Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form

All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.
Appeals and supporting documentation should be submitted to housing@scag.ca.gov.
Late submissions will not be accepted.

Date: 10/26/20

Jurisdiction Subject to This Appeal Filing:
(to file another appeal, please use another form)
Santa Ana

Filing Party (Jurisdiction or HCD)
Garden Grove

Filing Party Contact Name
Lisa L. Kim

Filing Party Email:
lisak@ggcity.org

APPEAL AUTHORIZED BY:

Name: Steve Jones

PLEASE SELECT BELOW:

- [x] Mayor
- [ ] Chief Administrative Office
- [ ] City Manager
- [ ] Chair of County Board of Supervisors
- [ ] Planning Director
- [ ] Other: _____

BASES FOR APPEAL

- [x] Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029)
- [ ] Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - [ ] Existing or projected jobs-housing balance
  - [ ] Sewer or water infrastructure constraints for additional development
  - [ ] Availability of land suitable for urban development or for conversion to residential use
  - [ ] Lands protected from urban development under existing federal or state programs
  - [ ] County policies to preserve prime agricultural land
  - [ ] Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - [ ] County-city agreements to direct growth toward incorporated areas of County
  - [ ] Loss of units contained in assisted housing developments
  - [ ] High housing cost burdens
  - [ ] The rate of overcrowding
  - [ ] Housing needs of farmworkers
  - [ ] Housing needs generated by the presence of a university campus within a jurisdiction
  - [ ] Loss of units during a state of emergency
  - [ ] The region's greenhouse gas emissions targets
  - [ ] Affirmatively furthering fair housing
- [ ] Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

FOR STAFF USE ONLY:
Date_____ Hearing Date: _____ Planner: _____

Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form

All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.

Appeals and supporting documentation should be submitted to housing@scag.ca.gov.

Late submissions will not be accepted.

Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):

Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

1. SCAG Failed to Adequately Consider Historic and Projected Housing Development of the City of Santa Ana

2. Application of the Final Methodology Directly Conflicts with SCAG's Regional Transportation Plan

Brief Description of Appeal Request and Desired Outcome:

The City of Garden Grove requests an increase of Santa Ana's draft allocation of 3,087 units to 10,174 units.

Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):

Reduced _____ **Added** 7,087

List of Supporting Documentation, by Title and Number of Pages

(Numbers may be continued to accommodate additional supporting documentation):

1. SCAG Letter - SA RHNA Appeal (31 Pages)

2.

3.

FOR STAFF USE ONLY:

Date_____ Hearing Date: _____ Planner: _____

GARDEN GROVE

CITY OF GARDEN GROVE

Steven R. Jones
Mayor

Stephanie Klopfenstein
Mayor Pro Tem – District 5

George S. Brietigam
Council Member– District 1

John O'Neill
Council Member– District 2

Thu-Ha Nguyen
Council Member– District 3

Patrick Phat Bui
Council Member– District 4

Kim B. Nguyen
Council Member– District 6

October 26, 2020

RHNA Appeals Board
Southern California Association of Governments
Attn: Mr. Kome Ajise, Executive Director
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017

SUBJECT: APPEAL OF THE CITY OF SANTA ANA'S REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) ALLOCATION OF 3,087 UNITS

Dear Mr. Ajise,

On behalf of the City of Garden Grove City Council, and in accordance with Government Code Section 65584.05, the City of Garden Grove (City) submits the following appeal for a revision of the allocation of the regional housing need to the City of Santa Ana and other local jurisdictions under the RHNA Methodology adopted for the 6th cycle.

The City believes SCAG failed to adequately consider historic and projected housing development, and adopted a methodology that is in direct conflict with the development patterns described in the regional transportation plan. Therefore, the City respectfully requests the City of Santa Ana's RHNA Allocation be increased by 7,087 units for a total 6th Cycle Allocation of 10,174 units.

1. SCAG Failed to Adequately Consider Historic and Projected Housing Development

Pursuant to Government Code Section 65584.05(b)(1), a jurisdiction may appeal the RHNA allocation of any other jurisdiction based on the failure of SCAG to adequately consider information submitted pursuant to Government Code Section 65584.04 and other readily available data related to the historic and projected development of housing by the City of Santa Ana.

Pursuant to Government Code Section 65584.04:

> "(e) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, ***shall include the following factors to develop the methodology that allocates regional housing needs***:
>
> (2) The ***opportunities*** and constraints ***to development of additional housing*** in each member jurisdiction, including all of the following:
>
> (B) The ***availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development..."***

During the 5th RHNA Cycle, the City of Santa Ana received a RHNA Allocation of 204 housing units, whereas their actual production seven years into the 8-year cycle is 2,996 housing units, which equates to an average of 428 units per year and a surplus of 2,792 units. History has shown the ability of Santa Ana to produce quality housing and the likelihood of Santa Ana to successfully produce substantially more RHNA units than allocated in the upcoming RHNA Cycle. However, the adopted 6th Cycle RHNA Allocation Methodology does not consider certain sources of data of which ***10,174 units of housing approved and/or planned for production by Santa Ana over the next eight years***. The following represents the City of Santa Ana's planned/approved housing production per their Planning Division website at https://www.santa-ana.org/pb/planning-division/major-planning-projects-and-monthly-development-project-reports/

Specific Plan Area Projects:

Harbor Mixed-Use Transit Corridor

- 20-Year Implementation Period (2014 through 2034)
- Provides framework to support 1,700 to 4,600 new residential units
- Minimum Planned Production - 1,700 units (85 units/year)
- **680 units** - Estimated Total Production over the next 8 years
- **Harbor Corridor Plan**

Mainplace Mall Transformation

- 8-Year Implementation Period (2019 through 2027)
- **1,900 units** – Total Planned Production over the next 8 years
- **Mainplace Specific Plan**

Non-Specific Plan Area Projects:

The City of Santa Ana lists on its website 28 Major Planning Projects not located in the Specific Plan Areas listed above and totaling **7,594 housing units** (See **Exhibit 1**: Non-Specific Plan Projects). While these projects are in various stages of development, the fact remains that Santa Ana is a pro-housing jurisdiction focused on producing a significant number of housing units over the next eight years.

Combined, the Specific Plan and Non-Specific Plan projects total 10,174 units of housing, which should be the basis for determining Santa Ana's 6th Cycle RHNA Allocation and represents a more equitable approach to allocating units throughout Orange County.

General Plan Update:

In June 2020, the City of Santa Ana produced a document entitled, "Santa Ana General Plan Buildout Methodology" (attached hereto as **Exhibit 2**), which is a component of their General Plan Update Environmental Impact Review. This document (Table 1 on Page B-b-9, shown below) identifies a potential growth of 36,261 housing units between 2020 and 2045; an average of 1,450 units per year, or a total of ***11,604 new housing units over the 8-year RHNA Cycle***. Additionally, this document (Table 7 beginning on Page B-b-13) contains a list of projects totaling ***8,748 new housing units in the "pipeline" as of January 2020***.

Table 1 Existing Conditions, Potential Growth, and Buildout Conditions in Santa Ana, 2020 to 2045

	EXISTING [1]			GROWTH [2]		
PLANNING AREA	Housing Units	Bldg. Sq. Ft.[3]	Jobs	Housing Units	Bldg. Sq. Ft.[3]	Jobs
FOCUS AREAS	6,380	13,421,155	28,428	17,575	2,263,130	6,616
55 Freeway/Dyer Road	1,221	5,666,453	8,898	8,731	475,830	4,404
Grand Avenue/17th Street	561	1,400,741	3,568	1,722	-696,847	-1,946
South Bristol Street	220	1,577,511	3,337	5,272	3,505,130	7,855
South Main Street	1,720	1,685,978	3,455	588	-739,316	-1,304
West Santa Ana Boulevard	2,658	3,090,472	9,170	1,262	-281,667	-2,393
SPECIFIC PLAN / SPECIAL ZONING	4,685	13,924,891	38,548	15,839	3,033,554	1,154
Adaptive Reuse Overlay Zone [4]	260	976,935	3,043	1,000	0	-476
Bristol Street Corridor Specific Plan	136	140,348	294	-1	2,791	-12
Harbor Corridor Specific Plan	1,324	1,767,937	3,286	3,298	200,045	-1,708
Main Place Specific Plan	0	1,108,080	2,216	1,900	1,318,843	3,164
Metro East Overlay Zone	844	2,516,056	7,524	4,707	2,169,891	4,734
Midtown Specific Plan	607	1,885,065	4,824	0	-66,812	-209
Transit Zoning Code	1,514	5,530,470	17,361	4,935	-591,204	-4,339
ALL OTHER AREAS OF THE CITY [5]	67,727	39,772,550	92,004	2,847	552,536	3,666
CITYWIDE TOTAL	78,792	67,118,596	158,980	36,261	5,849,220	11,436

The reduction of a jurisdiction's RHNA Allocation below their projected level of development is inequitable in that it causes the reduced units (via Residual Units) to be redistributed throughout the County, *thus being double-counted.* The City believes every jurisdiction's RHNA Allocation, regardless of their status, should take into consideration both historic and projected housing development. Therefore, the City respectfully requests the City of Santa Ana's RHNA allocation be increased by 7,087 units, for a total 6th Cycle allocation of 10,174 units (See **Exhibit 3**: Proposed RHNA Allocation Table). *The adjustment of Santa Ana's RHNA allocation would revise Garden Grove's RHNA allocation of 19,122 units to 18,186 units, resulting in a reduction of 936 units.*

2. Application of the Final Methodology Directly Conflicts with SCAG's Regional Transportation Plan

Government Code Section 65584.05(b)(2) allows a jurisdiction to appeal another jurisdiction's RHNA allocation based on a failure by SCAG to determine the share of the jurisdiction's regional housing need in accordance with the information described in and the methodology established pursuant to Government Code Section 65584.04, in a manner that furthers, and does not undermine, state housing objectives. SCAG's adoption of a methodology that allocates units in direct conflict with the development patterns described in the approved regional transportation plan (Connect SoCal) violates state law, and results in allocation of regional housing need in a manner that is highly inequitable.

Pursuant to Government Code Section 68554.04:

> (m)(1) It is the intent of the Legislature that housing planning be ***coordinated and integrated with the regional transportation plan***. To achieve this goal, the allocation plan shall allocate housing units within the region ***consistent with the development pattern included in the sustainable communities strategy***.

On September 3, 2020, the SCAG Regional Council adopted the regional transportation plan known as Connect SoCal (Plan). The overarching intent of the Plan is to reduce greenhouse gas emissions by building housing near jobs and transit.

Per the data used by SCAG to determine housing allocations, the City of Santa Ana has greater access to jobs and transit than 98% of fellow SCAG jurisdictions. As such, Santa Ana's Existing Need allocation (prior to applying the DAC exemption) is 24,141 units, which is the second highest Existing Need allocation among all Orange County jurisdictions (the highest is the City of Anaheim which also received an exemption).

Due to the exemption granted by SCAG, the City of Santa Ana is scheduled to receive an exemption that reduces their 6th Cycle allocation from 26,256 units to 3,087 units, a decrease of over 88%. The difference of Residual Units are then reallocated to non-exempt jurisdictions within the same county.

SCAG's adoption of a methodology that allocates housing near jobs and transit, but then reduces and redistributes said units to various jurisdictions within the same County directly conflicts with the Plan and, therefore, violates Government Code Section 65584.04(m)(1).

The City requests a more equitable approach to implement a "sliding-scale application" to reduce the housing burden for those jurisdictions with high proportions of their population living in DACs. Such an approach would continue to provide relief to DACs, but in a manner that is proportionate to each jurisdiction's disadvantaged population. In the "sliding-scale application" proposed by Garden Grove, a jurisdiction identified as having 60% of its population in DACs would receive a 10% reduction of their Total Need allocation, a jurisdiction with 70% in DACs would receive a 20%

reduction, and so on (i.e. a one percent reduction in Total Need allocation for each percent, over 50%, of the jurisdiction's population that lives in a DAC). See **Exhibit 4** which illustrates implementation of the "sliding-scale application" for all jurisdictions within Orange County.

In addition to being more equitable, a sliding-scale application would bring SCAG's RHNA allocation more in line with the intent of its adopted regional transportation plan as required by Government Code Section 65584.04(m)(1) by accommodating for housing in areas with the greatest access to jobs and housing. *Implementation of the "sliding-scale application" would adjust Garden Grove's RHNA allocation of 19,122 units to 16,309 units, resulting in a reduction of 2,813 units.*

Conclusion

The City of Garden Grove respectfully requests that SCAG increase the City of Santa Ana's 6th Cycle RHNA allocation by 7,087 units to a total of 10,174 units. This increase furthers state housing objectives and is consistent with Connect SoCal in that it would bring housing to locations with the greatest access to jobs and transportation. Importantly, such an increase would not place an additional burden on the City of Santa Ana, since it has already planned for and approved over 10,000 residential units which will be constructed during the 6th Cycle. In addition, the City further request that SCAG revise the draft RHNA allocation through utilization of the sliding-scale DAC exemption formula as explained herein and seen in **Exhibit 4**. Applying the more equitable sliding-scale exemption would decrease the City of Garden Grove's RHNA Allocation from 19,122 to 16,309, a reduction of 2,813 units. Doing so would further the state housing objectives identified by Government Code Section 65584(d) by "increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region *in an equitable manner*."

Sincerely,

Steven R. Jones
Mayor

Exhibit 1
Non-Specific Plan Projects

Project Location	Planned Approved or Entitled Units	Links
2700 N. Main St.	243	2700 N. Main St.
201 W. 3rd St.	171	201 W. 3rd St.
409-509 E. 4th St.	169	409-509 E. 4th St.
1122 N. Bewley St.	10	1122 N. Bewley St.
2300 Red Hill Ave.	1100	2300 Red Hill Ave.
1801 E. 4th St.	650	1801 E. 4th St.
1126 E. Washington Ave.	86	1126 E. Washington Ave.
114 E. 5th St.	220	114 E. 5th St.
801, 807, 809, 809 ½ E. Santa Ana Blvd.	17	801, 807, 809, 809 ½ E. Santa Ana Blvd.
3025 W. Edinger Ave.	18	3025 W. Edinger Ave.
609 N. Spurgeon St.	93	609 N. Spurgeon St.
651 W. Sunflower Ave.	226	651 W. Sunflower Ave.
200 E. First American Way	278	200 E. First American Way
200 N. Cabrillo Park Dr.	260	200 N. Cabrillo Park Dr.
2525 N. Main St.	256	2525 N. Main St.
301 N. Mountain View St.	8	301 N. Mountain View St.
1109 N. Broadway	327	1109 N. Broadway
1008 E. 4th St.	117	1008 E. 4th St.
1660 E. First St.	603	1660 E. First St.
2534 W. Westminster	85	2534 W. Westminster
3417 W. 5th St.	7	3417 W. 5th St.

888 N. Main St.	148	888 N. Main St.
2222 E. 1st St.	419	2222 E. 1st St.
2114 E. 1st St.	552	2114 E. 1st St.
2001 E. Dyer Rd.	1221	2001 E. Dyer Rd.
3630 Westminster Ave.	228	3630 Westminster Ave.
1666 N. Main St.	58	1666 N. Main St.
1584 E. Santa Clara	24	1584 E. Santa Clara

Total Units **7594**

Exhibit 2
Santa Ana General Plan Buildout Methodology

Santa Ana General Plan Buildout Methodology

June 2020

Purpose, Design, and Limitations

The following summarizes the methodology and factors used to calculate existing and buildout conditions for purposes of the General Plan and its analysis through an environmental impact report. All figures are estimates generated using the best available data for analysis at a citywide level, with additional detail provided by specific planning/focus areas and traffic analysis zones.

Whenever possible, the figures generated were derived from authoritative data sources, such as the U.S. Census or California Department of Finance. Such sources are subject to their own error rates and may summarize data at different geographic levels or in different categories. When more precise data was not available, figures generated for existing and projected figures were compared to aggregated or citywide totals from authoritative sources, understanding that such comparisons are primarily for the purpose of determining order-of-magnitude accuracy.

It is important to note that the buildout figures represent an informed but estimated projection of a future condition. The actual construction of development will likely vary by parcel and planning area in terms of location and mix of uses. The analysis in the General Plan Environmental Impact Report provides a programmatic assessment of potential impacts, enabling tiering for future projects that are consistent with the assumptions on some CEQA topics (other project-level impacts will still need to be evaluated through the appropriate environmental clearance under CEQA).

Existing Conditions

Housing Units and Building Square Footage

Existing conditions figures (see Table 1) reflects the built environment as of January 2020, using parcel data from the City of Santa Ana Planning Information Network, augmented by projects listed as already under construction in the City's January 2020 monthly development project report (see Table 5).

Households and Population

The number of households was generated by multiplying the total number of housing units by the occupancy rate as reported by the California Department of Finance for 2019 (see source notes in Table 4). Population was generated by multiplying the total number of households by persons per household rates, varying for single family and multi-family units, as reported in the 2018 American Community Survey 1-year estimates (see Table 4).

Students

The number of K-12 and college students currently attending schools in Santa Ana was obtained from the California Department of Education and Rancho Santiago Community College District, respectively (see Table 5).

Employment

The number of jobs (employment) in Santa Ana was generated by dividing building square footage (by land use) by employment generation factors (see Table 3). The building use and square footage data was obtained from the City of Santa Ana Planning Information Network, augmented by projects listed as already under construction in the City's January 2020 monthly development project report. The employment generation factors were derived by first dividing the building square footage by factors provided by the City and sourced to the Santa Ana OCP 2002/2006 Interagency Team. The results were compared to total employment figures reported citywide and by industry sector (with rough equivalents identified for each land use category), by the U.S. Census Bureau for 2017. The employment generation factors were adjusted as necessary to bring calculated figures for existing employment generally in line with figures reported by the U.S. Census in 2017.

Employed Persons

The number of employed persons is calculated exclusively as an input into the Orange County Traffic Analysis Model (OCTAM) to conduct the traffic analysis of the General Plan as part of the environmental impact report. The total estimated number of employed residents varies between different U.S. Census datasets. The Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics (LEHD) reports data based on W-2 and W-4 forms related to wages and worker's compensation, while the American Community Survey relies on statistical surveys of self-reported data. The LEHD figures are generally considered more appropriate for traffic analysis purposes since the job information is more consistent and more likely to involve vehicular travel outside of the home.

The number of employed persons in Santa Ana was generated by multiplying the total population in households by the percentage of population age 16 and over by the employment-to-population ratio, as reported by the U.S. Census Bureau in 2018 (see Table 4). These calculations, drawn from the ACS, are then reduced proportionally to bring figures in line with the total reported by LEHD.

Buildout Conditions

Proposed Plan

In coordination with a General Plan Advisory Group, the City identified five areas suited for new growth and development: South Main Street, Grand Avenue/17th Street, West Santa Ana Boulevard, 55 Freeway/Dyer Road, and South Bristol Street. These five areas are located along major travel corridors, the future OC Streetcar line, and/or linked to the Downtown. In general, many areas currently designated for General Commercial and Professional Office are expanding opportunities for residential development through a proposed change to the Urban Neighborhood or District Center General Plan land use designations. Industrial Flex would be introduced where Industrial land use designations currently exist within each of the five focus areas in order to allow for cleaner industrial and commercial uses with live-work opportunities.

There are seven other planning areas that represent specific plans and other special zoning areas that were previously adopted: Adaptive Reuse Overlay (2014), Bristol Street Corridor Specific Plan (1991/2018), Harbor Mixed Use Corridor Specific Plan (2014), MainPlace Specific Plan (2019), Metro East Mixed Use Overlay Zone (2007/2018), Midtown Specific Plan (1996), and Transit Zoning Code Specific Development (2010). The potential for new development in these areas is based on the forecasted buildout at the time of the respective zoning

document's adoption, minus the amount of new development built between their adoption date and 2019. The most recent adoption/amendment date for each zoning document is noted above in parentheses.

Growth outside of the focus areas and special planning areas is expected to be incremental and limited. Some growth was projected for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan. Some growth was also projected for the commercial and retail area south of the West Santa Ana Boulevard focus area. Finally, some additional residential development is expected to occur on a small portion (five percent) of single-family and multi-family lots through the construction of second units.

Focus Areas

Parcels within focus areas were first evaluated for the potential for new uses (units or building square footage), through redevelopment, intensification, and/or turnover. The analysis was conducted by MIG in 2019, in support of the City of Santa Ana, using the City of Santa Ana Planning Information Network as of April 2019. MIG determined the potential based on the building-to-land-value ratio. Those parcels that were vacant or exhibited a building-to-land-value ratio below 1.0 were determined to have potential for new uses. Exceptions include religious and governmental institutions.

For parcels without the potential for new uses, existing building square footage (non-residential) and/or existing units (residential) were carried over into future buildout. For parcels with potential for new uses, buildout factors can be found in Table 2. These factors were established by the City, assisted by MIG, based on a comparison of development throughout southern California that matched the vision established for each focus area. MIG identified the density and intensity factors corresponding with such development to inform the City's focus area buildout factors.

After calculating future buildout conditions using the density/intensity factors, PlaceWorks assisted the City in evaluating the potential implications of the potential buildout figures for each focus area, informed by analyses by IBI Group (circulation) and AECOM (market) conducted in 2019 and 2020. PlaceWorks concluded that the City should not assume a maximum theoretical buildout based on maximum density/intensity standards but should forecast and plan for growth beyond current market demand. PlaceWorks recommended that the City apply a buildout factor of 80% to the totals generated using the factors in Table 2 to arrive at buildout projections for 2045 that are realistic, market-friendly, consistent with the visions for each focus area, and more compatible with the proposed roadway network. The following information substantiates the General Plan buildout development assumptions and adjustments.

Realistic vs Maximum Theoretical Buildout

Density and intensity standards are provided in a general plan to convey the maximum scale and intensity for broad land use categories. Zoning standards are then applied at a parcel level to guide and control density and intensity at a development project level. When calculating buildout, a jurisdiction is permitted to assume that every single parcel will develop at the maximum permitted density/intensity. However, this assumption of absolute buildout runs the risk of overestimating the amount of building space and residential units within the identified planning horizon (in this case the year 2045). Overestimating buildout can lead to unnecessary and misleading concerns, mitigation measures, and planning efforts, as well as a misallocation of current and future

public funds. Accordingly, the City of Santa Ana General Plan calculated a realistic or more likely buildout scenario for projecting growth between 2020 and 2045.

Past Development Trends

While 25 years is a long period of time, the City of Santa Ana is a highly urbanized place containing relatively few vacant lots. The process of intensifying and/or redeveloping parcels of land that already contain functional uses and structures is often substantially more complicated and costly compared to developing vacant land. A review of the City's property records indicates that the pace of new development, intensification, and redevelopment has occurred over a much longer period of time to reach where the City is today. The average floor area ratios (amount of building space compared to the total area of the parcel) throughout the focus areas are 0.22 to 0.41 for commercial, 0.28 to 0.43 for industrial, 0.26 to 1.29 for office, and 0.40 for mixed use. Average densities are 4.5 to 6.5 dwelling units per acre (du/ac) for single family units and 13.5 to 24.8 units per acre for multi-family units.

Current Development Trends

Of course, past development trends do not necessarily match the likely and/or desired scale, intensity, or pace of new development envisioned by the updated General Plan. Current development trends can be identified through recent development projects and applications. The following list contains projects that were under construction, entitled, or in review as of January 2020. The projects are listed by planning area, with the proposed project intensity details shown alongside the maximum intensity standards of the desired general plan or zoning designation. This list demonstrates that some current projects are building to their maximum potential, but the majority are building at roughly 60% to 75% of the maximum potential (either in terms of residential density and/or building space).

- Metro East Mixed Use Overlay
  - Active Urban District, no maximum on stories
    - AMG Family Affordable Apartments, 6 stories, 80 du/ac, 10,000 sq. ft. of commercial
    - Central Pointe Mixed-Use Development, 5 stories, 75 du/ac, 8,800 sq. ft. of commercial
    - The Madison, 6 stories, 93 du/ac, 6,600 sq. ft. of commercial
    - Wermers Elks Site "Elan" Mixed-Use Development, 6 stories, 97 du/ac, 20,000 sq. ft. of commercial
  - Neighborhood Transitional District, allows up to 4 stories
    - AMCAL First Street Apartments, 3 stories, 32 du/ac
- 55/Dyer Focus Area
  - District Center, up to 90 du/ac, up to 1.7 FAR (Heritage) and up to 5.0 FAR (Bowery)
    - The Bowery Mixed-Use Project, 79 du/ac, 80,000 sq. ft. of commercial
    - The Heritage, 65 du/ac, 18,400 sq. ft. of commercial, and 56,000 sq. ft. of office
- MainPlace Specific Plan
  - District Center, up to 90 du/ac, up to 2.1 FAR
    - 2700 N Main, 71 du/ac
    - Magnolia at the Park, 58 du/ac
- Adaptive Reuse Overlay
  - Adaptive reuse standards/incentives, minimum 500-sq. ft. units, can exceed general plan density
    - Meta Housing Santa Ana Arts Collective Adaptive Re-Use, 61 du/ac

- Transit Zoning Code
  - Transit Village Zone, up to 25 stories
    - Crossroads at Washington, 4 stories, 38 du/ac, 10,060 sq. ft. of commercial
  - Downtown Zone, up to 10 stories
    - 3rd & Broadway, 10 stories of residential, 14,816 sq. ft. of commercial, 75-room hotel
    - 4th and Mortimer Mixed-Use Development, 6 stories of residential, 49 du/ac, 15,800 sq. ft. of commercial
    - First American Title Co. Site, 7 stories of residential, 12,350 sq. ft. of commercial
  - Urban Neighborhood 2, up to 5 stories
    - Tom's Trucks Residential & Adaptive Reuse Development, 3 stories, 14 du/ac

Market Analysis

AECOM conducted a market analysis for the General Plan update in 2019 and 2020 (final Santa Ana Economic Indicators Report, May 2020). The report concluded that the demand for new residential development could reach upwards of 15,520 units through 2040 (including pipeline projects, per Figure 7.2 in the Economic Indicators Report Report), although the report also noted that housing demand could increase if the housing pipeline remains strong if it can increase its capture rate of countywide growth. AECOM determined that future demand for office and industrial space would continue to be in line with historical rates, and demand for retail would continue to be tied to household growth and spending. While such findings may seem to justify relatively low levels of growth (especially compared to maximum buildout standards), jurisdictions must plan increased capacity throughout planning areas to create responsive and flexible market areas. New development requires not only market demand but also property owners willing to sell and/or redevelop. This means that new development is often limited to a fraction of the land theoretically available and suitable for reuse and/or development.

Density Bonus Assumptions

State law allows a graduated density bonus for the inclusion of affordable housing units --- for an increasing number of affordable units (by percentage), a project is allowed an increasing ability to exceed the permitted density. The amount of density bonus is generally capped at 35 percent. Recent updates to state housing law (Assembly Bill 1763, effect January 1, 2020), enables projects that are 100 percent affordable (either 100% lower income or 80% lower and 20% moderate (as defined in Section 50053 of the Health and Safety Code), to obtain a density bonus of 80 percent, or no limit if within one-half mile of a major transit stop.

However, not every project will include affordable units and not every project that includes affordable units will need a density bonus. Projects are not required to build at densities that exceed maximum limits; the law only requires that jurisdictions grant the density bonus if requested. The buildout methodology was based on past development trends, current development trends, and a forecasted market analysis. These trends accounted for any units approved (density bonus or otherwise), to determine the appropriate density and amount of development to assume.

Additionally, the optimal density of affordable units is at or below the densities levels assumed for forecasting buildout. Generally, projects beyond 50 to 70 units per acre require Type 1 construction (steel and concrete structure), which is dramatically more expensive compared to Type V construction (wood structure).

Accordingly, affordable projects are rarely greater than 70 units per acre (exceptions for very small parcels). The average densities used to calculate projected buildout at 2045 are 50 to 90 units per acre in the three most intense focus areas (55/Dyer, 17th/Grand, and South Bristol), with the other two applying a residential assumption at 30 units per acre over a broad area to account for development at or above the maximum density of 30 units per acre (maximum is 20 units per acre for projects proposed exclusively residential in the South Main Focus Area; maximum is 30 units per acre for a relatively small part of the West Santa Ana Boulevard Focus Area).

Roadway Network Performance

IBI Group conducted an analysis of existing roadway conditions in 2019 (documented in Section 5 of Santa Ana General Plan Update Traffic Impact Study, June 2020), including an analysis of existing and future roadway segment and intersections that are likely to experience roadway congestion issues created by future growth, even with feasible mitigation. While roadway congestion (level-of-service or LOS) is not a topic evaluated in the environmental impact report (removed through Senate Bill 743, passed in 2013), the performance of the City's roadway network remains a concern of the City and its residents, businesses, and other stakeholders. PlaceWorks and IBI Group recommended reduced (below absolute maximum) buildout assumptions for the focus areas given known or likely roadway (segment and/or intersection) performance issues alongside the City's desire to make adjustments to a number of roadway classifications.

Adopted and Existing Plans

Adaptive Reuse (AR) Overlay Zone

In consultation with the City, it was determined that 1,000 residential units could be developed over the planning period. A total of 800 units were distributed proportionally among parcels covered by AR Zone only (not in a specific plan or focus area). The remaining 200 units were distributed proportionally among parcels throughout the Midtown Specific Plan. For non-residential building square footage, it was assumed that no additional growth would occur during the planning period, and existing building square footage was carried over into future buildout.

Bristol Street Corridor Specific Plan

The City was determined that parcels with existing single/multi-family units would not redevelop during the planning period, and therefore existing units were carried forward into future buildout. For non-residential building square footage, due to the location and age of existing non-residential development, turnover was considered to potentially occur during the planning period.

Harbor Street Corridor Specific Plan

The Harbor Corridor Specific Plan was adopted in 2014 and included a comprehensive buildout analysis that spanned a similar planning period. Accordingly, the buildout conditions were carried over as detailed in the Specific Plan, adjusting for new development constructed or entitled since 2014.

MainPlace Specific Plan

The MainPlace Specific Plan was adopted in 2019 and included a comprehensive buildout analysis that spanned a similar planning period. Accordingly, the buildout conditions were carried over as detailed in the Specific Plan, adjusting for new development constructed or entitled since 2019.

Metro East Overlay Zone

The Metro East Mixed Use Overlay Zone, adopted in 2007 and amended in 2018, included a cumulative buildout analysis that spanned a similar planning period. Accordingly, the buildout conditions were carried over as detailed in the Specific Plan, distributed proportionally throughout the plan area and adjusting for new development constructed or entitled since 2019.

Midtown Specific Plan

The City determined that the Midtown Specific Plan (adopted in 1996) would experience little net growth during the planning period, so existing single/multi-family units and building square footage were largely carried forward into future buildout. To account for adaptive reuse projects, 200 multifamily units were distributed across eligible parcels.

Transit Zoning Code

The Transit Zoning Code was adopted in 2010 and included a cumulative buildout analysis that spanned a similar planning period. The cumulative buildout conditions for residential and non-residential development were carried over as detailed in the Specific Plan, distributed proportionally throughout the plan area according to the block system established in working maps (previously identified under the Draft Renaissance Specific Plan).

All Other Areas of the City

The City assumed a small increase (five percent) of residential units through the construction of second units, which are distributed throughout the City by traffic analysis zone and is not concentrated in a subset of neighborhoods. A 10 percent increase in non-residential building square footage (and associated employment), was assumed for the professional offices surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan, as well as the commercial and retail areas along 1st Street south of the West Santa Ana Boulevard focus area. Current development projects as listed in the City of Santa Ana monthly development project report (as of January 2020), were incorporated as follows: projects under construction and nearing occupancy were factored into the existing conditions figures; all other projects were included as potential future growth.

Current General Plan

As part of the technical analyses, it is common to evaluate a buildout scenario that reflects the currently adopted General Plan. It is also important to keep the overall buildout approach generally consistent with that used in developing the Proposed Plan buildout, with obvious exceptions for areas that are planned differently—in this case, the focus areas. The buildout for focus areas was based on the land designations as of January 2020, using a combination of current assumptions stated in the 1998 Land Use Element (Table A-4, Land Use Plan Build-out Capacities), past and current trends, and the results of the 2020 Economic Indicators Report by AECOM.

Other Projections

Orange County Projections (OCP)

The Center for Demographic Research (CDR) is the entity through which jurisdictions in Orange County distribute and generate population, housing, and employment projections for Orange County. This includes the use of OCP figures to communicate expected growth for the regional transportation plan. The latest OCP figures were

finalized (September 2018) prior to the current land use planning and buildout efforts associated with the General Plan update. Interim adjustments can be made to the OCP figures if significant changes in land use or other policies will have a significant impact on the projections, and if these changes can be documented. The buildout for the Santa Ana General Plan will be finalized upon the adoption of the General Plan at the end of 2020, with implementation beginning in 2021. The General Plan land use plan and buildout projections will be incorporated into the OCP figures in 2021/2022.

Southern California Association of Governments (SCAG)

As the metropolitan planning organization SCAG is responsible for developing long-range transportation plans and a sustainability strategy for the vast majority of Southern California. The centerpiece of that planning work is Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). This effort includes population, housing, and employment projections for each jurisdiction between 2020 and 2045.

SCAG is required by federal law to prepare and update (ever four years) a long-range RTP that identifies a feasible transportation system, adequate financial plan, and strategies to move people and goods efficiently. SCAG must also develop a SCS to integrate land use and transportation strategies that will achieve California Air Resources Board (CARB) greenhouse gas emissions reduction targets. In regard to housing, the SCS must demonstrate, on a regional level, areas sufficient to house all the population of the region, including the eight-year projection of the Regional Housing Needs Assessment (RHNA).

SCAG is also responsible for preparing the RHNA, a quantification of the housing need in each jurisdiction during specified planning periods. SCAG is in the process of developing the 6th cycle RHNA allocation plan which will cover the planning period October 2021 through October 2029. It is planned for adoption by SCAG in October 2020. Per Senate Bill 375 (2008), the RHNA must be consistent with the adopted SCS. The update process for the 2020 RTP/SCS began in 2018, and a draft of the proposed RTP/SCS was released in November 2019. SCAG's Regional Council approved the final RTP/SCS (aka Connect SoCal) on May 7, 2020, for the limited purpose of federal transportation conformity, so that SCAG could submit the plan to the Federal Highway Administration and Federal Transit Administration for review prior to the June 1, 2020, deadline, as required by the federal Clean Air Act. As of June 2020, the Regional Council anticipates the approval of Connect SoCal in its entirety sometime in late 2020 (possibly 120 days from May 7, 2020), following additional engagement with stakeholders to consider the impacts of the novel coronavirus (COVID-19) pandemic on the plan and its implementation.

The period to file RHNA appeals is expected to commence on the eighth day after the Regional Council adopts the Connect SoCal in its entirety. The appeals process will then follow the adopted RHNA Appeals Procedures with timelines updated to reflect the delay of the Connect SoCal Plan adoption.

Note that the adoption dates for the RTP/SCS and RHNA may be pushed due to circumstances related to the novel coronavirus (COVID-19) crisis. The buildout for the Santa Ana General Plan will be finalized upon the adoption of the General Plan at the end of 2020, with implementation beginning in 2021. The General Plan land use plan and buildout projections will be incorporated into the 2024 RTP/SCS, for which the update process should being in 2022.

Table 1 Existing Conditions, Potential Growth, and Buildout Conditions in Santa Ana, 2020 to 2045

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

Notes:

1. Existing represents conditions as of December 2019 as derived from the City of Santa Ana Planning Information Network and projects already under construction per the January 2020 monthly development project report.
2. The potential growth for new development in specific plan / special zoning area is based on the forecasted buildout at the time of the respective zoning document's adoption, minus the amount of new development built between its adoption date and 2019.
3. Only includes nonresidential building square footage.
4. The figures shown on the row for the Adaptive Reuse Overlay represents parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.
5. The City has included an assumption for growth on a small portion (five percent) of residential parcels through the construction of second units, which is distributed throughout the City and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan, as well as the commercial and retail along 1st Street south of the West Santa Ana Boulevard focus area.

Source: City of Santa Ana with assistance from PlaceWorks, 2020.

Table 2: Focus Area Buildout Factors

Focus Area	Density [1]	Intensity (FAR) [1]					Use Ratio (pct. of land) [1]						
Land Use	*DU/ac*	*Comm.*	*Off.*	*Ind.*	*Ins.*	*Hotel*	*Res.*	*Comm.*	*Off.*	*Ind.*	*Ins.*	*Hotel*	*O.S.*
55 Freeway / Dyer Road													
District Center	85	0.5	0.5	-	-	1.0	75%	15%	5%	-	-	-	5%
General Commercial	-	1.0	-	-	-	-	-	100%	-	-	-	-	-
Industrial / Flex	-	0.5	1.0	0.75	-	-	-	5%	30%	65%	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
17th Street / Grand Avenue													
District Center	50	0.5	0.5	-	-	-	75%	15%	5%	-	-	-	5%
General Commercial	-	0.28	-	-	-	-	-	100%	-	-	-	-	-
Industrial / Flex	-	0.5	0.75	0.6	-	-	-	5%	30%	65%	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Urban Neighborhood	30	0.5	0.5	-	-	-	75%	15%	5%	-	-	-	5%
South Bristol Street													
District Center Area A [2]	80	1.0	2.0	-	-	3.0	35%	5%	50%	-	-	5%	5%
District Center Area B [3]	90	1.0	2.0	-	-	3.0	75%	7%	7%	-	-	3%	8%
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Urban Neighborhood	30	0.5	0.5	-	-	-	65%	25%	5%	-	-	-	5%
South Main Street													
Industrial / Flex	-	0.75	0.5	0.3	-	-	-	15%	30%	55%	-	-	-
Institutional	-	-	-	-	0.36	-	-	-	-	-	100%	-	-
Low Density Residential	7	-	-	-	-	-	100%	-	-	-	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Urban Neighborhood	30	0.5	0.5	-	-	-	70%	20%	5%	-	-	-	5%
West Santa Ana Boulevard													
Corridor Residential	30	-	-	-	-	-	100%	-	-	-	-	-	-
General Commercial	-	1.0	-	-	-	-	-	100%	-	-	-	-	-
Industrial / Flex	15	0.5	0.75	0.6	-	-	5%	15%	30%	50%	-	-	-
Institutional	-	-	-	-	1.09	-	-	-	-	-	100%	-	-
Low Density Residential	7	-	-	-	-	-	100%	-	-	-	-	-	-
Low-Medium Density Residential	13.7	-	-	-	-	-	100%	-	-	-	-	-	-
Medium Density Residential	24.8	-	-	-	-	-	100%	-	-	-	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Professional and Administrative Office	-	-	2.0	-	-	-	-	-	100%	-	-	-	-
Urban Neighborhood	30	0.5	0.5	-	-	-	80%	10%	5%	-	-	-	5%

Notes:
1. Density, intensity, and use ratio figures determined by the City of Santa Ana in collaboration with MIG, 2019. The FAR figures address nonresidential building square footage only. The resulting buildout figures, with the exception of South Bristol Street District Center Area B, were then multiplied by a factor of 80% to arrive at projections for 2045.
2. Includes all District Center areas north of MacArthur Blvd and on the east side of Bristol south of MacArthur (~52 acres).
3. Includes all District Center areas south of Macarthur Blvd and west of Bristol (~58 acres).

Table 3: Employment Factors

Employment Generation Factors		
Land Use	**Existing Factor**	**Buildout Factor**
Commercial	500 sq. ft. / emp.	500 sq. ft. / emp.
Office / Office Park	286 sq. ft. / emp.	364 sq. ft. / emp.
Business Park / R&D	300 sq. ft. / emp.	333 sq. ft. / emp.
Light Industrial	400 sq. ft. / emp.	500 sq. ft. / emp.
Heavy Industrial	500 sq. ft. / emp.	500 sq. ft. / emp.
Warehouse	800 sq. ft. / emp.	800 sq. ft. / emp.
Medical	400 sq. ft. / emp.	222 sq. ft. / emp.
Government Office	286 sq. ft. / emp.	286 sq. ft. / emp.
Hospital	400 sq. ft. / emp.	364 sq. ft. / emp.
Religious Institution	800 sq. ft. / emp.	800 sq. ft. / emp.
Hotel / Motel	0.9 / room	0.9 / room
School	0.1 / student	0.1 / student
Park	0.75 / acre	0.75 / acre
Employed Persons Factors		
Population age 16+ (% of total)	76.8%	
Employment/working population ratio	63.7%	
LEHD / ACS employment	84.0%	

Source:
- Existing employment generation factors based on U.S. Census Bureau, Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics (LEHD), 2017, accessed and aggregated by PlaceWorks in March 2020.
- Buildout employment generation factors based on OCTA Typical Employment Conversion Factors, June 2001 allowable ranges; adjusted by Santa Ana OCP 2002/2006 Interagency Team.
- Population age 16+ derived by comparing total population in households and workforce population 16 and over, reported by the U.S. Census, American Community Survey (ACS) 2018 5-Year Estimates, Tables B25033 and S2301), accessed in March 2020.
- Employed/ working population ratio as reported by the U.S. Census, ACS 2018 5-Year Estimates, Table S2301), accessed in March 2020.
- LEHD / ACS employment compares the number of employed residents reported by LEHD to self-reported data in ACS 2017 5-Year Estimates, accessed in March 2020.

Table 4: Persons per Household Assumptions

Units in Structure	2000	2010	2011	2012	2013	2014	2015	2016	2017	2018	2045
Citywide	4.37	4.30	4.26	4.41	4.14	3.97	4.33	4.20	4.11	3.97	3.62
Single family[1]	5.01	4.92	4.98	4.94	4.84	4.81	5.00	4.85	4.73	**4.59 [3]**	**4.30 [4]**
Multi-family[2]	4.07	4.01	3.86	4.15	3.82	3.51	4.01	3.86	3.74	**3.58 [3]**	**3.12 [4]**
2 to 4	4.40	4.84	4.09	4.77	3.90	3.56	4.48	4.37	4.01	4.03	3.43
5 to 19	3.93	3.78	3.75	4.31	3.69	3.55	4.01	3.85	3.53	3.99	3.60
20 to 49	4.67	4.20	4.35	4.49	4.31	3.81	4.10	4.20	3.92	2.95	2.05
50 or more	3.71	3.58	3.67	3.55	3.71	3.19	3.43	3.18	3.74	2.77	2.41

Notes:
1. A category representing the aggregate figure for single family detached and single family attached units, as reported in the Census tables.
2. A category representing the aggregate figure for multi-family units with two or more units in the structure, as reported in the Census tables.
3. Factors used to generate population estimates for existing conditions.
4. Factors used to generate population estimates for buildout conditions.

Source:
- 2000 (Decennial Census Tables HCT003 and H033), accessed and aggregated (weighted average) by PlaceWorks in March 2020.
- 2010-218 (U.S. Census, American Community Survey 1-Year Estimates, Tables B25124 and B25033), accessed and aggregated (weighted average) by PlaceWorks in March 2020.
- 2045 derived through trendline analysis of 2000-2018 data by PlaceWorks in March 2020.
- Occupancy rate of 95.94% from the California Department of Finance, Table 2: E-5 City/County Population and Housing Estimates, 1/1/2019, downloaded in March 2020.

Table 5: Student Enrollment for Public and Private Schools in Santa Ana, 2018/2019

School	Enrollment	School	Enrollment
Garden Grove Unified School District		**Santa Ana Unified School District continued**	
Edward Russell Elementary	502	Manuel Esqueda Elementary	1,100
Heritage Elementary	452	Martin Elementary	645
Newhope Elementary	396	Martin Luther King Jr. Elementary	640
R. F. Hazard Elementary	468	Martin R. Heninger Elementary	1,151
Rosita Elementary	480	McFadden Intermediate	1,184
Stephen R. Fitz Intermediate	687	Middle College High	349
Bethel Baptist	225	Mitchell Child Development Center	419
Saint Barbara Elementary	325	Monroe Elementary	300
Santa Clara Nursery School	24	Monte Vista Elementary	516
Orange County Department of Education		Orange County School of the Arts	2,177
Samueli Academy	529	Pio Pico Elementary	563
Citrus Springs Charter	256	Raymond A. Villa Fund. Intermediate	1,390
College and Career Preparatory Academy	241	REACH Academy	34
Ednovate - Legacy College Prep.	189	Saddleback High	1574
Scholarship Prep	436	Santa Ana High	3,057
Vista Condor Global Academy	132	Santiago Elementary	1,152
Vista Heritage Global Academy	275	Segerstrom High	2,435
Orange Unified School District		Sierra Intermediate	757
Fairhaven Elementary	544	Taft Elementary	544
Panorama Elementary	404	Theodore Roosevelt Elementary	572
Santa Ana Unified School District		Thomas A. Edison Elementary	515
Edward B. Cole Academy	373	Valley High	2,150
Orange County Educational Arts Academy	622	Walker Elementary	401
Abraham Lincoln Elementary	790	Wallace R. Davis Elementary	538
Advanced Learning Academy	364	Washington Elementary	750
Andrew Jackson Elementary	745	Willard Intermediate	708
Carl Harvey Elementary	409	Wilson Elementary	578
Cesar E. Chavez High	385	**Tustin Unified School District**	
Century High	1,660	Arroyo Elementary	640
Community Day Intermediate and High	34	Foothill High	2,467
Diamond Elementary	509	Guin Foss Elementary	443
Douglas MacArthur Fundamental Intermediate	1,210	Hewes Middle	1,003
El Sol Santa Ana Science and Arts Academy	919	Loma Vista Elementary	454
Franklin Elementary	409	Red Hill Elementary	563
Fremont Elementary	536	Tustin Memorial Elementary	584
Garfield Elementary	723	**SBE – Magnolia Science Academy**	
George Washington Carver Elementary	386	Magnolia Science Academy Santa Ana	674
Gerald P. Carr Intermediate	1,405	**Private**	
Gonzalo Felicitas Mendez Fund. Intermediate	1,392	Ari Guiragos Minassian Armenian	109
Greenville Fundamental Elementary	1,043	Blind Children's Learning Center	60
Hector Godinez Fundamental High School	2,449	Calvary Chapel Private School	251
Heroes Elementary	565	Calvary Chapel High/Maranatha Christian Acad.	1,370
Hoover Elementary	357	Calvary Christian School	322
Jefferson Elementary	707	Fairmont Private School	300
Jim Thorpe Fundamental	927	Foothill Montessori School	76
John Adams Elementary	420	Mater Dei High School	2,200
John F. Kennedy Elementary	619	Nova Academy Early College High	430
John Muir Fundamental Elementary	876	Reedemer Christian School	19
Jose Sepulveda Elementary	372	Saint Anne School	220
Julia C. Lathrop Intermediate	948	Saint Joseph Elementary	220
Lorin Griset Academy	371	School of Our Lady	185
Lowell Elementary	709	The Prentice School	140
Lydia Romero-Cruz Elementary	196	**Rancho Santiago Community College District**	
Madison Elementary	1,009	Santa Ana College	36,411

Source: Santa Ana College student enrollment figure (2018 student headcount) from the Rancho Santiago Community College District, https://www.rsccd.edu/Discover-RSCCD/Pages/default.aspx, accessed in March 2020. All other student enrollment figures from the California Department of Education, California School Directory, 2018/2019 enrollment data, accessed in March 2020.

Table 6: Student Generation Rates

School District	Multi-Family Unit	Single Family Unit
Santa Ana Unified	0.4475	0.9099
Garden Grove Unified	0.3081	0.59877
Orange Unified	0.3735	0.4922
Tustin Unified	0.3072	0.6063

Sources:
- SAUSD, 2020 Residential Development School Fee Justification Study.
- GGUSD, 2020 Response to Service Questionnaire for Draft EIR. Multi-family rate reflects an average of rates for single family attached and multi-family units.
- OUSD, 2018 Fee Justification Report.
- TUSD, 2018 Fee Justification Report.

Table 7: Pipeline Projects as of January 2020

APN	Project Name	Address	Land Use	Res Units	Nonres Sq. Ft.	Status
198-081-28	The Line	3630 W Westminster Avenue	Residential Apartments and Commercial	228	4,248	Under Construction
002-312-35	Saint Thomas 3-Lot Subdivision	2828 N Flower Street	Single-Family Residential	3		Site Plan Review
002-210-40	2700 Main Street Apartments	2700 N Main Street	Residential Apartments	247		Site Plan Review
002-210-42	MainPlace Mall Revitalization Plan	2800 N Main Street	Residential	1900		DA Entitled
002-210-42	MainPlace Mall Revitalization Plan	2800 N Main Street	Hotel (400 rooms)		n/a	DA Entitled
002-210-42	MainPlace Mall Revitalization Plan	2800 N Main Street	Office		750,000	DA Entitled
002-210-42	MainPlace Mall Revitalization Plan	2800 N Main Street	Commercial		270,000	DA Entitled
041-213-04	Town and Country Manor (revise entitlement)	555 E Memory Lane	Senior Care Facility		46,218	Plan Check
390-171-03	Starbucks	2701 N Grand Avenue	Restaurant with Drive-thru		907	Under Construction
003-010-27	Magnolia at the Park	2525 N Main Street	Residential Apartments	347		Site Plan Review
003-010-27	Magnolia at the Park	2525 N Main Street	Demo Office Building for Apartments	0	-81,172	Site Plan Review
396-141-01	Starbucks Drive-thru & Retail Pad	2301 N Tustin Avenue	Restaurant with Drive-thru		3,567	Under Construction
003-113-41	Hampton Inn Hotel	2056 N Bush Street	Relocate SFD to 2125 North Main, change to commercial	-1	922	Plan Check
003-113-59	Hampton Inn Hotel	2115 N Main Street	SFD/Office Change to Commercial	-1	2,627	Plan Check
003-113-61	Hampton Inn Hotel	2058 N Bush Street	Demo SFD	-1		Plan Check
003-113-63	Hampton Inn Hotel	2119 N Main Street	Demo Office Building		-1,619	Plan Check
003-113-81	Hampton Inn Hotel	2129 N Main Street	Hampton Inn Hotel		73,322	Plan Check
399-031-23	The Academy Charter High School	1901 N Fairview Street	"Family" apartments	8		Under Construction
399-031-23	The Academy Charter High School	1901 N Fairview Street	Educational (High School)		146,136	Under Construction
399-031-24	Samuelli Academy Master Plan Revisions	1919 N Fairview Street	Master plan to modify schools classrooms		-6,530	Entitled
396-211-48	North Grand Car Wash	1821 N Grand Ave	Car Wash		5,243	Site Plan Review
396-211-48	North Grand Car Wash	1821 N Grand Ave	Demo Restaurant		-6,592	Site Plan Review

Table 7: Pipeline Projects as of January 2020

APN	Project Name	Address	Land Use	Res Units	Nonres Sq. Ft.	Status
396-031-16	Rocket Express Car Wash	1703 E Seventeenth Street	Car Wash		4,292	Entitled
396-031-16	Rocket Express Car Wash	1703 E Seventeenth Street	Demo Existing Commercial		-20,146	Entitled
396-052-43	Sexlinger Homes	1584 E Santa Clara Avenue	Single Family Residence	23		Under Construction
396-341-06	Tustin Service Station and Car Wash	2230 N Tustin Avenue	Commercial		3,600	Site Plan Review
405-262-20	In-N-Out Burger Bristol Rebuild & Expansion	815 N Bristol	Restaurant Rebuild & Expansion		1,776	Entitled
405-272-19	North Bristol Medical Project	1415 N Bristol	Medical Office Buildings		5,120	Plan Check
005-153-19	Arts Collective Meta Housing Adaptive Reuse	1666 N Main Street	Convert Office to Residential Apartments	58		Under Construction
398-522-18	Broadway Live/Work Units	1412 N Broadway	Live/work units	3		Site Plan Review
398-533-07	Craftsman Residential Duplex	1002 N Van Ness Avenue	Residential Apartments	2		Site Plan Review
398-541-13	The Orleans Adaptive Reuse Apartments	1212 N	Convert Existing Office to Residential Apartments	24		Under Construction
398-552-12	YCU Conversion of SFD to Office Use	1008 N Broadway	Convert Historic Structure SFD to Office	-1	2,800	Under Construction
398-561-18	One Broadway Plaza	1109 N Broadway	Office Tower		518,000	Entitled
398-561-18	One Broadway Plaza	1109 N Broadway	Restaurant		16,000	Entitled
003-153-48	Bridging the Aqua	317 E Seventeenth Street	Residential Apartments	57		Under Construction
100-161-46	Nguyen Medical Plaza	5030 Westminster Avenue	Commercial		5,800	Site Plan Review
004-020-12	Lam Residential	1514 N English Street	Single Family Residence	6		Site Plan Review
007-313-16	Tiny Tim Plaza Mixed Use	2223 W Fifth Street	Mixed Use Residential Apartments/Commercial	54	51,300	Under Construction
939-450-61	Vista Heritage School Expansion	2609 W Fifth Street	School Expansion (6-8th to K-8th/Enroll 470 to 870)		n/a	Site Plan Review
398-191-02	Certified Transportation	628 E Washington Avenue	Bus Terminal Maintenance Bldg		7,165	Plan Check
400-231-02	Target Shopping Center Commercial Pads	1330 E Seventeenth Street	Commercial		9,112	Under Construction
400-242-02	Ednovate Charter High School	1450 E Seventeenth Street	Convert 24,428 Office to School w/4,940 SF addition		4,940	Under Construction
400-062-01	Park Court Office Building A	1801 E Parkcourt Place	Office building		3,968	Site Plan Review
400-121-09	Raising Cane's Restaurant	2250 E Seventeenth Street	Demo Existing Restaurant		-10,000	Under Construction
400-121-09	Raising Cane's Restaurant	2250 E Seventeenth Street	Restaurant		3,935	Under Construction
400-164-10	Calvary Church Master Plan	1010 N Tustin Avenue	Master plan to modify center, classrooms, and office		50,000	Site Plan Review
198-101-07	Bewley Street Townhomes	1122 N Bewley Street	Residential Townhomes	11		Site Plan Review
198-102-20	John Le 5-Unit Development	1113 N Bewley Street	Residential Apartments	5		Site Plan Review
198-182-23	First & Harbor Commercial Development	121 N Harbor Boulevard	Commercial		36,606	Entitled
198-182-23	First & Harbor Commercial Development	121 N Harbor Boulevard	Demo Commercial		-6,400	Entitled
198-182-36	Fifth and Harbor Mixed Use Apartments	421 N Harbor Boulevard	Mixed Use Residential Apartments/Commercial	94	9,900	Entitled
198-281-05	Hue-Vo Two Unit Development	3402 W Seventh Street	Single-Family Residential	3		Site Plan Review
198-281-25	West Fifth Villas	3417 W Fifth Street	Residential Condos	8		Entitled
005-185-30	Eight Eight 8 - Adaptive Reuse	888 N Main Street	Convert Office to Mixed-Use/Residential Apartments	121	3,700	Plan Check
005-185-30	Eight Eight 8 - Adaptive Reuse	888 N Main Street	Convert Office to Mixed-Use/Residential Livework Aprt	25		Plan Check

Table 7: Pipeline Projects as of January 2020

APN	Project Name	Address	Land Use	Res Units	Nonres Sq. Ft.	Status
398-236-03	Legacy Square Mixed-Use Development	609 N Spurgeon Street	Demolition of Institutional Building	0	-8,030	Entitled
398-236-03	Legacy Square Mixed-Use Development	609 N Spurgeon Street	Demolition of Church	0	-22,330	Entitled
398-236-03	Legacy Square Mixed-Use Development	609 N Spurgeon Street	Mixed Use Residential Apartments/Commercial	93	7,267	Entitled
099-221-28	CN Square Office Building	402 N Euclid Street	Office Building		4,025	Site Plan Review
100-231-01	Euclid-Hazard 7-Eleven Service Station	813 N Euclid Street	Gas Station/Convenience Store		3,045	Site Plan Review
100-301-03	Euclid Commercial Plaza	111 N Euclid Street	Commercial		2,680	Plan Check
100-281-05	Bui 8-Unit Development	301 N Mountain View	Residential Apartments	8		Site Plan Review
398-214-01	Walnut Pump Station	723 W Walnut Street	Water Pump		3,800	Plan Check
398-325-01	4th and Mortimer (Block A)	409 E Fourth Street	Mixed Use Residential Apartments/Commercial	93	99,985	Site Plan Review
398-325-01	4th and Mortimer (Block A)	409 E Fourth Street	Demolition of Commercial Building		-22,330	Site Plan Review
398-327-09	201 E. 4th Street	401 N Bush Street	Residential Apartments	24		Under Construction
398-328-01	First American Site Mixed-Use Redevelopment	114 E Fifth Street	Mixed Use Residential Apartments/Commercial	218	8,900	Site Plan Review
398-330-08	4th and Mortimer (Block B)	509 E Fourth Street	Mixed Use Residential Apartments/Commercial	40	5,827	Site Plan Review
398-471-03	Tom's Trucks Residential Development	1008 E Fourth Street	Single Family Residence	117		Entitled
400-071-03	Madison Project	200 N Cabrillo Park Drive	Mixed Use Residential Apartments/Commercial	260	6,500	Entitled
402-181-11	AMG East First Senior Apartments	2222 E First Street	Residential Apartments	418	10,000	Under Construction
402-191-01	AMG East First Apartments/1st Point One	2114 E First Street	Mixed Use Residential Apartments/Commercial	552	10,000	Entitled
108-131-49	610 Newhope Condos	610 S Newhope Street	Residential Condos	9		Plan Check
188-021-08	4404 W. First Street	4404 W First Street	Commercial		3,662	Site Plan Review
144-341-04	Hoa Buddhist Center Addition	3222 W First Street	Church/Temple Expansion		9,256	Site Plan Review
144-551-51	Veteran's Village (Jamboree)	3314 W First Street	Residential Apartments	76		Under Construction
007-332-07	7-Eleven Store and Gas Station	1904 W First Street	Gas Station/Convenience Store		2,480	Site Plan Review
405-214-04	King Street Five Home Subdivision	1102 N King Street	Single Family Residence	5		Plan Check
011-154-43	AMCAL First Street Family Apartments	1440 E First Street	Residential Apartments	69		Under Construction
402-222-01	Wermers Properties Mixed-Use Development	1660 E First Street	Mixed Use Residential Apartments/Commercial	603	8,900	Entitled
108-073-14	Saigon Reformed Presbyterian	5321 W McFadden Avenue	Church/Temple Expansion		2,000	Site Plan Review
010-272-22	Star Wok	1019 S Bristol Street	Demo Apartment	-4		Plan Check
010-272-22	Star Wok	1019 S Bristol Street	Demo Mini Market		-1,645	Plan Check
010-272-22	Star Wok	1019 S Bristol Street	Restaurant		2,546	Plan Check
108-244-30	Archangel Michael Coptic Orthodox Church	4405 W Edinger Avenue	Church/Temple Expansion		9,928	Site Plan Review
108-244-30	Archangel Michael Coptic Orthodox Church	4319 W Edinger Avenue	Demo of SFD for church expansion	-1		Site Plan Review
108-244-30	Archangel Michael Coptic Orthodox Church	4325 W Edinger Avenue	Demo of SFD for church expansion	-1		Site Plan Review
108-244-30	Archangel Michael Coptic Orthodox Church	4326 W Regent Drive	Demo of SFD for church expansion	-1		Site Plan Review
108-244-30	Archangel Michael Coptic Orthodox Church	4330 W Regent Drive	Demo of SFD for church expansion	-1		Site Plan Review

Table 7: Pipeline Projects as of January 2020

APN	Project Name	Address	Land Use	Res Units	Nonres Sq. Ft.	Status
108-244-30	Archangel Michael Coptic Orthodox Church	4402 W Regent Drive	Demo of SFD for church expansion	-1		Site Plan Review
407-107-23	Haphan Housing	3025 W Edinger Avenue	Residential Townhomes	18		Entitled
402-111-36	McFadden Village Chevron	2120 E McFadden Avenue	Commercial		2,037	Under Construction
013-040-29	Mater Dei Park Structure	1202 W Edinger Avenue	Parking Structure		3 Story	Under Construction
403-164-08	TLC Care Facility	2032 S Cypress Avenue	Change of Use SF to Care Facility (12 Bed)		n/a	Site Plan Review
140-061-94	Shea Homes	2001 W MacArthur Boulevard	Single Family Residence	42		Under Construction
412-191-04	South Coast Speedwash	2402 S Bristol Street	Commercial Retail/Restaurant		8,183	Permits Issued
412-191-04	South Coast Speedwash	2402 S Bristol Street	Car Wash		26,153	Permits Issued
412-191-04	South Coast Speedwash	2402 S Bristol Street	Demo Existing Car Wash		-5,410	Permits Issued
016-051-28	Softscapes New Building	2605 S Cypress Avenue	Office/Industrial Building		2,665	Plan Check
016-082-48	Our Lady of Guadalupe Office/Residence	542 E Central	Office/Residential Apartment	1	6,372	Site Plan Review
016-151-11	Tapestry by Hilton and Restaurant	1580 E Warner Avenue	6-story Hotel		79,375	Site Plan Review
016-151-11	Tapestry by Hilton and Restaurant	1580 E Warner Avenue	Restaurant		5,000	Site Plan Review
430-221-13	Heritage Village Residential Phase A	1951 E Dyer Road	Mixed-Use Residential Apartments	335	65,700	Under Construction
430-221-13	Heritage Village Residential Phase B	1901 E Dyer Road	Mixed-Use Residential Apartments	403	4,100	Under Construction
430-221-13	Heritage Village Residential Phase C	2001 E Dyer Road	Mixed-Use Residential Apartments	483	4,200	Under Construction
430-222-07	Bowery: Redhill & Warner Mixed-Use	2300 S Redhill Ave	Residential Apartments and Commercial	1,150	80,000	Site Plan Review
411-141-12	Shea ITT	666 E Dyer Road	Industrial		40,000	Under Construction
411-074-03	Legado at the MET	200 E First American Way	Residential Apartments	278		Entitled
414-271-03	Shell Service Station Retail Building	3820 S Fairview Street	Demo Fuel Kiosk		-80	Site Plan Review
414-271-03	Shell Service Station Retail Building	3820 S Fairview Street	Gas Station/Convenience Store		1,600	Site Plan Review
412-541-07	Christ Our Savior Church	2000 W Alton Avenue	Demo Existing Modular Church		-7,190	Under Construction
412-541-07	Christ Our Savior Parcel Map	2000 W Alton Avenue	New Church, Community Center, and Office		46,307	Under Construction
410-111-02	Legacy Multi-Family Residential At Sunflower	651 W Sunflower Ave	Residential Apartments	226		Entitled
410-111-02	Legacy Multi-Family Residential At Sunflower	651 W Sunflower Ave	Demo Church	0	-9,875	Entitled
400-032-02	Russell/Fisher Gas Station & Com Ctr	325 N Tustin Avenue	Commercial		7,368	Entitled
400-032-02	Russell/Fisher Gas Station & Com Ctr	325 N Tustin Avenue	Demo Restaurant for commercial bldg.		-3,440	Entitled
400-032-02	Russell/Fisher Gas Station & Com Ctr	325 N Tustin Avenue	Car Wash		4,354	Site Plan Review
400-032-03	Russell/Fisher Gas Station & Com Ctr	301 N Tustin Avenue	Commercial		2,778	Entitled
400-032-03	Russell/Fisher Gas Station & Com Ctr	301 N Tustin Avenue	Demo Carwash for commercial gas station		-1,780	Entitled
400-032-03	Russell/Fisher Gas Station & Com Ctr	301 N Tustin Avenue	Commercial		2,778	Site Plan Review

Source: City of Santa Ana, Major Planning Projects and Monthly Development Reports, January 2020.

Table 8: Focus Area Buildout Factors for Current General Plan Scenario *(the GP land use plan adopted in 1998, with amendments through 2019)*

Focus Area	Density [1]	Intensity (FAR) [1]					Use Ratio (pct. of land) [1]						
Land Use	*DU/ac*	*Comm.*	*Off.*	*Ind.*	*Ins.*	*Hotel*	*Res.*	*Comm.*	*Off.*	*Ind.*	*Ins.*	*Hotel*	*O.S.*
55 Freeway / Dyer Road													
District Center	90	1.0	1.0	-	-	-	40%	10%	50%	-	-	-	-
General Commercial	-	0.5	-	-	-	-	-	100%	-	-	-	-	-
Industrial	-	-	-	0.45	-	-	-	-	-	100%	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Professional and Administrative Office	-	-	0.5	-	-	-	-	-	100%	-	-	-	-
17th Street / Grand Avenue													
General Commercial	-	0.5	-	-	-	-	-	100%	-	-	-	-	-
Institutional	-	-	-	-	0.5	-	-	-	-	-	100%	-	-
Low Density Residential	7	-	-	-	-	-	-	-	-	-	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Professional and Administrative Office	-	-	0.5	-	-	-	-	-	100%	-	-	-	-
South Bristol Street													
District Center	90	1.0	1.0	-	-	-	40%	10%	50%	-	-	-	-
General Commercial	-	0.5	-	-	-	-	-	100%	-	-	-	-	-
Medium Density Residential	15	-	-	-	-	-	100%	-	-	-	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Professional and Administrative Office	-	-	0.5	-	-	-	-	-	100%	-	-	-	-
South Main Street													
District Center	90	1.0	1.0	-	-	-	40%	10%	50%	-	-	-	-
General Commercial	-	0.5	-	-	-	-	-	100%	-	-	-	-	-
Industrial	-	-	-	0.45	-	-	-	-	-	100%	-	-	-
Institutional	-	-	-	-	0.5	-	-	-	-	-	100%	-	-
Low Density Residential	7	-	-	-	-	-	100%	-	-	-	-	-	-
West Santa Ana Boulevard													
General Commercial	-	0.5	-	-	-	-	-	100%	-	-	-	-	-
Industrial	-	-	-	0.45	-	-	-	-	-	100%	-	-	-
Institutional	-	-	-	-	0.5	-	-	-	-	-	100%	-	-
Low Density Residential	7	-	-	-	-	-	100%	-	-	-	-	-	-
Medium Density Residential	15	-	-	-	-	-	100%	-	-	-	-	-	-
Open Space	-	-	-	-	-	-	-	-	-	-	-	-	100%
Professional and Administrative Office	-	-	0.5	-	-	-	-	-	100%	-	-	-	-
Urban Neighborhood	30	0.5	0.5	-	-	-	50%	30%	20%	-	-	-	-

Notes:

1. Density, intensity, and use ratio figures determined using a combination of current assumptions stated in the 1998 Land Use Element (Table A-4, Land Use Plan Build-out Capacities), past and current trends, and the results of the 2020 Economic Indicators Report by AECOM. Maximum densities/intensities were assumed for conventional residential and industrial categories, while commercial and office categories were assumed to build out below maximum intensities. A balance of residential and nonresidential uses, with maximum residential densities and below-maximum nonresidential intensities, was assumed for the mixed used categories of Urban Neighborhood and District Center.

Table 9: Citywide Figures by Orange County Traffic Analysis Model (OCTAM) Category

Statistic	Existing Conditions	2045 Projections		
		Current GP	80% / 50% Prop GP	Proposed GP
K-12 Enrollment [1]	58,097	69,074	72,675	75,480
College Enrollment [2]	36,411	36,411	36,411	36,411
Total Population [3]	334,774	383,202	411,804	431,629
Household Population	330,256	378,684	407,286	427,111
Employed Population	135,717	155,615	167,368	175,515
Total Households	76,314	94,104	103,864	109,883
Median HH Income [4]	see note	see note	see note	see note
Retail Employment [5,8]	20,738	22,957	17,297	18,002
Services Employment [6,8]	45,602	60,513	48,260	52,367
Other Employment [7,8]	95,324	98,967	96,580	98,875

Notes:
1. Only includes students attending schools within the city boundaries.
2. No projection data was available.
3. Total Population includes all individuals living in households, institutional group quarters, and non-institutional group quarters.
4. Median household income figures generated by the traffic model.
5. Retail employment estimated to account for 50% of jobs generated by commercial land uses.
6. Services employment estimated to account for 50% of jobs generated by commercial land uses, 70% of jobs generated by office land uses, and 100% of jobs generated by hotel land uses.
7. Other ("Base") employment estimated to account for 30% of jobs generated by office land uses and 100% of jobs generated by industrial, institutional, and open space land uses.
8. The employment figures are subject to rounding when aggregated by parcel into traffic analysis zones, resulting in a 0.69% rounding delta.

Source: Figures aggregated and projected by PlaceWorks, 2020.

Exhibit 3
Proposed RHNA Allocation Table

OC Jurisdiction	BASELINE			CURRENT METHODOLOGY			SANTA ANA APPEAL METHODOLOGY				Difference (Total RHNA)
	Proj Need	Exist Need	Total Need	Residual Units	Redistri-bution	Total RHNA	% of Residual	New Residual	New Redistribution	New Total RHNA	
Stanton	667	561	3768	2540	0	1228	0.00%	2540	0	1228	0
Santa Ana	2114	973	26256	23168	0	3087	0.00%	16082	0	10174	7087
La Habra	341	463	2684	1881	0	803	0.00%	1881	0	803	0
Anaheim	4113	13299	28669	11257	0	17412	0.00%	11257	0	17412	0
Orange	2192	1735	9533	5606	0	3927	0.00%	5606	0	3927	0
Garden Grove	1512	17611	13246	0	5877	19122	13.22%	0	4940	18186	(936)
Buena Park	1533	7366	6441	0	2458	8899	5.53%	0	2066	8507	(392)
San Juan Capistrano	277	774	793	0	258	1051	0.58%	0	217	1010	(41)
Laguna Woods	20	974	669	0	325	994	0.73%	0	273	943	(51)
Westminster	709	9027	6724	0	3013	9736	6.78%	0	2532	9256	(480)
Tustin	49	6717	4525	0	2241	6766	5.04%	0	1884	6409	(357)
Fullerton	1641	11538	9329	0	3850	13179	8.66%	0	3237	12565	(614)
Placentia	860	3503	3194	0	1169	4364	2.63%	0	983	4177	(187)
Lake Forest	428	2799	2293	0	934	3228	2.10%	0	785	3079	(149)
Costa Mesa	411	11322	7955	0	3778	11733	8.50%	0	3176	11131	(602)
Fountain Valley	177	4650	3275	0	1552	4827	3.49%	0	1304	4579	(248)
Unincorporated OC	5407	4974	8721	0	1660	10381	3.73%	0	1395	10117	(264)
Dana Point	209	321	422	0	107	529	0.24%	0	90	512	(17)
Huntington Beach	441	12896	9033	0	4304	13337	9.68%	0	3618	12651	(686)
Brea	136	2224	1618	0	742	2360	1.67%	0	624	2242	(118)
Laguna Hills	848	1132	1602	0	378	1980	0.85%	0	317	1920	(60)
Irvine	7690	15864	18260	0	5294	23554	11.91%	0	4450	22710	(844)
Newport Beach	320	4514	3327	0	1506	4834	3.39%	0	1266	4594	(240)
Villa Park	10	285	200	0	95	295	0.21%	0	80	280	(15)
Cypress	112	3815	2654	0	1273	3927	2.86%	0	1070	3724	(203)
Mission Viejo	41	2170	1487	0	724	2212	1.63%	0	609	2096	(116)
Aliso Viejo	48	1144	811	0	382	1193	0.86%	0	321	1132	(61)
La Palma	6	794	535	0	265	800	0.60%	0	223	757	(43)
Laguna Beach	18	375	267	0	125	393	0.28%	0	105	373	(20)
Laguna Niguel	62	1143	824	0	381	1205	0.86%	0	321	1144	(61)
Los Alamitos	158	609	564	0	203	767	0.46%	0	171	734	(33)
Rancho Santa Margarita	43	636	467	0	212	679	0.48%	0	178	646	(33)
San Clemente	462	517	806	0	172	979	0.39%	0	145	951	(28)
Seal Beach	112	1128	863	0	377	1240	0.85%	0	317	1180	(60)
Yorba Linda	34	2376	1617	0	793	2410	1.78%	0	667	2283	(127)
	33201	150229	183431	44451	44451	183431	100.00%	37366	37366	183431	

Exhibit 4
Proposed Siding-Scale RHNA Allocation Table

OC Jurisdiction	BASELINE			CURRENT METHODOLOGY			SLIDING SCALE METHODOLOGY						
	Proj Need	Exist Need	Total Need	Residual Units	Redistri-bution	Total RHNA	DAC %	DAC Reduction (%)	New Residual Units	Redistri-bution %	New Redistri-bution	New RHNA	Difference New - Old RHNA
Stanton	667	561	3768	2540	0	1228	99.5%	49.5%	1864	0.0%	0	1904	676
Santa Ana	2114	973	26256	23168	0	3087	88.8%	38.8%	10191	0.0%	0	16064	12977
La Habra	341	463	2684	1881	0	803	87.9%	37.9%	1019	0.0%	0	1666	863
Anaheim	4113	13299	28669	11257	0	17412	82.9%	32.9%	9439	0.0%	0	19230	1818
Orange	2192	1735	9533	5606	0	3927	56.9%	6.9%	656	0.0%	0	8877	4950
Garden Grove	1512	17611	13246	0	5877	19122	47.9%	0.0%	0	13.2%	3063	16309	(2813)
Buena Park	1533	7366	6441	0	2458	8899	43.4%	0.0%	0	5.5%	1281	7722	(1177)
San Juan Capistrano	277	774	793	0	258	1051	42.5%	0.0%	0	0.6%	135	927	(124)
Laguna Woods	20	974	669	0	325	994	38.6%	0.0%	0	0.7%	169	839	(155)
Westminster	709	9027	6724	0	3013	9736	37.8%	0.0%	0	6.8%	1570	8294	(1442)
Tustin	49	6717	4525	0	2241	6766	35.2%	0.0%	0	5.0%	1168	5693	(1073)
Fullerton	1641	11538	9329	0	3850	13179	33.5%	0.0%	0	8.7%	2007	11335	(1844)
Placentia	860	3503	3194	0	1169	4364	29.8%	0.0%	0	2.6%	609	3804	(560)
Lake Forest	428	2799	2293	0	934	3228	24.8%	0.0%	0	2.1%	487	2780	(448)
Costa Mesa	411	11322	7955	0	3778	11733	19.2%	0.0%	0	8.5%	1969	9924	(1809)
Fountain Valley	177	4650	3275	0	1552	4827	12.3%	0.0%	0	3.5%	809	4084	(743)
Unincorporated OC	5407	4974	8721	0	1660	10381	8.7%	0.0%	0	3.7%	865	9587	(794)
Dana Point	209	321	422	0	107	529	8.6%	0.0%	0	0.2%	56	478	(51)
Huntington Beach	441	12896	9033	0	4304	13337	7.8%	0.0%	0	9.7%	2243	11276	(2061)
Brea	136	2224	1618	0	742	2360	6.6%	0.0%	0	1.7%	387	2004	(356)
Laguna Hills	848	1132	1602	0	378	1980	6.4%	0.0%	0	0.8%	197	1799	(181)
Irvine	7690	15864	18260	0	5294	23554	5.8%	0.0%	0	11.9%	2759	21019	(2535)
Newport Beach	320	4514	3327	0	1506	4834	4.3%	0.0%	0	3.4%	785	4112	(722)
Villa Park	10	285	200	0	95	295	2.0%	0.0%	0	0.2%	50	249	(46)
Cypress	112	3815	2654	0	1273	3927	0.3%	0.0%	0	2.9%	664	3317	(610)
Mission Viejo	41	2170	1487	0	724	2212	0.0%	0.0%	0	1.6%	378	1865	(347)
Aliso Viejo	48	1144	811	0	382	1193	0.0%	0.0%	0	0.9%	199	1010	(183)
La Palma	6	794	535	0	265	800	0.0%	0.0%	0	0.6%	138	673	(127)
Laguna Beach	18	375	267	0	125	393	0.0%	0.0%	0	0.3%	65	333	(60)
Laguna Niguel	62	1143	824	0	381	1205	0.0%	0.0%	0	0.9%	199	1023	(182)
Los Alamitos	158	609	564	0	203	767	0.0%	0.0%	0	0.5%	106	669	(98)
Rancho Santa Margarita	43	636	467	0	212	679	0.0%	0.0%	0	0.5%	111	578	(101)
San Clemente	462	517	806	0	172	979	0.0%	0.0%	0	0.4%	90	896	(83)
Seal Beach	112	1128	863	0	377	1240	0.0%	0.0%	0	0.8%	196	1060	(180)
Yorba Linda	34	2376	1617	0	793	2410	0.0%	0.0%	0	1.8%	413	2030	(380)
	33201	150229	183431	44451	44451	183431		12.6%	23168		23168	183431	