated for potential water quality impacts. Where needed, future development projects would be required to prepare water quality plans and/or incorporate best management practices (BMP) into their construction operations to reduce potential water quality impacts. Impacts to water quality due to the adoption of the Housing Element would be less than significant.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. Water supply in the City is derived from local groundwater wells operated and maintained by the City of Santa Ana Water Department and imported water from the Orange County Water District. The 2010 Urban Water Management Plan states that existing water supplies can continue to meet the City’s water demands in normal, single dry, and multiple dry years between 2013 and 2035 (Santa Ana 2011).

The anticipated development under the Housing Element update could increase water consumption in the City as well as increase dependence on local and imported supplies of groundwater. Any future development would be subject to CEQA review and potential impacts to groundwater supply and recharge would be analyzed. Impacts to groundwater due to the adoption of the Housing Element would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site.

Less Than Significant Impact. The City of Santa Ana is relatively flat and erosion is not anticipated to be substantial during construction or operation of developments anticipated by the Housing Element. Each

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development site would be connected to the City's storm drain system and is not anticipated to create substantial erosion or siltation on- or off-site. Future development projects would be subject to CEQA review and would adhere to the City's standard practices designed to prevent erosion and siltation during the construction phase. Impacts to the drainage pattern due to the adoption of the Housing Element would be less than significant.

- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Less Than Significant Impact. Approval of the Housing Element would not modify land uses, but implementation relies on future development assumptions. Although Santa Ana is largely built out, increased development intensity could increase the amount of runoff from impervious surfaces. Given that each of the land use change areas are currently developed, however, the increase in impervious surfaces and resultant increase in runoff is anticipated to be nominal and not have the potential to result in flooding on- or offsite. Therefore, any future development would likely have a less than significant impact with regard to surface runoff. Additionally, any future development would be subject to CEQA review and potential drainage patterns and surface runoff impacts would be analyzed. Therefore, impacts due to the adoption of the housing element are less than significant.

- e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?**

Less Than Significant Impact. The majority of the City is built out, and stormwater drainage systems are already in place. Approval of the Housing Element would not directly modify land uses; however, development in accordance to the Housing could potentially increase the impervious surface area and resultant runoff and discharge of sediments and pollutants to stormwater drainage systems. This increase, however, would be nominal in comparison to existing development and would be subject to compliance with regulatory requirements. Therefore, any future development would likely have a less than significant impact with regard to surface runoff. Additionally, future development would be subject to CEQA review and would comply with the City and NPDES regulations regarding stormwater pollution prevention measures during construction and operation. Therefore, impacts from runoff water due to the adoption of the Housing Element would be less than significant.

- f) Otherwise substantially degrade water quality?**

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. Construction activities and long-term operation of the future development have the potential to degrade water quality through an increase in water pollutants, including sediments. Future projects would be evaluated on an individual basis for their potential to degrade water quality, and projects must comply with any applicable water quality standards and regulations. Impacts to water quality due to the adoption of the Housing Element would be less than significant.

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g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Less Than Significant Impact. The City has two major drainage courses that have the potential for significant flooding: Santiago Creek and the Santa Ana River. However, according to the Federal Emergency Management Agency (FEMA), the City of Santa Ana is located in Zone X, which is any area outside the 1 percent annual chance floodplain (FEMA 2013). Figure 5, *Flood Hazard Map*, recreated from the City's Public Safety Element update, also shows that the entire City is outside of the 100-year flood risk area with the exception of a small portion of the City's western corner. The Public Safety Element update also outlines policies to require future development within the 100-year flood zone to implement mitigation measures to minimize risks associated with flood hazards. In addition, the City has floodplain management regulations that require new construction or substantial improvements in flood prone areas of the City to be elevated above base flood elevations. Furthermore, potential development as anticipated under the Housing Element would be evaluated on a project-by-project basis and would be required to comply with the City's uniform building codes and regulations as described above. No mitigation measures are necessary.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less Than Significant Impact. See 3.8g above.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. Santa Ana is located in the Prado Dam, Santiago, and Villa Park Reservoir Inundation Areas. Prado Dam, with a design reservoir capacity of 196,000 acre-feet, is an Army Corps of Engineer earthen facility 21 miles northeast of the City of Santa Ana. The dam is designed and constructed to withstand the maximum probable earthquake for the area, and therefore the probability for dam failure as a result of a seismic event is statistically insignificant.

Santiago Dam and Reservoir (Irvine Lake) and Villa Park Dam are a two-pool system west of Black Star Canyon maintained by the County of Orange, approximately seven miles east of the City's border. Santiago Dam is a 25,000-acre-foot earthen structure retaining Irvine Lake. Downstream is the flood control structure, Villa Park Dam. Santiago Creek, the natural waterway that flows west from the Villa Park-Santiago complex, is in the northern part of the City. System failure would occur when both pools are full and would result in a flood flow path spreading beyond the banks of Santiago Creek.

The City of Santa Ana has an Emergency Response Plan that addresses flooding in the event of levee or dam failure. Additionally, any future development would comply with the City's building standards to reduce the risk of structural damage due to flooding. Therefore, the risk from exposure of people and structures to flooding throughout the City due to the adoption of the Housing Element is considered less than significant. No mitigation measures are necessary.

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j) Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. While the City of Santa Ana does have aboveground water reservoirs, the potential for one of them failing is unlikely. However, dam failure at Prado Dam or the Irvine Lake/Villa Park dam and reservoir system could inundate the project area. A tsunami is a great sea wave produced by a submarine earthquake or volcanic eruption. Due to the City's distance from the coastline (approximately six miles), a tsunami does not pose a hazard to the site. Mudflows are landslide events in which a mass of saturated soil flows downhill as a very thick liquid. Santa Ana is generally flat and is not located along steep slopes or hillsides. Although it is unlikely that anticipated development would be impacted by seiche, tsunami or mudflows, any future development would be evaluated on an individual basis. Therefore, potential site inundation as a result of seiche, tsunami, or mudflow due to the adoption of the Housing Element would have no impact and no mitigation measures are necessary.

3.10 LAND USE AND PLANNING

a) Physically divide an established community?

No Impact. The Housing Element identifies multiple residential opportunity areas within Santa Ana. The Harbor Corridor Specific Plan involves rezoning 305 acres to allow for mixed-use/residential development, with approximately 10 acres set aside exclusively for residential development. This specific plan is anticipated to be adopted in early 2014. Metro East and Transit Zoning Code (TZC) areas are already zoned for residential development and would not require rezoning. Transit corridors along First Street and Fifth Street would, however, require rezoning to allow for new residential development. Nevertheless, the residential opportunity areas along First and Fifth Street are additional and are not required to meet the City's RHNA for the 2014-2021 timeframe. These areas would only supplement the City with more opportunity areas, exceeding the RHNA housing requirements. Furthermore, the Housing Element does not propose any roadway extensions or other development features through areas that would alter the City's circulation network. Therefore, residential development in accordance with the Housing Element would not physically divide an established community and no impacts would occur.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The project is an update to the Housing Element of the City's General Plan, and would become the new Housing Element upon approval by the City Council. The City of Santa Ana is not within the coastal zone, and so is not subject to a local coastal program. The City has set forth a strategy for addressing its housing needs by already built or approved new housing projects, housing preservation, and identifying opportunity areas for future residential and mixed uses primarily within the

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Metro East area, Harbor Corridor Specific Plan, transit corridors along First Street and Fifth Street, and the Transit Zoning Code (TZC) area.

General Plan Amendments and/or Zoning Changes would be required only for the Harbor Corridor area, which would be reflected in the Harbor Corridor Specific Plan currently being prepared and anticipated to be approved in early 2014. The MEMU Overlay Zone was adopted in 2007 and the TZC was adopted in 2010. Both of these areas allow residential development and would contribute to the housing needs outlined in the City's RHNA. The transit corridors along First and Fifth Street are additional housing opportunity areas that, if rezoned for residential and/or mixed use, would allow the City to surpass its RHNA requirements. Therefore, rezoning of the corridors is not required to meet the RHNA minimum. Given the opportunity areas within the Harbor Corridor Specific Plan, Metro East, and TZC areas, the City would meet its RHNA requirements and would not conflict with any land use plan and impacts would be less than significant.

Potential future housing development as identified in the Housing Element would also be subject to project-specific CEQA review, including an evaluation of conflicts with applicable land use plans, policies, and regulations. Impacts associated the adoption of the Housing Element with respect to consistency to land use plans, policies, and regulations, therefore, would be less than significant, and no mitigation measures are necessary.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. There are no habitat conservation plans or natural community conservation plans within or in the vicinity of the City (CDFW 2013). Therefore, implementation of the Housing Element would not conflict with any habitat conservation plans or natural community conservation plans. No impacts would occur.

3.11 MINERAL RESOURCES

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. Based on the California Geological Survey, areas known as mineral resource zones (MRZs) are classified according to the presence or absence of mineral resources. Lands designated as MRZ-2 are of the greatest importance and are considered "regionally significant." Development in areas designated as MRZ-2 would require that a lead agency's land use decisions be made in accordance with its mineral resource management policies (if any exist) and that it consider the importance of the mineral resource to the region or the state as a whole, not just to the lead agency's jurisdiction (CGS 1994). All of Santa Ana is zoned MRZ-3, which means the City is in an area that containing mineral deposits of undetermined significance based on available data (CDMG 1994).

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. See 3.10a.

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3.12 NOISE

- a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. Future construction and operation activities would increase noise levels throughout the City. However, future development would be subject to project-specific CEQA review and also required to comply with City, federal, and state guidelines on vehicle noise, roadway construction, occupational noise and noise abatement, and insulation standards. Impacts regarding noise due to the adoption of the Housing Element would be less than significant.

- b) **Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

Less Than Significant Impact. It is possible that groundborne vibration or groundborne noise would occur during the construction phase of future development projects anticipated by the Housing Element Update. Although groundborne vibration and groundborne noise are common results of the construction phase, each development would be subject to CEQA review and consideration of potential groundborne vibration and groundborne noise impacts. Impacts regarding noise due to the adoption of the Housing Element would be less than significant.

- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

Less Than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. Traffic related to the future developments could result in long-term increases in ambient noise levels. However, depending on the size of each development, this increase may be noticeable for some people but may not significantly impact surrounding sensitive uses and may not generate a substantial increase in ambient noise levels. Future development would be subject to CEQA review and consideration of potential noise impacts. Therefore, the impacts regarding noise due to the adoption of the Housing Element would be less than significant.

- d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Less Than Significant Impact. See response to Section 3.12(c), above.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

Less Than Significant Impact. The John Wayne Airport is approximately one mile southeast of Santa Ana. The southern area of Santa Ana is located in the AELUP boundary (ALUC 2013). There may be a potential

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for future projects to be exposed to excessive noise levels. The projects would be required to go through the CEQA process and reviewed for consistency with the AELUP. Impacts regarding excessive noise levels due to the adoption of the Housing Element would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. There are no private airstrips located within the City of Santa Ana; therefore, the proposed project would not result in any significant safety hazards from airstrip/airport related activity. No mitigation measures are necessary.

3.13 POPULATION AND HOUSING

a) Induce substantial 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)?

Less Than Significant Impact. The proposed project consists of an updated assessment of housing needs within the City, and changes to the policies and procedures the City uses in addressing those needs. The project identifies sites in the City suitable for the development of housing and involves other efforts to facilitate the development of housing in the City. The Housing Element discusses the City's housing production goal and how the City would achieve the regional housing needs production goals. The City's RHNA housing goals are consistent with the existing General Plan and SCAG regional growth projections for the City of Santa Ana. The Housing Element itself would not involve any development projects and would not directly result in the construction of any housing units. However, as summarized in the response to Section 3.9(b), implementation of the Housing Element would require rezoning of approximately ten acres of land as strictly residential along Harbor Boulevard, which would be reflected in the Harbor Corridor Specific Plan, anticipated to be approved in early 2014. Project-specific development to meet the goals identified in the Housing Element, however, would be subject to CEQA review, including an assessment of population and housing impacts. Adoption of the Housing Element, therefore, would have a less than significant impact.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The City of Santa Ana is completing the Housing Element Update in order to meet needs for housing in the City determined in the RHNA. The project therefore facilitates that provision of housing. The areas identified as housing opportunity areas are not characterized by existing housing. The TZC area is located in the central urban core of Santa Ana and consists of primarily general commercial and industrial uses, including automotive garages, equipment rental yards, metal shops, and wholesale establishments (TZC 2010 EIR Section 3.1). The Metro East area is predominantly comprised of professional offices and administrative buildings (MEMU 2007 EIR Section 3.1). The Harbor Corridor Specific Plan is primarily auto-oriented commercial uses. A nominal number of housing units that currently exist within these areas could potentially be displaced for future housing opportunities. The "replacement

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housing” would likely be the housing opportunities as identified in the Housing Element. This impact would be less than significant.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The City of Santa Ana is completing the Housing Element update in order to meet needs for housing in the City determined in the RHNA. The project itself only identifies residential development opportunity areas and would not directly displace any people or demolish any housing units or structures. Any future projects proposed in accordance with the Housing Element would provide housing to meet the RHNA housing goals for the City. No impacts would occur.

3.14 PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less than Significant Impact. Fire protection service is provided to the City of Santa Ana by the Orange County Fire Authority (OCFA). OCFA maintains 10 fire stations throughout the City and has a hazardous materials team (OCFA 2004). Mutual aid agreements have been established with neighboring cities that already have their own fire departments. The City estimates future fire protection needs based on growth as projected in the City’s General Plan.

New development anticipated to achieve the Housing Element goals could increase fire protection service needs in the City, and may require improvements to existing facilities or increases in staffing and equipment. RHNA housing units and associated fire protection demands in the Metro East and TZC have been addressed in their respective EIRs and land uses have been approved that will now be reflected in the General Plan. An EIR is currently being prepared for the Harbor Corridor Specific Plan that will address the plan’s impacts on fire protection services, and proposed applicable mitigation, if needed.

Furthermore, the City’s Public Safety Element Update includes policies regarding minimum OCFA response times, annual assessments regarding fire unit deployment plans as related to fire call patterns, property maintenance standards, and community education on fire prevention and suppression.

Additionally, each future development would be subject to CEQA review and evaluation of potential impacts to OCFA. Adoption of the Housing Element would not result in direct impacts to fire protection services, and therefore impacts would be less than significant and no mitigation measures are necessary.

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b) Police protection?

Less than Significant Impact. The City of Santa Ana operates its own police department, with its headquarters located in Civic Center Plaza. The Police Department maintains two Public Safety Satellite Offices or communication points throughout the City rather than traditional precinct stations. Mutual aid agreements have been set up with all cities in Orange County, providing the Santa Ana Police Department with backup assistance when necessary. The City estimates future needs for police protection service based on growth projected in the City's General Plan.

New developments anticipated to achieve the Housing Element goals could increase police protection service needs in the City, and may require improvements to existing facilities or increases in staffing and equipment. As with fire services, EIRs were certified for Metro East and TZC that were required to address public service demands. The Harbor Corridor Specific Plan and EIR are anticipated to be completed and approved by early 2014 and will include an impact assessment of police services.

Furthermore, the City's Public Safety Element update includes policies regarding Santa Ana Police Department's police call response times, annual assessments with regards to the efficiency of police fleets and personnel deployment plans as related to police call patterns, and continuation of "storefront" Public Safety Satellite Office programs.

Moreover, each future development would be subject to CEQA review and evaluation of potential impacts on the police department. Impacts to police protection due to adoption of the Housing Element would be less than significant and no mitigation measures are necessary.

c) Schools?

Less than Significant Impact. The Santa Ana Unified School District, Tustin Unified School District, Garden Grove Unified School District, and Orange Unified School District boundaries all cover partial portions of Santa Ana and provide school services to its residents. Development of additional housing could increase the demand on schools; therefore, additional facilities and staffing may be necessary to accommodate the growth. The potential housing development impact on schools was required to be addressed in the EIRs certified for the Metro East and TZC projects, and will be addressed in the upcoming Harbor Corridor Specific Plan EIR. Future development would be subject to project-specific CEQA review and impacts on school facilities would be considered. Impacts to schools due to adoption of the Housing Element would be less than significant and no mitigation measures are necessary.

d) Parks?

Less than Significant Impact. Approval of the Housing Element would not impact parks or any recreational facility; however, residential development in accordance to the Housing Element could increase demands on parks and recreational facilities. A programmatic level analysis of park impacts was required in the EIRs certified for the Metro East and TZC projects, and will be addressed in the upcoming Harbor Corridor Specific Plan EIR. Moreover, future development would be subject to project-specific CEQA

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review and impacts on local park and recreational facilities would be considered. Impacts on parks due to adoption of the Housing Element would be less than significant. No mitigation measures are necessary.

e) Other public facilities?

Less than Significant Impact. The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. Future development would be subject to CEQA review and impacts on other public facilities would be considered. Impacts on other public facilities due to adoption of the Housing Element would be less than significant and no mitigation measures are necessary.

3.15 RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. The City of Santa Ana's standard for amount of parkland to population is 2.0 acres per 1,000 residents. The total area of parks and recreational facilities within the City is approximately 400 acres of public parks and recreation space (Santa Ana 2010). According to the Department of Finance, the City's estimated population is 329,915 (DOF 2013). Thus, the ratio of parkland to population is approximately 1.21 acres per 1,000 residents, below the City's standard of 2 acres of parkland per 1,000 residents. Future development anticipated by the Housing Element would be subject to CEQA review and would either be required to pay residential development fees and in-lieu fees to the City for the development and maintenance of park facilities or provide improved parks. If fees are necessary, the amount would be determined by the City Department of Parks and Recreation during the City's approval process for those projects. Impacts to parks and recreational facilities due to the adoption of the Housing Element would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less than Significant Impact. Approval of the Housing Element would not impact any recreational facility; however, implementation of the Housing Element is reliant on future development assumptions. Future development would increase the demand for parks and recreation facilities in the City. However, future projects would be subject to CEQA review and would either be required to pay residential development fees and in-lieu fees to the City for the development and maintenance of park facilities or provide improved parks. If fees are necessary, the amount would be determined by the City Department of Parks and Recreation during the City's approval process for those projects. Impacts to recreational facilities due to the adoption of the Housing Element would be less than significant.

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3.16 TRANSPORTATION/TRAFFIC

- a) **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Less Than Significant Impact. The proposed project consists of an updated assessment of housing needs within the City, and changes to the policies and procedures the City uses in addressing those needs. Future development to meet the housing goals could result in an increase in vehicle trips that would have the potential to affect traffic service levels and result in congestion at intersections within the City. In addition, approximately ten acres of land along Harbor Boulevard would need to be rezoned as strictly residential. The Harbor Corridor Specific Plan, which accommodates and addresses this land use change, is anticipated to be adopted in early 2014. Any future roadway and circulation improvements proposed as part of the entitlements and individual projects would also be reviewed. Therefore, any impacts associated with traffic due to the adoption of the Housing Element would be less than significant.

Public transit service is provided to the City of Santa Ana by the Orange County Transportation Authority and there are several existing bicycle routes within the City (OCTA 2013). The project itself would have no impact on facilities for alternative transportation, such as bus turnouts, bicycle routes, or pedestrian walkways. However, any future development would comply with adopted policies, plans or programs that support alternative transportation. Impacts with adopted policies, plans, or programs due to the adoption of the Housing Element would be less than significant.

- b) **Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less Than Significant Impact. Development anticipated by the Housing Element could contribute to cumulative countywide traffic impacts. However, any future projects would be evaluated for potential traffic impacts through the CEQA process and appropriate mitigation measures may be required. Therefore, impacts associated with traffic due to the adoption of the Housing Element would be less than significant and no mitigation measures are necessary.

- c) **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

No Impact. The potential increase in housing and population due to the Housing Element would not be anticipated to increase the use of the John Wayne Airport to a level that would significantly increase air traffic levels or require a change in air traffic patterns. Potential hazards associated with development proximate to the airport and within the boundaries of the AELUP would be analyzed on a project-by-project basis and subject to CEQA review. Therefore, the Housing Element would have no impact on air traffic patterns.

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d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. The increased amount of traffic associated with the anticipated Housing Element would not likely increase hazards to motorists, pedestrians, or bicyclists. The Housing Element itself only identifies housing opportunity areas within the City and does not propose any design features that may alter the City's existing conditions. Furthermore, through the City's environmental review process, future development projects would be evaluated for potential safety and traffic impacts. Where needed, appropriate mitigation measures would be required. Adoption of the Housing Element would be less than significant and no mitigation measures are necessary.

e) Result in inadequate emergency access?

Less Than Significant Impact. Any future development that is anticipated under the Housing Element would be required to conform to traffic and safety regulations that specify adequate emergency access measures. However, because adequate emergency access is impossible to determine with any precision without specific details regarding each development, any future development would be evaluated to determine adequacy of emergency access on a project by project basis. Impacts regarding inadequate emergency access due to the adoption of the Housing Element would be less than significant.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. Public transit service is provided to the City of Santa Ana by the Orange County Transportation Authority and there are several existing bicycle routes within the City (OCTA 2013). The project itself would have no impact on facilities for alternative transportation, such as bus turnouts or bicycle racks. However, any future development would comply with adopted policies, plans or programs that support alternative transportation. Impacts with adopted policies, plans, or programs due to the adoption of the Housing Element would be less than significant.

g) Result in inadequate parking capacity? (Optional: Deleted from 2010 CEQA Guidelines.)

Less Than Significant Impact. Development of residential dwelling units is anticipated under the Housing Element. Future development would be evaluated to determine adequacy of parking and would be required to comply with City parking standards. Therefore, impacts associated with parking due to the adoption of the Housing Element would be less than significant.

3.17 UTILITIES AND SERVICE SYSTEMS

a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact. The Orange County Sanitation District (OCSD) provides sewage collection and treatment service for the City of Santa Ana. Wastewater treatment at the OCSD facility is required to meet applicable Regional Water Quality Control Board standards. Through the City's environmental review

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process, future development would be evaluated for potential impacts to wastewater treatment facilities. Where needed, appropriate mitigation measures would be required to reduce potential impacts. Impacts to wastewater treatment due to adoption of the Housing Element would be less than significant.

b) Require or result in the construction of new water or waste water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. The City of Santa Ana maintains approximately 450 miles of local sewer lines (Santa Ana 2010). Main sewer trunks within the City of Santa Ana are owned and maintained by OCSD, which provides sewage collection and treatment service. The City's sewage is diverted to Reclamation Plant Number 1 in Fountain Valley. The reclamation plant takes in approximately 92 million gallons per day (gpd) and is planned to provide capacity of up to 120 million gpd (OCSD 2013).

The Housing Element designates adequate sites for potential future development that could accommodate any unmet portion of the RHNA through 2021. The MEMU and TZC EIRs indicated that implementation of each project would not generate enough wastewater to pose a significant impact on existing facilities. Future proposed developments would be required to undertake a site-specific sewer evaluation and might be required, as part of the project design, to determine the adequacy of the existing sewer pipe capacity in the affected project area lines.

The existing sewer infrastructure within the Harbor Corridor Specific Plan is deficient based on Orange County Sanitation District depth of flow versus diameter requirements. However, the Harbor Corridor Specific Plan would not generate enough wastewater to pose a significant impact to the existing infrastructure. The Harbor Corridor Specific Plan EIR is currently being prepared and will address any potentially significant impacts and provide mitigation measures as necessary. If improvements are needed, However, developers would be responsible for paying a pro rata share of the costs to improve or replace the infrastructure.

Any future projects would also be required to consult with OCSD to estimate the level and type of demand to determine the significance of impacts to existing and planned levels of service, and to develop measures to avoid or reduce potentially significant impacts to less than significant, if possible. Additionally, OCSD requires all new developers of residential projects within their service area to pay capital facility charges that are designed to fund the construction, maintenance, and improvement of facilities. Therefore, the Housing Element itself would be less than significant.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. Storm drainage is provided through reinforced concrete pipes and open channels throughout the city. Stormwater flows are directed toward Orange County Flood Control open channels or the Santa Ana River. Stormwater in the City generally flows southwest toward the Pacific Ocean. The City maintains an NPDES copermit with Orange County for storm drain facilities serving Santa Ana.

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Existing storm drain lines would be utilized by future developments identified by the Housing Element. Future development could increase the amount of stormwater runoff over the long term as a result of increases in impervious surfaces, which may require alteration to existing stormwater drainage facilities in the area. However, any future project would be subject to CEQA review and considerations of any potential impacts on stormwater drain facilities. Impacts to stormwater drainage facilities due to the adoption of the Housing Element would be less than significant and no mitigation measures are necessary.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. The major present source of water for Santa Ana is a municipally owned system operated by the Santa Ana Public Works Agency. Two other small water companies supply service to small portions of the City. Santa Ana is also a member of the Metropolitan Water District (MWD) and receives water from the State Water Project. The City receives 62 percent of its water supply from groundwater wells accessing the Santa Ana River groundwater basin, 38 percent is imported from MWD, and 0.4 percent is recycled water. The 2010 Urban Water Management Plan states that water supplies can continue to meet the City's imported water needs until the year 2035 (Santa Ana 2011). In addition, the EIRs for Metro East and the TZC area indicated that development of the two areas would have a less than significant impact on existing water supplies (MEMU 2007 EIR Section 4.13.3, TZC 2010 EIR Section 4.12.3).

The EIR for the Harbor Corridor Specific Plan is currently being prepared and will address the potential environmental and infrastructure impacts of the development of the specific plan area and will provide mitigation measures if needed. Furthermore, should improvements to the existing water system be required or additional facilities be deemed necessary, the property developer would be required to pay its fair share of the cost of all or portions of the needed improvements. The Housing Element itself would not involve any development projects and would not directly result in the increase in water supply demands. Project-specific development to meet the goals identified in the Housing Element, however, would be subject to CEQA review, including an assessment of water supply impacts. Impact on water supplies due to the adoption of the Housing Element would be less than significant.

e) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. The OCSD provides wastewater treatment for the City of Santa Ana. The City's sewage is diverted to Reclamation Plant Number 1 in Fountain Valley. The reclamation plant has a design capacity of 92 million gallons per day (gpd) and is planned to provide capacity of up to 120 million gpd (OCSD 2013). OCSD requires all new developers of residential projects within their service area to pay capital facility charges that are designed to fund the construction, maintenance, and improvement of facilities. The Housing Element itself would not involve any development projects and would not directly result in the increase in sewer flows. Project-specific development to meet the goals identified in the Housing Element, however, would be subject to CEQA review, including an assessment of wastewater impacts. Impacts on the capacity for wastewater treatment due to the adoption of the Housing Element would be less than significant.

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f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. The City of Santa Ana is under contract with Waste Management of Orange County for solid waste hauling and disposal. The predominant receiving landfill is the Frank R. Bowerman Sanitary Landfill at 11002 Bee Canyon Access Road in Irvine (OCRW 2013). The landfill, which is owned and operated by CalRecycle, opened in 1990 and is scheduled to operate until approximately 2053 (CalRecycle 2013).

Regarding any future development, consultation with CalRecycle would be required to estimate the level and type of demand, to determine the type and significance of impacts to existing and planned levels of service, and to develop measures to avoid or reduce potentially significant impacts to less than significant, if possible. The Housing Element itself would not involve any development projects and would not directly result in the increase in solid waste generation. Project-specific development to meet the goals identified in the Housing Element, however, would be subject to CEQA review, including an assessment of solid waste impacts. Therefore, impacts regarding solid waste due to the adoption of the Housing Element are less than significant and no mitigation measures are necessary.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. Any future development would comply with federal and state laws regulating solid waste disposal, including Assembly Bill 939 involving solid waste diversion rates. No adverse impact would occur, and no further analysis of this issue is required.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. The proposed project is located in the City of Santa Ana, which has an urban character and is 99 percent built out. No significant biological or historical impacts are anticipated to result from implementation of the proposed project. No mitigation measures are necessary.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact. The proposed project involves the implementation of the Housing Element for the City of Santa Ana. The Housing Element is a policy document designed to assist the City in future planning. Through the City's environmental review process, future development projects would be evaluated

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for potential cumulative impacts. Where needed, appropriate mitigation measures would be required to reduce potential impacts to a level that is less than significant. No mitigation measures are necessary.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. The proposed project consists of an updated determination of housing needs within the City, and revisions to policies and procedures the City uses in addressing those needs. The Housing Element is a policy document designed to assist the City in future planning. Through the City's environmental review process, future development projects would be evaluated for potential cumulative impacts. Where needed, appropriate mitigation measures would be required to reduce potential impacts to a level that is less than significant. No mitigation measures are necessary.

3. Environmental Analysis

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4. References

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4.3 PERSONAL COMMUNICATION

City of Santa Ana. 2013. Personal communication with City of Santa Ana Planning Division.

4. References

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