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December 10, 2020

Mr. Kome Ajise
Executive Director
Southern California Association of Governments (SCAG)
900 Wilshire Blvd. Suite 1700
Los Angeles, CA 90017

RE: Response to Appeals of the City of Santa Ana's Sixth Cycle Draft Regional Housing Needs Assessment (RHNA) Allocation

Dear Mr. Ajise,

The City of Santa Ana (City) respectfully submits this response to the appeals submitted to the Southern California Association of Governments (SCAG) by the Cities of Garden Grove, Irvine, Newport Beach, and Yorba Linda related to the City's Draft Regional Housing Needs Assessment (RHNA) Allocation for the Sixth Housing Element Cycle (2021-2029).

SCAG's RHNA Housing Needs Assessment Subcommittee; Community, Economic, and Human Development Committee; and Regional Council met over a period of more than 18 months to undertake the arduous RHNA planning process required by Government Code Sections 65584 – 65584.04.¹ The effort culminated in the finding by the Department of Housing and Community Development (HCD) that the draft RHNA methodology met the five objectives contained in Section 65584(d) and the Regional Council's adoption of the Final RHNA Methodology on March 4, 2020. In particular, HCD applauded the inclusion of the "DAC" process, whereby units are reallocated from cities such as Santa Ana designated as "disadvantaged communities (DACs)" to cities with high opportunity areas, meeting the goal of affirmatively furthering fair housing (required by Section 65584(d)(5)) by increasing access to high opportunity areas. Santa Ana compliments SCAG on adopting a methodology that attempts to further equity and reduce segregation and concentrated poverty.

¹ All future citations are to the Government Code.

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The appeals before you attempt to unwind this laudable adopted standard by lowering the RHNA in high opportunity cities and increasing housing development in Santa Ana, which was designated as a DAC only because over half of its population resides in either high segregation and poverty or very low resource areas. SCAG should not allow appeals by wealthy and resource-rich cities to undermine its approved Final Methodology crafted to promote equity in the region.

None of the Submitted Appeals May Be Approved under State Law

As a threshold matter, none of the claims made in the four appeals fulfill the criteria provided in Section 65584.05(b) or that in Section I(C) of the SCAG 6th RHNA Cycle Appeals Procedures, which together specify the grounds for an appeal.

State law allows other cities to appeal Santa Ana's RHNA on only two grounds:

- **Methodology:** SCAG failed to determine Santa Ana's RHNA in accordance with the information described in, and the Final RHNA Methodology established under Section 65584.04 and in a manner that furthers and does not undermine the intent of the objectives listed in Section 65584(d).(Section 65584.05(b)(2)).
- **Local Planning Factors and Information Affirmatively Furthering Fair Housing:** SCAG failed to adequately consider information submitted under Section 65584.04(b).

SCAG determined Santa Ana's RHNA in accordance with the Final RHNA Methodology. Although the appeals criticize the Final RHNA Methodology adopted by SCAG, they cite no instance where the methodology was not applied to Santa Ana exactly as required by the Final RHNA Methodology. Rather, they urge SCAG to modify its Final Methodology – which is *final*, cannot be modified, and cannot serve as the grounds for an appeal.

Although the appellants supply a variety of "readily available information" relating to development in Santa Ana, failure to consider "readily available information" is not the basis for a RHNA appeal. Government Code Section 65585.05(b)(1) allows appeals based *only* on SCAG's failure to adequately consider the "information *submitted*" under Section 65584.04(b). That section requires that, *before the RHNA methodology is adopted*, SCAG must survey cities and counties within the region and invite them to provide information that can be used in developing the methodology. If the information was not submitted to SCAG as part of the Section 65584.04(b) process, it cannot be used as grounds for an appeal.

All four appeals failed to include any examples of information related to Santa Ana that was actually *submitted* to SCAG before development of the Final RHNA Methodology and which SCAG did not adequately consider. Rather, the appeals introduce *new* information relating to Santa Ana. The appeals are in fact based on changed circumstances, which cannot be the basis for an appeal of Santa Ana's RHNA by another city (Section 65584.05(b)(3)).

In conclusion, the four appeals are fatally flawed and cannot be approved under the criteria contained in state law. Additional responses to the four appeals are contained in Attachment 1.

Validity of Appeal Data

The City's RHNA allocation that is being challenged is chiefly based on growth projections contained in Connect SoCal. These were developed through a cooperative process that was consistent for all Orange County jurisdictions. As with all Orange County jurisdictions, the City of Santa Ana's projected housing, population, and employment growth was provided through the Orange County Projection (OCP 2018) process and provided to California State University Fullerton Center for Demographic Research (CDR) in April/May of 2018. The City of Santa Ana's projected growth was based on new housing units that were viewed as "likely," or reasonably foreseeable, based on pipeline projects and other anticipated growth and projects to be developed during the planning period of 2016 to 2045.

The Orange County Projection 2018 numbers were then provided to SCAG for incorporation into the SCAG regional growth forecast and were included in SCAG's Connect SoCal Plan. The growth projections in the Connect SoCal plan, developed based on the information provided in 2018, were then used by SCAG to develop the City's RHNA. Connect SoCal projects growth of 2,974 units in Santa Ana to 2045, resulting in Santa Ana's existing RHNA of 3,087 units when the residual adjustment factor was applied. The methodology, data, and resulting growth were deemed by SCAG to be consistent with the region.

The appeals filed by the cities of Garden Grove, Irvine, and Newport Beach recommend an increase in the City's projected growth ranging from 7,087 to 10,000 units and rely on sources of data as follows:

1. Various lists of "pipeline" projects provided by Garden Grove, Newport Beach, and Irvine. The list used by Garden Grove and Newport Beach includes 7,594 units while Irvine's list includes 9,810 units.
2. Table 1 entitled "Existing Conditions, Potential Growth, and Buildout Conditions in Santa Ana, 2020 – 2045" in a document entitled, "Santa Ana General Plan Buildout Methodology, June 2020" related to a draft general plan update that has not been adopted.

The City has consolidated and reviewed the lists of pipeline projects submitted by these cities and compared the numbers with the Pipeline Project List that the City maintains (see Attachment 2), and has identified 4,777 potential new units that were not included in the 2018 submission for So Cal Connect. Of the total 9,891 pipeline units listed in Irvine's appeal, which contained the largest number of specific projects, 3,946 were already included in the original growth projections, and 2,467 were either built before 2020, not approved, or were a part of projects no longer viable for development.

City General Plan Update and SCAG DAC Reallocation

The appeals also cite growth projections in the draft land use element of the proposed comprehensive general plan update for Santa Ana that has not adopted. The City of Yorba Linda further requested that the entire DAC redistribution of 23,167 units be reallocated to the City for inclusion in the final RHNA allocation.

On November 9, 2020, the Santa Ana Planning Commission voted to table its consideration of the proposed general plan indefinitely to allow time for additional community outreach regarding the proposed general plan policies and implementation actions, particularly reaching those within Santa Ana Disadvantaged Communities, also known as Environmental Justice Communities. It is very possible that the growth plans and projections will change to ensure that the plan does not cause displacement of existing communities. The plan is not moving forward for adoption at this time; no further Commission or Council meetings are scheduled. At this point, it is not possible to predict what land use changes will be included in whatever plan is ultimately adopted, and the preliminary general plan buildout projections cannot be considered to be valid projections of future growth in Santa Ana.

Yorba Linda's appeal is entirely inconsistent with the DAC provisions included in the Final RHNA Methodology which were deemed particularly significant by HCD to affirmatively further fair housing. The reallocation promoted by Yorba Linda would move housing from high opportunity areas to lower resource areas and open disadvantaged neighborhoods in Santa Ana to unplanned growth, with the potential for significant displacement, the very reason the DAC provisions were adopted. The appeal should be rejected as inconsistent with the Final RHNA Methodology adopted by SCAG.

Appeal Procedures

Under SCAG's adopted Appeal Procedures, the four appellant cities will have 20 minutes to present their case (5 minutes each), while Santa Ana will have only 8 minutes to respond. Similarly, the cities will have 12 minutes (3 minutes each) to rebut the staff presentation, while Santa Ana will have only 3 minutes to respond. The Appeal Procedures provide that the Chair of the Appeals Board may elect to grant additional time for any presentation or rebuttal in the interest of due process and fairness. Given the large number of appeals lodged against Santa Ana, the City would request 15 minutes to present its case and 10 minutes to rebut. We would further ask that this request be acted on before the date of the hearing so that the City might appropriately prepare its presentations.

In closing, the 1.3 million RHNA determination for the SCAG region by the State of California has created challenges for all communities within this region. Working together collectively to address this goal and meet the critical housing needs of our communities is necessary. As an urban developed community, successful new development in Santa Ana is reliant on the redevelopment of the existing built-out environment, which has many challenges. As a result of years of responsible actions by the City shaping and implementing regulations and policies to expand public

infrastructure such as the OC Streetcar, Santa Ana is committed to playing a leadership role in Orange County in promoting attainable housing and sustainable transit supportive development projects.

The City of Santa Ana is agreeable to absorbing up to an additional maximum of 4,777 housing units from the region in the Moderate and Above Moderate Income categories for a total not to exceed RHNA of 7,864 housing units. This total is consistent with the City of Santa Ana's adopted General Plan Land Use Element and will more than double the City's current allocation of 3,087 units in the various income categories. This action will assist our fellow Orange County jurisdictions, particularly those designated as high resource communities, by offsetting some of the unintended consequences associated with the redistribution of DAC "residual" housing.

Additional specific responses to the four appeals are contained in Attachment 1. Should you have any questions regarding this correspondence, please feel free to contact Planning and Building Agency Executive Director Minh Thai at Mthai@santa-ana.org.

Sincerely,



Kristine Ridge
City Manager

Attachments:

1. Additional Responses to Appeals of Garden Grove, Irvine, Newport Beach, and Yorba Linda
2. City of Santa Ana Major Development Pipeline Projects

C: Minh Thai, Executive Director, Planning and Building Agency

ATTACHMENT 1

ADDITIONAL RESPONSES TO APPEALS OF GARDEN GROVE, IRVINE, NEWPORT BEACH, AND YORBA LINDA

Additional Responses to Appeal of Garden Grove

Garden Grove has appealed Santa Ana's RHNA on two bases, discussed below.

Assertion One: SCAG failed to adequately consider historic and projected housing development.

Garden Grove asserts that SCAG failed to consider "readily available information" related to planned development in Santa Ana, and so Santa Ana's RHNA must be increased.

However, failure to consider "readily available information" is not the basis for a RHNA appeal. Government Code Section 65585.05(b)(1) allows appeals based on SCAG's failure to adequately consider the "information *submitted*" under Section 65584.04(b). That section requires that, *before the RHNA methodology is adopted*, SCAG must survey cities and counties within the region and invite them to provide information that can be used in developing the methodology. The appeal includes no examples of information related to Santa Ana that was actually submitted to SCAG before development of the RHNA methodology and which SCAG failed to adequately consider. Rather, the appeal submits new information relating to changed circumstances, which cannot be the basis for an appeal of another city's RHNA.

Assertion Two: Allocation of the final methodology directly conflicts with SCAG's Regional Transportation Plan.

Garden Grove asserts that the Final RHNA Methodology adopted by SCAG conflicts with SCAG's Regional Transportation Plan and suggests that an alternative "sliding-scale" methodology be used to reallocate units from disadvantaged communities (DACs).

The Final RHNA Methodology has been adopted by SCAG. Challenges to the methodology itself cannot be the basis for an appeal of the RHNA allocation.

Validity of Appeal Data

Garden Grove asks that Santa Ana's RHNA be increased from 3,087 units to 10,174 units based upon: 1) a list of planned projects that include 7,594 total units; and 2) estimated growth of 2,580 units in the Harbor Mixed-Use Corridor (680 units) and the Mainplace Mall Transformation (1,900 units).

Attachment 1 shows projects previously included in growth estimates provided for SoCal Connect and already incorporated into the City's 3,087-unit RHNA calculation. Of the 7,594 units listed in Garden Grove's project list; 3,646 were already included in the original growth projections, and 2,230 were either built before 2020, not approved or were a part of projects no longer viable for development.

Additional Responses to Appeal of Newport Beach

Newport Beach has appealed Santa Ana's RHNA on two bases, discussed below.

Assertion One: SCAG failed to adequately consider readily available data related to 10,174 housing units approved and/or planned by the City of Santa Ana over the next eight years that will exceed their Draft RHNA allocation of 3,087 units for the Sixth Cycle.

Newport Beach asserts that SCAG failed to consider "readily available data" related to planned development in Santa Ana, and so Santa Ana's RHNA must be increased.

However, failure to consider "readily available data" is not the basis for a RHNA appeal. Government Code Section 65585.05(b)(1) allows appeals based on SCAG's failure to adequately consider the "information *submitted*" under Section 65584.04(b). That section requires that, *before the RHNA methodology is adopted*, SCAG must survey cities and counties within the region and invite them to provide information that can be used in developing the methodology. The appeal includes no examples of information related to Santa Ana that was actually submitted to SCAG before development of the RHNA methodology and which SCAG failed to adequately consider. Rather, the appeal submits new information relating to changed circumstances, which cannot be the basis for an appeal of another city's RHNA.

Assertion Two: SCAG failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established, pursuant to Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in Section 65584(d).

Newport Beach asserts that the Final RHNA Methodology adopted by SCAG misuses the TCAC/HCD Opportunity Index Scores and Mapping and states that SCAG's DAC methodology results in redistributing units to those with less access to transit and longer drives from the job centers.

The Final RHNA Methodology has been adopted by SCAG. Challenges to the methodology itself cannot be the basis for an appeal of the RHNA allocation.

Validity of Appeal Data

Newport Beach, like Garden Grove, asks that Santa Ana's RHNA be increased from 3,087 units to 7,954 units and has submitted the same data justifying the request. The City's evaluation is contained in the response to the Garden Grove appeal.

Additional Responses to Appeal of Irvine

Irvine has appealed Santa Ana's RHNA on two bases, discussed below.

Grounds for Appeal #1: Failure to Adequately Consider Information for the Methodology (Government Code Section 65584.05(b)(1).)

Irvine asserts that SCAG failed to consider various information when it developed the Final RHNA Methodology. In particular, it asserts that the TCAC/HCD Opportunity Index Scores and Mapping were misused by being incorporated into the Final Methodology and that the last-minute adoption of the DAC formula by the Regional Council did not provide Irvine with an adequate opportunity to provide information relating to the factor.

However, irregularities in the RHNA adoption process and objections to the use of a factor in the *adopted* methodology are not the basis for a RHNA appeal under Section 65584.05(b)(1). That section only allows appeals based on SCAG's failure to adequately consider the "information *submitted*" under Section 65584.04(b), which requires that, at least six months *before the RHNA methodology is adopted*, SCAG must survey cities and counties within the region and invite them to provide information that can be used in developing the methodology. If information was not submitted during that period, it cannot be the basis for an appeal.

Irvine's appeal acknowledges that Irvine did not submit information about growth in Santa Ana during this period; the appeal includes no examples of information related to Santa Ana that was actually submitted to SCAG before development of the RHNA methodology and which SCAG failed to adequately consider. Rather, like the Garden City and Newport Beach appeals, the appeal submits new information relating to changed circumstances, which cannot be the basis for an appeal of another city's RHNA. (Section 65584.05(b)(3).)

Grounds for Appeal #2: Failure to Determine the City's Share of the Regional Need in Accordance with Information Described in, and Methodology Established, in a Manner that Furthers and Does Not Undermine the Intent of the Objectives in Section 65584(d). (Section 65584.05(b)(2).)

Irvine asserts that SCAG did not consider information available about the City's proposed general plan and planned projects in determining the City's RHNA but does not explain how this is inconsistent with the information described in, and the methodology established by, SCAG.

The Final RHNA Methodology states that a jurisdiction's projected household need will be established by "[a]ssign[ing] household growth to jurisdictions based on SCAG's Connect SoCal Regional Transportation Plan." (page 4 of Final RHNA Methodology). It describes how household growth was calculated "based on local input" (*id.* page 6) and following an interactive process, which Santa Ana participated in. The 2,974-unit growth projection was based on Connect SoCal and so fully consistent with the process described in the Final RHNA Methodology.

Validity of Appeal Data

Irvine has submitted a list of "pipeline" projects in Irvine containing 9,891 units. Of the total 9,891 pipeline units listed in the appeal, 3,946 were already included in the original growth projections; and 2,467 were either built before 2020, not approved, or were a part of projects no longer viable for development.

Additional Responses to Appeal of Yorba Linda

The City of Yorba Linda's appeal does not cite either Section 65584.05(b)(1) or (b)(2) as the basis for the City's appeal nor explain how the cited issues comply with the statutory requirements. Consequently, it does conform with State law.

Yorba Linda's appeal asks that Santa Ana's entire residual need of 23,167 units be reallocated to the City based on the general plan considered by the Planning Commission in November. As described in our letter, the general plan has been tabled, and reallocation of all 23,167 units would be contrary to the DAC provisions adopted as part of the Final RHNA Methodology and critically important to affirmatively further fair housing.

The appeal also cites the pipeline projects listed on Santa Ana's website. These are evaluated in Attachment 1 and in the previous appeals.

Attachment 2 - City of Santa Ana Major Development Pipeline Projects

Project Name		Address	Land Use	Santa Ana Pipeline Res. Units (1)	Res. Units After May 2018 (2)	Irvine List (3)	Garden Grove & Newport Beach Lists (4)	Status	Construct Date
INCLUDED IN OCP 2018/ So Cal Connect									
Andalucía Apartments	815	N Harbor Boulevard	Residential Apartments	70				Constructed	4/2/2017
Trumark "Tribella"	1206	N Harbor Boulevard	Single Family Residence	95		95		Constructed	6/19/2017
Trumark "Tribella"	1206	N Harbor Boulevard	Live-Work	15		15		Constructed	6/19/2017
Orchard First Street Care Home	2151	E First Street	Convert Motel to Supportive Housing	72				Constructed	1/1/2018
KB Homes "Lotus"	520	S Harbor Boulevard	Single Family Residence	35		35		Constructed	2/6/2018
Habitat for Humanity Homes	4010-4026	W McFadden Avenue	Single Family Residence	5				Constructed	6/1/2018
PRISMA	301	E Jeanette Lane	Residential Apartments	182				Constructed	6/6/2018
Depot at Santiago	923	N Santiago Street	Mixed Use Residential Apartments/Commercial	70				Constructed	6/21/2018
Santa Ana Collection/VENTURE	1010	S Harbor Boulevard	Residential Townhouses and Livework	79				Constructed	8/8/2018
Olson Residential/Ventana Walk	1506	W First Street	Residential Townhomes	62				Constructed	12/21/2018
Harbor Collection Residential	1406	N Harbor Boulevard	Residential Townhomes	38		38		Constructed	1/8/2019
Sexlinger Homes (Avery at the Grove)	1584	E Santa Clara Avenue	Single Family Residence	22		24	24	Constructed	3/27/2019
Heritage Village Residential Phase A	1951	E Dyer Road	Mixed-Use Residential Apartments	335		335	335	Constructed	2/28/2020
Veteran's Village (Jamboree)	3314	W First Street	Residential Apartments	76				Constructed	6/3/2020
The Line	3630	W Westminster Avenue	Residential Apartments and Commercial	228		228	228	Constructed	6/11/2020
Arts Collective Meta Housing	1665	N Sycamore	Convert Office to Residential Apartments	10			10	Constructed	6/24/2020
Arts Collective Meta Housing	1666	N Main Street	Convert Office to Residential Apartments	48		58	48	Constructed	6/24/2020
AMCAL First Street Family Apartments	1440	E First Street	Residential Apartments	69		64		Constructed	8/29/2019
Fifth and Harbor Mixed Use Apartments	421	N Harbor Boulevard	Mixed Use Residential Apartments/Commercial	94				Entitled	
Madison Project	200	N Cabrillo Park Drive	Mixed Use Residential Apartments/Commercial	260		260	260	Entitled	
Haphan Housing	3025	W Edinger Avenue	Residential Townhomes	18		18	18	Plan Check	
King Street Five Home Subdivision	1102	N King Street	Single Family Residence	5				Plan Check	
Tom's Trucks Residential Development	1008	E Fourth Street	Single Family Residence	117		117	117	Plan Check (grading only)	
The Orleans Adaptive Reuse Apartments	1212	N Broadway	Convert Existing Office to Residential Apartments	24				Under Construction	
Wermers Properties Mixed-Use Development	1660	E First Street	Mixed Use Residential Apartments/Commercial	603		603	603	Under Construction	
Eight Eight 8 - Adaptive Reuse	888	N Main Street	Convert Office to Mixed-Use/Residential Live-Work	146		148	148	Under Construction	
Tiny Tim Plaza Mixed Use	2223	W Fifth Street	Mixed Use Residential Apartments/Commercial	54		51		Under Construction	
AMG East First Senior Apartments	2222	E First Street	Residential Apartments	418		419	419	Under Construction	
Heritage Village Residential Phase C	2001	E Dyer Road	Mixed-Use Residential Apartments	483		483	483	Under Construction	
Heritage Village Residential Phase B	1901	E Dyer Road	Mixed-Use Residential Apartments	403		403	403	Under Construction	
AMG East First Apartments/1st Point One	2114	E First Street	Mixed Use Residential Apartments/Commercial	552		552	552	Under Construction	
ADDITIONAL PIPELINE PROJECT AFTER MAY 2018									
Shea Homes (Artisan at South Coast)	2001	W MacArthur Boulevard	Single Family Residence	42	42			Constructed	9/26/2019
Central Pointe	1801	E Fourth Street	Mixed Use Residential Apartments/Commercial	644	644	650	650	Entitled/ Appealed	
MainPlace Mall Revitalization Specific Plan **	2800	N Main Street	Multi Family Residential	1,591	511	1,900		Entitled	
3rd & Broadway	201	W Third Street	Mixed Use Residential Apartments/Commercial	171	171	171	171	Entitled	
One Broadway Plaza	1109	N Broadway	Residential Apartments	415	415	327	327	Entitled	

Attachment 2 - City of Santa Ana Major Development Pipeline Projects

Project Name		Address	Land Use	Santa Ana Pipeline Res. Units (1)	Res. Units After May 2018 (2)	Irvine List (3)	Garden Grove & Newport Beach Lists (4)	Status	Construct Date
Our Lady of Guadalupe Office/Residence	542	E Central	Office/Residential Apartment	1	1			Entitled	
The Bowery: Building A	2300	S Redhill Avenue	Mixed Use Residential Apartments/Commercial	300	300	1,150	1100	Entitled/ In litigation	
The Bowery: Building B	2300	S Redhill Avenue	Mixed Use Residential Apartments/Commercial	248	248			Entitled/ In litigation	
The Bowery: Building C	2300	S Redhill Avenue	Mixed Use Residential Apartments/Commercial	322	322			Entitled/ In litigation	
The Bowery: Building D	2300	S Redhill Avenue	Residential Apartments	230	230			Entitled/ In litigation	
Craftsman Residential Duplex	1002	N Van Ness Avenue	Residential Apartments	2	2			Entitled	
4th and Mortimer (Block A)	409	E Fourth Street	Mixed Use Residential Apartments/Commercial	99	99	99	99	Entitled	
4th and Mortimer (Block B)	509	E Fourth Street	Mixed Use Residential Apartments/Commercial	70	70	70	70	Entitled	
The Crossroads at Washington	1126	E Washington Avenue	Residential Apartments	86	86	86	86	Entitled	
Budget Inn Conversion	1108	N Harbor Boulevard	Residential Apartments	91	91			Entitled	
Bewley Townhomes	1122	N Bewley Street	Residential Townhomes	10	10	10	10	Plan Check	
Legacy Square Mixed-Use Development	609	N Spurgeon Street	Mixed Use Residential Apartments/Commercial	93	93	93	93	Plan Check	
Legado at the MET	200	E First American Way	Residential Apartments	278	278	278	278	Plan Check	
West Fifth Villas	3417	W Fifth Street	Residential Condos	8	8		7	Plan Check	
First American Mixed-Use Redevelopment	114	E Fifth Street	Mixed Use Residential Apartments/Commercial	220	220	220	220	Plan Check	
Lam Residential	1514	N English Street	Single Family Residence	6	6			Plan Check	
MainPlace Residential Community**	2800	N Main Street	Residential Apartments	309	309			Site Plan Review	
Hue-Vo Two Unit Development	3402	W Seventh Street	Single-Family Residential	3	3			Site Plan Review	
Saint Thomas 3-Lot Subdivision	2828	N Flower Street	Single-Family Residential	3	3			Site Plan Review	
Dantes North Olive Subdivision	1510	N Olive Street	Single-Family residential subdivision	4	4			Site Plan Review	
John Le 5-Unit Development	1113	N Bewley Street	Residential Apartments	5	5			Site Plan Review	
Bui 8-Unit Development	301	N Mountain View	Residential Apartments	8	8	8	8	Site Plan Review	
Bewley Townhomes	921	N Bewley Street	10 Residential Townhomes + 2 ADUs	12	12			Site Plan Review	
Francis Xavier	801-809	E Santa Ana Blvd.	Permanent Supportive Residential Apartment	17	17	17	17	Site Plan Review	
Innovative Housing (North)	601	N Golden Circle Drive	Mixed Use Residential Apartments/Commercial	80	80			Site Plan Review	
Innovative Housing (South)	2021	E Fourth Street	Mixed Use Residential Apartments/Commercial	80	80			Site Plan Review	
Westview Housing	2534	W Westminster Avenue	Residential Apartments	85	85	85	85	Site Plan Review	
2700 Main Street Apartments **	2700	N Main Street	Residential Apartments	312	0	243	243	Site Plan Review	
Broadway Live/Work Units	1412	N Broadway	Live-Work Apartments	3	3			Under Construction	
Midoros LLC Train Station Lofts	930	N Grand Avenue	Live-Work Apartments	5	5			Under construction	
610 Newhope Condos	610	S Newhope Street	Residential Condos	9	9			Under Construction	
201 E. 4th Street	401	N Bush Street	Convert Commerical to Residential Apartments	24	24			Under Construction	
Bridging the Aqua	317	E Seventeenth Street	Residential Apartments	57	57	56		Under Construction	
Legacy Multi-Family Residential At Sunflower	651	W Sunflower Avenue	Residential Apartments	226	226	226	226	Under Construction	
Magnolia at the Park ***	2525	N Main Street	Residential Apartments & Discovery Parking Lot	0	0	256	256	Denied/ In litigation	
			Santa Ana Current Pipeline Projects	10,857	4,777	9,891	7594		

Attachment 2 - City of Santa Ana Major Development Pipeline Projects

Project Name		Address	Land Use	Santa Ana Pipeline Res. Units (1)	Res. Units After May 2018 (2)	Irvine List (3)	Garden Grove & Newport Beach Lists (4)	Status	Construct Date
Notes:									
(1) The Santa Ana Pipeline Residential Units identifies housing included in the OCP 2018/So Cal Connect (4,688 units) and confirmed pipeline projects through December 1, 2020.									
(2) Housing units included in the City of Santa Ana's development pipeline identified after May 2018 through December 1, 2020.									
(3) Housing units included in the City of Irvine Appeal of City of Santa Ana's RHNA as detailed in their Attachment 2 (City of Santa Ana Major Development Project List and Individual Project Website Information)									
(4) Housing units included in the Cities of Newport Beach and Garden Grove Appeal of City of Santa Ana's RHNA, as detailed in their Appeal attachment as City of Santa Ana Major Planning Projects (Non-Specific Plan)									
* The MainPlace Specific Plan allows a Maximum Buildout of 1,900. However, the Development Agreement limits 401 to 820 housing units, pending the redevelopment of former Nordstrom box and new entertainment use of at least 75,000 sq. ft. is built within the first 7 years. Thus, buildout projected is a total of 820.									
**This project has significant site access issues requiring adjacent property owner approval, and is not considered likely to be developed. Site also requires a General Plan Amendment and Zone Change.									
*** This project was denied the needed General Plan Amendment and Zone Change by City Council.									