

# CITY OF STANTON STANTON CITY HALL, 7800 KATELLA AVENUE, STANTON, CA PLANNING COMMISSION REGULAR MEETING WEDNESDAY, JANUARY 19, 2022 - 6:30 P.M.

#### **AGENDA**

#### SAFETY ALERT – NOTICE REGARDING COVID-19

The President, Governor, and the City of Stanton have declared a State of Emergency as a result of the threat of COVID-19 (aka the "Coronavirus"). On September 16, 2021, Assembly Bill 361 (AB 361) was signed by Governor Newsom to allow for the City Council to attend City Council meetings electronically/telephonically and for the public to patriciate in the City Council meeting by electronic means. Given the health risks associated with COVID-19 and the recent surge of the Omicron variant, state and local officials are recommending measures to promote social distancing. To that end, the Stanton City Council will return to virtual meetings until further notice. The health and well-being of our residents and staff is the top priority for the City of Stanton, and people are urged to take all appropriate health safety precautions.

Members of the public will be able to access the meting live electronically/telephonically using any of the following sources

#### In order to join the meeting via telephone please follow the steps below:

- 1. Dial the following phone number +1 (669) 900-9128 US (San Jose).
- 2. Dial in the following **Meeting ID: 861 2653 6361#** to be connected to the meeting.

### ANY MEMBER OF THE PUBLIC WISHING TO PROVIDE PUBLIC COMMENT FOR ANY ITEM ON THE AGENDA MAY DO SO AS FOLLOWS:

E-Mail your comments to <a href="CommunityDevelopment@ci.stanton.ca.us">CommunityDevelopment@ci.stanton.ca.us</a> with the subject line "PUBLIC COMMENT ITEM #" (insert the item number relevant to your comment). Comments received no later than 5:00 p.m. before the meeting (Wednesday, January 19, 2022) will be compiled, provided to the Planning Commission, and made available to the public before the start of the meeting. Staff will not read e-mailed comments at the meeting. However, the official record will include all e-mailed comments received until the close of the meeting.

The Stanton Planning Commission and staff thank you for your continued patience and cooperation during these unprecedented times. Should you have any questions related to participation in the Planning Commission Meeting, please contact the Community Development Department at (714) 890-4243.

In compliance with the American Disabilities Act, if you need special assistance to participate in this meeting, you should contact the Community Development Department at (714) 379-9222. Notification by noon on the Monday prior to the Commission meeting will enable the City to make the reasonable arrangements to assure accessibility to this meeting.

#### 1. CALL TO ORDER

#### 2. PLEDGE OF ALLEGIANCE

#### 3. ROLL CALL

Chair Frazier, Vice Chair Marques, Commissioner Ash, Commissioner Adams, Commissioner Norgaard

#### 4. PLANNING COMMISSION REORGANIZATION

- The Community & Economic Development Director will accept nominations for Chair.
- 2. The Chair will accept nominations for Vice Chair.

#### 5. SPECIAL PRESENTATION

None.

#### 6. APPROVAL OF MINUTES

None.

#### 7. PUBLIC COMMENTS

At this time members of the public may address the Planning Commission regarding any items within the subject matter jurisdiction of the Planning Commission, for a maximum of three (3) minutes, provided that **NO** action may be taken on non-agenda items.

Members of the public wishing to address the Planning Commission during Public Comments or on a particular item may do so by submitting their comments via e-mail to CommunityDevelopment@ci.stanton.ca.us with the subject line "PUBLIC COMMENT ITEM #" (insert the item number relevant to your comment) or "PUBLIC COMMENT NON-AGENDA ITEM". Comments received by 5:00 p.m. before the meeting (Wednesday, January 19, 2022) will be compiled, provided to the Planning Commission, and made available to the public before the start of the meeting. Staff will not read e-mailed comments at the meeting. However, the official record will include all e-mailed comments received until the close of the meeting.

#### 8. PUBLIC HEARINGS

ANY MEMBER OF THE PUBLIC WISHING TO PROVIDE PUBLIC COMMENT ON PUBLIC HEARING ITEM <u>8A</u> ON THE AGENDA MAY DO SO AS FOLLOWS:

- E-mail a request to speak to <u>CommunityDevelopment@ci.stanton.ca.us</u> with thee subject line "REQUEST TO SPEAK ITEM #" (insert the item number relevant to your comment) no later than 5:00 p.m. before the meeting (Wednesday, January 19, 2022) and, at the time of the requested public hearing item, the host will unmute the mic to allow the commenter to address the Commission during the live meeting. Please indicate the Agenda Item you wish to address and provide your name and phone number in your e-mail.
- E-Mail Comments: Your e-mailed comments will be compiled, provided to the Commission and made available to the public before the start of the meeting. Staff will not read e-mail comments out loud during the meeting but the official record will include all e-mail comments received by 5:00 p.m. before the meeting (Wednesday, January 19, 2022).
- 8A. GENERAL PLAN AMENDMENT NO. GPA 22-01 (6<sup>TH</sup> CYCLE HOUSING ELEMENT UPDATE FOR THE 2021-2029 PLANNING PERIOD) AND GENERAL PLAN AMENDMENT NO. GPA 22-02 (COMMUNITY HEALTH AND SAFETY ELEMENT UPDATE)

#### RECOMMENDED ACTION

That the Planning Commission:

- That the environmental effects of the project are within the scope described in the Final Environmental Impact Report (FEIR) for the Revised City of Stanton General Plan which was certified in 2008 and no subsequent EIR is necessary in compliance with Section 15164 of the California Environmental Quality Act
- Adopt Resolution No. Recommending City Council Approval of General Plan Amendments Nos. GPA 22-01 and GPA 22-02

#### 9. <u>NEW BUSINESS</u>

None.

#### 10. OLD BUSINESS

None.

#### 11. PLANNING COMMISSION COMMENTS

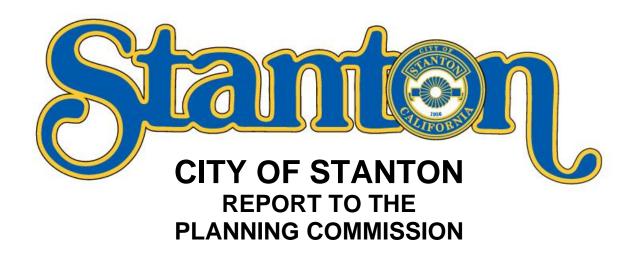
At this time Commissioners may report on items not specifically described in the agenda which are of interest to the Commission <u>provided no discussion or action may be taken</u> except to provide staff direction to report back or to place the item on a future agenda.

#### **DIRECTOR'S REPORT 12**.

#### **ADJOURNMENT** 13.

I hereby certify under penalty of perjury under the laws of the State of California, the foregoing agenda was posted at the Post Office, Stanton Community Services Center and City Hall, not less than 72 hours prior to the meeting. Dated this 13th day of January 2022.

Community & Economic Development Director



TO: Chairperson and Members of the Planning Commission

**DATE:** January 19, 2022

SUBJECT: GENERAL PLAN AMENDMENT NO. GPA 22-01: 6TH CYCLE HOUSING

ELEMENT UPDATE FOR THE 2021-2029 PLANNING PERIOD AND

**COMMUNITY HEALTH AND SAFETY ELEMENT UPDATE** 

#### **RECOMMENDED ACTION**

That the Planning Commission:

- That the environmental effects of the project are within the scope described in the Final Environmental Impact Report (FEIR) for the Revised City of Stanton General Plan which was certified in 2008 and no subsequent EIR is necessary in compliance with Section 15164 of the California Environmental Quality Act
- Adopt Resolution No 2547. Recommending City Council Approval of General Plan Amendments No. GPA 22-01

#### **BACKGROUND**

Providing housing for all Californians is considered by the state legislature to be of vital statewide importance. Cities are required to adopt a Housing Element that provides an analysis of the community's housing needs for all income levels and strategies to address those needs. State housing element law also recognizes that for the private sector to address housing needs and demands, local governments must adopt land use policies and plans that provide opportunities for, and do not unduly constrain, housing development by the private sector. Having a certified Housing Element ensures local land use control and keeps the City of Stanton eligible for State and Federal funds for roads, sewers, parking, housing and planning efforts.

State Law requires the Safety element to be updated with the Housing Element to include a vulnerability assessment that identifies the risks that climate change poses to the City

and the areas at risk from climate change impacts. The Community Health and Safety Element of the General Plan has been updated with a set of adaptation and resiliency goals, policies and objectives, and a set of implementation measures.

#### **ANALYSIS/JUSTIFICATION**

#### 6<sup>th</sup> Cycle Housing Element Update

The Updated Housing Element provides the plan to meet the housing needs of Stanton residents at all economic levels and addresses segments of the population with special housing needs. The document is organized into two parts: *Part 1 - Housing Plan* and *Part 2 - Background Report*.

Part 1 - Housing Plan addresses the City's housing needs through goals, policies, and programs that the City will implement. The Housing Plan's objective is to ensure decent, safe housing at a cost that is within the reach of the diverse economic segments that make up the Stanton Community. To meet this objective, the Housing Plan focuses on five overarching goals:

- 1. Encourage housing diversity and opportunities
- 2. Provide housing affordable to lower and moderate-income households
- 3. Preserve the quality of existing housing and residential neighborhoods
- 4. Minimize governmental constraints; and
- 5. Promote equal opportunity for all residents to reside in the housing of their choice

Part 2 – Background Report identifies and evaluates Stanton's housing needs that the Housing Plan addresses. The Background Report describes housing, economic and demographic conditions in Stanton and assesses the demand for housing across all income levels. Part of this assessment includes the Regional Housing Needs Allocation (RHNA). The RHNA, assigned by the Southern California Association of Governments (SCAG) represents the City's fair share of units of the regional housing goal. State Law does not require cities to construct these units, but rather identify sites that can accommodate the units and programs and policies to allow for the development of said units. The City of Stanton's fair share allocation for the 6<sup>th</sup> cycle planning period (June 30, 2021 – October 15, 2029) can be seen in Table 1.

Table 1 – RHNA Allocation

Income Group	Total Units Allocated	Percent of All Units
Extremely/Very Low	165	13%
Low	145	12%
Moderate	231	19%
Above Moderate	690	56%
Total	1231	100%

Jurisdictions may count housing units that have been developed, under construction, received their building permits, or have been entitled or approved after June 30, 2021,

towards this allocation. So far, 953 units have been either approved, permitted, or under construction since June 30<sup>th</sup> and can be counted as credit towards the total allocation at 1,231. A Complete breakdown of credited units by project and income level is available in the Background Report of the Housing Element (Attachment A).

On October 18, 2021, the City submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for review, pursuant to Government Code section 65585(b). The draft was found to be in substantial compliance with statutory requirements. The draft for consideration today has incorporated the minor revisions requested by the Department of Housing and Community Development to ensure full compliance with state law (Attachment B).

#### Community Health and Safety Element

In compliance with Government Code Section 65302(g), the Stanton Climate Vulnerability Assessment (Appendix A, Attachment C) focuses on identifying vulnerabilities and adaptation strategies within the City of Stanton to address climate change. The Assessment informs goals, policies, and actions aimed specifically at climate change that are included in the updated Community Health and Safety Element of the Stanton General Plan (Attachment B).

#### **ENVIRONMENTAL IMPACT**

In accordance with Section 15146 of the California Environmental Quality Act, an Addendum to the FEIR has been prepared for the project (Attachment D). As detailed in the Addendum, on the basis of substantial evidence in light of the whole record, a subsequent EIR is not appropriate for these General Plan Amendments because none of the criteria permitting such a document under State CEQA Guidelines Section 15162 are met.

The 2021-2029 Housing Element Update and Community Health and Safety Element Update would result in no new significant impacts that were not analyzed in the General Plan FEIR, nor would the proposed Project cause a substantial increase in the severity of any previously identified environmental impacts. The potential impacts associated with the proposed Project would either be the same or less than those described in the General Plan FEIR. In addition, there are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the General Plan FEIR, nor has any new information regarding the potential for new or more severe significant environmental impacts been identified. Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this Addendum to the previously certified General Plan FEIR is the appropriate environmental documentation for the proposed Project. In taking action on any of the approvals, the decision-making body must consider the whole of the data presented in the Final EIR.

#### **PUBLIC NOTIFICATION**

Notice of Public Hearing was mailed to all property owners within a five-hundred-foot radius of the subject property and made public through the agenda-posting process.

Prepared by,

Approved by,

Paige Montojo Associate Planner

Jennifer A. Lilley, AICP Community and Economic Development Director

#### **ATTACHMENTS**

- A. Draft 6<sup>th</sup> Cycle Housing Element
- B. Correspondence from HCD
- C. Draft Community Health and Safety Element
- D. Addendum to the General Plan EIR
- E. Draft Resolution 2547





# 2021—2029 HOUSING ELEMENT

#### PREPARED FOR: CITY OF STANTON

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#### 2021-2029 HOUSING ELEMENT ORGANIZATION

#### Part 1: Housing Plan

Part 1 of the 2021-2029 Housing Element is the City's "Housing Plan", which includes the goals, policies, and programs the City will implement to address constraints and needs. The City's overarching objective is to ensure that decent, safe housing is available to all current and future residents at a cost that is within the reach of the different economic segments which comprise Stanton.

#### Part 2: Background Report

Part 2 of the 2021-2029 Housing Element is the "Background Report" which identifies the nature and extent of Stanton's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. By examining the City's housings, resources, and constraints, the City can then determine a plan of action for providing adequate housing, as presented in Part 1: Housing Plan. In addition to identifying housing needs, the Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

#### **Appendix A: Housing Sites Inventory**

The Housing Element must include an inventory of land suitable and available for residential development to meet the City's regional housing need by income level. The California Department of Housing and Community Development (HCD) requires that the Housing Sites Inventory be prepared using a State-approved format, included here as Appendix A.

#### **Appendix B: Public Engagement Summary**

As part of the Housing Element Update the process, the City hosted numerous opportunities for the community and key stakeholders to provide feedback on existing housing conditions, housing priorities, priority areas for new residential growth, and topics related to fair housing. Materials were provided in both English and Spanish to further engage the Stanton community. Public participation played an important role in the refinement of the City's housing goals and policies and in the development of new housing programs, as included in Part 1: Housing Plan. The public's input also helped to validate and expand upon the contextual information included in Part 2: Background Report. The City's efforts to engage the community in a meaningful and comprehensive way are summarized in Appendix B.



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# 1 Introduction

This section presents the City of Stanton's Housing Plan, including goals, policies, and programs the City will implement to address housing needs and constraints. The City's overarching objective is to ensure that decent, safe housing is available to all current and future residents at a cost that is within the reach of the diverse economic segments that comprise Stanton. To this end, the Housing Plan focuses on:

- 1) Encouraging housing diversity and opportunities;
- 2) Providing housing affordable to lower and moderate-income households;
- 3) Preserving the quality of existing housing and residential neighborhoods;
- 4) Minimizing governmental constraints; and
- 5) Promoting equal opportunity for all residents to reside in the housing of their choice.

# 2 Goals and Policies

The Housing Element Background Report evaluates the City's housing needs, opportunities, and constraints, and presents a review of the previous Housing Element. This Housing Plan reflects the City's experience during the 2014-2021 planning period and sets forth the City's goals, policies, and programs to address the identified housing needs and issues for the 2021-2029 planning period. Quantified objectives for new construction, rehabilitation, and conservation are also identified. The goals and policies that guide the City's housing programs and activities are as follows:

#### HOUSING DIVERSITY AND OPPORTUNITIES

#### **GOAL 1**

Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.

- Policy 1.1: Allow for the development of a variety of housing opportunities (ownership and rental) in Stanton including low-density single-family homes, moderate-density townhomes, higher-density apartments and multifamily projects, mixed-use development, accessory dwelling units, and mobile homes to fulfill regional housing needs.
- **Policy 1.2:** Maintain adequate capacity to accommodate the City's unmet Regional Housing Needs Allocation (RHNA) for all income categories throughout the planning period.
- **Policy 1.3:** Promote the development of new housing units in the City's mixed-use districts, which are located along the City's major transportation corridors and near community activity centers.
- **Policy 1.4:** Encourage both the private and public sectors to produce or assist in the production of housing with particular emphasis on housing affordable to seniors, persons with disabilities, large families, female-headed households with children, and the homeless.
- **Policy 1.5:** Coordinate efforts with the Public Works Department and the City's sewer and water providers with regard to ongoing infrastructure maintenance and upgrades to ensure that sewer and water capacity are sufficient to accommodate projected growth.
- **Policy 1.6:** Continue to work with the County of Orange and surrounding jurisdictions to address the needs of the homeless on a regional basis.

#### **AFFORDABLE HOUSING**

#### GOAL 2

Protect, encourage, and provide housing opportunities for persons of lower and moderate incomes.

**Policy 2.1:** Preserve and expand the City's supply of affordable rental and ownership housing for lower and moderate-income households.

- **Policy 2.2:** Utilize the City's regulatory powers including density bonuses and financial incentives to promote and facilitate the development of affordable housing.
- **Policy 2.3:** Seek out partnerships with affordable housing developers, nonprofits, and other agencies to maximize resources available for the provision of housing affordable to lower and moderate-income households.
- **Policy 2.4:** Actively pursue state and federal housing program funds to provide housing assistance and to support the development of housing affordable to lower and moderate-income households.
- Policy 2.5: Allow by-right approval of housing developments proposed on non-vacant sites included in the previous Housing Element inventory and on vacant sites included in the two previous Housing Element inventories, provided that the proposed housing development includes at least 20 percent lower income affordable housing units.

#### PRESERVATION AND MAINTENANCE OF HOUSING

#### GOAL 3

Preserve and maintain the existing housing stock so that all residents live in neighborhoods free from blight and deterioration.

- **Policy 3.1:** Promote programs that improve the overall quality and conditions of existing housing in Stanton with an emphasis on housing that is affordable to lower income households.
- **Policy 3.2:** Promote and facilitate the conservation and rehabilitation of substandard residential properties by homeowners and landlords.
- **Policy 3.3:** Subject to the availability of funding, continue to offer rehabilitation and home improvement loans to qualified households.
- **Policy 3.4:** Promote resources and programs available to homeowners and landlords for residential maintenance and rehabilitation.
- **Policy 3.5:** Use the code enforcement program to bring substandard units into compliance with City codes and to improve housing quality and conditions.
- Policy 3.6: Promote a balance of rental and affordable ownership housing.
- **Policy 3.7:** Monitor "at-risk" affordable housing and proactively address potential conversion of affordable units to market-rate units prior to their transition.

**Policy 3.8:** Support County efforts to preserve and expand rental assistance programs for very low-income households, including the Housing Choice Voucher Program.

#### **REMOVAL OF HOUSING CONSTRAINTS**

#### GOAL 4

Reduce or remove governmental and nongovernmental constraints to the development, improvement, and maintenance of housing where feasible and legally permissible.

- **Policy 4.1:** Review residential development standards, regulations, ordinances, departmental processing procedures, and permit fees related to construction and rehabilitation to determine any constraints on housing development and modify accordingly.
- **Policy 4.2:** Inform applicants on how to navigate the development review process and efficiently facilitate building permit and development plan processing for residential construction.
- **Policy 4.3:** Monitor state and federal housing-related legislation, and update City plans, ordinances, and processes pursuant to such legislation to remove or reduce governmental constraints.
- **Policy 4.4:** Provide incentives and regulatory concessions for residential projects constructed specifically for lower and moderate-income households.
- **Policy 4.5:** Adopt plans and programs that support the provision of adequate infrastructure and public facilities required to serve new housing.

#### **EQUAL HOUSING OPPORTUNITY**

#### **GOAL 5**

Affirmatively further fair housing practices, promoting equal opportunity for all residents to reside in housing of their choice.

- **Policy 5.1:** Prohibit discrimination in the sale, rental, or financing of housing based on race, color, ancestry, religion, national origin, sex, sexual orientation, gender identity, age, disability/medical condition, familial status, marital status, source of income, or other protected characteristics.
- **Policy 5.2:** Assist in the enforcement of fair housing laws by providing support to organizations that conduct outreach and education regarding fair housing rights, receive and

investigate fair housing allegations, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.

- **Policy 5.3:** Encourage housing development in an equitable and fair manner that prevents discrimination, overcomes patterns of segregation, avoids concentrations of lower income households, addresses pollution burdens, and fosters inclusive communities.
- **Policy 5.4:** Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Code.
- **Policy 5.5:** Broaden the availability and accessibility of housing to special needs residents such as seniors, disabled persons, developmentally disabled, large households, families with children, female-headed households, and persons experiencing homelessness.
- **Policy 5.6:** Provide information to the public on available housing, housing affordable to lower income households, and special needs housing through the City's public information channels and social media accounts.

# 3 Housing Element Programs

Stanton offers a variety of housing opportunities to meet the needs of the community and comply with State housing law. This section of the Housing Plan addresses the issues identified in the Background Report of the Housing Element and provides a strategy to achieve the City's housing goals. The housing programs designed to implement the City's strategy are discussed in detail below.

#### **Adequate Housing Sites**

#### (GOAL 1: HOUSING DIVERSITY AND OPPORTUNITIES)

A key element in satisfying the housing needs of all segments of the community is the provision of adequate sites for housing. This is an important function of both the General Plan and zoning.

#### **Program 1: Residential Sites Inventory**

Planning and regulatory actions to achieve adequate housing sites are implemented through the Community Development Element, Zoning Code, and in some instances, development agreements. These regulatory documents provide for a variety of residential development types, ranging from lower-density single-family homes to higher-density apartments, condominiums, and mixed-use projects.

The City of Stanton received a RHNA of 1,231 units for the 2021-2029 planning period. After credits for constructed units (572) and approved/entitled units (353) are taken into consideration, the City has a remaining 2021-2029 RHNA of 306 units, including 33 extremely/very low-income, 145 low-income, 4 moderate-income, and 124 above moderate-income units.

The residential sites inventory consists of approximately 34.39 acres of land designated in mixed-use areas which allow for residential development at densities beyond 30 du/ac, with the potential to yield at least 1,288 new units. The City has also identified 3.55 acres of

underdeveloped residential uses (five sites) that could yield an additional 37 units affordable to moderate and above moderate income households. Construction of new accessory dwelling units (ADUs) will also add to the City's housing stock (117 units). Together, these resources have the capacity to accommodate at least 1,442 new units affordable to all income levels. These sites can accommodate the City's remaining RHNA allocation for all income levels through year 2029. The City will maintain an inventory of sites with residential development potential and provide it to prospective residential developers upon request.

**Responsible Agencies:** Community and Economic Development Department

**Funding Sources:** General Fund

**2021-2029 Objectives:** Maintain and monitor the residential sites inventory to ensure

sufficient sites remain to accommodate the RHNA allocation

throughout the planning period. Receive and process development applications for residential projects.

**Timeframe:** Annual monitoring and reporting throughout the planning

period.

#### **Program 2: Monitor Residential Capacity (No Net Loss)**

The City will monitor the consumption of residential acreage (i.e. land identified with residential development potential), and review proposed General Plan amendments, Zoning Code amendments, and development projects to ensure an adequate inventory is available to meet the City's 2021-2029 RHNA obligations. This program modifies the City's 5<sup>th</sup> Cycle Residential Development Monitoring Program.

To make certain sufficient residential development capacity is maintained, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863 and will make the findings required by that code section if a site is proposed for development with fewer units or at a different income level(s) than shown in the residential sites inventory. Should an approval of development result in a reduction of capacity below that needed to accommodate the remaining RHNA for lower income, moderate-income, or above moderate-income households, the City, and potentially the applicant (in accordance with State law), will identify and, if necessary, rezone sufficient sites within 180 days to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA allocation, consistent with State law. Any rezoned site(s) will satisfy the adequate sites requirements of Government Code Section 65583.2 and will be consistent with the City's obligation to affirmatively further fair housing.

Responsible Agencies: Community and Economic Development Department

**Funding Sources:** General Fund

**2021-2029 Objectives:** Maintain adequate capacity to accommodate the City's RHNA

obligations at all income levels throughout the planning period.

Report as required through the HCD annual report process.

Timeframe: Ongoing implementation, at time of approval of a project on a

site listed in the Housing Element, and annual reporting

throughout the planning period.

#### **Program 3: Public Property Conversion to Housing**

The City will maintain a list of surplus city-owned lands, including identification of address, APN, General Plan land use designation, zoning, current use, parcel size, and status (surplus land or exempt surplus land). The City will work with nonprofits and public agencies to evaluate the feasibility of transferring surplus city-owned lands not committed to other City purposes for development of affordable housing by the private sector. The inventory will be updated annually in conjunction with the Annual Progress Report (Program 1). Any disposition of surplus lands will be conducted consistent with the requirements of Government Code Section 54220 et. seq.

**Responsible Agencies:** Community and Economic Development Department; City

Manager's Office

Funding Sources: General Fund and federal and state technical assistance grants

**2021-2029 Objectives:** Collaborate with the development community on an annual

basis, including affordable housing developers, to evaluate the viability of developing city-owned land as affordable housing.

Timeframe: Annually

#### **Program 4: Replacement of Affordable Units**

Consistent with the requirements of Government Code Section 65583.2(g)(3), development projects on sites in the residential sites inventory (Appendix A) that have, or have had within the five years preceding the application, residential uses restricted with rents affordable to low or very low-income households or residential uses occupied by low or very low-income households, shall be conditioned to replace all such units at the same or lower income level as a condition of any development on the site, and such replacement requirements shall be consistent with Government Code Section 65915(c)(3).

**Responsible Agencies:** Community and Economic Development Department

**Funding Sources**: General Fund; replacement costs to be borne by developer of any

such site

**2021-2029 Objectives:** For all project applications, identify need for replacement of

affordable housing units and ensure replacement, if required,

occurs.

Timeframe: Ongoing

#### **Program 5: Facilitate Affordable and Special Needs Housing Construction**

The City will encourage and facilitate affordable housing construction and housing that addresses populations with special housing needs through financial assistance (when funding is available), removal of regulatory constraints, and administrative support. With limited funding, the City will rely on the following actions to encourage affordable housing production during the planning period:

- Collaborate with Affordable Housing and Special Needs Housing Developers: Affordable housing developers work to develop, conserve, and promote rental and ownership affordable housing, including for extremely low-income households. Special needs housing developers work to ensure housing opportunities are available that are accessible to and supportive of persons and households with special needs, such as persons with developmental disabilities. These developers can help meet the goals for additional housing by implementing or assisting with the implementation of programs described in this Housing Element. The City will collaborate with affordable housing developers and special needs housing developers to identify potential sites, write letters of support to help secure governmental and private sector funding, and offer technical assistance related to the application of City incentive programs (e.g., density bonus). The City will proactively provide affordable housing developers with maps illustrating higher resource areas and areas with high levels of people-based and place-based opportunities in the City in order to highlight opportunities for new development to affirmatively further fair housing. In addition, developers will proactively be provided the list of housing sites identified in the residential sites inventory (Appendix A).
- Regulatory Concessions and Incentives: The City will work with developers on a case-by-case basis to provide regulatory concessions and incentives to assist them with the development of affordable and special needs housing. In a relatively small city like Stanton, this is the most effective method of assisting developers, as each individual project can be analyzed to determine which concessions and incentives would be the most beneficial to the project's feasibility. Regulatory concessions and incentives could include, but are not

limited to, density bonuses, reductions in required parking, fee reductions or deferral, expedited permit processing, and modified or waived development standards pursuant to Chapter 20.330 (Affordable Housing - Density Bonuses) of the Municipal Code.

- Low Income Housing Tax Credits (LIHTC): The City will assist developers in gaining funding for the development of affordable housing through the LIHTC program. Investors receive a credit against federal tax owed in return for providing funds to developers to build or renovate housing for low-income households. In turn, the capital subsidy allows rents to be set at below market rates.
- Collaborate with Housing Developers to Support Large Families: Developers of affordable and market rate housing can help address the special needs of the community's large families by providing a mix of unit types and sizes, including units with more than three bedrooms. The City will advise developers regarding the presence of larger families in Stanton and encourage them to evaluate the feasibility of including a higher proportion of units which are more than three bedrooms.

Responsible Agencies: Community and Economic Development Department

**Funding Sources:** General Fund

**2021-2029 Objectives:** Monitor the City's existing affordable housing stock and support

affordable housing developers in their efforts to develop new affordable units in Stanton. Monitor the City's options for special needs housing and likewise support special needs housing

developers.

**Timeframe:** Annual outreach to the development community; provide

ongoing assistance to interested affordable housing and special

needs housing developers.

#### **Program 6: Mixed-Use Development**

The City previously adopted a comprehensive revision to its General Plan and Zoning Code to maximize the potential for mixed-use and other creative residential development types. Mixed-use development will add residential units along major corridors such as Beach Boulevard and can provide significant opportunities for affordable housing development. In addition to providing for expanded residential development in higher-density settings, mixed-use developments will help the City achieve greenhouse gas reductions through reduced vehicle trips. Furthermore, mixed-use developments such as Stanton's new 22 & Beach can be transformative projects that

become the catalyst for the revitalization of a larger area. The City will undertake the following actions to encourage mixed-use development during the planning period:

- Facilitate the development of residential units in mixed-use districts by providing technical support for lot consolidation, streamlined permit processing, regulatory concessions or incentives, fee waivers and fee deferrals, assistance with on and off-site improvements, and financial assistance (when feasible). The City will establish specific and objective criteria for mixed-use site plan reviews and will target development densities as estimated in the Housing Element.
- Play a proactive role in development of mixed-use areas by pursuing strategic partnerships with developers, lenders, and property owners to ensure the development of housing at appropriate densities and the inclusion of affordable housing units.
- Monitor development interest, inquiries, and progress towards mixed-use development and affordable housing creation. Periodically re-evaluate approach and progress. Should monitoring reveal a shortfall in residential and affordable residential uses in mixed-use developments, the City will develop additional incentives and approaches (including examination of development standards) to ensure the City satisfies its identified housing need (RHNA).

Responsible Agencies: Community and Economic Development Department

**Funding Sources:** General Fund and other sources

2021-2029 Objectives: Support the development of mixed-use projects along transit

corridors and near activity centers.

Timeframe: Ongoing implementation with annual monitoring; prepare

objective design standards for mixed-use development by

December 2023.

#### **Program 7: Accessory Dwelling Units (ADUs)**

Accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) help meet the City's housing needs for all income levels and also provide a housing resource for seniors, students, and low and moderate-income households throughout the entire Stanton community, not just in any single geographic area. The City will continue to apply Zoning Code regulations that allow ADUs and JADUs (also known as second units or granny flats) by right in all residential zones, in accordance with State law. The City will amend the ADU ordinance as necessary based on future changes to State law and work with HCD to ensure continued compliance with the law. The City will also continue to monitor trends pertaining to the extent of ADU production to ensure that the Housing Element goals can be met.

While the City will promote the opportunity for residents to develop ADUs throughout Stanton, the City is especially focused on promoting the development of ADUs that are affordable to lower income and moderate-income households, and the development of ADUs in areas of opportunity as described in the Affirmatively Furthering Fair Housing section of the Housing Element Background Report. To the extent feasible, the City will survey ADU owners/builders to determine if they will be affordable to lower or moderate-income households. The City will ask ADU applicants to voluntarily share the unit's intended rental rate (if applicable) to track the supply of affordable ADUs in the City. Additionally, by the end of 2023, the City will identify and evaluate potential incentives (if any) to encourage production of affordable ADUs, particularly in higher resource areas (as described in the Affirmatively Furthering Fair Housing section of the Housing Element Background Report ), and present potential strategies to implement those incentives to the Planning Commission and/or City Council during the planning period. To further strengthen the potential for ADU development in higher opportunity areas, the City will conduct targeted outreach in these areas such as meeting with HOAs in higher opportunity areas and posting educational social media advertisements on location-based platforms like Nextdoor.

The City will continue to work with the Orange County Council of Governments (OCCOG) and neighboring jurisdictions to leverage resources and create a streamlined, standard set of ADU plans for use by applicants. Moreover, the City will provide information regarding typical plans for ADU development as a housing resource, including providing website information where ADU plans can be found along with the standard set of plans developed by the City.

Responsible Agencies: Community and Economic Development Department

Funding Sources: General Fund

**2021-2029 Objectives:** Maintain an ADU ordinance consistent with State law. Support the

development of accessory dwelling units in neighborhoods

throughout the City.

**Timeframe:** Update the City's current ADU ordinance by October 15, 2022 to

comply with current State law. Survey ADU owners/builders to determine affordability and update ADU application to inquire about affordability level (2022); identify and evaluate potential incentives to encourage production of affordable ADUs (2022-2023); present findings to the City's Planning Commission and/or City Council (2023); prepare and distribute ADU factsheet (2022); prepare standard set of ADU plans (2022-2023); implementation and annual monitoring and reporting throughout the planning

period via the Housing Element Annual Progress Report

(continuous).

# **Housing and Supportive Services for Special Needs Populations**

#### (GOAL 1: HOUSING OPPORTUNITIES)

#### **Program 8: Density Bonus Implementation**

The City will provide for density bonuses consistent with State law for all projects proposing to construct affordable housing. A density bonus functions on a sliding scale, where the level of density bonus and number of development incentives vary according to the number and type of affordable housing units to be provided. The City will annually monitor State law updates that impact density bonuses and will update local plans and programs as necessary. As part of the City's regular outreach to developers, the City will advertise the density bonus provisions and answer any questions on the program and its implementation.

Responsible Agencies: Community and Economic Development Department

**Funding Sources:** General Fund and planning grants

**2021-2029 Objectives:** Continue to implement density bonuses consistent with State

law. Promote the use of density bonus incentives and provide technical assistance to developers in utilizing the density bonus

to maximize feasibility and meet local housing needs.

Timeframe: Annual monitoring of relevant legislation; annual outreach to the

development community; ongoing implementation

#### Program 9: Redevelop the Tina/Pacific Neighborhood

The former Stanton Redevelopment Agency initiated a project in the Tina/Pacific Neighborhood in 2009. The neighborhood consisted of 40 properties, each with a four-plex apartment complex. The Agency purchased 25 of the 40 properties, relocated tenants from 12 of the properties, and demolished the buildings prior to the State's elimination of Redevelopment Agencies. The properties were transferred to the Stanton Housing Authority for completion of the project.

The Housing Authority will continue the redevelopment of the neighborhood. Based on the available funding, the project may be a full redevelopment, including the purchase of the remaining 15 properties, and construction of a new affordable housing development; or a hybrid of new development on the vacant lots, and rehabilitation of the existing buildings on the remaining sites. The properties that were purchased prior to the elimination of Redevelopment were purchased utilizing the Low to Moderate Income Housing Funds. As such, the housing units

purchased with these funds will be replaced with affordable housing units in accordance with Redevelopment Law.

More recently the City has gone through the Surplus Land Act to initiate a competitive bid process for the acquisition, relocation, and redevelopment of this site. The new project is expected to develop a combination of market rate homes and affordable housing units and include community facilities, amenities, and wraparound services.

Responsible Agencies: Community and Economic Development Department; Housing

Authority

Funding Sources: Housing Authority, Bonds, HUD

**2021-2029 Objectives:** Complete Tina/Pacific Redevelopment

Timeframe: Ongoing

#### **Program 10: California Accessibility Standards Compliance Program**

The City will continue to ensure that all construction projects requiring building permits comply with the State of California accessibility standards. The City will provide technical assistance as part of the building permit review process to assist property owners and contractors in understanding this law and related requirements applied to new development and/or retrofit or rehabilitation projects for public, residential, or commercial structures. The City will also provide a link on the City website to the Division of the State Architect's web page that provides various access compliance reference materials, including an advisory manual and answers to frequently asked questions.

**Responsible Agencies:** Community and Economic Development Department

Funding Sources: General Fund

**2021-2029 Objectives:** Assure housing units accommodate residents with disabilities.

**Timeframe:** Ongoing implementation; updates to the City's website by

February 15, 2022

#### **Rental Assistance and Conversion**

#### (GOALS 1 AND 2: AFFORDABLE HOUSING OPPORTUNITIES)

Market rents in Stanton are at a level which significantly limits the supply of housing affordable to very low-income households. Rental subsidies are necessary to prevent many of the City's very low-income residents from spending upwards of 30% of their incomes on housing costs, and over-extending themselves financially. In addition to rent subsidies, actions to preserve the low-

income housing projects in Stanton at-risk of converting to market rate will be necessary to maintain their affordability and not reduce affordable housing units available in the community.

#### **Program 11: Rental Assistance**

The Federal Housing Choice Voucher rental assistance program provides rental subsidies to extremely low and very low-income families (i.e. those earning up to 50% AMI) and elderly who spend more than 30% of their income on rent. The subsidy represents the difference between the excess of 30% of a recipient's monthly income and the actual rent. Rent subsidies can be used to pay for mobile home park space rents.

The City will work with the Orange County Housing Authority to promote the program to all residents while placing an emphasis on the City's special needs populations, including seniors, persons with disabilities, large families, and female-headed households, with the goal of assisting an average of approximately 190 extremely low and very low-income households annually during the planning period. Through other programs included in the Housing Plan, the City will educate the community on the importance of integrating affordable housing throughout all geographic areas of the City to help create balanced and integrated neighborhoods.

**Responsible Agencies:** Orange County Housing Authority (OCHA)

Funding Sources: U.S. Department of Housing and Urban Development (HUD)

**Housing Choice Vouchers** 

**2021-2029 Objectives:** An average of 190 Stanton households were assisted by this

program annually during the prior planning period. The objective

is to assist OCHA to promote the program, with a special

emphasis on promoting the program to the City's special needs populations and maintain this level of assistance as allowed by

the federal budget.

Timeframe: Ongoing implementation and annual reporting throughout the

planning period.

#### **Program 12: Preservation of Existing Affordable Units**

In order to meet the housing needs of all economic groups in Stanton, the City must develop programs to minimize the loss of housing units available to lower income households. As of February 2021, the City's affordable housing inventory consisted of 743 deed-restricted units, of which 297 were at risk of converting to market rate rents during the planning period.

The City will work with property owners, interest groups, and the State and federal governments to conserve the City's affordable housing stock through implementation of the following

#### programs:

- Monitor Units at Risk: Maintain contact with providers and owners to monitor the status of existing and future affordable units.
- Work with Owners: Provide technical assistance to owners of properties with at-risk units by identifying funding sources and supporting grant or tax credit applications for the extension of affordability covenants.
- Work with Potential Purchasers: Where feasible, provide technical assistance to public and non-profit agencies interested in purchasing and/or managing properties that include units at risk.
- Tenant Education: The California Legislature extended the noticing requirement of at-risk units opting out of low-income use restrictions to one year. Should a property owner pursue conversion of the units to market rate, the City will strive to ensure that tenants are properly noticed and informed of their rights and that they are eligible to receive Housing Choice Vouchers that would enable them to stay in their units, should they receive one.

**Responsible Agencies:** Community and Economic Development Department; Orange

County Housing Authority (OCHA)

Funding Sources: General Fund, CDBG, HOME, Housing Choice Voucher Program

2021-2029 Objectives: Work with property owners, interest groups, and the State and

federal governments to preserve the City's affordable housing

stock.

Timeframe: Ongoing implementation and annual monitoring and reporting

throughout the planning period. Within 60 days of notice of intent to convert at-risk units to market rate rents, the City will work with potential purchasers using HCD's current list of

Qualified Entities (<a href="https://www.hcd.ca.gov/policy-">https://www.hcd.ca.gov/policy-</a>

research/preserving-existing-affordable-housing.shtml), and

educate tenants of their rights.

#### **Preservation and Maintenance**

#### (GOAL 3: PRESERVE EXISTING HOUSING STOCK)

The majority of the City's housing stock is in good condition; however, it is important for the City to provide programs that ensure the continued maintenance of the housing stock.

#### **Program 13: Homeowner Rehabilitation Program**

Subject to the availability of funding, the City may provide housing rehabilitation assistance to low and moderate-income homeowners to make exterior home improvements through a loan/grant program for owner-occupied single-family detached and attached homes and mobile home units. Eligible repairs include roofing, windows, exterior and interior painting, plumbing, electrical, energy/weatherization, garage doors, and other common home repairs, as well as accessibility improvements. The City no longer has an identified funding source to assist with the rehabilitation of the existing housing stock; however, City staff will research and identify new funding sources through federal assistance, grants, and collaborations to assist with financing rehabilitation of the existing housing stock.

**Responsible Agencies:** Community and Economic Development Department

**Funding Sources:** CDBG or other grant funding sources

**2021-2029 Objectives:** Identify and secure funding sources.

**Timeframe:** Ongoing

#### **Program 14: Proactive Code Enforcement**

The City's code enforcement program implements a comprehensive approach to property and neighborhood improvement to ensure building safety, property maintenance, and the integrity of residential neighborhoods. The City will identify and prioritize target areas where the rehabilitation of housing units is most needed. The City will provide financial incentives, identify funding options and apply for grant funds if any and when they become available, and services to property owners in identified target areas to provide opportunities for maintenance and rehabilitation.

**Responsible Agencies:** Community and Economic Development Department

**Funding Sources:** General Fund, CDBG

**2021-2029 Objectives:** Continue to enforce applicable sections of the Stanton Municipal

Code, including property maintenance standards and the California Building Code. Identify and prioritize target areas.

**Timeframe:** Ongoing enforcement; identify and prioritize target areas (2021-

2022).

#### **Program 15: Energy Conservation and Energy Efficiency Opportunities**

The City will continue to implement energy-efficient measures for new construction and rehabilitation projects, including the California Green Building Standards Code (CALGreen). Information regarding the City's energy-efficiency standards and available programs to assist

homeowners and property owners, including those identified in the Housing Element Background Report, will be made available on the City's website and at the permit counter. In addition to promoting the programs citywide, the City will target special advertisements and education to the City's lower income census tracts to explain available programs and potential long-term utility cost savings.

The City will review the General Plan to determine if updates are needed to support and encourage energy-efficiency in existing and new housing, especially in areas of the City with higher (worse) CalEnviroScreen scores, which may suffer from elevated levels of environmental burdens. If updates are necessary, amend the General Plan to support this program.

Responsible Agencies: Community and Economic Development Department

**Funding Sources**: General Fund

**2021-2029 Objectives:** Improve energy-efficiency in new and existing development and

promote available programs and benefits to all City residents,

especially lower income residents.

**Timeframe:** Ongoing implementation; review the General Plan to determine

if updates are appropriate no later than December 2022 and complete updates, if needed, no later than December 2023.

#### **Removal of Housing Constraints**

#### (GOAL 4: MINIMIZE GOVERNMENTAL CONSTRAINTS)

State law requires the Housing Element to address, and where appropriate and legally possible, remove constraints affecting the maintenance, improvement, and development of housing. The following programs are designed to lessen governmental and nongovernmental constraints on housing development during the planning period.

## Program 16: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws

The City will continue to monitor federal and state legislation that could impact housing and comment on, support, or oppose proposed changes or additions to existing legislation, as well as support new legislation when appropriate. Furthermore, while Program 21 addresses specific constraints identified in this Housing Element, the City will continue to, at least annually, monitor its development processes and zoning regulations to identify and remove any housing constraints and endeavor to minimize governmental constraints to the development, improvement, and maintenance of housing.

Responsible Agencies: Community and Economic Development Department; City

Manager's Office

Funding Sources: General Fund

**2021-2029 Objectives:** Monitor state and federal legislation as well as City development

processes and zoning regulations to identify and remove

constraints to housing.

Timeframe: Ongoing implementation and annual reporting throughout the

planning period.

#### **Program 17: Zoning Code Amendments - Housing Constraints**

The City shall update the Zoning Code to remove constraints to housing development and ensure the City's standards and permitting requirements are consistent with State law. The update shall address the following:

- **A.** Residential Care Facilities: The Zoning Code will be updated to allow "large" residential care facilities (those serving seven or more clients) by right where they are currently allowed with a Conditional Use Permit, i.e. in the RM, RH, GLMX, NGMX, and SGMX zones, as well as by right in the RE and RL zones.
- **B.** Low Barrier Navigation Centers: The Zoning Code will be updated to define and permit low barrier navigation centers consistent with the requirements of Government Code Sections 65660 through 65668, including treating low barrier navigation centers as a byright use in areas zoned for mixed-use and nonresidential zones permitting multifamily uses (if applicable).
- C. Transitional and Supportive Housing: The Zoning Code will be revised to ensure that transitional and supportive housing are allowed in residential and mixed-use zones subject to the same standards as a residence of the same type in the same zone consistent with Government Code Section 65583(c)(3), and to allow eligible supportive housing as a by-right use in zones where multifamily and mixed uses are permitted pursuant to Government Code Sections 65650 through 65656. Specifically, a Zoning Code Amendment will be undertaken to allow transitional and supportive housing in the RE and RL zones.

#### D. Emergency Shelters:

a. Emergency Shelter Bed Count Limitation: The City will modify the maximum bed limitation from the current 20 bed count to 25 to allow shelters within Stanton to operate more effectively. This program is also a carryover from the 2014-2021 Housing Element.

- b. Emergency Shelter Parking Requirements: The City will amend the parking requirements for emergency shelters to be consistent with AB 139 such that parking is only required "to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone."
- **E.** Reasonable Accommodation: The City will modify the factors that must be considered when reviewing applications for reasonable accommodation to remove the factor that requires consideration of "alternatives to the requested waiver or exception that could provide similar benefits to the applicant with less potential detriment to surrounding owners and occupants or to the general public."
- F. Streamlined and Ministerial Review for Eligible Affordable Housing Projects: The Zoning Code will be updated to ensure that eligible multifamily projects with an affordable component are provided streamlined review and are only subject to objective design standards consistent with relevant provisions of SB 35 and SB 330 as provided by applicable sections of the Government Code, including but not limited to Sections 65905.5, 65913.4, 65940, 65941.1, 65950, and 66300. State law defines objective design standards as those that "involve no personal or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant and public official prior to submittal."

**Responsible Agencies:** Community and Economic Development Department

**Funding Sources**: General Fund

**2021-2029 Objectives:** Ensure that the City's Zoning Code is consistent with State law and

update the Zoning Code as needed to comply with future

changes.

**Timeframe:** Zoning Code Amendments adopted by December 2022.

#### **Program 18: Parking Standards Review**

The City will conduct a comprehensive review of the parking standards for residential development to ensure that the parking requirements do not unduly impact the cost and supply of housing, or the ability for developments to achieve maximum densities, as a result of excessive parking standards.

Responsible Agencies: Community and Economic Development Department

**Funding Sources:** General Fund

**2021-2029 Objectives:** Ensure that the City's parking standards for residential uses are

adequate while not unduly constraining housing development.

**Timeframe:** Review completed by December 2023.

#### **Equal Housing Opportunity**

#### (GOAL 5: AFFIRMATIVELY FURTHER FAIR HOUSING)

#### **Program 19: Fair Housing Services**

Stanton currently contracts with the Fair Housing Council of Orange County (FHCOC) for the provision of fair housing services, and the City will continue to contract with a fair housing services provider to provide fair housing services for the duration of the planning period. Services offered include bilingual fair housing enforcement and education, landlord/tenant counseling, mediation, and homebuyer HUD counseling which includes first-time homebuyer education and mortgage default counseling.

The City monitors and attempts to minimize discriminatory housing practices with the assistance of the FHCOC. Funding to FHCOC is provided annually from the City's CDBG funding allocation. FHCOC actively counsels residents on landlord/tenant issues to help minimize discriminatory housing acquisition policies and practices. In addition to providing educational workshops to our residents, the organization advocates fair housing rights on behalf of residents. The City will continue to maintain the link on the City's website providing information about fair housing services. The City will also work with its fair housing services provider to identify any specific geographic areas in the City that have higher levels of discrimination claims and will target outreach and education to these areas.

To help address fair housing issues at local and regional levels, the City will continue efforts to mitigate impediments identified in the Regional Analysis of Impediments to Fair Housing Choice.

**Responsible Agencies:** City of Stanton; fair housing services provider

Funding Sources: CDBG

**2021-2029 Objectives:** Support fair housing services provider and efforts to minimize

discriminatory housing practices.

**Timeframe:** Annual allocation of funds to fair housing services provider.

Annual monitoring and reporting throughout the planning period through the Housing Element Annual Progress Report

(APR) and the County of Orange Consolidated Annual

Performance and Evaluation Report (CAPER).

## Program 20: Affirmatively Furthering Fair Housing Outreach and Coordination Program

Facilitate equal and fair housing opportunities by implementing actions to affirmatively further fair housing and opportunities for all persons regardless of race, religion, sex, age, marital or familial status, ancestry, national origin, color, disability, or other protected characteristics through provision of information, coordination, and education on fair housing law and practices to residents, landlords, and housing developers. This program addresses the fair housing issues of education and outreach, integration/segregation, and access to opportunity. Efforts will begin immediately and may include, but not be limited to:

#### **Education and Outreach**

- Provide public information and brochures regarding fair housing/equal housing opportunity requirements including how to file a complaint and access the investigation and enforcement activities of the State Fair Employment and Housing Commission. This information will be made available on the City's website and at City Hall. This information will be reviewed annually to ensure that any materials, links, and information provided are up-to-date.
- City staff will serve as liaison between the public and appropriate agencies in matters concerning housing discrimination within the City. City staff will refer discrimination complaints to the City's fair housing services provider.
- Provide annual training to City staff, including through coordination with local advocacy groups or the fair housing services provider, on how to receive, log, refer, and follow-up on fair housing complaints. If resolution is not obtained for any complaints, refer complaint to HCD to ensure that affordable housing laws are actively enforced.
- Provide a biennial fair housing update to the City Council.
- Provide annual public service announcements, through coordination with the Orange

- County Housing Authority and HCD, via different media (e.g., newspaper ads, public service announcements on local radio and television channels, the City's website, or the City's social media accounts).
- Provide fair housing literature to schools, libraries, and post offices. This information is available via the City's fair housing services provider and will be reviewed annually to ensure that the posters and literature being provided are up-to-date.

#### Integration/Segregation

- Coordinate with local organizations, through Community Action Agency, Continuum of Care, and Housing Authority efforts, to encourage, expand, and publicize fair housing requirements as part of programs that provide rental assistance to lower income households.
- On an ongoing basis, and at least annually, review land use and planning proposals, including development proposals, general plan amendments, master planning efforts for parks, recreation, infrastructure, and other facilities and amenities, to ensure that the City is replacing segregated living patterns with integrated and balanced living patterns, where applicable and feasible, and work to transform racially and ethnically concentrated areas of poverty into areas of opportunity without displacement.

#### **Access to Opportunity**

- Provide assistance to aid alleged victims of violence or discrimination in obtaining access to appropriate state or federal agency programs.
- On an ongoing basis, actively recruit residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies as positions are made available due to the regular appointment process or vacancies.
- On an annual basis, provide education to the community on the importance of participating in the planning and decision-making process and completing Census questionnaires.

**Responsible Agencies:** Community and Economic Development Department

**Funding Sources:** General Fund

**2021-2029 Objectives:** Facilitate equal and fair housing opportunities by implementing

actions to affirmatively further fair housing and opportunities for all persons regardless of race, religion, sex, age, marital or familial

status, ancestry, national origin, color, disability, or other protected characteristics through provision of information,

coordination, and education on fair housing law and practices to

residents, landlords, and housing developers.

**Timeframe:** Ongoing outreach and coordination, beginning immediately;

annual review of fair housing educational information to ensure that the most recent information provided by the City's fair housing services provider is being disseminated; annual

presentations and media outreach.

#### **Program 21: Economic Displacement Risk Analysis**

Economic displacement can occur when new development, particularly residential development, changes the market conditions in an existing area so much that current residents can no longer afford to live there. The City of Stanton can reduce the impact of economic displacement when it occurs by preventing practices that increase or enable displacement. To determine if market-force economic displacement is occurring due to development of new housing, increased housing costs, or other factors, the City will conduct an analysis to determine if individuals and families may be displaced as a result of new residential development in the City's mixed-use areas. The analysis will consider gentrification locally and will assess how new development and community investments may potentially influence displacement. If this study shows that displacement is expected as a result of new development in the City's mixed-use areas, the City will develop an action program based on the identified causes of displacement, including specific actions to monitor and mitigate displacement. Annual review of the action program may result in modifications to further reduce displacement risk. This program addresses the fair housing issue of disproportionate housing needs, including displacement risk.

**Responsible Agencies:** Community and Economic Development Department

**Funding Sources:** General Fund, grant funding

2021-2029 Objectives: Understand the potential for market-force economic

displacement and consider programs to address the issue, if

necessary.

Timeframe: Conduct analysis by December 31, 2022 and establish resulting

programs (if any) by December 31, 2023. Ongoing implementation and reporting throughout the planning period through the

Housing Element Annual Progress Report (APR).

# 4 Quantified Objectives

State law requires the Housing Element to include quantified objectives for the maximum number of units that can be constructed, rehabilitated, or conserved. Policies and programs in the Housing Element establish the strategies to achieve these objectives. The City's quantified objectives are described under each program and represent the City's best effort in implementing each of the programs. Assumptions are based on past program performance and funding availability, construction trends, land availability, and future programs that will enhance program effectiveness and achieve full implementation of the City's housing goals.

The new construction objectives shown in Table 1 are based on the City's RHNA for the 2021-2029 planning period for lower income, moderate-income, and above moderate-income housing, historic trends, and expectations for new ADUs. Rehabilitation and conservation objectives are based on specific program targets, including such programs as use of the City's Housing Rehabilitation Program and Rental Assistance Program.

Table 1 below summarizes the City's quantified objectives for housing during the 2021-2029 planning period.

**TABLE 1: QUANTIFIED OBJECTIVES 2021-2029** 

Income Category	New Construction Objectives	Rehabilitation Objectives	Conservation/Preservation Objectives
Extremely Low (0% - 30% AMI)	82		
Very Low (31% - 50% AMI)	83		297
Low (51% - 80% AMI)	145	12	
Moderate (81% - 120% AMI)	231	12	
Above Moderate (>120% AMI)	690		
TOTAL	1,231	24	297



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### 1 Introduction

The City of Stanton is a forward-looking community located in northwestern Orange County. Stanton is bordered by the cities of Anaheim, Garden Grove, and Cypress and is within six miles of the Pacific Ocean (northeast). California State Route 22 and State Route 39 (Beach Boulevard) provide regional access. Stanton has a population of 39,077 (*Department of Finance, 2020*) and is approximately 3.1 square miles in size. The City reincorporated in 1956 (following an original incorporation in 1911 and disincorporation), and the community has a rich history dating back to its original land grant days.

Stanton is an urban suburb that is experiencing a redevelopment renaissance. Recent development activity, particularly along the main corridor Beach Boulevard, is widening the range of housing, employment, and lifestyle opportunities within the City, and re-creating a community where people can truly *live*, work, and play.

State Housing Law (Government Code Section 65583) requires that a "housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, and mobile homes, and shall make adequate provision for the existing and projected needs of all economic segments of the community." This report is an update of the City's 2014-2021 Housing Element (5<sup>th</sup> Cycle), adopted in October 2013.

The assessment and inventory must include all of the following:

- Analysis of population and employment trends, documentation of projections, and a quantification of the locality's existing and projected housing needs for all income levels. Such existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584 of the Government Code.
- Analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition.
- An inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship between zoning, public facilities, and city services to these sites.
- Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development.
- Analysis of potential and actual non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, requests to develop housing at densities below the minimum densities in the inventory of sites, and the length of time

between receiving approval for a housing development and submittal of an application for building permits that hinder the construction of a locality's share of the regional housing need.

- Analysis of any special housing needs, such as those of the elderly, disabled, including developmentally disabled, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter.
- Analysis of opportunities for energy conservation with respect to residential development.
- Analysis of existing assisted multifamily rental housing developments that are eligible to change from low-income housing to market-rate during the next ten years.

The Background Report of this Housing Element identifies the nature and extent of Stanton's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. By examining the City's housing needs, resources, and constraints, the City can then determine a plan of action for providing adequate housing. This plan is presented in the Housing Plan, which is the policy component of the Housing Element. In addition to identifying housing needs, the Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

Since the update of the City's last Housing Element in 2013, statutory changes have occurred that must be included in the 2021-2029 Stanton Housing Element (6th Cycle). These laws have been incorporated in the appropriate sections throughout this Background Report as well as in its accompanying Policy Document.







## 2 Accomplishments

The following section reviews and evaluates the City's progress in implementing the 2014-2021 (5<sup>th</sup> Cycle) Housing Element. It reviews the results and effectiveness of programs, policies, and objectives from the previous Housing Element planning period, which covered 2014 through 2021. This section also analyzes the difference between projected housing need and actual housing production.

#### 2A. Review of 2014-2021 Housing Element

The 2014-2021 Housing Element program strategy focused on the implementation of policies and programs to ensure adequate housing sites, to encourage the production of new housing, including affordable and special needs housing, to encourage the maintenance and preservation of existing housing, to remove various constraints to housing, including housing for special needs populations, and to encourage fair housing and non-discrimination. The 2014-2021 Housing Element identified the following goals:

- Goal H-1.1 Provide for a housing stock of sufficient quantity composed of a variety and range of types and costs.
- Goal H-2.1 A housing stock that is conserved in a sound, safe and sanitary condition.
- Goal H-3.1 Retention of existing housing stock and housing opportunities for Stanton residents.
- Goal H-4.1 Access to decent and suitable housing opportunities for all Stanton residents.
- Goal H-5.1 Increase awareness of and participation in housing programs.
- Goal H-6.1 Promote energy conservation, and green building techniques for residential construction and rehabilitation projects.

#### 2B. Housing Production During 5th Cycle RHNA Period

The City's 5<sup>th</sup> Cycle Housing Element specifically addressed housing needs for Stanton from October 15, 2013 through October 15, 2021. Note, however, that the 5<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) projection period adopted by the Southern California Association of Governments (SCAG) began on January 1, 2014 and concluded on October 1, 2021. Hence, there was a slight offset between the 5<sup>th</sup> Cycle Housing Element planning period and the 5<sup>th</sup> Cycle RHNA projection period.

Table 2-1 shows the total number of housing units built in the City during the 5<sup>th</sup> Cycle RHNA period based on the City's 2020 General Plan Annual Progress Report and compares this number with the units required to be accommodated under the Regional Housing Needs Allocation. Housing development in Stanton during the 5<sup>th</sup> Cycle surpassed the City's RHNA allocation in terms of total units; however, there was no housing development in the lower income categories.

During the 2014-2021 RHNA period, 268 units were constructed in the City. This included 254

above moderate, market-rate dwelling units and 14 moderate-income units. It is also anticipated that some of the developments will provide additional rental units affordable to moderate-income households based on the market rates of multifamily rentals in the City. Furthermore, the City partnered with Orange County and Jamboree Housing Corporation for the conversion of two motels to temporary supportive housing during the planning period (Project Homekey). These 132 units are accounted for in the 6<sup>th</sup> Cycle, which is when the temporary supportive housing will be redeveloped into permanent supportive housing.

TABLE 2-1: REGIONAL HOUSING NEEDS ALLOCATION - 5TH CYCLE PROGRESS

Status	Extremely Low	Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	0	68	49	56	140	313
Built	0	0	0	14	254	268
Remaining Allocation	0	68	49	42	0	159

Sources: City of Stanton 2014-2021 Housing Element; 2020 General Plan Annual Progress Report

## 2C. Appropriateness and Effectiveness of 2014-2021 Housing Element

The overarching goals and policies of the 2014-2021 Housing Element continue to be appropriate to encourage the City's housing strategy. While the majority of goals, policies, and programs included in the 2014 Housing Element continue to be relevant to address the City's housing needs, the Housing Plan will be updated to provide clearer guidance and more specific direction to encourage affordable and special needs housing production. The Housing Plan will also be updated to streamline programs so they are easier for staff to implement and to include a matrix that makes it easier to identify the applicability and timing of programs. In order to facilitate implementation of the Housing Plan and tracking of programs, the housing programs are presented in a user-friendly table.

As discussed in Table 2-2, most housing programs have been effective and/or are necessary. The intent of these programs will be kept in the Housing Plan, with revisions to address specific housing needs, constraints, or other concerns identified as part of this update, and to affirmatively furthering fair housing. The City implemented many of the housing programs in the prior several years and anticipates that these changes will further encourage affordable and special needs housing production.

Since adoption of the Housing Element in 2013, the City has used various funding sources, including CDBG funds, for housing rehabilitation programs and to provide fair housing services as well as services to special needs and at-risk populations (homeless, persons at risk of homelessness). Due to the limited amount of funds available on an annual basis to substantially subsidize a rental or ownership housing development, it can require several years of accrued funds to assist a single project. Nonetheless, the City partnered with Orange County and Jamboree Housing Corporation through the Project Homekey program during the planning period for the conversion of two motels to permanent supportive housing as described in Table 2-2. The City will look to expand on the Project Homekey program during the upcoming planning period.

The Housing Plan included in this 2021-2029 Housing Element includes modifications to make programs more effective, clarify objectives, and ensure that the programs are implementable. See the Housing Plan for the goals, policies, and programs of this Housing Element.

While the City took several significant steps to promote housing during the prior planning period,

the experience of most communities throughout the state demonstrates that it is very difficult for local governments to meet their fair share housing goals for lower and moderate-income housing (i.e. the RHNA allocation) when working alone. All cities, including Stanton, have limited financial and staffing resources and require substantial state and/or federal assistance, which has not been available at the levels necessary to support the City's housing needs, as well as the technical assistance of area non-profit housing developers and agencies. As discussed below, the City has evaluated the success of existing programs to support the development of affordable housing, and has added new programs to the Housing Plan to address this objective.

TABLE 2-2: EVALUATION OF THE 2014-2021 HOUSING PROGRAMS

Program Accomplishments

Goal H-1.1: Provide for a housing stock of sufficient quantity composed of a variety and range of types and costs.

Strategy H-1.1.1: Review and revise development standards, as appropriate, to facilitate construction of a range of housing types.

Action H-1.1.1 (a): Expedited Project Review: The City will continue to expedite project review, processing and building plan check of affordable residential projects to ensure project reviews are not constraints to development of affordable housing.

Result/Evaluation: Program considered successful. During the 2014-2021 planning period, the City processed applications for 14 moderate-income affordable units. Twelve of the units were ADUs; the other two involved an SFR with a second unit (application predated January 1, 2017). ADUs require an administrative approval typically processed within 2-3 months. A development with two or more units requires Planning Commission approval (3-6 months).

The City also approved two projects, for which it partnered with Orange County and Jamboree Housing Corporation, for the conversion of two motels to temporary supportive housing – the Stanton Inn and Suites located at 7161 Katella Avenue and the Tahiti Motel located at 11850 Beach Blvd. During the upcoming planning period the sites will be converted to *permanent* supportive housing. As well, a third site is currently in negotiation.

Additionally, the City (Housing Authority) created 12 units of transitional housing in the Tina-Pacific Neighborhood and approved transitional housing for at-risk and homeless mothers with children under the age of 5 for the property located at 10862 Oak Street.

**Status:** Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-1.1.1 (b): Review and Revise Development Fees: The City will continue to review and revise required development fees including in-lieu fees, development impact fees and processing fees, with the aim of reducing constraints for the development of affordable residential projects.

**Result/Evaluation:** The City revised its development fee schedule as recently as July 12, 2018. Affordable housing developers may request a fee waiver through the density bonus program.

**Status:** Program continues to be appropriate and will be kept for the 2021-2029 planning period with modification of review cycle (i.e. biannual review).

Action H-1.1.1 (c): Standard Plans for Second Unit Development: Provision of second dwelling units on existing single-family properties increases the supply of housing affordable to lower income households. In order to preserve the character of residential neighborhoods and provide opportunities for the development of second dwelling units, the City

Result/Evaluation: The pursuit of preparing standard plans was temporarily suspended due to cost and was not realized during the planning period; however, the City is working with the Orange County Council of Governments (OCCOG) and adjacent communities to leverage resources and complete the task of creating a streamlined, standard set of plans and process. Moreover, subsequent changes in ADU law in 2017 and 2020 have allowed greater flexibility in ADU design and development.

#### Program Accomplishments

developed an informational packet to assist property owners through the permitting process. The informational packet includes development standards for second dwelling units, permit procedures for the planning and building divisions, and sample site plans for the different configurations for second dwelling units. To further assist with the development of second dwelling units, the City will evaluate the appropriateness of developing standard plans to facilitate the construction of these units. The standard plans will streamline the processing timeline and discourage the proliferation of poorly constructed second dwelling units. The City will provide information regarding standard plans for second unit development in their comprehensive housing resource (Action H-5.1.1(a)).

Going forward, the City will provide information regarding plans for ADU development in its comprehensive housing resource (Action H-5.1.1(a)), including website information where typical ADU plans can be found along with the standard plans.

**Status:** Program continues to be appropriate and will be kept for the 2021-2029 planning period. The City will pursue work on standard plans and provide amnesty for illegal/nonconforming ADUs to be brought into compliance.

Action H-1.1.1 (d): Encourage Mixed Use and Infill Development, and Create an Infill Development Overlay: The City adopted a comprehensive revision to its General Plan and Zoning Code to maximize the potential for infill, mixed-use and other creative residential development types. The revised General Plan provides for new mixed-use land use designations. The revised Zoning Code established development standards and processing requirements appropriate for encouraging mixed-use development within the Mixed-Use zone.

To further promote infill development, the City will develop an infill development overlay district. This overlay district will target areas that are prime for redevelopment and would be supportive of infill development. New development standards will be established that promote infill development, including reduced setbacks and separations between buildings, use of communal open space, and potentially modified parking requirements. The City will also provide information on possible financial assistance, regulatory concessions or incentives such as density bonuses, fee waivers, fee deferrals and assistance with on and off-site improvements to the development community as part of the comprehensive housing resource (Action H-5.1.1(a)).

**Result/Evaluation:** The City determined that an infill development overlay district would not be the best solution since the parcels most suitable for infill development are scattered throughout the City. Instead, the City will consider a small lot subdivision ordinance program.

The City continues to provide information to developers regarding mixeduse development standards, processing fees and timelines, funding/financing options available, incentives for affordable housing, and opportunity sites.

**Status:** Program continues to be appropriate and will be kept for the 2021-2029 planning period but requires modification, including replacement with a small lot subdivision program.

Action H-1.1.1 (e): Residential Development Monitoring Program: The City will continue the residential monitoring program that evaluates the effectiveness of housing development consistent with the policies of this Housing Element. On an annual basis, the City will analyze constructed/approved

Result/Evaluation: Program considered successful. City staff continue to maintain a record of housing production and report progress to the City Council. The adopted policies, programs, and procedures have resulted in a recent increase in redevelopment activity, particularly along Beach Blvd., including both higher intensity mixed use and residential-only development.

#### Accomplishments **Program** projects, remaining vacant and underutilized land Status: Program continues to be appropriate and will be kept for the 2021capacity and market trends to evaluate the 2029 planning period. effectiveness of adopted policies, programs and procedures. Based on its annual monitoring, the City may revise policies as necessary to further encourage and facilitate residential development to meet the City's RHNA needs through the planning period. Action H-1.1.1 (f): Quality Multifamily Design: The Result/Evaluation: Program considered successful; City continues to City shall promote quality design and appearance of require a high design aesthetic per the Zoning Code, the design guidelines all new multifamily and affordable housing projects so in the Stanton Plaza Specific Plan, and the Site Plan and Design Review they blend in with the existing community fabric, process. Guidelines for high-quality multifamily design will also carry enhance the visual character of the neighborhood, through in the new Town Center Specific Plan currently being prepared.

2029 planning period.

#### Strategy H-1.1.2: Maximize the development potential of vacant and underutilized land.

Action H-1.1.2 (a): Vacant and Underutilized Sites Inventory: The City shall provide regular identification of vacant and underutilized sites for potential development of residential units. The City will maintain and update an inventory of these sites on an on-going basis.

add value to the community's built environment, and

strengthen acceptance by the local community.

Result/Evaluation: Program considered successful. In 2020, the City collaborated with housing developers to locate and consolidate underutilized land for residential developments. Two projects, a 40-unit condominium development and a 300-unit mixed-use/apartment complex have purchased multiple smaller lots, consolidated those parcels, and are in the process of developing new homes on vacant and underutilized land. Likewise, the City worked with a developer to assemble land for a mixed-use project with an assisted living component.

Status: Program continues to be appropriate and will be kept for the 2021-

**Status:** Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-1.1.2 (b): Encourage Lot Consolidation: The City will continue to encourage the consolidation of vacant and underutilized lots for residential development. This may be through available financial incentives such as fee deferrals, rebates and grants, and other pre-development costs associated with the assemblage of multiple parcels. Consolidation will provide the opportunity to develop vacant and underutilized lots to their fullest potential.

**Result/Evaluation:** The City's mixed-use regulations provide incentives for lot consolidation including a reduction in required parking, increase in total sign area, increase in floor area ratio, and reduction in open space requirements in order to encourage the assembly of smaller existing lots into larger lots that can be more efficiently developed into mixed-use projects.

**Status:** Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-1.1.2 (c): Redevelop the Tina/Pacific Neighborhood: The Stanton Redevelopment Agency initiated a project in the Tina/Pacific Neighborhood in 2009. The neighborhood consisted of 40 properties, each with a four-plex apartment complex. The Agency purchased 25 of the 40 properties, relocated tenants from 12 of the properties, and demolished the buildings prior to the State's elimination of Redevelopment Agencies. The properties were transferred to the Housing Authority for completion of the project.

The Housing Authority will continue the

Result/Evaluation: The Stanton Housing Authority partnered with a developer to complete the acquisition of the remaining 15 parcels (60 units total), relocate all remaining tenants, and develop a 161-unit affordable housing development. The development was to consist of 58 very low-income units, 101 low-income units, and 2 on-site property manager units. The Final EIR was prepared for the Tina-Pacific Neighborhood Development Plan Project in October 2019. However, this project did not move forward.

The City has since gone through the Surplus Land Act to initiate a competitive bid process for the acquisition, relocation, and redevelopment of this site. The new project is expected to develop a combination of market rate homes and affordable housing units and include community

redevelopment of the neighborhood. Based on the available funding, the project may be a full redevelopment, including the purchase of the remaining 15 properties, and construction of a new affordable housing development; or a hybrid of new development on the vacant lots, and rehabilitation of the existing buildings on the remaining sites. The properties that were purchased prior to the elimination of Redevelopment were purchased utilizing the Low to Moderate Income Housing Funds. As such, the housing units purchased with these funds will be replaced with affordable housing units in accordance with Redevelopment Law.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period (until redevelopment is complete).

facilities, amenities, and wraparound services.

The Housing Authority will attempt to partner with a development firm to complete the redevelopment project. The Authority will also research other available funding sources.

Strategy H-1.1.3: Actively promote the development of affordable housing through provision of financial and technical assistance.

Action H-1.1.3 (a): Pursue HOME Funds: The City will continue to actively pursue HOME funds administered through the County of Orange for development of housing affordable to lower income households.

Result/Evaluation: Stanton is a participating city in the "Urban County" of Orange, and as such, HOME funds provided by HUD are administered through the county. HOME funds are distributed to projects that meet priority needs, are timely, and meet other evaluation factors that indicate a strong probability the project will come to fruition.

Construction of a year-round emergency shelter and multi-service center for homeless families and individuals in Orange County was completed in August 2018 using leveraged HOME funds. The emergency shelter is located at 1000 N. Kraemer Place in Anaheim.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-1.1.3 (b): Identify Additional Funding Sources to Assist Affordable Housing Projects: With the elimination of the Redevelopment Agencies, the City no longer has an identified funding source to assist with the development of affordable housing. The City will research and identify new funding sources through federal assistance, grants, and collaborations to assist with financing affordable housing projects.

**Result/Evaluation**: The Stanton Housing Authority is the Housing Successor to the former Redevelopment Agency. As part of the dissolution of Redevelopment, housing assets were transferred to the Housing Authority, including 13 properties in the Tina-Pacific Neighborhood. This real property plus the existing fund balance in the Housing Authority's Housing Fund are earmarked for the development of the Tina-Pacific project.

The City was also awarded an SB 2 Planning Grant in the amount of \$160,000 to assist with streamlining housing approvals and accelerate housing production. This will entail implementation of an online permitting system and preparation of a specific plan to allow housing and mixed-use development by right, including the environmental analysis.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-1.1.3 (c): Modify Affordable Housing Regulations and Identify Incentives: The RH (High

**Result/Evaluation:** The City continues to evaluate the affordable housing

Density Residential) zone affordable housing overlay allows affordable housing projects by right at a minimum density of 30 du/ac. The City will amend the zoning code to facilitate development of affordable housing and shall apply to the sites identified in Table 7C-2 by addressing the following:

- The City will determine the eligibility requirement for the percent of affordable housing necessary to qualify for the higher density available.
- Any density bonus will be calculated using the density of 30 du/ac or greater under the RH zone for affordable housing projects as defined in Chapter 20.210 of the Zoning Code, rather than any base density (11.1-18 du/ac) of the RH zone.
- The City will continue to investigate and implement additional incentives available above those required under the density bonus law and currently available to affordable housing projects.

regulations as they apply to the RH (High Density Residential) zone.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period. Furthermore, as part of the Housing Element Update project, amendments to the Zoning Code are anticipated for consistency with the Housing Element. The amendments identified in Action H-1.1.3 (c) will be included as part of this more comprehensive Zoning Code Update.

Action H-1.1.3 (d): Monitoring: To ensure sufficient residential capacity for units affordable to lower income households is maintained within the RH zone to accommodate the identified regional need for lower income households, the City will develop and implement a formal ongoing monitoring procedure. The procedure shall provide that where an approval of a development (residential, commercial or mixed-use) on an identified site in Table 7C-2 results in a reduction of potential affordable units below the residential capacity assumed in Table 7C-2, the City will identify and designate additional RH sites to accommodate the shortfall of capacity remaining within the RH zone.

The City will report on the Status and implementation of the RH zone for affordable housing projects including development occurring on identified sites to determine whether the incentives described above are providing the necessary catalyst to ensure that development is occurring consistent with the buildout projections. As necessary, the City will make changes to this program to ensure the RH zone for affordable housing projects remains a realistic and viable development strategy.

Result/Evaluation: Program considered successful. Planning staff continued to track projects through the development review process during the planning period based on the level of affordability. Although projects built or approved during the 5th Cycle fell into the moderate and above moderate-income categories only, the capacity for affordable housing was not threatened during the planning period. (Note that the two Project Homekey projects created temporary supportive housing during the 2014-2021 planning period and will be captured as permanent supportive housing during the upcoming planning period.)

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Goal H-2.1: A housing stock that is conserved in a sound, safe and sanitary condition.

#### Strategy H-2.1.1: Pursue funding for maintenance and rehabilitation of existing housing stock.

Action H-2.1.1 (a): Housing Rehabilitation: With the elimination of the Redevelopment Agencies, the City no longer has an identified funding source to assist with the rehabilitation of the existing housing stock. The City will research and identify new funding sources through federal assistance, grants, and collaborations to assist with financing rehabilitation of the existing housing stock.

**Result/Evaluation:** Program considered successful. After losing funding due to the dissolution of the Redevelopment Agency, the City utilized its CDBG funding allocation to bring back the Homeowner Rehabilitation Grant Program, which provides financial assistance to low to moderateincome homeowners to make exterior home improvements. The program is intended to assist making the necessary repairs, improve the aesthetics of the residence, and help beautify the neighborhood.

The program was relaunched in 2019 and more aggressively advertised in 2020. In 2020, the City administered seven rehabilitation grants through the program – three for single-family homes, two for attached condominiums, and two for mobile homes.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-2.1.1 (b): Maintain Public Infrastructure: The City will combine various funding sources, such as CDBG and CIP funding, to maintain necessary public infrastructure improvements to support existing housing developments.

Result/Evaluation: Program considered successful; City's Capital Improvement Program continues to maintain, repair, and replace street infrastructure, including pavement, sidewalks, ADA ramps, street lighting, etc. Furthermore, the FY 2019-20 CIP Budget allocated 84% of CIP funding to assist the Housing Authority with property acquisition for the Tina-Pacific affordable housing project.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Strategy H-2.1.2: Engage in code enforcement activities.

Action H-2.1.2 (a): Enforcement of Building Code: To ensure minimum health and safety standards are met in new construction and modification of existing buildings, the City will continue to enforce the provisions of the California Building Code through inspections and the plan check process.

Result/Evaluation: Program considered successful; completed 1,425 inspections/year on average during the planning period and issued 338 building permits/year on average.

As part of the awarded SB 2 Planning Grant, funds have been used for new permitting software to improve efficiency and streamline permit processing.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-2.1.2 (b): Proactive Code Enforcement Program: The City will continue a proactive code enforcement program to ensure building safety and integrity of residential neighborhoods. The City shall identify and prioritize target areas where the rehabilitation of housing units is most needed. The City will provide further financial incentives, identify funding options and apply for grant funds if any and when they become available, and services to property owners in identified target areas to provide opportunities for maintenance and rehabilitation.

Result/Evaluation: Program considered successful. Completed approximately 1,200-1,500 inspections annually. Case processing was improved to dedicate one code enforcement officer, when possible, to a single property to oversee all various maintenance, safety, and/or building code violations. Target areas were identified and prioritized, including the Little Mansions and Clover Park neighborhood (north of Chapman Ave, west of Beach Blvd), the Tina/Pacific Neighborhood, and the residential neighborhood on the northwest corner of Katella Ave and Beach Blvd.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Strategy H-2.1.3: Identify partnerships to assist in acquisition and rehabilitation of existing housing units.

Action H-2.1.3 (a): Acquisition and Rehabilitation of Units with Non-Profit Entities: The City will seek

Result/Evaluation: Program considered successful. In conjunction with non-profit entities, the City renovated 12 City-owned rental units for use

opportunities for acquisition and rehabilitation of existing single-family or multi-family units, particularly in conjunction with a non-profit entity. The City will investigate the most effective means for outreach to the entities to maximize participation.

as transitional housing in the Tina-Pacific Neighborhood. The City also partnered with Jamboree Housing Corporation to acquire the Tahiti Motel and the Stanton Inn and Suites to rehabilitate the units into temporary supportive housing.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Goal H-3.1: Retention of existing housing stock and housing opportunities for Stanton residents.

#### Strategy H-3.1.1: Ensure long term affordability of housing units.

Action H-3.1.1 (a): Long-Term Affordability of Agency-Assisted Units: The City will continue to require long-term affordability covenants for housing projects receiving city-sponsored development assistance.

Result/Evaluation: Program considered successful; City will require deed restrictions/affordability covenants for the affordable housing development in the Tina-Pacific Neighborhood.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period, albeit with all references changed from "Agency" (i.e. Redevelopment Agency) to the Housing Authority.

Action H-3.1.1 (b): Monitoring of Units At-Risk of Converting to Market Rate: The City shall continue to provide for regular monitoring of deed-restricted units that have the potential of converting to market rate. The City will maintain contact with and assist owners of these units on an ongoing basis to extend and/or renew the deed restrictions and/or covenants to maintain affordability. The City will identify funding sources at the federal, State and local levels to preserve at-risk units on a project-by-project basis. In the event a notice to convert is received, the City will work with owners, tenants and non-profit partners to pursue a preservation strategy to ensure long-term affordability of the development. The list of funding sources and interested organizations will be provided

as part of the City's comprehensive housing resource

(Action H-5.1.1(a)).

**Result/Evaluation**: The City has continued its monitoring of at-risk affordable housing units. The earliest conversion of any affordable housing units in the city is November 2022.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Goal H-4.1: Access to decent and suitable housing opportunities for all Stanton residents.

#### Strategy H-4.1.1: Promote homeownership opportunities.

Action H-4.1.1 (a): Funding Sources to Assist in Homeownership: The City will aggressively pursue potential sources of additional funding for homeownership assistance, including the availability of HOME funds administered through the County of Orange, California Housing Finance Agency, and LIHTC if developers/investors are interested. The City will improve public outreach activities through the compilation of resources for down-payment assistance, silent second mortgages and other means of acquiring a home.

Result/Evaluation: The City continues to regularly develop forms of comprehensive information resources regarding housing programs and available funding. The City continues to pursue potential sources of additional funding for homeownership assistance.

Furthermore, the Orange County Housing Authority administers homeownership assistance (and rehab assistance) programs that are available to members of the CDBG/HOME consortium, which includes the City of Stanton.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-4.1.1 (b): Mortgage Credit Certificate

**Result/Evaluation:** The City continues to publicize this program, which is

Program: The City will participate in the County of Orange Mortgage Certificate Program for homeowner assistance.

currently funded, and is administered by National Homebuyers Fund, Inc. on behalf of Orange County.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Strategy H-4.1.2: Address the needs of the homeless population.

Action H-4.1.2 (a): Participation in the Orange County Homeless Issues Task Force: The City will continue to participate in the Orange County Homeless Issues Task Force to ensure the needs of Stanton's homeless are addressed at the County level.

Result/Evaluation: The Homelessness Task Force is a committee of the Association of California Cities - Orange County working to end homelessness throughout the County. The Homelessness Task Force laid out an ambitious work plan in 2018, which includes the following:

- The development of countywide business plans that identify the number of Permanent Supportive Housing units needed in Orange County and that will base Stanton's "share" of housing units upon its population and additional mitigating factors. The business plans will also identify monetary resources in the form of grants, vouchers, etc. to help control costs and increase feasibility of development.
- Support for the County of Orange and the healthcare system working to develop crisis stabilization units in all regions of the County.
- Working with homelessness service providers to ensure workforce development and training are occurring as part of the continuum of care, and working to connect workforce development non-profits with homelessness advocacy groups.

The City of Stanton has been an active leader in the Homelessness Task Force. The City entered into a regional partnership through the North Orange County Service Planning Area to open two Navigation Centers – one in Buena Park with a total of 150 beds and the other in Placentia providing a total of 100 beds. In 2020, the City used \$147,026 of its SB 2 allocation to secure the construction and on-going operations of these facilities.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-4.1.2 (b): Operation of the Neighborhood Enhancement Taskforce for the City of Stanton: The City developed a Neighborhood Enhance Taskforce to address the unique homeless issue in the City. The Neighborhood Enhancement Taskforce includes participation from City representatives, the Sheriff's Department, and non-profit entities. Through the operation of this taskforce, the City has provided transitional housing in the Tina/Pacific neighborhood for much of the homeless population. The City and Housing Authority will assist with finding more permanent housing options prior to implementation of the Tina/Pacific project. The City will work to reduce its homeless and at-risk population by partnering with

Result/Evaluation: The Neighborhood Enhancement Task Force was established to address issues of community safety that are essential to neighborhood revitalization. The Task Force is headed up by the Public Safety Services Department. Addressing homelessness as it relates to public safety is the primary purpose of the Task Force. As part of this effort, the City has provided 12 Housing Authority-owned units for transitional housing in the Tina-Pacific Neighborhood and approved transitional housing for at-risk and homeless mothers with children under the age of 5 for the property located at 10862 Oak St.

Additionally, the City has hired a full-time community outreach professional to conduct daily outreach and engagement to help the homeless in Stanton and those at risk of homelessness find temporary shelter, connect to services, and reunite with family.

#### Accomplishments Program non-profit organizations to place the homeless Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period. population in transitional or permanent housing. Action H-4.1.2 (c): Hotel and Motel Families: The Result/Evaluation: The City took steps in 2020 to convert Stanton Inn City will coordinate with the Orange County Housing and Suites and the Tahiti Motel into emergency and temporary housing Authority and non-profit organizations to determine for those at risk of COVID-19 and experiencing homelessness using state the number of families who utilize hotels/motels as funds as well as federal Coronavirus Relief Funds (CRF). temporary residences. The City will contact public and With the vision of maintaining these motels for at-risk individuals and non-profit organizations who may have an interest or families, the City partnered with the Orange County Health Care Agency experience in the conversion of hotel/motel units to and Jamboree Housing Corporation to secure \$28.1 million dollars in permanent housing. The City has recognized that Project Homekey funding as well as contributing \$5 million of City funds families who are living in hotels/motels may be to operate Stanton Inn and Suites and the Tahiti Motel as temporary provided an opportunity for permanent housing housing with the ultimate goal of converting to permanent supportive through the conversion of these facilities to residential housing. A third motel conversion through Project Homekey is in the units affordable to extremely low-, very low- and lowpipeline for the 2014-2021 planning period. income families. The City will evaluate the feasibility Furthermore, the City participates in the Orange County Housing of converting these units to permanent housing. Authority's Urban County program, and actively coordinates with the Based on this analysis, the City will encourage the participating cities of the Urban County on an annual basis to identify conversion of hotel/motels to permanent housing by housing needs and develop appropriate programs to address the highest the development community through a variety of needs/strongest priorities countywide.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-4.1.2 (d): Single Room Occupancy Units: The City will continue to monitor the requirement for a conditional use permit for SROs on an annual basis to ensure the requirement does not constrain the development of SROs.

activities such as in-kind technical assistance, density bonuses, reduced parking requirements and other

modified development standards, fee waivers, fee

deferrals, assistance with on and off-site improvements and other incentives and concessions.

> Result/Evaluation: There was no development demand for single-room occupancy (SRO) units during the 2014-2021 planning period, and therefore no measure of the adequacy of the SRO development standards.

> Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-4.1.2 (e): Modify Emergency Shelter Bed Count Limitation: Through a Zoning Code Amendment, the City will modify the maximum bed limitation from the current 20 bed count to 25 to allow for the shelters to operate more effectively.

Result/Evaluation: During the planning period, Stanton adopted a regional approach to providing emergency shelter beds. The North Service Planning Area, made up of 13 cities (Stanton, Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Villa Park, and Yorba Linda), collectively agreed to share the cost and operations of two navigation centers in the cities of Placentia and Buena Park largely through grant funds under California's Homeless Emergency Aid Program and certain additional funds made available under Senate Bill 2. Through the Street Homeless Outreach program, the goal in the City of Stanton is for those individuals experiencing homelessness to enter into Orange County's Coordinated Entry System (CES). The CES connects individuals and families experiencing homelessness or at risk of homelessness to appropriate services and housing interventions to end homelessness.

Status: Program continues to be appropriate and will be implemented during the 2021-2029 planning period.

Strategy H-4.1.3: Provide opportunities for the development of housing for large families.

Action H-4.1.3 (a): Development of Housing for Large Families: The City shall encourage and support the development of rental and for-sale housing for larger families within future affordable housing projects through various strategies and programs that may include: assistance with site identification and entitlement processing; fee waivers and deferrals; and modifying development standards and granting concessions and incentives for projects that provide housing for lower income families.

Result/Evaluation: Program considered successful. The City incentivized development of large family housing through the adoption of an Amenity Options Incentives program that allows higher density for the provision of 3-bedroom+ units.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period with modifications.

#### Strategy H-4.1.4: Provide opportunities for the development of housing for persons with disabilities.

Action H-4.1.4 (a): Encourage Alternative Housing **Models:** The City will encourage the provision of more innovative housing types that may be suitable for the community, including community care facilities, supportive housing, and assisted living for special needs groups such as seniors and disabled, including developmentally disabled persons. The City will promote the availability of these units through outreach efforts (Action H-5.1.1(a)).

Result/Evaluation: Program considered successful. In 2020, the City approved the construction of a 66-bed senior assisted living facility above a commercial development. The facility is anticipated to open in late 2021.

As well, through the Project Homekey program, the City partnered with Orange County and Jamboree Housing Corporation for the conversion of two motels to permanent supportive housing – the Stanton Inn and Suites located at 7161 Katella Avenue and the Tahiti Motel located at 11850 Beach Blvd. A third site is currently in negotiation. As part of the effort to make the project possible, the City amended the Zoning Code to allow the use on the sites.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Strategy H-4.1.5: Continue support for Section 8 Program.

Action H-4.1.5 (a): Section 8 Referrals: The City will continue to provide referral services and information to residents regarding the Section 8 Rental Housing Assistance Program administered by the Orange County Housing Authority.

Result/Evaluation: Program considered successful; City continues to provide information on the Housing Choice Voucher Program and to refer potential applicants to the Orange County Housing Authority (OCHA), as needed.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Strategy H-4.1.6: Promote fair housing standards.

Action H-4.1.6 (a): Fair Housing Counseling: The City will continue to refer all inquiries regarding housing discrimination to the Fair Housing Council of Orange County. The Fair Housing Council of Orange County provides community education, individual counseling, mediation and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire. The City will disseminate fair housing information through the comprehensive housing resource (Action H-5.1.1(a)) in English, Spanish and other languages as found appropriate.

Result/Evaluation: Program considered successful; City continues to provide information on fair housing and to refer housing discriminationrelated inquiries to the Fair Housing Council of Orange County, as needed.

Status: Program will continue for the 2021-2029 planning period and will be revised to reflect current state requirements to affirmatively further fair housing.

Strategy H-4.1.7: Provide opportunities for the development of housing for extremely low-income households.

#### **Program**

#### Accomplishments

Action H-4.1.7 (a): Development of Housing for Extremely Low-Income Households: The City shall encourage and support the development of housing for extremely low-income households within future affordable housing projects through various strategies and programs that may include: assistance with site identification and entitlement processing; fee waivers and deferrals; and modifying development standards such as parking and unit size requirements and granting concessions and incentives for projects that provide housing for lower income families. The Action will work in conjunction with other actions to encourage development of units suitable for extremely low-income households including transitional and supportive housing and single room occupancy units.

Result/Evaluation: Program considered successful; City has created 12 units of transitional housing in the Tina-Pacific Neighborhood and approved transitional housing for at-risk and homeless mothers with children under the age of 5 for the property located at 10862 Oak Street.

The City also approved two projects, for which it partnered with Orange County and Jamboree Housing Corporation, for the conversion of two motels to temporary supportive housing – the Stanton Inn and Suites located at 7161 Katella Avenue and the Tahiti Motel located at 11850 Beach Blvd. During the upcoming planning period the sites will be converted to permanent supportive housing. As well, a third site is currently in negotiation.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-4.1.7 (b): Modify Zoning Code to Permit Transitional and Supportive Housing in all Residential Zones: The California Health and Safety Code indicates that supportive and transitional housing shall be considered a residential use and only subject to those restrictions that apply to other residential uses of the same type in the same zone. Currently, the City's Zoning Code does not permit Supportive or Transitional housing in the Residential Estates, and Low Density Residential zones. As such, to comply with the State's regulations, the City will modify the Zoning Code to permit Supportive and Transitional Housing in all residential zones.

**Result/Evaluation**: The Zoning Code permits transitional and supportive housing in the RM and RH zones, but does not permit these uses in the RE and RL residential zones. During the planning period the City processed a zone change from commercial to residential to allow temporary transitional housing (Project Homekey). Additionally, the City has created 12 units of transitional housing in the Tina-Pacific Neighborhood and approved transitional housing for at-risk and homeless mothers with children under the age of 5 for the property located at 10862 Oak Street.

Status: As SB 2 requires transitional and supportive housing in all zones that allow residential uses, a Zoning Code Amendment will be undertaken to allow transitional and supportive housing in the RE and RL zones, and to be consistent with Government Code Section 65651.

#### Goal H-5.1: Increase awareness of and participation in housing programs.

#### Strategy H-5.1.1: Consolidate and disseminate information.

Action H-5.1.1 (a): Community Access to Comprehensive Housing Information: The City understands the importance of providing a single source of housing information to its residents. To provide ease of access to programs, policies and available funds, the City will develop a comprehensive information resource about the State, County and City housing projects, programs, policies, available funding, technical assistance, and other related items at locations accessible to the general public. The City will determine the best form of delivery of this information (e.g., online, print media, meetings, etc.) and provide the community with a comprehensive source of housing information including resources for special needs groups such as, but not limited to, seniors, disabled, developmentally disabled, and

Result/Evaluation: Program considered successful. The City continues to regularly develop forms of comprehensive information resources regarding housing policies, programs, projects, available funding, technical assistance, and other related items with appropriate delivery means (e.g., information packets, City webpage, cable TV channel, reader board sign, workshop meetings).

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period with improvements to the City webpage that will provide residents with information regarding affordable housing resources (e.g., affordable housing complexes, loan/grant programs, etc.), fair housing information, and information for developers regarding incentives for affordable and special needs housing.

Accomplishments Program homeless.

Action H-5.1.1 (b): Housing Information Outreach to Development Community: The City will provide, as part of their comprehensive housing resources (Action H-5.1.1(a)), informational packets for developers that summarize development standards; processing fees and timelines; funding/financing options available at the federal, state and local level; and incentives, such as density bonuses and reduced parking requirements, related to residential projects. The City will also include information regarding properties identified in the Housing Element for the development of affordable housing in the RH (High Density Residential) zone and the requirement to develop the properties at a density of at least 30 dwelling units per acre. In addition, the City will provide a handout listing the available site inventory for housing development. The City will provide technical assistance to assist the development community in pursuing available funding and financing.

Result/Evaluation: Program considered successful. The City continues to provide information to developers regarding development standards, processing fees and timelines, funding/financing options available, incentives for affordable housing, and opportunity sites. Presentations by City staff were made during the planning period to identify vacant and underutilized properties with the information then being made available on the City website.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

#### Goal H-6.1: Promote energy conservation, and green building techniques for residential construction and rehabilitation projects.

#### Strategy H-6.1.1: Encourage use of energy efficient design and appliances.

Action H-6.1.1 (a): Review City regulations for energy-efficiency standards: The City will review its zoning ordinance and recommend any changes where necessary to encourage energy-efficient housing design and practices that are consistent with State regulations.

Result/Evaluation: Program considered successful. With adoption of CALGreen Code and sustainability principles incorporated into the Building Code, the program is preempted.

Status: Program no longer necessary and will not be kept for the 2021-2029 planning period.

Action H-6.1.1 (b): Encourage use of energy conservation devices: The City will encourage the installation of energy conservation devices for all new and existing residential projects. The City will maintain and distribute literature on energy conservation, including solar power, additional insulation, and subsidies available from utility companies, the Federal, State, and local governments.

Result/Evaluation: Program considered successful; Community and Economic Development Department provides brochures and information on energy conservation, including solar power/photovoltaic (PV) systems. The City also participates in the HERO Program, which is a Property Assessed Clean Energy (PACE) program providing financing for energyefficient, water-efficient, and renewable energy products to home and business owners.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Action H-6.1.1 (c): Compliance with Green Building Standards: The City will ensure green building concepts and processes in new residential construction and rehabilitation of existing housing is consistent with State building standards and local subdivision and zoning standards.

Result/Evaluation: Program considered successful; sustainability principles incorporated into the Building Code. With adoption of CALGreen Code, it preempts program.

Status: Program continues to be appropriate and will be kept for the 2021-2029 planning period, but with a shift in focus.

## 3 Housing Needs Assessment

#### 3A. Introduction and Background

The purpose of the Housing Needs Assessment is to describe housing, economic, and demographic conditions in Stanton, assess the demand for housing for households at all income levels, and document the demand for housing to serve various special needs populations. The Housing Needs Assessment also addresses whether assisted housing projects are at risk of converting to market-rate projects. The Housing Needs Assessment is intended to assist Stanton in developing housing goals and formulating policies and programs that address local housing needs.

Several sources of data were used to describe existing demographic and housing conditions, including the following:

- Local Housing Data package for the City of Stanton developed by the Southern California Association of Governments (SCAG) and pre-certified by the California Department of Housing and Community Development (HCD) for use in 6th cycle housing elements.
- Data from the 2010 U.S. Census, 2014-2018 U.S. Census American Community Survey (ACS), California Department of Finance (DOF), California Employee Development Department (EDD), and U.S. Department of Housing and Urban Development (HUD) is included to provide information on population, household, housing, income, employment, and other demographic characteristics.
- Regional information from the Fair Housing Council of Orange County.
- Other sources of economic data such as information from the websites Zillow.com and Apartments.com, and other published data are used where current Census, ACS, DOF, HUD, and other standard data sources do not provide relevant data.
- Interviews with key agencies and organizations were conducted to obtain information on housing needs and, in particular, needs of populations with special housing needs.
- Research and data related to fair housing, including Census Scope, Social Science Data Analysis Network, the UC Davis Center for Regional Change and Rabobank, N.A., and the California Fair Housing Task Force.

Due to the use of multiple data sources (with some varying dates), there are slight variations in some of the information, such as total population and total household numbers, presented in this document. However, these variations do not significantly affect the discussion of overall housing trends and changes.

#### **3B. Population Trends and Characteristics**

#### **POPULATION GROWTH**

Table 3-1 shows population growth for Stanton and other jurisdictions in the region from 2000 through 2020. According to data prepared by the California DOF, the population of Stanton in 2020 was 39,077 persons, an increase of approximately 2.3% since 2010. During the previous decade (2000 to 2010), the City's population increased 2.1% to total 38,186 in 2010. Stanton's growth has been lower than countywide growth, with Orange County experiencing population growth rates during both the 2000 to 2010 and 2010 to 2020 periods higher than that experienced in Stanton, as shown in Table 3-1. This is largely due to Stanton's built-out nature and the availability of developable land in the county versus in the City. The City's population is anticipated to increase to approximately 59,397 persons upon buildout of lands within the city limits (*City of Stanton General Plan, September 2008*). Anaheim had both the greatest numeric change in population (29,311 persons) and the largest percentage change in population (8.9%) of the neighboring jurisdictions.

TABLE 3-1: POPULATION TRENDS - STANTON AND NEIGHBORING JURISDICTIONS

Jurisdiction	2000	2010	2020	Change 2000-20	% Change 2000-20
Stanton	37,403	38,186	39,077	1,674	4.5%
Anaheim	328,014	336,265	357,325	29,311	8.9%
Garden Grove	165,196	170,794	174,801	9,605	5.8%
Cypress	46,229	47,802	49,272	3,043	6.6%
Westminster	88,207	89,701	92,421	4,214	4.8%
Orange County	2,846,289	3,010,232	3,194,332	348,043	12.2%

Sources: US Census, 2000; DOF, 2020







#### **AGE**

Changes in the age groups can indicate future housing needs. Table 3-2 compares age group sizes in 2018 for Stanton and Orange County. In Stanton, children under 15 comprise 21.1% of the City's population, teens and young adults (15 – 24) represent 14.3%, and adults in family-forming age groups (25 – 44) comprise 29.2%. Adults aged 45 to 64 represent 19.1% of the population and seniors (65 and over) comprise 15.2%. In 2018, the median age in Stanton (34.5 years) was lower than that of Orange County (37.8 years) and 1.8 years lower than the statewide median age of 36.3 years. The median age of City residents has increased from the 2010 median age of 33.9 years. These figures indicate that the City of Stanton is a family-oriented community with a high proportion of families with children.

**TABLE 3-2: POPULATION BY AGE (2018)** 

Δ	Sta	nton	Orange (	County
Age	Number	Percent	Number	Percent
Under 5 Years	2,755	7.2%	188,956	6.0%
5 to 9	2,677	7.0%	189,548	6.0%
10 to 14	2,670	6.9%	206,380	6.5%
15 to 19	2,853	7.4%	208,793	6.6%
20 to 24	2,643	6.9%	218,993	6.9%
25 to 34	5,981	15.5%	453,121	14.3%
35 to 44	5,287	13.7%	415,919	13.1%
45 to 54	5,317	13.8%	453,608	14.3%
55 to 64	2,057	5.3%	388,376	12.3%
65 to 74	1,903	4.9%	249,211	7.9%
75 to 84	2,823	7.3%	131,180	4.1%
85 and Over	1,155	3.0%	60,097	1.9%
TOTAL	_ 38,509	100%	3,164,182	100%

Source: US Census, 2014-2018 ACS







#### **RACE AND ETHNICITY**

Table 3-3 shows the ethnic composition of Stanton's population. Over half (53.2%) of the City's population identify as White. The next largest racial group is Asian (27.0%), followed by "other race" (12.5%), "two or more races" (3.7%), Black or African American (1.4%), American Indian or Alaska Native (1.3%), and Native Hawaiian and Pacific Islander (0.9%). Nearly half of the population (49.2%) is of Hispanic or Latino origin. Stanton is a more culturally diverse community than the county as a whole, which has the potential to influence special housing needs or buying preferences, such as a stronger cultural history of multigenerational housing.

**TABLE 3-3: RACE AND ETHNICITY (2018)** 

Dogg/Fthmigitu	Stanton		Orange County	
Race/Ethnicity -	Number	Percent	Number	Percent
White	20,477	53.2%	1,950,902	61.7%
Black or African American	555	1.4%	54,732	1.7%
American Indian or Alaska Native	494	1.3%	14,466	0.5%
Asian	10,389	27.0%	635,672	20.1%
Native Hawaiian and Pacific Islander	362	0.9%	9,442	0.3%
Some Other Race	4,817	12.5%	370,679	11.7%
Two or More Races	1,415	3.7%	128,289	4.1%
TOTAL	38,509	100%	3,164,182	100%
Hispanic or Latino (of any race)	18,939	49.2%	1,080,195	34.1%

Source: US Census, 2014-2018 ACS

#### **EMPLOYMENT**

An assessment of the needs of the community must take into consideration the type of employment held by residents. Incomes associated with different jobs and the number of workers in a household determines the type and size of housing a household can afford. In some cases, the types of jobs themselves can affect housing needs and demand (such as in communities with military installations, college campuses, and seasonal agriculture). Employment growth typically leads to strong housing demand, while the reverse is true when employment contracts.

One of the factors that can contribute to an increase in demand for housing is expansion of the employment base. Table 3-4 shows the employment and unemployment rates for persons 16 years and older that were in the labor force in 2010 and 2018. The number of employed residents increased by 288 from 2010 to 2018. In 2018, ACS data indicates that the unemployment rate in Stanton was approximately 5.9%, a significant decrease from 9.9% in 2010 as the City (and country) emerged from the Great Recession. According to the labor report data compiled by the California EDD, the Anaheim-Santa Ana-Irvine Metropolitan Area's average annual unemployment rate in 2018 was estimated at 3.0%, Orange County's rate was also 3.0%, while California's was 4.1%.

**TABLE 3-4: JOB GROWTH AND EMPLOYMENT STATUS** 

	20	2010		)18
	Number	Percent	Number	Percent
Total Persons in Labor Force	19,746	100%	19,213	100%
Employed	17,783	90.1%	18,071	94.1%
Unemployed	1,963	9.9%	1,142	5.9%

Sources: US Census, 2010-2014 ACS and 2014-2018 ACS

#### INDUSTRY AND OCCUPATION

The 2014-2018 ACS data identifies 18,071 employed persons in the Stanton labor force. Table 3-5 shows 2018 employment by industry for the City. Of Stanton's employed residents, the "Manufacturing" industry employed the most people at 18.2%. The second largest employment sector was the "Educational services, health care and social assistance" industry, which had 16.3% of the total employed persons in Stanton. The top two employment categories in Orange County were the "Educational services, health care and social assistance" industry at 19.3% and the "Professional, scientific, management, administrative, waste management" industry at 14.4%.

The City's workforce holds a variety of types of jobs as shown in Table 3-6, with the largest sector (23.9%) working in service occupations (which tend to be lower paying), followed by 23.8% in management, business, science, and arts occupations. Employment and occupation trends play an important role in defining housing needs. This relationship extends beyond the impact of employment growth on housing demand in the City and includes how wage levels and median earnings affect the type of housing affordable to workers and households in Stanton. There is a significant gap, for example, between the median earnings of a resident employed in management and a resident employed in a service occupation, and this translates into the type of housing that is needed in the City.

**TABLE 3-5: JOBS BY INDUSTRY (2018)** 

Industry	Number	Percent
Agriculture, forestry, fishing and hunting, mining	127	0.7%
Construction	1,416	7.8%
Manufacturing	3,295	18.2%
Wholesale trade	573	3.2%
Retail trade	2,275	12.6%
Transportation, warehousing, utilities	771	4.3%
Information	224	1.2%
Finance and insurance, real estate and rental and leasing	909	5.0%
Professional, scientific, management, administrative, waste mgmt.	1,745	9.7%
Educational services, health care and social assistance	2,936	16.3%
Arts, entertainment, recreation, accommodation, food services	2,315	12.8%
Other services	1,015	5.6%
Public administration	463	2.6%
TOTAL (Civilian Labor Force)	18,064	100%
Armed Forces	7	100%

Source: US Census, 2014-2018 ACS

**TABLE 3-6: JOBS BY OCCUPATION (2018)** 

Occupation	Number	Percent	Median Earnings*
Management, business, science, and arts occupations	4,291	23.8%	\$55,179
Service occupations	4,312	23.9%	\$17,786
Sales and office occupations	4,177	23.1%	\$31,261
Natural resources, construction, and maintenance occupations	1,683	9.4%	\$38,770
Production, transportation, and material moving	3,591	19.9%	\$26,043

<sup>\*</sup>Median earnings in previous 12 months prior to survey

Sources: SCAG 6th Cycle Data Package; US Census, 2014-2018 ACS

#### TRAVEL TO WORK

Approximately 51.7% of Stanton workers 16 years and over travel less than 30 minutes to work. Comparatively, only 8.8% of workers drive more than 60 minutes to work. Most Stanton workers, 79.1%, drive alone to work and 13.9% carpool. Table 3-7 identifies travel time to work and Table 3-8 identifies commute methods for Stanton workers in 2018.

TABLE 3-7: TRAVEL TIME TO WORK (2018)

	Number	Percent
Less than 10 minutes	918	5.4%
10-19 minutes	3,658	21.4%
20-29 minutes	4,258	24.9%
30-44 minutes	5,360	31.3%
45-59 minutes	1,418	8.3%
60 + minutes	1,512	8.8%

Source: US Census, 2014-2018 ACS

**TABLE 3-8: COMMUTE METHOD (2018)** 

	Number	Percent
Drive Alone	13,755	79.1%
Carpooled	2,414	13.9%
Public Transportation	398	2.3%
Walk	156	0.9%
Other	401	2.3%
Work at Home	263	1.5%

Source: US Census, 2014-2018 ACS

#### 3C. Household Characteristics

According to the Census, a household is defined as all persons living in a housing unit. This definition includes families (related individuals living together), unrelated individuals living together, and individuals living alone.

A housing unit is defined by the Census as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live and eat separately from any other persons in the building and which have direct access from the outside of the building or through a common hall. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

People living in retirement homes or other group living situations are not considered "households" for the purpose of the U.S. Census count. The household characteristics in a community, including household size, income, and the presence of special needs households, are important factors in determining the size and type of housing needed in the City.

Table 3-9 below identifies the ages of householders in Stanton and Orange County in 2018 based on ACS data from 2014-2018. Homeowner households are generally headed by residents early middle-aged to middle-aged, with 54.2% of homeowner households headed by a resident 35-59 years of age; however, 15.6% of homeowner households are headed by someone 65-74 years. <u>Households who rent their homes</u> trend slightly younger; approximately 67.8% of renter households are headed by a person aged 25-54.

**TABLE 3-9: HOUSEHOLDS BY TENURE AND AGE (2018)** 

	Stanton		Orang	je County
	Number	%	Number	%
Owner Occupied:	5,191	100% (47.6% of total households)	592,269	100% (57.4% of total households)
Householder 15 to 24 years	10	0.2%	2,053	0.3%
Householder 25 to 34 years	466	9.0%	36,065	6.1%
Householder 35 to 44 years	870	16.8%	86,899	14.7%
Householder 45 to 54 years	1,362	26.2%	137,678	23.2%
Householder 55 to 59 years	580	11.2%	75,371	12.7%
Householder 60 to 64 years	489	9.4%	67,259	11.4%
Householder 65 to 74 years	809	15.6%	104,985	17.7%
Householder 75 to 84 years	453	8.7%	58,068	9.8%
Householder 85 years and older	152	2.9%	23,891	4.0%
Renter Occupied:	5,719	100% (52.4% of total households)	440,104	100% (42.6% of total households)
Householder 15 to 24 years	200	3.5%	23,193	5.3%
Householder 25 to 34 years	1,093	19.1%	105,489	24.0%
Householder 35 to 44 years	1,655	28.9%	101,763	23.1%
Householder 45 to 54 years	1,131	19.8%	91,096	20.7%
Householder 55 to 59 years	394	6.9%	33,973	7.7%
Householder 60 to 64 years	441	7.7%	24,592	5.6%
Householder 65 to 74 years	479	8.4%	33,099	7.5%
Householder 75 to 84 years	208	3.6%	16,518	3.8%
Householder 85 years and older	118	2.1%	10,381	2.4%
TOTAL	10,910	-	1,032,373	-

Source: US Census, 2014-2018 ACS 5-Year Data Profile (Table B25007)

Table 3-10 identifies the household sizes by housing tenure. In 2018, the majority of households consisted of 2 to 4 persons, which is consistent with the county's profile. Large households of 5 or more persons made up 23.2% of the total households in Stanton – a sizable percentage of total households and a higher proportion when compared to the county. The average household size was 3.51 persons, which was higher than Orange County's (3.02 persons). Additionally, the average household size in 2018 for an owner-occupied unit was 3.29 persons per household and 3.71 persons per household for a renter-occupied unit.

**TABLE 3-10: HOUSEHOLD SIZE BY TENURE (2018)** 

	Stanton		Orange (	County
	Number	%	Number	%
Owner Households	5,191	100%	592,269	100%
Householder living alone	1,094	21.1%	110,780	18.7%
Households 2–4 persons	3,120	60.1%	404,680	68.3%
Large households 5+ persons	977	18.8%	76,809	13.0%
Average Household Size	3.29 pc	ersons	2.99 pe	rsons
Renter Households	5,719	100%	440,104	100%
Householder living alone	983	17.2%	106,627	24.2%
Households 2–4 persons	3,183	55.7%	263,316	59.8%
Large households 5+ persons	1,553	27.2%	70,161	15.9%
Average Household Size	3.71 pc	ersons	3.06 pe	rsons
Total Households	10,910	100%	1,032,373	100%
Householder living alone	2,077	19.0%	217,407	21.1%
Households 2–4 persons	6,303	57.8%	667,996	64.7%
Large households 5+ persons	2,530	23.2%	146,970	14.2%
Average Household Size	3.51 pc	ersons	3.02 pe	rsons

Sources: SCAG 6th Cycle Data Package; U.S. Census Bureau, 2014-2018 ACS 5-Year Data Profile (Table B25009)

#### 3D. Income

#### **HOUSEHOLD INCOME**

From 2000 to 2018, the median household income increased by 44.4% to \$56,506 and the per capita income increased by 51.1% to \$21,445. An increase in both per capita and median household incomes also occurred from 2010 to 2018. Table 3-11 identifies the per capita and median household incomes in 2000, 2010, and 2018.

TABLE 3-11: MEDIAN HOUSEHOLD AND PER CAPITA INCOME

	2000	2010	2018
Median Household Income	\$39,127	\$51,539	\$56,506
Per Capita Income	\$14,197	\$20,444	\$21,445

Sources: US Census, 2000; US Census, 2014-2018 ACS

In 2018, the majority (55.4%) of Stanton's households earned in excess of \$50,000 per year. The incidence of households earning less than \$35,000 per year was significantly higher among renter households (40.1%) than owner households (18.4%). Table 3-12 identifies household income by tenure. As shown in Table 3-12, the median income of owner households is approximately \$32,000 more than renter households. Compared to the county, median household incomes are lower for both owner and renter households - by 33.8% and 31.0%, respectively.

TABLE 3-12: HOUSEHOLD INCOME FOR ALL HOUSEHOLDS AND BY TENURE (2018)

lucomo	All Hou	All Households		Owner Households		Renter Households	
Income	Number	Percent	Number	Percent	Number	Percent	
Less than \$5,000	369	3.4%	48	0.9%	321	5.6%	
\$5,000 to \$9,999	252	2.3%	74	1.4%	178	3.1%	
\$10,000 to \$14,999	524	4.8%	100	1.9%	424	7.4%	
\$15,000 to \$19,999	519	4.8%	141	2.7%	378	6.6%	
\$20,000 to \$24,999	473	4.3%	210	4.0%	263	4.6%	
\$25,000 to \$34,999	1,121	10.3%	388	7.5%	733	12.8%	
\$35,000 to \$49,999	1,603	14.7%	595	11.5%	1,008	17.6%	
\$50,000 to \$74,999	2,042	18.7%	1,084	20.9%	958	16.8%	
\$75,000 to \$99,999	1,422	13.0%	826	15.9%	596	10.4%	
\$100,000 to \$149,999	1,568	14.4%	996	19.2%	572	10.0%	
\$150,000 or more	1,017	9.3%	729	14.0%	288	5.0%	
Median Household Income – Stanton	\$56	5,506	\$73	3,920	\$41	,881	
Median Household Income – Orange County	\$85	5,398	\$11	1,730	\$60	,671	

Source: US Census, 2014-2018 ACS

#### **HOUSEHOLDS BY INCOME GROUP**

A special aggregation of 2013-2017 ACS data performed by HUD - the Comprehensive Housing Affordability Strategy (CHAS) data - provides a breakdown of households by income group by tenure. The number of households in extremely low, very low, low, and moderate/above moderate-income groups is shown in Table 3-13. Nearly one-third (32.9%) of all households are at or above moderate income. The HUD CHAS data indicates the extremely low-income group represents 24.9% of households, and a higher proportion are renters (2,055) than owners (665). The very low-income group represents 22.8% of households and the low-income group represents 19.4% of households. The City's RHNA (see Table 3-29) identifies the City's share of regional housing needs for extremely low, very low, and low-income households, as well as for moderate and above moderate-income households.

As shown in Table 3-13, there is a larger proportion of renters in the extremely low and very lowincome groups, while there is a larger proportion of low, moderate, and above moderate-income groups in owner households. The high incidence of lower income renter households is of particular significance as market rents in Stanton exceed the level of affordability for 75% of lower income households (see Table 3-26). Moreover, as indicated by Table 3-26, 68% of lower income households, including both renter and homeowner households, pay more than 30% of their income for housing.

TABLE 3-13: HOUSEHOLDS BY INCOME GROUP (2017)

Incomo Croun	Total		Owner		Renter	
Income Group	Households	Percent	Households	Percent	Households	Percent
Extremely Low (<30% AMI)	2,720	24.9%	665	12.8%	2,055	36%
Very Low (31–50% AMI)	2,490	22.8%	905	17.4%	1,585	27.8%
Low (51–80% AMI)	2,115	19.4%	1,210	23.2%	905	15.9%
Moderate and Above Moderate (>80% AMI)	3,595	32.9%	2,430	46.6%	1,165	20.4%
TOTAL	_ 10,920	100%	5,210	100%	5,710	100%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017

Available: https://www.huduser.gov/portal/datasets/cp.html

#### **POVERTY LEVELS**

The 2014-2018 ACS data indicates that 1,208 (14.4%) of all Stanton families and 7,278 individuals (18.9%) had incomes at or below the poverty level. According to the ACS data, poverty rates are disparate between races and economic indicators are particularly severe for those identified as "White alone" and for those of Hispanic or Latino origin. In 2018, those identified as "White alone" had a poverty rate of 24.6% compared to 14.8% for "Some other race", 12.9% for Asians, 9.3% for Black or African Americans, 7.6% for "Two or more races", 6.1% for Native Hawaiian and Other Pacific Islanders, 1.5% for American Indian and Alaska Natives. The population of Hispanic or Latino origin had a poverty rate of 26.4%.

The level of poverty in a jurisdiction often influences the need for housing to accommodate those persons and families in the very low and low-income categories. The U.S. Census Bureau measures poverty by using a set of money income thresholds that vary by family size and composition of who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. For example, the poverty threshold for a family of two with no children would be \$17,120, a household of two with a householder aged 65 or older and no children has a poverty threshold of \$15,453, and the poverty threshold of a family of four with two children under the age of 18 would be \$25,926. (U.S. Census Bureau, 2019).

#### **EXTREMELY LOW-INCOME HOUSEHOLDS**

Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income. For Orange County, the median household income in 2020 was \$103,000. For ELI households in Stanton (and the rest of Orange County), this results in an income of \$38,450 or less for a four-person household or \$26,950 for a one-person household. ELI households have a variety of housing situations and needs. For example, most families and individuals receiving only public assistance, such as social security disability insurance or disability insurance, qualify as ELI households. Table 3-14 provides representative occupations with hourly wages that are within or close to the ELI income range. As shown in Table 3-13, ELI households make up 24.9% of all households in Stanton. And based on Table 3-26, 82.2% of ELI households in Stanton pay more than 30% of their incomes for housing.

TABLE 3-14: OCCUPATIONS WITH WAGES FOR EXTREMELY LOW-INCOME HOUSEHOLDS (2020)

Occupation Title	Median Hourly Wage
Laborers and Freight, Stock, and Material Movers	\$12.70
Telemarketers	\$12.43
Waiters and Waitresses	\$12.07
Retail Salespersons	\$12.03
Ambulance Drivers and Attendants, Except Emergency Medical Technicians	\$11.94
Cooks, Fast Food	\$11.63
Couriers and Messengers	\$11.61
Personal Care Aides	\$11.59
Hosts and Hostesses, Restaurant, Lounge, and Coffee Shop	\$11.52
Amusement and Recreation Attendants	\$11.42
Cashiers	\$11.42
Parking Lot Attendants	\$11.41

Source: Employment Development Department, Long-Term Occupational Projections 2016-2026 (accessed January 2021)

Pursuant to Government Code Section 65583(a)(1), 50% of Stanton's very low-income regional housing needs assigned by HCD are extremely low-income households. As a result, from the very low-income need of 165 units (see Table 3-29), the City has a projected need of 82 units for extremely low-income households (i.e. households earning 30% or less of the area median income). Based on current figures, extremely low-income households will most likely be facing overpayment, overcrowding, or substandard housing conditions. Some extremely low-income households could include individuals with mental or other disabilities and special needs. To address the range of needs of ELI households, the City will implement several programs including the following programs (refer to the Housing Element Policy Document for more detailed descriptions of these programs):

- Program 5: Facilitate Affordable and Special Needs Housing Construction
- Program 11: Rental Assistance
- Program 17: Zoning Code Amendments Housing Constraints

#### **3E. Housing Characteristics**

#### **HOUSING TYPE**

Table 3-15 identifies the types of housing units in Stanton in 2020 as reported in the Department of Finance, E-5 Report. The table summarizes total housing stock according to the type of structure. As shown in the table, multifamily, 5+ units is the largest housing type with 32.1% of the total units. The second largest type is single-family, detached units, comprising 27.9% of the total units. Single-family attached homes represent 15.8% of housing units and multifamily, 2-4 units (i.e. duplex, triplex, and fourplex structures) account for 11.5% of housing units. Of note, the percentage of mobile homes in Stanton (12.6%) is high relative to county (3%) and state percentages (3.9%).

**TABLE 3-15: HOUSING STOCK BY TYPE (2020)** 

	Total	Single Family		amily Multifamily Mobile		Mobile	Occupied	Vacant
	TOTAL	Detached	Attached	2 – 4	5+ Units	Homes	Occupied	Vacaiii
Units	11,448	3,198	1,812	1,321	3,679	1,438	11,093	355
Percent	100%	27.9%	15.8%	11.5%	32.1%	12.6%	96.9%	3.1%

Sources: SCAG 6th Cycle Data Package; DOF E-5 Report 2020

#### **VACANCY RATE**

Table 3-15 also shows the number and percentage of occupied units and the percentage of vacant units. It is important to note that these counts include all vacant units, including those units that are newly constructed but not yet occupied. In order for the housing market to function properly in a city there should always be some level of housing vacancy, otherwise rents or housing prices could skyrocket. The 3.1% vacancy in Stanton is considered low (the historical equilibrium in California is 5.5% for rental vacancy and 1.2% for homeownership vacancy).<sup>1</sup>

The 2014-2018 ACS data indicates that there were 349 vacant units in 2018. As shown in Table 3-16, of the total vacant units in 2018, 141 were for rent, 55 were for sale, 45 were rented or sold but not yet occupied, 28 were for seasonal, recreational, or occasional use, and 80 were classified as other vacant. There were no vacant units for migrant workers in Stanton. The overall vacancy rate in the City in 2018 was 3.1%, a rate which has steadily decreased since 2010.

**TABLE 3-16: VACANCY BY TYPE (2018)** 

Vacancy Type	Number	Percent
For rent	141	40.4%
Rented, not occupied	19	5.4%
For sale only	55	15.8%
Sold, not occupied	26	7.4%
For seasonal, recreational, or occasional use	28	8.0%
For migrant workers	0	0%
Other vacant	80	22.9%
TOTAL	349	100%

Source: US Census, 2014-2018 ACS

<sup>&</sup>lt;sup>1</sup> "California's low residential vacancy rates signal more construction," first tuesday Journal (February 15, 2021).

#### HOUSING CONDITIONS

The U.S. Census provides only limited data that can be used to infer the condition of Stanton's housing stock. In most cases, the age of a community's housing stock is a good indicator of the condition of the housing stock. Moreover, many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include plumbing, roof repairs, electrical repairs, foundation rehabilitation, or other significant improvements.

The 2014-2018 ACS data indicates that almost half (48.8%) of the housing in the City is greater than 50 years old (i.e. built before 1970). Another 22.6% of units were built between 1970 and 1979. The age of the housing stock indicates that the need for maintenance and rehabilitation assistance may grow during the planning period. Units built prior to 1970 may require aesthetic and maintenance repairs including roof, window, and paint improvements and some units in this age range may also require significant upgrades to structural, foundation, electrical, plumbing, and other systems.

When examining a housing stock to determine what condition it is in, there are certain factors that the Census considers. For example, older units may not have plumbing that is fully functional or the plumbing might be substandard. Table 3-17, however, indicates that no occupied dwelling units in the City lacked complete plumbing facilities in 2018.

**TABLE 3-17: HOUSING STOCK CONDITIONS (2018)** 

Voor Structure Duilt	Owner-C	Occupied	Renter-C	Renter-Occupied		Total		
Year Structure Built	Number	Percent	Number	Percent	Number	Percent		
2014 or later	34	0.7%	0	0.0%	34	0.3%		
2010 to 2013	58	1.1%	33	0.6%	91	0.8%		
2000 to 2009	574	11.1%	127	2.2%	721	6.4%		
1990 to 1999	400	7.7%	305	5.3%	705	6.3%		
1980 to 1989	809	15.6%	797	13.9%	1,663	14.8%		
1970 to 1979	1,163	22.4%	1,286	22.5%	2,549	22.6%		
1960 to 1969	760	14.6%	1,390	24.3%	2,247	20.0%		
1950 to 1959	1,240	23.9%	1,419	24.8%	2,705	24.0%		
1940 to 1949	100	1.9%	263	4.6%	382	3.4%		
1939 or earlier	53	1.0%	99	1.7%	162	1.4%		
TOTAL	5,191	100%	5,719	100%	11,259	100%		
Plumbing Facilities (Occupied Units)								
Units with Complete Plumbing Facilities	5,191	100%	5,719	100%	10,910	100%		
Units Lacking Complete Plumbing Facilities	0	0.0%	0	0.0%	0	0.0%		

Source: US Census, 2014-2018 ACS (Table B25036)

As noted, the City's housing stock is aging with 71.4% of dwelling units in Stanton (8,045) having been constructed prior to 1980, and as such, structural deterioration and maintenance problems may be prevalent. The City's Building Official has identified areas in the City with concentrations of housing in need of substantial rehabilitation or replacement, including the Santa Barbara neighborhood, the Tina/Pacific Neighborhood, and the residential neighborhood on the northwest corner of Katella Avenue and Beach Boulevard. Moreover, the goal of the City's Proactive Code Enforcement Program is to address housing concerns before they become serious problems.

To supplement the Census information regarding housing conditions, the City of Stanton

included specific questions pertaining to the quality of the City's housing stock in its Housing Element Update community survey, which was posted on the City's website from November 2020 through January 2021 (this is further detailed in Appendix B). When asked to rate the physical condition of the residence they lived in, the majority (45.3%) responded that their home shows signs of minor deferred maintenance such as peeling paint or chipped stucco while 29.9% indicated that their home was in excellent condition. Another 18.0% of respondents indicated that their home was in need of a modest repair (like a new roof or new siding) and 17.1% reported that their home needed a major repair (such as new foundation, complete new plumbing, or complete new electrical). Homeowners were more likely than renters to respond that their residence was in excellent condition (36.7% vs. 14.3%). When considering the age of the respondent, younger respondents (24-39 years) were more likely to state that their residence was in excellent condition. This may point to the high quality of newer housing in the community, both single-family and multifamily, likely purchased by younger homeowners.

Community members were also asked to report the type of home improvements they have considered making to their homes. Although "does not apply" received the most responses (37.1%), other popular answers included improvements for painting, solar, and new roofing. The most common home improvement for each age group, young adult through older resident, was painting (interior and/or exterior).

Additionally, the City's Planning Division has identified particular areas of the City which appear to have a significant amount of housing that is in need of major repair. These areas include the Tina/Pacific Neighborhood, Crow Village, and various motel sites on Beach Boulevard (which may be used for SRO housing). The City will continue to implement its Homeowner Rehabilitation Grant Program using CDBG funds to help qualified homeowners to rehabilitate substandard housing.

#### **OVERCROWDING**

Typically, a housing unit is considered overcrowded if there is more than one person per room and severely overcrowded if there are more than 1.5 persons per room. Table 3-18 summarizes overcrowding data for Stanton. It should be noted that kitchenettes, strip or Pullman kitchens, bathrooms, porches, balconies, foyers, halls, half-rooms, utility rooms, unfinished attics, basements, or other space for storage are not defined as rooms for Census purposes.

Overcrowded households are usually a reflection of the lack of affordable housing available. Households that cannot afford housing units suitably sized for their families are often forced to live in housing that is too small for their needs, which may result in poor physical condition of the dwelling unit. In 2018, 1,827 housing units (16.7% of the total occupied units) were overcrowded, which represented 9.5% of owner units and 23.3% of renter units.

**TABLE 3-18: OVERCROWDING BY TENURE (2018)** 

Darsons nor Doom	Ow	Owner		Renter		Total	
Persons per Room	Number	Percent	Number	Percent	Number	Percent	
1.00 or less	4,699	90.5%	4,384	76.7%	9,083	83.3%	
1.01 to 1.50	364	7.0%	971	17.0%	1,335	12.2%	
1.51 or more	128	2.5%	364	6.4%	492	4.5%	
TOTAL	5,191	100%	5,719	100%	10,910	100%	
Overcrowded	492	9.5%	1,335	23.3%	1,827	16.7%	

Source: SCAG 6th Cycle Data Package; US Census, 2014-2018 ACS (Table B25014)

As shown in Table 3-19, the average household size in Stanton was 3.51 persons in 2018, which was an increase in the average household size of 3.27 persons in 2010. Table 3-19 shows Stanton's household sizes for owner, renter, and all households. The average household size was lower for owners (3.29 persons). Renter households had an average size of 3.71 persons. The most commonly occurring household size is of two people (20.7%) and the second-most commonly occurring household size is of three people (19.6%). Table 3-20 identifies bedrooms by tenure. Although larger renter households (5 or more persons) are proportionally higher than larger owner households, the proportion of larger homes (4 or more bedrooms) is significantly higher for owner households.

**TABLE 3-19: HOUSEHOLD SIZE BY TENURE (2018)** 

Hausshald Circ	Owner		Renter		Total	
Household Size	Number	Percent	Number	Percent	Number	Percent
1-person	1,094	21.1%	983	17.2%	2,077	19.0%
2-person	1,271	24.5%	983	17.2%	2,254	20.7%
3-person	927	17.9%	1,213	21.2%	2,140	19.6%
4-person	922	17.8%	987	17.3%	1,909	17.5%
5-person	492	9.5%	765	13.4%	1,257	11.5%
6-person	282	5.4%	390	6.8%	672	6.2%
7-or-more-person	203	3.9%	398	7.0%	601	5.5%
TOTAL	5,191	100% (47.6% of total)	5,719	100% (52.4% of total)	10,910	100%
Average Household Size	,	3.29		3.71	3.	51

Source: SCAG 6th Cycle Data Package

TABLE 3-20: NUMBER OF BEDROOMS BY TENURE (2018)

Podroom Tuno	Owner		Renter		Total	
Bedroom Type	Number	Percent	Number	Percent	Number	Percent
No bedroom	34	0.7%	200	3.5%	234	2.1%
1-bedroom	152	2.9%	1,340	23.4%	1,492	13.7%
2-bedroom	1,522	29.3%	2,547	44.5%	4,069	37.3%
3-bedroom	2,668	51.4%	1,177	20.6%	3,845	35.2%
4-bedroom	766	14.8%	446	7.8%	1,212	11.1%
5 or more bedroom	49	0.9%	9	0.2%	58	0.5%
TOTAL	5,191	100%	5,719	100%	10,910	100%

Source: US Census, 2014-2018 ACS

# **3F. Housing Costs**

#### FOR SALE HOUSING

As shown in Figure 3-1, between 2000 and 2018, median home sales prices in Stanton increased 189% while prices in the SCAG region increased 151%. The 2018 median home sales price in Stanton was \$432,000 (lower than the current highs as described below). Prices in the City have ranged from a low of 66.8% of the SCAG region median in 2000 to a high of 86.5% in 2009.

In May 2021, there were 27 homes listed for sale on *Zillow.com* with prices ranging from \$79,900 (manufactured home) to \$949,000 (single-family detached). Four multifamily properties were also listed. Of these homes, there were four detached single-family homes with sales prices

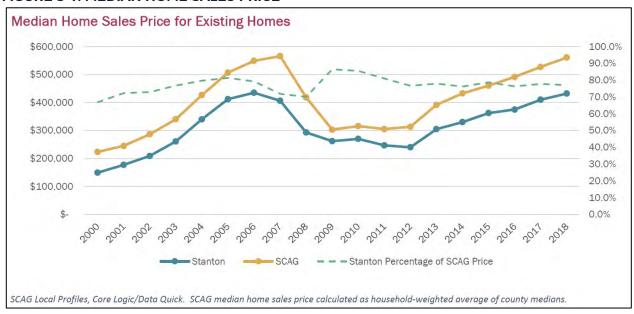
TABLE 3-21: HOMES FOR SALE (MAY 2021)

Price	Homes	% of Homes for Sale
\$700,000 and more	8*	29.6%
\$600,000 - \$699,999	0	0%
\$500,000 - \$599,999	6	22.2%
\$400,000 - \$499,999	5	18.5%
\$300,000 - \$399,999	0	0%
\$200,000 - \$299,999	0	0%
\$100,000 - \$199,999	6	22.2%
\$0 - \$99,999	2	7.4%

Source: Zillow.com, May 2021

beginning at \$719,000. As shown in Table 3-21, the majority of homes for sale are in the \$700,000+ price range (29.6%), with 22.2% of homes in the \$500,000 to \$599,999 range and another 22.2% of homes in the \$100,000 to \$199,999 range. *Zillow* identified the May 2021 median sales price as \$502,000. While the median sales price is not affordable to lower and most moderate-income households (see Table 3-25), the City's home sales prices are lower compared to Orange County (*Zillow* reported a median home sales price of \$890,000 for the county in May 2021), which could result in demand for the City's higher priced housing units since they may offer more amenities and are more affordable than comparable homes in the county.

FIGURE 3-1: MEDIAN HOME SALES PRICE



Source: SCAG 6th Cycle Data Package

<sup>\*</sup> Includes four multifamily properties.

#### **RENTAL HOUSING**

Table 3-22 summarizes rents paid in Stanton in 2018 by rental range. The range with the highest percentage of units rented was between \$1,000 and \$1,499 at 45.1% (2,534 units). Only 10.9% of rentals were under \$1,000 per month. Less than half (43.9%) of all rentals were over \$1,500 per month.

Based on a review of rental ads on Zillow.com and Apartments.com, the average rent in Stanton is \$1,870 per month. There were 19 rentals available in May 2021. Rents ranged from \$1,675 to \$2,375 for 2 bed/2 bath homes to \$2,900 for a four-bedroom home.

TABLE 3-22: RENTAL COSTS (2018)

Rent Range	Number	% of Units Paying Rent
Less than \$500	334	5.9%
\$500 to \$999	283	5.0%
\$1,000 to \$1,499	2,534	45.1%
\$1,500 to \$1,999	1,681	29.9%
\$2,000 to \$2,499	578	10.3%
\$2,500 to \$2,999	116	2.1%
\$3,000 or more	91	1.6%
Median (dollars)	\$ 1	,441

Source: US Census, 2014-2018 ACS

**TABLE 3-23: RENTAL RATES BY NUMBER OF BEDROOMS** 

	Rental Survey						
Bedroom Type	Units Available	Range	Average Rent				
Studio	1	\$1,201	\$1,201				
1 bed	7	\$1,375 - \$1,800	\$1,570				
2 bed	8	\$1,675 - \$2,375	\$1,997				
3 bed	2	\$1,998 - \$2,300	\$2,149				
4 bed or more	1	\$2,900	\$2,900				

Sources: Zillow.com and Apartments.com, May 2021

#### **INCOME GROUPS**

The California Department of Housing and Community Development (HCD) publishes household income data annually for areas in California. Table 3-24 shows the maximum annual income level for each income group adjusted for household size for Orange County. The maximum annual income data is then utilized to calculate the maximum affordable housing payments for different households (varying by income level) and their eligibility for housing assistance programs.

- Extremely Low-Income Households have a combined income at or lower than 30% of area median income (AMI), as established by the Department of Housing and Community Development (HCD).
- Very Low-Income Households have a combined income between 30 and 50% of AMI, as established by HCD.

- Low-Income Households have a combined income between 50 and 80% of AMI, as established by HCD.
- Moderate-Income Households have a combined income between 80 and 120% of AMI, as established by HCD.
- Above Moderate-Income Households have a combined income greater than 120% of AMI, as established by HCD.

**TABLE 3-24: STATE INCOME LIMITS - ORANGE COUNTY (2020)** 

Income Group	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low	\$26,950	\$30,800	\$34,650	\$38,450	\$41,550	\$44,650	\$47,700	\$50,800
Very Low	\$44,850	\$51,250	\$57,650	\$64,050	\$69,200	\$74,300	\$79,450	\$84,550
Low	\$71,750	\$82,000	\$92,250	\$102,450	\$110,650	\$118,850	\$127,050	\$135,250
Moderate	\$86,500	\$98,900	\$111,250	\$123,600	\$133,500	\$143,400	\$153,250	\$163,150
Above Moderate	\$86,500+	\$98,900+	\$111,250+	\$123,600+	\$133,500+	\$143,400+	\$153,250+	\$163,150+

Source: HCD 2020 Orange County Income Limits

#### HOUSING AFFORDABILITY

Table 3-25 shows the estimated maximum rents and sales prices, respectively, that are affordable to very low, low, moderate, and above moderate-income households. Affordability is based on a household spending 30% or less of their total household income for shelter. Affordability is based on the maximum household income levels established by HCD (Table 3-24). The annual income limits established by HCD are similar to those used by the U.S. Department of Housing and Urban Development (HUD) for administering various affordable housing programs. Maximum affordable sales price is based generally on the following assumptions: 4% interest rate, 30-year fixed loan, and down payments that vary with income level, as described in Table 3-25.

Comparing the maximum affordable housing costs in Table 3-25 to the rental rates in Tables 3-22 and 3-23, rental rates in Stanton are generally affordable to moderate-income households and to above moderate-income households. While there are some units affordable to low-income households, there are no appropriately sized units affordable to extremely low and very lowincome households. The majority of available rentals were 1 and 2-bedroom units. Moderate and above moderate-income households can afford a broad range of available housing.

Although there are homes for sale in Stanton available to all income groups based on a comparison of Tables 3-21 and 3-25, the majority of homes (i.e. in the \$500,000+ range) are affordable to only moderate and above moderate-income households.

TABLE 3-25: HOUSING AFFORDABILITY BY INCOME GROUP

	One P	erson	Two P	erson	Four F	erson	Six Po	erson
Income Group	Home Sale Price*	Monthly Rent or Housing Cost						
Extremely Low	\$95,732	\$674	\$110,336	\$770	\$139,354	\$961	\$162,871	\$1,116
Very Low	\$172,037	\$1,121	\$191,528	\$1,281	\$240,080	\$1,601	\$278,960	\$1,858
Low	\$272,909	\$1,794	\$311,789	\$2,050	\$389,359	\$2,561	\$451,567	\$2,971
Moderate	\$345,719	\$2,163	\$394,100	\$2,473	\$476,828	\$3,090	\$551,932	\$3,585
Above Moderate	\$345,719+	\$2,163+	\$394,100+	\$2,473+	\$476,828+	\$3,090+	\$551,932+	\$3,585+

<sup>\*</sup>Maximum affordable sales price is based on the following assumptions: 4.0% interest rate, 30-year fixed loan; down payment: \$5,000

Sources: HCD 2020 Orange County Income Limits; De Novo Planning Group, 2021

## Extremely Low-income Households

As previously described, extremely low-income households earn less than 30% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$674 and \$1,116 per month and homes priced at \$95,732 to \$162,871. As of May 2021, there were no rental homes listed on *Zillow.com* or *Apartments.com* that would be affordable to extremely low-income households. However, based on US Census data, approximately 11% of renters pay monthly rents affordable to extremely low-income households. Extremely low-income households are able to afford to purchase a manufactured home in Stanton; however, real estate listings for these homes indicate that homes affordable at this price point are in very limited supply.

### Very Low-income Households

Very low-income households earn between 31% and 50% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$1,121 to \$1,858 per month and homes priced at \$172,037 to \$278,960. As of May 2021, there were some studio, one-bedroom, and two-bedroom rental homes listed on *Zillow.com* or *Apartments.com* that could be affordable to very low-income households. Furthermore, based on US Census data, approximately one-third of renters pay monthly rents affordable to very low-income households (inclusive of units also affordable to extremely low-income). Very low-income households may be able afford to purchase a manufactured home in Stanton; however, real estate listings for these homes indicate that homes affordable at this price point are in very limited supply.

#### Low-income Households

Low-income households earn between 51% and 80% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$1,794 to \$2,971 per month and homes priced at \$272,909 to \$451,567. As of May 2021, all studio through four-bedroom+ options listed on *Zillow.com* or *Apartments.com* would be affordable to low-income households. Based on US Census data, approximately 98% of renters pay monthly rents affordable to low-income households. Low-income households can afford better-maintained manufactured homes and multifamily homes, excluding new construction.

<sup>-</sup> extremely low, \$10,000 - very low; \$15,000 - low, \$25,000 - moderate; property tax, utilities, and homeowners insurance as 30% of monthly housing cost.

#### Moderate-income Households

Moderate-income households earn between 80% and 120% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$2,163 and \$3,585 per month and homes priced at \$345,719 to \$551,932. As of May 2021, all studio through four-bedroom+ options were affordable to moderate-income households; these units included multifamily homes as well as single-family homes listed for rent by the homeowner. Moderateincome households can also afford a broader array of homes listed for sale as of May 2021. These unit types include manufactured homes, multifamily homes, and some single-family homes, excluding new construction.

#### **OVERPAYMENT**

As in most communities, the location of the home is one of the biggest factors with regard to price. Compared to the county, housing in Stanton is relatively more affordable (\$890,000 versus \$502,000 according to Zillow median sales prices in May 2021). However, housing is not affordable for all income levels, particularly the extremely low, very low, and low-income households.

As shown in Table 3-26, 60.9% of renters in Stanton and 35.0% of homeowners overpay for housing. The majority of renters that overpay are in the lower income groups, with 73.5% in the extremely low-income group and 19.2% in the very low-income group severely overpaying for housing (over 50% of their monthly income). Comparatively, 61.8% of extremely low-income owners and 32.0% of very low-income owners are severely overpaying. Therefore, while overpayment is more predominate among lower income renter households, overpayment is an issue for both renter and owner households. Close to half (48.5%) of all households in Stanton overpay for housing.

TABLE 3-26: HOUSEHOLDS BY INCOME LEVEL AND OVERPAYMENT (2017)

Household Overpayment	Renters	Owners	Total	% of Income Category
Extremely Low-Income Households	2,055	665	2,720	100%
With Cost Burden >30%	1,730 / 84.2%	505 / 77.1%	2,235	82.2%
With Cost Burden >50%	1,510 / 73.5%	405 / 61.8%	1,915	70.4%
Very Low-Income Households	1,585	905	2,490	100%
With Cost Burden >30%	1,340 / 84.5%	550 / 60.8%	1,890	75.9%
With Cost Burden >50%	305 / 19.2%	290 / 32.0%	595	23.9%
Low-Income Households	905	1,210	2,115	100%
With Cost Burden >30%	350 / 38.7%	495 / 40.9%	845	40.0%
With Cost Burden >50%	25 / 2.8%	95 / 7.9%	120	5.7%
Total Extremely Low, Very Low, and Low-Income Households Paying >30%	3,420 / 75%	1,550 / 56%	4,970	68% of lower income households
Moderate and Above Moderate- Income Households	1,165	2,430	3,595	100%
With Cost Burden >30%	60 / 5.2%	274 / 11.3%	334	9.3%
With Cost Burden >50%	10 / 0.9%	19 / 0.8%	29	0.8%
Total Households	5,715	5,210	10,925	100%
With Cost Burden >30%	3,480 / 60.9%	1,824 / 35.0%	5,304	48.5%
With Cost Burden >50%	1,850 / 32.4%	809 / 15.5%	2,659	24.3%

Note: Data is rounded to the nearest 5.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017

#### AFFORDABLE HOUSING INVENTORY

The City uses various funding sources to preserve and increase the supply of affordable housing through new construction and the acquisition and/or rehabilitation of renter-occupied units. Affordability covenants in Stanton include developments that hold federal subsidy contracts, received tax credits or mortgage revenue bonds, and/or were financed by redevelopment funds or non-profit developers.

Table 3-27 shows assisted units with covenants that require rents to be maintained at affordable levels for various agreed upon periods of time. In 2021, Stanton had 743 total deed-restricted affordable units. A recorded deed restriction serves as an affordability covenant that restricts the income level of a person who occupies the property and ensures the property will remain available for low to moderate-income persons through the foreseeable future.

TABLE 3-27: DEED RESTRICTED AFFORDABLE HOUSING UNITS

Project Name/Address	No. & Type of Affordable Units	Duration of Affordability
Park Stanton Senior Apartments	335 total units; 335 affordable units	30 years
7622 Katella Avenue	Seniors	(2024)
Plaza Court	103 total units; 102 affordable units	30 years
11380 Court Street	Family	(2027)
Continental Gardens Apartments	297 total units; 297 affordable units	30 years
8101 Cerritos Avenue	Family	(2026)
Stanton Accessible Apartments	10 total units; 9 affordable units	20 years / 38 years
10572 Knott Avenue	Disabled	(2027 / 2045)

Sources: California Housing Partnership, 2021; SCAG 6th Cycle Data Package

#### **MOBILE HOMES**

Mobile homes offer a more affordable option for those interested in homeownership. The median value of a mobile home in Orange County in 2018 was \$59,000 (2018 ACS 5-Year Estimates Data Profile). Overall, 1,438 mobile homes are located in Stanton (DOF, Table 2: E-5, 1/1/2019). As shown by Table 3-28, there are nine mobile home parks in the City with a total of 1,301 permitted spaces. The mobile home parks are located throughout the City, but are concentrated in the south part of Stanton.

In addition to the cost of a mobile home, owners must either purchase a residential site or rent a mobile home space. And although they present a more affordable alternative, mobile home rents have risen steadily in Orange County and throughout southern California since 2009.<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> Jeff Collins, "Soaring rents jolt senior tenants at mobile home park," *OC Registrar* (July 20, 2018).

**TABLE 3-28: MOBILE HOME PARKS IN STANTON** 

Park Name/Address	Operator		MH Spaces
Villa Capri MH Estates (30-0114-Mp) 8111 Stanford Ave	Teemly, LLC		176
Garden Terrace Estates (30-0133-Mp) 7887 Lampson Ave	Garden Terrace MHC LLC		103
Magic Lamp MHP (30-0185-Mp) 7700 Lampson Ave	Busch Carr & McAdoo C/O Bessire & Casenhiser		132
Katella MH Estates (30-0186-Mp) 8681 Katella Ave	MJM Properties Inc		279
La Lampara MHP (30-0217-Mp) 7271 Katella Ave	Busch Carr & McAdoo C/O Bessire & Casenhiser		102
Beach West Mobile Home Estates (30-0228-Mp) 8051 Acacia Ave	Mitchell, D		90
Plaza Pines Estates (30-0251-Mp) 11250 Beach Blvd	Ronnenberg Inc.		144
Fernwood Mobile Home Park (30-0253-Mp) 10550 Western Ave	Fernwood One LLC		165
Parque Pacifico MHP (30-0449-Mp) 12101 Dale St	Busch Carr & McAdoo C/O Bessire & Casenhiser		110
		TOTAL	1,301

Source: HCD 2019 Mobile Home Park Listings

# **3G. Future Housing Needs**

A Regional Housing Needs Plan (RHNP) is mandated by the State of California (Government Code Section 65584) for regions to address housing issues and needs based on future growth projections for the area. The RHNP for Stanton is developed by the Southern California Association of Governments (SCAG), and allocates a "fair share" of regional housing needs to individual cities. The intent of the RHNP is to ensure that not only are local jurisdictions addressing the needs of their immediate areas, but also that the needs of the entire region are fairly distributed to all communities. A major goal of the RHNP is to ensure that every community provides an opportunity for a mix of affordable housing to all economic segments of its population.

As the regional planning agency, SCAG determines the City's fair share of housing through the Regional Housing Needs Allocation (RHNA) process. This Housing Element addresses SCAG's RHNA schedule for the 6<sup>th</sup> Cycle, from 2021 through 2029. The City will need to plan to accommodate 1,231 new units, which includes 82 extremely low-income units, 83 very low, 145 low, 231 moderate, and 690 above moderate-income units. Pursuant to Government Code Section 65583(a)(1), 50% of Stanton's very low-income regional housing needs assigned by SCAG are extremely low-income households, and hence the 82 ELI units. Table 3-29 summarizes Stanton's fair share, progress to date, and remaining units.

TABLE 3-29: REGIONAL HOUSING NEEDS ALLOCATION - 6TH CYCLE

Status	Extremely and Very Low-income (0-50% AMI)	Low-income (51-80% AMI)	Moderate- income (81-120% AMI)	Above Moderate- income (121%+ AMI)	Total
RHNA Allocation	165	145	231	690	1,231
Constructed, Under					
Construction, Permits	79	12	114	335	540
Issued (Since 6/30/2021)					
Units Approved/Entitled	60	0	121	232	413
Remaining Allocation	26	133	0 (-4)	123	282

Sources: SCAG 6th Cycle Final RHNA Allocation Plan, 2021; City of Stanton, 2021

# **3H. Special Needs Groups**

Government Code Section 65583(a)(7) requires a housing element to address special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The needs of these groups often call for targeted program responses, such as temporary housing, preservation of residential hotels, housing with features to make it more accessible, and the development of four-bedroom apartments. Special needs groups have been identified and, to the degree possible, responsive programs are provided. A principal emphasis in addressing the needs of these groups is to continue to seek state technical assistance grants to identify the extent and location of those with special needs and identify ways and means to assist them. Local government budget limitations may act to limit effectiveness in implementing programs for these groups. Please refer to Section 5C of this Housing Element for a discussion of agencies and programs that serve special needs populations in Stanton.

# **SENIORS**

Seniors are considered persons age 65 or older in this Housing Element. However, it must be noted that some funding programs have lower age limits for persons to be eligible for their senior housing projects. Seniors have special housing needs primarily resulting from physical disabilities and limitations, fixed or limited income, and health care costs. Additionally, senior households also have other needs to preserve their independence including supportive services to maintain their health and safety, in-home support services to perform activities of daily living, conservators to assist with personal care and financial affairs, public administration assistance to manage and resolve estate issues, and networks of care to provide a wide variety of services and daily assistance. Various portions of the Housing Element describe characteristics of the senior population, the extent of their needs for affordable housing, housing designated for seniors, and City provisions to accommodate their need. Senior household growth in Stanton from 2010 to 2018 is shown in Table 3-30. The increase in elderly persons is likely due to aging in place of Stanton's residents. Senior households increased by approximately 4.6% from 2010 to 2018. While seniors represent approximately 11.3% of the City's population, senior households represent approximately 20.3% of total households, which is primarily due to the smaller senior household size.

TABLE 3-30: SENIOR POPULATION AND HOUSEHOLDS (2010 & 2018)

Population	2010	2018
Number	3,841	4,366
Percent Change	-	13.7%
Annual Percent Change	-	1.7%
Households	2010	2018
Number	2,122	2,219
Percent Change	-	4.6%
Annual Percent Change	-	0.6%

Source: US Census, 2010; US Census, 2014-2018 ACS

Table 3-31 summarizes senior households by age and tenure. The majority of senior households are owners, 1,414 or 64%, whereas 36% of senior households (805) are renters. Stanton has a lower percentage of owner-occupied elderly households than in Orange County (13.0% vs. 18.1%), and a higher percentage of renter-occupied elderly households (7.4% vs. 5.8%). Elderly renters tend to prefer affordable units in smaller single-story structures or multi-story structures with an elevator, close to health facilities, services, transportation, and entertainment.

During the planning period, senior households are anticipated to increase at a rate commensurate with overall population and household growth. It is anticipated that approximately 20% of the City's RHNA will be needed or used by senior households. Senior housing types can include market rate homes, senior single-family housing communities, senior apartments, and mobile homes.

**TABLE 3-31: HOUSEHOLDER AGE BY TENURE (2018)** 

Ago Croup	Ov	vners	Renters		
Age Group	Number Percent		Number	Percent	
65-74 years	809	57.2%	479	59.5%	
75-84 years	453	32%	208	25.8%	
85 plus years	152	10.8%	118	14.7%	
TOTAL	1,414	100% (64% of total)	805	100% (36% of total)	

Source: US Census, 2014-2018 ACS (Table B25007)

The 2014-2018 ACS survey indicates that 7.3% (162) of senior households in Stanton are below the poverty level. It is likely that a portion of these senior households overpay for housing due to their limited income. The median income of households with a head of household that is 65 years and over is \$33,598, significantly less (40.5% less) than the median household income of \$56,506.

#### Senior Housing

There is increasing variety in the types of housing available to the senior population. This section focuses on three basic types.

**Independent Living** - Housing for healthy seniors who are self-sufficient and want the freedom and privacy of their own separate apartment or house. Many seniors remain in their original

homes, and others move to special residential communities which provide a greater level of security and social activities of a senior community.

**Group Living -** Shared living arrangements in which seniors live in close proximity to their peers and have access to activities and special services.

**Assisted Living** - Provides the greatest level of support, including meal preparation and assistance with other activities of daily living.

Stanton permits residential care facilities serving six or fewer persons by right in all residential zones, and those serving more than six persons by conditional use permit in the Medium Density Residential (RM) Zone and High Density Residential (RH) Zone. Senior housing is permitted with a conditional use permit in the High Density Residential (RH) Zone. There are two assisted living residential care facilities for the elderly in the City:

- New Horizon Senior Living, 8541 Cerritos Avenue 120-bed elderly residential care facility
- Rowntree Gardens, 12151 Dale Street Senior living community providing the complete continuum of care, including independent living, assisted living, and memory care

Additionally, a new 66-bed senior assisted living facility is under construction. It should be noted, however, that there are no assisted living facilities that serve low and very low-income seniors who cannot afford to pay the market rates for housing and services.

Several programs address the non-housing needs of seniors in Stanton. Additional support for senior residents is provided by the Parks & Recreation Department, which provides and coordinates senior services programs offered by the City and non-profits. Some of the programs and services offered by the City include nutrition/meal programs, tax counseling, legal assistance, and recreational activities. The City also partners with OCTA to provide senior transportation services throughout Stanton.

#### **DISABLED PERSONS**

A "disability" includes, but is not limited to, any physical or mental disability as defined in California Government Code Section 12926. A "mental disability" involves having any mental or psychological disorder or condition that limits a major life activity. A "physical disability" involves having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that affects body systems. In addition, a mental or physical disability limits a major life activity by making the achievement of major life activities difficult including physical, mental, and social activities and working.

Physical, mental, and/or developmental disabilities could prevent a person from working, restrict a person's mobility, or make caring for oneself difficult. Therefore, disabled persons often require special housing needs related to potential limited earning capacity, the lack of accessible and affordable housing, and higher health costs associated with disabilities. Additionally, people with disabilities require a wide range of different housing, depending on the type and severity of their disability. Housing needs can range from institutional care facilities to facilities that support partial or full independence (i.e. group care homes). Supportive services such as daily living skills and employment assistance need to be integrated in the housing situation.

Individuals with a mobility, visual, or hearing limitation may require housing that is physically accessible. Examples of accessibility in housing include widened doorways and hallways, ramps, bathroom modifications (e.g., lowered countertops, grab bars, adjustable shower heads, etc.) and special sensory devices including smoke alarms and flashing lights.

- Individuals with self-care limitations (which can include persons with mobility difficulties) may require residential environments that include in-home or on-site support services ranging from congregate to convalescent care. Support services can include medical therapy, daily living assistance, congregate dining, and related services.
- Individuals with developmental disabilities and other physical and mental conditions that prevent them from functioning independently may require assisted care or group home environments.
- Individuals with disabilities may require financial assistance to meet their housing needs because a higher percentage than the population at large are low-income and their special housing needs are often more costly than conventional housing.

According to the 2014-2018 ACS, there were 3,951 persons with one or more disabilities in Stanton. Of the disabled population, 61.5% were aged 5 to 64 and 38.1% were aged 65 and over. No disabilities were reported in the population aged 5 and under (except for a vision difficulty – 18 persons under 5 years). Table 3-32 identifies disabilities by type of disability.

**TABLE 3-32: DISABILITIES BY DISABILITY TYPE (2018)** 

Type of Disability -	Persons A	Persons Ages 5-64		Persons Ages 65+		Total	
Type of Disability	Number	Percent	Number	Percent	Number	Percent	
Hearing Difficulty	649	26.7%	507	33.7%	1,156	29.3%	
Vision Difficulty	376	15.5%	170	11.3%	564	14.3%	
Cognitive Difficulty	1,282	52.8%	552	36.7%	1,834	46.4%	
Ambulatory Difficulty	769	31.7%	1,015	67.4%	1,784	45.2%	
Self-Care Difficulty	411	16.9%	375	24.9%	786	19.9%	
Independent Living Difficulty	624	25.7%	779	51.8%	1,403	35.5%	
Total Persons with One or More Disabilities <sup>1</sup>	2,428	100% / 61.5% of disabled	1,505	100% / 38.1% of disabled	3,951	100%	

<sup>&</sup>lt;sup>1</sup>A person may have more than one disability, so the total disabilities may exceed the total persons with a disability.

Source: US Census, 2014-2018 ACS

As shown in Table 3-33, the 2014-2018 ACS indicates that for individuals between the ages of 16 and 64, approximately 1,065 persons had some form or type of disability and were not in the labor force. This indicates that their disability may impede their ability to earn an adequate income, which in turn could affect their ability to afford suitable housing accommodations to meet their special needs. Therefore, many in this group may be in need of housing assistance.

TABLE 3-33: DISABLED PERSONS BY EMPLOYMENT STATUS (2018)

	Ages 16 to 64	Percent
Employed with Disability	793	41.3%
Unemployed with Disability	64	3.3%
Not in Labor Force with Disability	1,065	55.4%
TOTAL	1,922	100%

Source: US Census, 2014-2018 ACS

While recent Census data does not provide income levels or overpayment data for persons with a disability, the 2014-2018 ACS survey does report on indicators that relate to a disabled person's or household's income. The 2014-2018 ACS data indicates that 861 persons with a disability are

below the poverty level. It is likely that a portion of these disabled persons are in households that overpay for housing due to their limited income. The 2014-2018 ACS data indicates that 26.6% of households receiving food stamps or similar assistance have a disabled member. Of the 2,903 households with a disabled member, 541 households receive food stamps or similar assistance. The 2014-2018 ACS data indicates that the median earnings for males 16 years and over with a disability were \$30,718 compared with \$31,329 for males with no disability. Median earnings for females 16 years and over with a disability were \$11,983 compared to \$23,610 for females with no disability.

The persons in the "with a disability" category in Tables 3-32 and 3-33 include persons with developmental disabilities. "Developmental disability" means "a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual." This term includes an intellectual disability, cerebral palsy, epilepsy, autism, and disabling conditions found to be closely related to intellectual disabilities or to require treatment similar to that required for individuals with an intellectual disability, but does not include other handicapping conditions that are solely physical in nature.

While the U.S. Census reports on a broad range of disabilities, the Census does not identify the subpopulation that has a developmental disability. The California Department of Developmental Services (DDS) maintains data regarding people with developmental disabilities, defined as those with severe, life-long disabilities attributable to mental and/or physical impairments. The DDS data is reported by zip code, so the data reflects a larger area than the City of Stanton; however, the data was joined at the jurisdiction level by SCAG to approximate the counts for Stanton. The DDS/SCAG data indicates that 265 developmentally disabled persons reside in zip codes 90680. 92804, and 92841. Table 3-34 breaks down the developmentally disabled population by residence type. Of these persons, the majority (224) live at home with a parent or guardian and only 15 live independently.

TABLE 3-34: DEVELOPMENTALLY DISABLED PERSONS BY RESIDENCE TYPE (2018)

	Home of Parent/ Guardian	Independent/ Supported Living	Community Care Facility	Intermediate Care Facility	Foster/ Family Home	Other	TOTAL
Stanton*	224	15	16	5	5	0	265

<sup>\*</sup>Data is for the Stanton portion of zip codes 90680, 92804, and 92841

Sources: CA DDS, 2019; SCAG 6th Cycle Data Package

# Housing for Disabled Persons

Households with a disabled member will require a mixture of housing units with accessibility features, in-home care, or group care housing facilities. Some of these households will have a member with a developmental disability and are expected to have special housing needs. Developmentally disabled persons may live with a family in a typical single-family or multifamily home, but some developmentally disabled persons with more severe disabilities may have special housing needs that may include extended family homes, group homes, small and large residential care facilities, intermediate care, and skilled nursing facilities and affordable housing such as extremely low/very low/low-income housing (both rental and ownership), Section 8/Housing Choice Vouchers, and single room occupancy-type units.

In Stanton, there is one residential facility serving adults with special needs, including physical, mental, and developmental disabilities:

Casa de Esperanza, 10572 Knott Avenue - ten 1-2 bedroom accessible apartments

Furthermore, there are a number of resources available throughout the County to serve the disabled residents of Stanton. Table 3-35 identifies some of the organizations in or near Stanton that specialize in providing services for the disabled and developmentally disabled population.

TABLE 3-35: FACILITIES AND SERVICES FOR DISABLED PERSONS

Organization Name	Type of Service Provided	Disabled Population Served
The Arc Los Angeles and Orange Counties	Educational, vocational, and life skills training	Developmentally disabled adults
Blind Children's Learning Center – Santa Ana	Braille instruction, occupational and communication therapies, and vision services	Children from birth to 12th grade
Dayle McIntosh Center – Anaheim	Skills training, adaptive life skills, referrals, etc.	Disabled persons
Goodwill Industries of Orange County	Vocational evaluation, training, and employment opportunities	Adults with physical, psychiatric, and developmental disabilities
John Henry Foundation – Santa Ana	Medically supervised residential facility	Mentally disabled persons
Mental Health Association of Orange County	Medication support, case management, vocational rehabilitation, etc.	Mentally disabled persons
Regional Center of Orange County	Educational and vocational skills training	Developmentally disabled adults
Providence Speech and Hearing Center – Fountain Valley	Complete diagnostic and treatment services	Children and adults with speech and hearing impairments
United Cerebral Palsy Association of Orange County	Support group, life skills training	Persons with cerebral palsy and similar disabilities
VNA Health Care	Home-based nursing, rehabilitation, etc.	III, injured, or physically disabled persons

The 2014-2018 ACS data indicates that for individuals between the ages of 5 and 64, approximately 4.6% of the total population of Stanton have an ambulatory difficulty, 1.5% have a vision difficulty, 3.0% have a hearing difficulty, and 3.6% have an independent living difficulty. These types of disabilities may impede their ability to find suitable housing accommodations to meet their special needs. Therefore, many in these groups may be in need of housing assistance. Households containing physically handicapped persons may also need housing with universal design measures or special features to allow better physical mobility for occupants.

The 2014-18 ACS data also indicates that 2,903 households (26.6%) in Stanton had one or more disabled persons, including developmentally disabled persons. It is anticipated that this rate will remain the same during the planning period. Housing needed for persons with a disability during the planning period is anticipated to include community care facilities or at-home supportive services for persons with an independent living difficulty or self-care difficulty (approximately 5.7% of the population), as well as housing that is equipped to serve persons with ambulatory and sensory disabilities. Approximately 26% of the RHNA, 327 units, may be needed to have universal design measures or be accessible to persons with a disability.

# LARGE FAMILY HOUSEHOLDS

Large family households are defined as households of five or more persons. Large family households are considered a special needs group because there is often a limited supply of

adequately sized housing to accommodate their needs. The more persons in a household, the more rooms are needed to accommodate that household. Specifically, a five-person household would require three or four bedrooms, a six-person household would require four bedrooms, and a seven-person household would require four to six bedrooms.

In Stanton, 2,530 households, 23.2% of all households, have five or more persons as described in Table 3-19. Of the large households, 38.6% own their home and 61.4% rent. Typically, there are more owner-occupied large households that are cost burdened when compared to renter households and the population as a whole. However, the 2014-2018 ACS survey does not provide data regarding overpayment for large households. Table 3-36 compares the median income for households with five or more persons to the citywide median income for 2018. For five- and six-person households, the median household income was higher versus the citywide median of \$56,506, but was lower for seven or more person households.

TABLE 3-36: MEDIAN INCOME BY HOUSEHOLD SIZE (2018)

Size	Median Income
5-Person Households	\$63,893
6-Person Households	\$67,679
7 or More Person Households	\$55,417
Median Household Income (All Households)	\$56,506

Source: US Census, 2014-2018 ACS

Large families can have a difficult time finding housing units large enough to meet their needs. In Stanton, there appears to be a sufficient amount of ownership housing available to provide units with enough bedrooms for larger households, but there is a shortage of adequately sized units for renter households with six or more persons. Table 3-37 identifies the number of large households by household size versus the number of large owner and rental units. Furthermore, while there may be adequate units in Stanton to accommodate large owner and five-person renter households, it does not mean that there is a match between housing units that exist and large families. As described in Table 3-18, 9.5% of owner-occupied homes and 23.3% of renter-occupied homes are overcrowded.

TABLE 3-37: HOUSEHOLD SIZE VERSUS BEDROOM SIZE BY TENURE (2018)

Tonuro	3 BR	5-Person I	Households	4+ BR		and Larger seholds
Tenure Units	Units	House- holds	Shortfall/ Excess	Units	House- holds	Shortfall/ Excess
Owner	2,668	492	2,176	815	485	330
Renter	1,177	765	412	455	788	(333)

Source: US Census, 2014-2018 ACS

Large households require housing units with more bedrooms than housing units needed by smaller households. In general, housing for these households should provide safe outdoor play areas for children and should be located to provide convenient access to schools and child care facilities. These types of needs can pose problems particularly for large families that cannot afford to buy or rent single-family houses. It is anticipated that approximately 24% of the regional housing needs allocation units will be needed to accommodate large households and an emphasis should be placed on ensuring rental units are available to large households.

#### SINGLE PARENT AND FEMALE-HEADED HOUSEHOLDS

Single parent households are households with children under the age of 18 at home and include both male- and female-headed households. These households generally have a higher ratio between their income and their living expenses (that is, living expenses take up a larger share of income than is generally the case in two-parent households). Therefore, finding affordable, decent, and safe housing is often more difficult for single parent and female-headed households. Additionally, single parent and female-headed households have special needs involving access to daycare or childcare, health care, and other supportive services.

While the majority of households in Stanton are either two-spouse couples or single person households, 34.6% of family households are headed by a single male or single female. There are 868 male heads of household with no wife present and 297 of these households have children under 18. There is a larger number of female householders with no husband present – 2,038 households or 24.3% of family households – and 936 of these female-headed households have children under 18. Table 3-38 identifies single parent households by gender of the householder and presence of children.

The median income of female-headed households (no spouse present) is \$39,702, 17.9% less than the median income of a male-headed, no spouse present family (\$48,333) and 29.7% less than the median income of all households in the City (\$56,506). Approximately 11.1% of all households are under the poverty level; 34.9% of female-headed households with related children under 18 are under the poverty level.

TABLE 3-38: FAMILIES AND FEMALE HOUSEHOLDER WITH CHILDREN UNDER 18 (2018)

Category	Number	Percent
Total Families	8,389	100%
Male householder, no spouse present	868	10.3%
With children under 18	297	3.5%
Female householder, no spouse present	2,038	24.3%
With children under 18	936	11.2%

Source: US Census, 2014-2018 ACS

As Stanton's population and households grow, there will be a continued need for supportive services for single parent households with children present. To address both the housing and supportive services needs of single parent households, additional multifamily housing should be developed that includes childcare facilities (allowing single parents to actively seek employment).

In addition, the creation of innovative housing for female-headed households could include co-housing developments where childcare and meal preparation responsibilities can be shared. The economies of scale available in this type of housing would be advantageous to this special needs group as well as all other low-income household groups. Limited equity cooperatives sponsored by non-profit housing developers are another financing structure that could be considered for the benefit of all special needs groups.

# **FARMWORKERS**

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Following changes in the area's economy, Orange County today is a mostly developed urban/suburban region with a strong local economy that is not tied to an agricultural base. While there are still active farming areas on the Irvine Ranch and

in some other cities, shifts in the county's economy to manufacturing, technology, and service-oriented sectors have significantly curtailed agricultural production.

The 2014-2018 ACS data estimates that only 127 (less than 1.0% of the working population) of Stanton's residents were employed in agriculture (or related industries – forestry, fishing and hunting, mining) in 2018. Given the limited active agriculture operations in and around the City, the number of residents employed in agriculture as opposed to those employed in forestry, fishing and hunting, or mining is likely to be smaller than 127. In addition, it is possible (although statistics are not available) that a number of active farmworkers are not full-time residents of Stanton, and migrate into the area depending on seasonal crop harvest. The United States Department of Agriculture (USDA) estimates that there were just 340 migrant farmworkers in Orange County in 2017. USDA estimates that 666 farmworkers worked seasonally (hired for a period of less than 150 days) in Orange County in 2017, while 1,106 farmworkers in Orange County were permanent (hired for a period of greater than or equal to 150 days). Such farmworkers may find temporary housing in Stanton by living with relatives, or short-term rental of a single unit for several families, resulting in overcrowded conditions.

#### **HOMELESS PERSONS**

Government Code Section 65583(a)(7) requires that the Housing Element include an analysis of the needs of homeless persons and families. Homeless persons are defined as those who lack a fixed and adequate residence. People who are homeless may be chronically homeless (perhaps due to substance abuse or mental health issues) or situationally homeless (perhaps resulting from job loss or family strife). Homeless people face critical housing challenges due to their very low incomes and lack of appropriate housing. Thus, state law requires jurisdictions to plan to help meet the needs of their homeless populations.

The law also requires that each jurisdiction address community needs and available resources for special housing opportunities known as transitional and supportive housing. These housing types provide the opportunity for families and individuals to "transition" from a homeless condition to permanent housing, often with the assistance of supportive services to assist individuals in gaining necessary life skills in support of independent living.

#### Homeless Estimates

Counting the homeless population is problematic due to their transient nature; however, through the efforts of the Orange County Continuum of Care (CoC) estimates have been developed. The Orange County CoC is a consortium of individuals and organizations with the common purpose of developing and implementing a strategy to address homelessness in Orange County. The Orange County CoC is responsible for managing U.S. Department of Housing and Urban Development (HUD) funds for homelessness, and is uniquely positioned to identify system needs and take steps to address them with the collaboration and partnership of community stakeholders.

As the primary coordinating body for homeless issues and assistance for the entire county, the Orange County CoC accomplishes a host of activities and programs vital to the county, including a biennial point-in-time "snapshot" survey to identify and assess the needs of both the sheltered and unsheltered homeless. Orange County's 2019 Sheltered Point-In-Time Count took place the night of Tuesday, January 22, 2019. Emergency shelters and transitional housing programs collected client-level demographic information from individuals and families staying the night in each program. The 2019 Unsheltered Count process took place over two days, Wednesday, January 23 and Thursday, January 24, to ensure the 800 square mile county jurisdiction was canvassed effectively.

The 2019 Point-In-Time Report identified 116 people in the City of Stanton experiencing homelessness, representing 1.7% of Orange County's total homeless count (6,860 individuals). An estimated 71 (61.2%) of the 116 homeless individuals in Stanton were unsheltered and an estimated 45 (38.8%) were sheltered.

# Housing Accommodations

In 2013, the City amended the Zoning Code to allow 1) emergency shelters by right in the Industrial General (IG) zone, subject to compliance with objective standards consistent with the requirements identified in Government Code Section 65583(a)(4), and 2) transitional and supportive housing by right in all residential zoning districts and subject only to the same requirements for residential uses of the same type (e.g., single-family or multifamily) in the same zone. The Housing Plan includes policies and programs directed to encourage the provision of housing and services for the homeless population as well as persons and households at risk of homelessness.

There are currently no emergency shelters operating in the City. Instead, Stanton supports a regional effort among the various local agencies making up the North Service Planning Area of Orange County, which includes 13 cities (Stanton, Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Villa Park, and Yorba Linda).

The most recent inventory of resources available within Orange County for emergency shelters, transitional housing, and permanent supportive housing units comes from the 2019 Housing Inventory reported to HUD by the Orange County CoC. Table 3-39 shows the total beds offered by homeless facilities in the Orange County CoC area.

TABLE 3-39: HOMELESS FACILITIES (2019)\*

		Orange County CoC Region					
Facility Type		Family Units	Family Beds	Adult-Only Beds	Total Year- Round Beds		
Emergency Shelter		170	574	1,401	1,989		
Transitional Housing		272	816	289	1,105		
Permanent Supportive Housing		213	518	1,725	2,243		
Rapid Re-Housing		149	615	159	774		
Other Permanent Housing		8	16	92	108		
	TOTAL	812	2,539	3,666	6,219		

\*Numbers are for the total Orange County Continuum of Care region for which Stanton is a participating member Source: HUD 2019 Continuum of Care Homeless Assistance Programs, Housing Inventory Count Report

- Emergency Shelters An emergency shelter is intended to be a first stop to exit homeless from the street. Emergency shelter models have changed dramatically in recent years, moving from a very utilitarian, limited service environment, to a highly managed intake process with immediate case management and support services to stabilize individuals and families experiencing homelessness. Ideally, stays are under six months with the intent to move the individual or family into transitional housing. No individual or household may be denied emergency shelter because of an inability to pay. Shelters serving the North Service Planning Area include the Buena Park Navigation Center and the Placentia Navigation Center.
- Transitional Housing Sometimes referred to as "bridge" housing, provides housing accommodations and support services for persons and families, but restricts occupancy to no more than 24 months. In the Orange County CoC region, a total of 1,105 transitional

housing beds are provided. The 2019 point-in-time survey found that the average occupancy for transitional housing beds was 78.2% at the time of the survey.

- Permanent Supportive Housing Supportive housing has no limit on length of stay and is linked to onsite or offsite services that assist residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. A total of 2,243 permanent housing beds are provided in the Orange County CoC region. As part of the Project Homekey program in Stanton, the Stanton Inn and Suites and the Tahiti Motel are serving as temporary housing and will be converted to permanent supportive housing during the 2021-2029 planning period.
- Rapid Re-Housing Rapid re-housing provides short-term rental assistance and services. The goals are to help people obtain housing quickly, increase self-sufficiency, and stay housed.
- Other Permanent Housing Consists of permanent housing with services (no disability required for entry) and permanent housing with housing only.

A network of local and regional service providers operates a number of programs to serve the needs of varied homeless subpopulations. Table 3-40 provides a list of emergency and transitional shelters and available services for the homeless population in and around Stanton.

TABLE 3-40: FACILITIES AND SERVICES FOR THE HOMELESS

Organization Name	Type of Service Provided	Homeless Population Served	Number of Beds
American Family Housing – multiple locations	Permanent supportive housing	All	n/a
APAIT Health Center – Garden Grove	Emergency shelter, transitional housing	Individuals living with HIV/AIDS	n/a
Buena Park Navigation Center (Mercy House) – Buena Park	Emergency shelter, transitional housing	All	150
Colette's Children's Home – Huntington Beach	Emergency shelter, transitional housing	Women and children	n/a
Family Promise of Orange County – Anaheim	Emergency shelter, transitional housing	Families with children	n/a
Hannah's House (Casa Teresa) – Orange	Transitional housing, case management	Pregnant women	n/a
Hope Family Housing (Orange County Rescue Mission) – Tustin	Emergency shelter, transitional housing	Families	n/a
House of Hope (Orange County Rescue Mission) – Orange County	Transitional and supportive housing	Women/women with children	45
Huntington Beach Navigation Center (Mercy House) – Huntington Beach	Emergency shelter, transitional housing	Adults, couples without children	174
Illumination Foundation – Stanton	Case management	All	n/a
Mary's Path – Central Orange County	Transitional housing	Young mothers	n/a
Pathways of Hope – Orange County	Emergency shelter, case management	Families with children	n/a
Placentia Navigation Center (PATH) – Placentia	Emergency shelter, case management	All	100
Salvation Army Anaheim Emergency Shelter	Emergency shelter	All	224
Salvation Army Hospitality House – Santa Ana	Emergency shelter	All	75
The Sheepfold – Central Orange County	Domestic violence shelter, transitional housing	Women with children	n/a
Thomas House Family Shelter – Garden Grove	Transitional housing	Families with children	n/a
WISEPlace - Santa Ana	Transitional housing, case management	Women without children	52

# Assessment of Need

Based on the available information, there is a countywide homeless population of 6,860 persons but only 6,219 beds, indicating an unmet demand for 641 homeless persons. It is noted that the 2019 point-in-time survey identified 2,899 sheltered homeless persons and 3,961 unsheltered homeless persons (45 sheltered and 71 unsheltered for Stanton, respectively). The discrepancy between sheltered homeless persons and the county's total capacity to house homeless persons indicates a need for additional community services resources to assist and match the homeless population with the countywide shelter and housing resources. Overall, the average bed-utilization rate for emergency shelters is 79.2% and is 78.2% for transitional housing, according to the point-in-time survey information. Although there are seasonal fluctuations in bed counts, these figures demonstrate a demand for supportive housing.

# 31. Units at Risk of Conversion

#### ASSISTED HOUSING AT RISK OF CONVERSION

California housing element law requires jurisdictions to provide an analysis of low-income, assisted multifamily housing units that are eligible to change from low-income housing uses during the next ten years (2021-2031) due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use (Government Code 65583). These units risk the termination of various subsidy groups which could convert certain multifamily housing from affordable to market rate. State law requires housing elements to assess at-risk housing in order to project any potential loss of affordable housing.

The California Housing Partnership (CHP) provides data on assisted housing units, including those in Stanton. Table 3-41 indicates the extent of subsidized multifamily rental housing in the City, the subsidy programs that are in place for each project, and the likelihood of current housing assisted projects to convert to market-rate projects that would not provide assistance to lower income residents.

**TABLE 3-41: SUMMARY OF AT-RISK SUBSIDIZED HOUSING UNITS** 

Project/Address	No. & Type of Units	Type of Subsidy	Current Owner	Earliest Date of Conversion	Risk
Park Stanton Senior Apts 7622 Katella Avenue	335 Senior (55+)	LIHTC	EMC Financial Corporation	2050	Low
Plaza Court 11380 Court Street	102 Family	LIHTC	Foundation for Affordable Housing III	2052	Low
Continental Gardens Apartments 8101 Cerritos Avenue	297 Family	LIHTC	Continental Gardens, LLC	2028	Moderate
Stanton Accessible Apts 10572 Knott Avenue	9 Disabled	HUD	Stanton Accessible Apartments	2043	Low

Sources: California Housing Partnership, February 2021; SCAG 6th Cycle Data Package

#### PRESERVATION OPTIONS

Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. The following discussion highlights ways that the City's moderate risk units could be preserved as affordable housing. All of the presented alternatives are costly and beyond the ability of the City of Stanton to manage without large amounts of subsidy from federal and/or state resources.

#### Replacement Through New Construction

The construction of new lower income housing units is a means of replacing the at-risk units should they be converted to market-rate. The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs, and type of construction. Assuming an average development cost of \$200,000 per unit for multifamily rental housing, replacement of the 297 units with a moderate risk of conversion would require approximately \$59.4M, excluding land costs, which vary depending upon location.

## Purchase of Replacement Units

One preservation option is for a non-profit organization to purchase similar units. By purchasing similar units, a non-profit organization can secure lower income restrictions and potentially enable the project to become eligible for a greater range of governmental assistance. The cost of purchasing similar units depends on a number of factors, including the market conditions at the time, occupancy rate, and physical condition of the units to be acquired.

Current market value for the at-risk units is estimated on the basis of the units' potential annual income, and operating and maintenance expenses. The estimated market value of Stanton's current stock of units with a moderate risk of conversion is \$74.3M (\$250,000 per unit). This estimate is provided for the purpose of comparison and understanding the magnitude of costs involved and does not represent the precise market value of the at-risk units or units that could be purchased to offset converted units. The actual market value at time of sale would depend on market and property conditions, lease-out/turnover rates, among other factors.

# Purchase of Affordability Covenants

Another option to preserve the affordability of at-risk projects is to provide an incentive package to the owners to maintain the projects as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, and/or supplementing the subsidy amount received to market levels.

To purchase the affordability covenant on these projects, an incentive package should include interest subsidies at or below what the property owners can obtain in the open market. To enhance the attractiveness of the incentive package, the interest subsidies may need to be combined with rent subsidies that supplement the HUD fair market rent levels.

#### Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. Similar to Housing Choice Vouchers, the City, through a variety of potential funding sources, could provide rent subsidies to very low-income households. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (FMR) for a unit minus the housing cost affordable by a very low-income household. Approximately \$117,612 in rent subsidies would be required monthly (or \$1.4M annually). Assuming a 20-year affordability period, the total subsidy is about \$28.2M.

# 3J. Estimates of Housing Need

Several factors influence the degree of demand, or "need," for housing in Stanton. The major needs categories considered in this element include:

- Housing needs resulting from the overcrowding of units.
- Housing needs that result when households pay more than they can afford for housing.
- Housing needs of "special needs groups" such as elderly, large families, female-headed households, households with a disabled person, and the homeless.

State law requires that cities quantify existing housing need in their Housing Element. Table 3-42 summarizes the findings.

**TABLE 3-42: SUMMARY OF NEEDS** 

Summary of Households/Persons with Identified Housing Need	Percent of Total Population/Households		
Households Overpaying for Housing:			
% of Renter Households Overpaying	60.9%		
% of Owner Households Overpaying	35.0%		
% of Extremely Low-income Households (0-30% AMI) Overpaying	82.2%		
% of Very Low-income Households (0-30% AMI) Overpaying	75.9%		
% of Low-income Households (0-30% AMI) Overpaying	40.0%		
Overcrowded Households:			
Overcrowded Renter Households	23.3%		
Overcrowded Owner Households	9.5%		
All Overcrowded Households	16.7%		
Special Needs Groups:			
Elderly Persons/Households	11.3% of pop. 20.3% of households		
Disabled Persons	10.3% of pop.		
Developmentally Disabled Persons	0.7% of pop.		
Large Households	23.2% of households		
Female-Headed Households	4.8% of households		
Female-Headed Households with Children	3.7% of households		
Farmworkers	0.7% of labor force		
Homeless	116 persons (2019)		
Affordable Housing Units At-Risk of Conversion to Market Rate Costs	297 units		

Sources: US Census, 2014-2018 ACS; HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017

# 4 Constraints

Constraints to housing development are defined as government measures or non-government conditions that limit the amount or timing of residential development.

Government regulations can potentially constrain the supply of housing available in a community if the regulations limit the opportunities to develop housing, impose requirements that unnecessarily increase the cost to develop housing, or make the development process so arduous as to discourage housing developers. State law requires housing elements to contain an analysis of the governmental constraints on housing maintenance, improvement, and development (Government Code Section 65583(a)(4)).

Non-governmental constraints (required to be analyzed under Government Code Section 65583(a)(5)) may include land prices, construction costs, and financing. While local governments cannot control prices or costs, identification of these constraints can be helpful to Stanton in formulating housing programs.

# **4A. Governmental Constraints**

Housing affordability is affected by factors in both the private and public sectors. Actions by the City can have an impact on the price and availability of housing in Stanton. Land use controls, site improvement requirements, building codes, fees, and other local programs intended to improve the overall quality of housing may serve as a constraint to housing development. These governmental constraints can limit the operations of the public, private, and nonprofit sectors, making it difficult to meet the demand for affordable housing and limiting supply in a region. All City zoning regulations, development standards, specific plans, and fees are posted on the City's website and available to the public, consistent with the requirements of AB 1483.

# **4A.1 Land Use Controls**

Local land use policies and regulations impact the price and availability of housing, including affordable housing. This section discusses the General Plan land use designations and provisions in the Zoning Code that specify the types of housing allowed within Stanton as a potential governmental constraint.

#### **GENERAL PLAN**

The General Plan Community Development Element sets forth land use designations that guide the location, type, and intensity or density of permitted uses of land in the City of Stanton. The Zoning Code (Title 20 of the Municipal Code) implements the General Plan by providing specific direction and development standards for each general land use category and zoning district. Table 4-1 shows residential land uses, the corresponding zoning designation, and permitted densities allowed for housing.

**TABLE 4-1: GENERAL PLAN RESIDENTIAL LAND USE DESIGNATIONS** 

General Plan Designation	Description	Zone Symbol	Zoning Description
Low Density Residential	Intended for single-family residential development with detached units each on their own parcel. This designation allows a maximum density of 1.0–6.0 du/ac.	RE, RL	Residential Estates (1.0-2.0 du/ac); Single-Family Residential (2.1-6.0 du/ac)
Medium Density Residential	Single-family and multifamily residential neighborhoods, including attached or detached single-family homes, cluster housing, duplexes, triplexes, fourplexes, townhomes, condominiums, apartments, and mobile homes. This designation allows a maximum density of 6.1–11.0 du/ac.	RM	Medium Density Residential (6.1-11.0 du/ac)
High Density Residential	Intended for the development of multifamily residential neighborhoods that provide a variety of housing types, primarily along major transportation corridors. This designation allows a maximum density of 11.1–18.0 du/ac.	RH, PD	High Density Residential (11.1-18.0 du/ac); Planned Development (11.1-18.0 du/ac)
General Mixed-Use	The General Mixed-Use designation is generally located along Beach Boulevard and along the southeast portion of Katella Avenue. The district allows vertical and horizontal mixed-use up to three stories in height and an allowable density of 45 du/ac.	GLMX	General Mixed-Use Overlay (25.0-45.0 du/ac)
North Gateway Mixed-Use District	The North Gateway Mixed-Use District focuses on commercial and office uses, servicing northern Stanton and Anaheim areas. The district allows vertical and horizontal mixed-use up to three stories in height and an allowable density of 45 du/ac. Commercial uses are encouraged on the ground floor along Beach Boulevard with office and/or residential components on upper floors.	NGMX	North Gateway Mixed-Use Overlay (25.0-45.0 du/ac)
South Gateway Mixed-Use District	The South Gateway Mixed-Use District is the main entryway into the City of Stanton from the Garden Grove Freeway (22 Fwy) and communities to the south. Commercial, office, and residential uses are allowed up to five stories in height and a density of 60 du/ac. Uses may be vertically or horizontally integrated, with an emphasis on freeway-oriented commercial and office uses. Residential uses are encouraged to support commercial uses and to serve as a transition to adjacent single-family and multifamily residential development.	SGMX	South Gateway Mixed-Use Overlay (60.0-90.0 du/acre)
Town Center Mixed-Use District	The Town Center Mixed-Use District focuses on community-serving uses in a transit supportive environment, with emphasis on a balance of commercial, office, and residential uses. Located close to the civic center and potential transit routes, the Town Center Mixed-Use District is intended to be a pedestrian-friendly district with strong linkages between different uses and easy access to future transit. Commercial, office, and residential uses up to five stories in height and an allowable density of 60 du/ac. Retail uses are encouraged along the street frontage with office or residential on the rear of properties or upper floors of buildings.	n/a	*The City is currently in the process of preparing a specific plan for the Town Center area.

Source: City of Stanton General Plan, 2008

#### SPECIFIC PLANS

A specific plan is a comprehensive planning document that guides the development of a defined geographic area in a mix of uses including residential, commercial, industrial, schools, and parks and open space. Specific plans typically include more detailed information than the General Plan about land use, traffic circulation, development standards, affordable housing programs, resource management strategies, and a comprehensive infrastructure plan. Specific plans are also used as a means of achieving superior design by providing flexibility in development standards beyond those contained in the Zoning Code.

The City Council has adopted the Stanton Plaza Specific Plan and the City is currently preparing the Town Center Specific Plan. Each contains or will contain detailed regulations, conditions, programs, and design criteria unique to a defined geographic area within Stanton and is intended to implement the General Plan. The adopted specific plans are or will be consistent with the General Plan. Future specific plans, specific plan amendments, and development projects must be consistent with policies contained in the General Plan, including the General Plan Community Development Element.

## Stanton Plaza Specific Plan

The purpose of the Stanton Plaza Specific Plan is to provide the momentum for the revitalization and upgrade of the Stanton Plaza site. The plan outlines a framework for growth and redevelopment of the 14.91-acre project site which is located immediately adjacent to, and east of, Beach Boulevard. All new construction within the plan boundaries is guided by the site development standards and design criteria outlined in the plan, which provides the guidance needed to implement the area's intended urban form and character. The Specific Plan identifies four Planning Areas, three of which that allow residential development:

- Sub-Area A Commercial
- Sub-Area B Mixed-Use
- Sub-Area C Residential/Live-Work
- Sub-Area D Mixed-Use

The following site development standards are established for residential units within the Specific Plan area, at densities that range from 12 to 48 dwelling units per acre. The Specific Plan allows for a mixture of commercial, medium density single-family detached residential, live/work units, and medium density single-family attached residential within the Specific Plan area.

TABLE 4-2: RESIDENTIAL DEVELOPMENT STANDARDS - STANTON PLAZA SPECIFIC PLAN

Development Standard		Medium Density	Medium High Density	High Density	
Density (units per acre)		12.0-20.0	21.0-36.0	37.0-48.0	
Minimum Project Size		1 ac	1 ac	1 ac	
Minimum Unit Size	Minimum Unit Size		875 sf	800 sf	
	Beach Blvd	25 ft	25 ft	25 ft	
Perimeter	Orangewood Ave	15 ft	15 ft	15 ft	
Setbacks	Court St	10 ft	10 ft	10 ft	
	Rear	10 ft	10 ft	10 ft	
Interior Setbacks		None	None	None	
Maximum Building Height		45 ft or 3	55 ft or 4	55 ft or 4	
		stories plus	stories plus	stories plus	
		loft/attic space	loft/attic space	loft/attic space	
Private Open Space		65 sf. (min 5 ft dimension)	65 sf. (min 5 ft dimension)	55 sf. (min 5 ft dimension)	

Source: Stanton Plaza Specific Plan, 2016

On-site parking is provided per the requirements of the Stanton Municipal Code, with provisions allowing for shared parking between residential and commercial uses as well as tandem parking for residential uses only.

Following an amendment to the Specific Plan in 2005, 39 detached single-family homes, 111 townhomes, and 7 live/work units were constructed in the project area (later followed by the commercial piece in Sub-Area A).

# Town Center Specific Plan

The City has initiated a long-range plan for transforming the Town Center area into a mixed-use, pedestrian-friendly district. The Town Center Specific Plan will serve as the guiding document to provide policy, regulatory, and design guidance for public and private land within the project area. The Specific Plan will set forth a plan to serve the needs of the community, including improving existing commercial and industrial areas, enhancing Beach Boulevard, redeveloping the City's Main Street, and allowing for development of new commercial/retail mixed-use and housing projects. Although the framework plan was only being developed at the writing of this report, residential uses considered included transit-oriented development and mixed-use residential and retail. It is anticipated that the Town Center Specific Plan will be adopted in Fall 2021.

#### **ZONING CODE**

Land use policies in the General Plan are implemented primarily through the Zoning Code. The Zoning Code provides for a range of densities and residential uses and is designed to protect and promote the health, safety, and general welfare of residents, which includes preserving the character and integrity of established residential neighborhoods. To that end, the City has established specific development standards that apply to residential construction in various districts. These include density, lot coverage, building height, parking standards, and other applicable requirements.

# Provisions for a Variety of Housing Types

State housing element law requires that jurisdictions facilitate and encourage a range of housing types for all economic segments of the community. This includes the production of housing to meet the needs of different types of households with incomes ranging from low to above moderate. The Housing Element is the City's plan for achieving this objective.

As shown in Table 4-3, the City's Zoning Code accommodates a wide variety of conventional and special needs housing, including single-family dwellings, duplexes, multifamily, ADUs, manufactured housing, mobile home parks, residential care facilities (small and large), and transitional and supportive housing. Please note that the information contained in this table represents accurate information at the time of the Housing Element's preparation; future amendments and modifications to the Zoning Code may change the information in this table. All interested parties should refer directly to the Zoning Code to ensure that the most accurate information is considered.

**TABLE 4-3: PERMITTED RESIDENTIAL USES BY ZONE** 

Housing Type	Residential Zones			Mixed-Use Overlays			Industrial Zone	
	RE	RL	RM	RH	GLMX	NGMX	SGMX	IG
Conventional Housing								
Single-Family								
Detached	Р	Р	Р	Р	CUP	CUP	CUP	
Attached			Р	Р	Р	Р	Р	
Duplex			Р	Р				
Multifamily			Р	Р	Р	Р	Р	
Live/Work Unit					Р	Р	Р	
Accessory Dwelling Unit	А	Α	Α	А	А	Α	Α	
Manufactured Housing	Р	Р	Р	Р				
Mobile Home Park	CUP	CUP	CUP	CUP				
Group Home			CUP	CUP				
Special Needs Housing								
Senior Residential Project				CUP	Р	Р	Р	
Residential Care Facility								
6 or fewer clients	Р	Р	Р	Р	Р	Р	Р	
7 or more clients			CUP	CUP	CUP	CUP	CUP	
Emergency Shelter								Р
Transitional Housing			Р	Р	Р	Р	Р	
Supportive Housing			Р	Р	Р	Р	Р	
Single-Room Occupancy (SRO)			CUP	CUP			Р	

Source: City of Stanton Zoning Code, 2021

Notes: "P" = Permitted; "A" = Accessory to Permitted Use; "CUP" = Conditional Use Permit; and "--" = Not Permitted

Single-Family: Detached single-family dwellings and subdivisions are permitted within the RE, RL, RM, and RH zones. Detached single-family dwellings are also permitted in the mixed-use overlay zones with a CUP if the residential use is located in the rear of a property behind single-family attached dwellings, or a commercial use. Attached single-family dwellings, which are units that are attached side by side, are allowed within the RM and RH zones and the mixed-use overlay zones. Single-family projects are subject to administrative Site Plan and Design Review. Projects proposing two or more units are reviewed by the Planning Commission. Furthermore, City Council

approval is required for projects proposing a major subdivision (five or more parcels).

*Duplex:* Duplexes are allowed within the RM and RH zones, subject to administrative Site Plan and Design Review.

*Multifamily:* Multifamily developments are permitted in the RM, RH, and mixed-use overlay zones. Multifamily housing is accommodated in a range of densities, from RM developments at 6.1 units per acre up to 45.0 units per acre in the North Gateway Mixed-Use Overlay (NGMX) and South Gateway Mixed-Use Overlay (SGMX). Multifamily housing can be constructed as apartments, townhomes, condominiums, and as mixed-use housing above or in conjunction with commercial or office uses. Multifamily projects consisting of 2-4 units are subject to administrative Site Plan and Design Review. Multifamily projects proposing five or more units are reviewed by the Planning Commission.

In the General Mixed-Use Overlay (GLMX), residential uses are allowed above or behind commercial or office uses. However, stand-alone residential development may be permitted in some portions of the GLMX zone.

*Live/Work Unit*: Live/work units combine commercial or manufacturing activities with a residential space. Typically, the residential component is secondary or accessory to the primary use as a place of work. Live/work units are limited to the mixed-use overlay zones (GLMX, NGMX and SGMX). All development within the mixed-use overlay zones is subject to Site Plan and Design Review by the Planning Commission.

Accessory Dwelling Unit (ADU): Government Code Section 65852.2(a)(1) allows local agencies to designate areas within a city where accessory dwelling units (ADU) may be permitted and to impose development standards addressing issues such as unit size, height, setbacks, lot coverage, parking, landscaping, and architectural review. The City recently (2020) updated Chapter 20.400 of its Municipal Code to be consistent with California Government Code Sections 65852.150 and 65852.2, which establish regulations for accessory dwelling units.

Stanton Municipal Code (SMC) Section 20.400.330 was amended to define an accessory dwelling unit as:

An attached or a detached residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. An accessory dwelling unit also includes the following:

- 1. An efficiency unit, as defined by Section 17958.1 of the California Health and Safety Code; and
- 2. A manufactured home, as defined by Section 18007 of the California Health and Safety Code.

Construction of an ADU or JADU (junior accessory dwelling unit) is permitted on a lot in a residential or mixed-use zone that allows residential uses and includes a proposed or existing dwelling. A building permit is required for an ADU and JADU pursuant to compliance with the minimum requirements described below and in SMC Section 20.400.330. The approval process is ministerial in nature, and the City must approve or deny an application for a building permit to construct an ADU or JADU within 60 days after receiving a complete application. If a complete application for a building permit to construct an ADU or JADU is submitted in connection with an application to construct a new primary dwelling on a lot, the application may not be approved until the application is approved for the new dwelling. The application for the ADU or JADU must

be processed ministerially regardless of the approvals required for the primary dwelling. The following minimum parcel standards and requirements apply:

- a. **Converted on Single-Family Lot.** Only one ADU or JADU on a lot with a proposed or existing single-family dwelling on it, where the ADU or JADU:
  - i. Is either: within the space of a proposed single-family dwelling: within the existing space of an existing single-family dwelling; or within the existing space of an accessory structure, plus up to 150 additional square feet if the expansion is limited to accommodating ingress and egress.
  - ii. Has exterior access that is independent of that for the single-family dwelling.
  - iii. Has side and rear setbacks sufficient for fire and safety, as dictated by applicable building and fire codes.
- b. Limited Detached on Single-Family Lot. One detached, new-construction ADU on a lot with a proposed or existing single-family dwelling (in addition to any JADU that might otherwise be established on the lot under subsection (D)(1)(A) above), if the detached ADU satisfies the following limitations:
  - i. The side- and rear-yard setbacks are at least four feet.
  - ii. The total floor area is 800 square feet or smaller.
  - iii. The peak height above grade is 16 feet or less.
- c. Converted on Multifamily Lot. Multiple ADUs within portions of existing multifamily dwelling structures that are not used as livable space, including, but not limited to, storage rooms, boiler rooms, passageways, attics, basements, or garages, if each converted ADU complies with state building standards for dwellings. At least one converted ADU is allowed within an existing multifamily dwelling, and up to 25 percent of the existing multifamily dwelling units may each have a converted ADU under this paragraph.
- d. Limited Detached on Multifamily Lot. No more than two detached ADUs on a lot that has an existing multifamily dwelling if each detached ADU satisfies the following limitations:
  - i. The side- and rear-yard setbacks are at least four feet.
  - ii. The total floor area is 800 square feet or smaller.

**Manufactured Housing:** State law requires that manufactured housing, when constructed as a single-family dwelling on a permanent foundation, be treated as a conventional single-family home subject to the same development standards as a single-family residential dwelling on the same lot would require, except for architectural requirements limited to its roof overhang, roofing material, and siding material.

Manufactured homes may be placed on individual lots that allow single-family residential uses provided that the homes are attached to a foundation system in compliance with all applicable building regulations and Section 18551 of the Health and Safety Code and occupied only as a residential use. Manufactured homes are subject to all Zoning Code provisions applicable to residential structures.

Mobile Home Park: Mobile home parks, including manufactured home parks, that conform to the State Mobile Home Parks Act (Division 13, Part 2.1 of the California Health and Safety Code, commencing with Section 18200) or the implementing State guidelines (Title 25, Division I, Chapter 2 of the California Code of Regulations) and Section 18300 of the Health and Safety Code, are allowed in all residential zones (RE, RL, RM, and RH) as a conditional use subject to Planning Commission approval.

*Group Home:* A group home means shared living quarters, occupied by two or more persons not living together as a single household unit. Includes boarding or rooming houses and dormitories, fraternities, and sororities. Group homes are allowed in the RM and RH zones subject to approval of a CUP by the Planning Commission.

Senior Residential Project: Senior residential projects are allowed in the RH zone subject to a conditional use permit and compliance with SMC Section 20.400.340, and are permitted in the GLMX, NGMX, and SGMX zones subject to compliance with SMC Section 20.400.340. The requirements and standards established for senior residential projects are intended to ensure quality living spaces and increase the ability of the elderly to live independently and close to services.

Residential Care Facility: "Small" residential care facilities (those serving six or fewer clients) are allowed by right in all zones that allow residential uses, including the mixed-use overlays, subject to the same development standards and permit processing requirements as other residential uses in those zones, pursuant to the California Lanterman Developmental Disabilities Services Act. "Large" residential care facilities require approval of a conditional use permit (CUP) by the Planning Commission and are allowed in the RM, RH, GLMX, NGMX, and SGMX zones. Large residential care facilities are subject to development standards contained in Section 20.400.310 of the Zoning Code. Under Program 17 in the Housing Plan, the City will amend the Zoning Code to allow large residential care facilities by right where they are currently allowed with a CUP, i.e. in the RM, RH, GLMX, NGMX, and SGMX zones, as well as by right in the RE and RL zones.

Emergency Shelter: Emergency shelters are allowed without discretionary review in the Industrial General (IG) zone. In addition to the same land use regulations and development standards that apply to all development within the IG zone (e.g., lot size, setbacks, building height, etc.), emergency shelters are subject to objective standards established in Section 20.400.150 of the Zoning Code, which are consistent with those standards allowed under State law, including hours of operation, maximum number of beds to be served nightly by the facility, off-street parking requirements, size and location of waiting and intake areas, proximity to other shelters (300 feet apart), on-site management, and patrol of the surrounding area.

The IG zone includes approximately 152 acres on 199 parcels. According to County Assessor data, 21 of these parcels have no reported improvement value and are vacant. Only one parcel is larger than one acre in size (1.76 ac); however, three other parcels range in size from 0.82 to 0.95 acres. These undeveloped IG-zoned parcels could accommodate a year-round emergency shelter, although one shelter alone may not sufficiently house the 116 unsheltered homeless individuals in the City (2019 Point-In-Time Report). These parcels are infill sites in developed areas and are suitable for emergency shelters. Water, sewer, and utilities are available in the roadways adjacent to these parcels.

The IG zone is suitable for emergency shelters because:

Shelters are compatible with a range of uses that are common in suburban communities and allowed in the IC zone (e.g., government facilities, office buildings, assembly/meeting facilities, health/fitness facilities, etc.);

- The IG zoned parcels are concentrated near Katella Ave and Beach Boulevard, which are served by three different Orange County Transit Authority (OCTA) bus routes that connect to regional transit, including light rail service;
- There is a mixture of existing uses in the IG zone that include light industrial, manufacturing, warehousing, office uses, and non-industrial uses; and
- Although hazardous materials may be present and used on some of the properties within the IG zone, the majority of parcels are not known to be constrained by the presence of hazardous materials.

Low Barrier Navigation Center: A low barrier navigation center is a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. AB 2162 requires jurisdictions to further streamline approval of eligible low barrier navigation center applications in areas zoned for mixed-use and residential zones permitting multifamily uses, subject to specific criteria. The City's Zoning Code does not conform to these recent requirements; however, Program 17 in the Housing Plan requires the Zoning Code to be updated to address AB 2162.

*Transitional and Supportive Housing:* Transitional housing facilities meeting the Health and Safety Code Section 50675.2(h) definition are considered a residential use and allowed by right in all zones that allow residential uses, consistent with State law. These facilities are subject to the same development standards and permit processing criteria required for similar uses in the same zones.

Supportive housing meeting the Health and Safety Code definition in Section 50675.14(b), like transitional housing facilities, is considered a residential use and is allowed as a permitted use in all zones that allow residential uses, consistent with State law. Supportive housing is subject to the same development standards and permit processing criteria required for similar uses in the same zones.

Single Room Occupancy (SRO): Single room occupancy (SRO) facilities are a housing type that is considered suitable to meet the needs of extremely low, very low, and low-income households. The Zoning Code defines an SRO as a facility providing dwelling units where each unit has a minimum floor area of 170 square feet and a maximum floor area of 400 square feet. These dwelling units are required to have both kitchen and bathroom facilities. Rental procedures allow for weekly and monthly tenancies only. SROs are allowed in the RM and RH zones subject to approval of a CUP by the Planning Commission.

Housing for Disabled Persons: On January 1, 2002, SB 520 became effective and required local jurisdictions to analyze local government constraints on developing, maintaining, and improving housing for persons with disabilities. In accordance with SB 520 and Government Code 65583(a)(7), the City recognizes the importance of providing housing for persons with disabilities. Persons with disabilities have a number of specific housing needs, including those related to design and location. Design needs generally include the removal of architectural barriers that limit the accessibility of dwelling units and construction of wheelchair ramps, railings, etc. Location needs include accessibility to public transportation, commercial services, health care, and supportive services. Some persons with disabilities need group housing opportunities, especially those who are lower income or homeless. The following discussion addresses these issues and determines that no specific City policy or regulation serves to impede the access that persons with disabilities have to housing that suits their specific needs.

Zoning and Land Use: The General Plan and Zoning Code provide for the development of

multifamily housing in the RM, RH, and mixed-use overlay zones. Traditional multifamily housing for persons with special needs, such as apartments for the disabled, are considered regular residential uses permitted by right in these zones. The City's land use policies and zoning provisions do not constrain the development of such housing.

Under the Lanterman Developmental Disabilities Services Act (Lanterman Act), small State-licensed residential care facilities for six or fewer persons must be permitted in all zones that allow single or multifamily uses, subject to the same permit processing requirements and development standards. The City of Stanton is compliant with the Lanterman Act. Large residential care facilities serving seven or more clients require approval of a CUP in the RM, RH, GLMX, NGMX, and SGMX zones. Potential conditions of approval may include hours of operation, security, loading requirements, and management. Conditions would be similar to those for other similar uses in the same zones and would not serve to unduly constrain the development of residential care facilities for more than six persons. Occupancy standards for residential care facilities are the same as occupancy standards for all other residential uses. The Zoning Code also accommodates transitional and supportive housing in the RM, RH, GLMX, NGMX, and SGMX zones. These facilities may serve persons with disabilities.

<u>Building Code</u>: Building construction and procedures within Stanton are required to conform to the 2019 California Building Code, as adopted in Title 16 of the City's Municipal Code. Standards within the Building Code include provisions to ensure accessibility for persons with disabilities. These standards are consistent with the Americans with Disabilities Act (ADA). No local amendments that would constrain accessibility or increase the cost of housing for persons with disabilities have been adopted and City officials are not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

Reasonable Accommodation: Both the federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodation (i.e. modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility impairments. Whether a particular modification is reasonable depends on the circumstances and must be decided on a case-by-case basis.

Reasonable accommodation refers to flexibility in standards and policies to accommodate the needs of persons with disabilities. The City's zoning and building codes, as well as approach to code enforcement, allow for special provisions that meet the needs of persons with disabilities without the need for variances. The City's Reasonable Accommodation Ordinance is codified in Chapter 20.525 of the Zoning Code.

The City's Community Development Director has administrative/ministerial authority to hear and decide applications for reasonable accommodation to allow reasonable remedy from zoning and other land use regulations, policies, and procedures for individuals with physical or mental impairment, unless the application is tied to another entitlement that requires discretionary review, in which case the Planning Commission is the reviewing authority. A request for reasonable accommodation may include a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice.

Reasonable accommodation applications are not charged a fee for review and the reviewing

authority must consider all of the following factors:

- 1. Whether the housing, which is the subject of the request, will be used by an individual defined as disabled under the Acts:
- 2. Whether the request for Reasonable Accommodation is necessary to make specific housing available to an individual with a disability under the Acts;
- 3. Whether the requested Reasonable Accommodation would impose an undue financial or administrative burden on the City;
- 4. Whether the requested Reasonable Accommodation would require a fundamental alteration in the nature of a City program or law, including but not limited to land use and zoning;
- 5. Whether there are alternatives to the requested waiver or exception that could provide similar benefits to the applicant with less potential detriment to surrounding owners and occupants or to the general public;
- 6. Physical attributes of the property and structures; and
- 7. Other Reasonable Accommodations that may provide an equivalent level of benefit.

ADA accessible features or structures required for accessibility are permitted to encroach into any required setback consistent with applicable building codes, pursuant to Section 20.305.070(C) of the Zoning Code. This provision obviates the need for homeowners and landlords to submit a separate and additional application for reasonable accommodation.

During the 5<sup>th</sup> Cycle Housing Element planning period, the City reviewed XX applications for reasonable accommodation.

<u>Conclusion</u>: Current planning policies and zoning regulations have mitigated potential constraints to the availability of housing for persons with disabilities. The City has analyzed its Zoning Code and procedures to ensure that it is providing flexibility in, and not constraining the development of, housing for persons with disabilities. In an effort to remove governmental constraints, under Program 17 in the Housing Plan, the City will amend the Zoning Code to remove the factor that requires consideration of "alternatives to the requested waiver or exception that could provide similar benefits to the applicant with less potential detriment to surrounding owners and occupants or to the general public."

# **Development Standards**

Development standards directly shape the form and intensity of residential development by providing controls over land use, heights and volumes of buildings, and open space on a site. Site development standards also ensure a quality living environment for all household groups in the City, including special groups such as lower and moderate-income households and senior citizens.

Table 4-4 summarizes development standards in the residential zones (RE, RL, RM, and RH), including density, minimum lot size, setbacks, lot coverage, and building height, by zoning district. Table 4-5 summarizes development standards for the City's mixed-use overlay districts (GLMX, NGMX, and SGMX). Development standards for the specific plan areas were discussed above.

TABLE 4-4: DEVELOPMENT STANDARDS WITHIN RESIDENTIAL ZONES

Development	Standard	RE	RL	RM	RH	
Density (units per acre)		1.0-2.0	2.1-6.0	6.1-11.0	11.1-18.0	
Minimum Lot Area		20,000 sf	6,500 sf	8,000 sf	8,000 sf	
Minimum Lot Depth	Interior Lot		10	0 ft		
willilliam Lot Depth	Cul-de-Sac		80	) ft		
	Interior Lot	75 ft	65 ft	65 ft	65 ft	
Minimum Lot Width	Corner Lot	80 ft	65 ft	70 ft	70 ft	
	Cul-de-Sac	80 ft	65 ft	45 ft	45 ft	
	Front		20	20 ft		
	Interior Side	5 ft	5 ft	10 ft	2-story – 10 ft; 3-story – 15 ft	
Setbacks	Street Side	10 ft	10 ft	10 ft; or 10% of lot width	10 ft; or 10% of lot width	
•	Rear – 1-story		15	i ft		
•	Rear – 2-story		20	) ft		
	Rear – 3-story	n/a	n/a	n/a	25 ft	
Structure Coverage	Interior Lot	30%	40%	50%	65%	
Structure Coverage	Corner Lot	35%	45%	50%	65%	
Maximum Dwelling Height		2 stories; not to exceed 32 ft	2 stories; not to exceed 32 ft	2 stories; not to exceed 32 ft	3 stories; not to exceed 40 ft	
Open Space		n/a	n/a	(1)	(1)	

Source: Stanton Municipal Code, Title 20, 2021

- 1. Required Common Open Space:
- a. Multi-Family Development Apartment: Multi-family development with 12 or more dwelling units shall provide 30 percent of the total site area for usable open space for passive and active recreational uses. Usable common open space areas shall have minimum dimensions of 15 feet in width.
- b. Multi-Family Development Single-Family Detached Dwelling and Single-Family Attached Condominium Projects: A minimum of 5 percent of the total site area shall be dedicated for usable open space for passive and active recreational uses. Usable common open space areas shall have minimum dimensions of 15 feet in width. Required front and streetside setback areas may not be utilized for usable common open space.

TABLE 4-5: DEVELOPMENT STANDARDS WITHIN MIXED-USE OVERLAY ZONES

Development Standard		GLMX	NGMX	SGMX
Density (units per acre	e)	25-45	25-45	60-90
Minimum Lot Area		40,000 sf (1)	30,000 sf (1)	50,000 sf (1)
Minimum Lot Depth		100 ft	100 ft	200 ft
Minimum Lot Width		100 ft	100 ft	200 ft
	Front (2)	0 ft (min);	0 ft (min);	0 ft (min);
		15 ft (max)	15 ft (max)	10 ft (max)
	Front (3)	5 ft (min);	5 ft (min);	0 ft (min);
Setbacks	FIUIII (3)	15 ft (max)	15 ft (max)	10 ft (max)
Semacks	Street Side	5 ft (min);	0 ft (min);	0 ft (min);
		15 ft (max)	15 ft (max)	10 ft (max)
	Interior Side	10 ft min; No max	5 ft min; No max	5 ft min; No max
	Rear	10 ft min; No max	10 ft min; No max	10 ft min; No max
Maximum Dwelling Height		3 stories; not to	3 stories; not to	7 stories; not to
Maximum Dwelling He	ayın	exceed 45 ft	exceed 45 ft	exceed 85 ft
Open Space		(4)	(4)	(4)
		Live-Work	Live-Work	Office
Building Frontage Typ	es (5)	Office	Office	Storefront
		Storefront	Storefront	Residential (upper)
		Live-Work	Live-Work	Live-Work
Ruilding Frontage Typ	nes (6)	Office	Office	Office
Building Frontage Types (6)		Residential	Residential	Residential
		Storefront	Storefront	Storefront

Source: Stanton Municipal Code, Title 20, 2021

- New lots less than 30,000 square feet may be allowed provided that the lots are designed as part of a larger development project and are fully integrated into the larger development by means of access, circulation, parking, landscape theme, signage, and overall project design and that the overall development project complies with the minimum required density or intensity standards.
- 2. Along Beach, Chapman, and Katella.
- 3. Along all other streets.
- 4. Required Common Open Space:
- a. Multi-Family Development Apartment: Multi-family development with 12 or more dwelling units shall provide 30 percent of the total site area for usable open space for passive and active recreational uses. Usable common open space areas shall have minimum dimensions of 15 feet in width.
- b. Multi-Family Development Single-Family Detached Dwelling and Single-Family Attached Condominium Projects: A minimum of 5 percent of the total site area shall be dedicated for usable open space for passive and active recreational uses. Usable common open space areas shall have minimum dimensions of 15 feet in width. Required front and streetside setback areas may not be utilized for usable common open space.
- 5. Along Beach, Chapman, and Katella within 150 ft of intersections.
- 6. Elsewhere.

# Residential Parking Requirements

Parking standards are an important development regulation in communities. The City's parking requirements are intended to ensure that adequate off-street parking and loading facilities are provided in proportion to the need created by the type of use. Adequate parking for residential projects contributes to the value of a project, the safety of residents, and the quality of a project's appearance. However, excessive parking standards can pose a significant constraint to the

development of housing because they can reduce the buildable area on a site and impact the funding available for project amenities or additional units. The parking requirements for residential and mixed-use developments are shown in Table 4-6.

**TABLE 4-6: RESIDENTIAL PARKING REQUIREMENTS** 

Use	Requirement	Additional Regulations
Single-Family Dwelling	<ul> <li>1 bdrm: 2 enclosed spaces</li> <li>2 bdrm: 3 spaces (at least 2 enclosed)</li> <li>3-4 bdrm: 4 spaces (at least 2 enclosed)</li> <li>5+ bdrm: 4 spaces (at least 2 enclosed) + 0.5 spaces per additional bedroom</li> </ul>	
Single-Family Dwelling – Cluster, Subdivisions, and Condominiums	<ul> <li>1 bdrm: 2 enclosed spaces</li> <li>2 bdrm: 3 spaces (at least 2 enclosed)</li> <li>3-4 bdrm: 4 spaces (at least 2 enclosed)</li> <li>5+ bdrm: 4 spaces (at least 2 enclosed) + 0.5 spaces per additional bedroom</li> </ul>	Plus 1 parking space for every 3 dwelling units for guest parking purposes
Duplex	Same as Single-Family Dwelling	
Multifamily Dwellings	<ul> <li>Studio: 1 space</li> <li>1-bedroom: 2 spaces</li> <li>2-bedroom: 2.75 spaces</li> <li>3-bedroom: 3.5 spaces</li> <li>4+ bedroom: 4 spaces + 0.5 per additional bedroom</li> </ul>	Plus 1 parking space for every 3 dwelling units for guest parking purposes
Mixed-Use Development (Residential Component)	2 covered spaces/unit	
Live/Work Unit (Residential Component)	2 covered spaces/unit	
Accessory Dwelling Unit	1 space/ADU (1)	<ul> <li>No parking is required if ADU is:         <ul> <li>Located within 0.5 mile walking distance of public transit</li> <li>Located within an architecturally and historically significant historic district</li> <li>Part of the proposed or existing primary residence or an accessory structure</li> <li>When on-street parking permits are required but not offered to the occupant of the ADU</li> <li>When there is an established car share vehicle stop located within one block of the ADU</li> </ul> </li> </ul>
Manufactured Housing	2 spaces/site	1 guest space/5 sites
Mobile Home Park	2 spaces/trailer site	1 guest space/5 trailer sites
Group Home	1 covered space per rooming unit	
Senior Housing	1 covered space/unit	1 uncovered space/5 units for guest parking
Residential Care Facility	Small: Spaces required for dwelling unit	

Use	Requirement	Additional Regulations
6 or fewer clients (Small)	only	
7 or more clients (Large)	<ul> <li>Large: Spaces required for dwelling unit only</li> </ul>	
Emergency Shelter	<ul><li>1 uncovered space/5 beds; and</li><li>1 space/employee</li></ul>	
Transitional Housing	Same as for single-family housing if 6 or fewer persons; same as for multifamily housing if 7 or more persons	
Supportive Housing	Same as for single-family housing if 6 or fewer persons; same as for multifamily housing if 7 or more persons	
Single-Room Occupancy (SRO)	1 space/2 rooms	
Affordable Housing Projects Using Density Bonus	<ul> <li>Studio: 1 space</li> <li>1-bedroom: 1 space</li> <li>2-bedroom: 2 spaces</li> <li>3-bedroom: 2 spaces</li> <li>4+ bedroom: 2.5 spaces</li> </ul>	May provide required parking through uncovered parking, but not through on-street parking

Source: Stanton Municipal Code, Title 20, 2021

1. When a garage, carport, or covered parking structure is demolished in conjunction with the construction of an ADU or converted to an ADU, those off-street parking spaces are not required to be replaced.

The City previously modified the residential parking standards through a comprehensive zoning code update to require parking spaces based on bedroom counts to ensure that larger dwelling units provide sufficient parking on-site. The increase in the number of parking spaces required may have resulted in a governmental constraint; however, to compensate for this, the City modified or eliminated other development standards to provide greater flexibility in site design to balance the parking constraints. In addition, the City provided opportunities to request a parking reduction of between 10-15% of the required parking, which helps to encourage affordable housing and provides flexibility for housing serving disabled persons. An administrative reduction may be provided for a 10% reduction for all projects, and up to 15% if the project site is over 10,000 square feet. A conditional adjustment through a Minor Use Permit may also be approved on all projects. For affordable housing projects, if a density bonus is requested, the parking may be reduced based on the allowed concessions as identified in Table 4-6 above. Recently approved single-family and multifamily housing projects have been able to develop within the permitted density ranges for the given zone, while also meeting the parking requirements.

Although the City has made recent efforts to ensure that the parking requirements do not unduly impact the cost and supply of housing, or the ability for developments to achieve maximum densities, the City remains committed to reducing constraints on housing development that may be resulting from excessive parking standards. Program 18 in the Housing Plan is included as an effort to comprehensively review the City's parking standards to achieve the most effective requirements for parking and to eliminate unnecessary constraints to housing.

Moreover, under AB 139, parking for emergency shelters is only required to "accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone." Program 17 addresses this inconsistency between the Zoning Code and State law.

# **4A.2 Development Review Process**

The time and cost of permit processing and review can be a constraint to housing development if significant development review is required. Project review and permit processing are necessary steps to ensure that residential construction proceeds in an orderly manner. The time required for project approval is often not so much a factor of the approval body (Director versus Planning Commission), but the complexity of the project and associated environmental issues. However, small infill projects that can be approved administratively are generally less complex and take a shorter time to obtain appropriate approvals. Large mixed-use projects or residential subdivision maps, subject to the California Environmental Quality Act (CEQA), require a public hearing before the Planning Commission.

The City reviews all applications for development to ensure the construction of projects that contribute in a positive manner to the community and improve quality of life. Residential development projects typically undergo several types of approvals – ministerial, discretionary actions (either with or without a public hearing), and legislative actions. This section outlines the timeline for typical residential development review and describes the permitting requirements and procedures for Site Plan and Design Review, Conditional Use Permits (CUP), Subdivision Maps, etc. Given the recent development activity and housing growth experienced by Stanton over the past couple of years, the City's processing and permit procedures do not appear to unduly constrain the development of housing.

# **TIMEFRAMES**

Processing times for applications in Stanton vary based upon the scope and type of project. The amount of time involved in processing applications depends on the type of project, the applicant's compliance with the City's ordinances, and the completeness of the applications. Certain types of applications/permits are discretionary and require a public hearing, while others are processed administratively. Through administrative approval, the applicant bypasses the public hearing requirement and shortens the processing time.

Some projects may take an extended period for final approval. However, these projects generally have significant environmental impacts, involve General Plan or specific plan amendments, rezoning, or need additional community workshops. Developers may be responsible for delays by failing to provide information or requesting continuances. Permit approval under these circumstances requires more time for public notice, public hearings, and negotiation of design modifications to resolve problems.

On average, the typical processing time for a single-family home ranges from 30-60 days, which assumes Site Plan and Design Review and building permits with no additional entitlements required. These residential projects tend not to create substantial environmental impacts, thereby greatly reducing the time needed for review. The typical processing time for a multifamily unit is 3-6 months, which assumes that additional entitlements are required, a moderate level of environmental analysis is necessary, and public hearings with the Planning Commission and/or City Council will occur.

Table 4-7 outlines the typical permit processing times and associated reviewing body by the type of approval or permit. It should be noted that many projects require multiple entitlements, which are often processed concurrently, thereby shortening the overall processing time. The City has established a list of standard permits that apply to residential development projects ranging from building permits to use permits.

TABLE 4-7: TYPICAL PERMIT PROCESSING TIMES AND REVIEWING BODY

	Review Authority				Processing	
Type of Approval or Permit	Director	PC	СС	Public Hearing	Times	
Site Plan and Design Review (only)	D	А	А	Appeals Only	30-60 days	
Site Plan and Design Review (with other discretionary action)	R	D	А	Yes	3-6 months	
Conditional Use Permit	R	D	А	Yes	3-6 months	
Variance	R	D	А	Yes	3-6 months	
Planned Development Permit	R	D	А	Yes	6-8 months	
Zoning Amendment or Zone Change	R	R	D	Yes	6-12 months	
General Plan Amendment	R	R	D	Yes	6-12 months	
Tentative Map/Parcel Map	R	D	А	Yes	3-6 months	
Reasonable Accommodation	D	А	А	Appeals Only	30-45 days	

Source: City of Stanton, 2021

D = Deciding body whose decision is final unless appealed

 $R = Advisory\ body\ required\ to\ make\ recommendations$ 

A = Appeal authority

# Site Plan and Design Review

In accordance with Chapter 20.530 of the Zoning Code, a Site Plan and Design Review is required for all construction and development activities involving new or rehabilitated structures, with the exception of certain accessory structures, fences, and walls. If the project involves a Site Plan and Design Review only, as would be the case for one new single-family dwelling on a lot, Planning staff reviews and approves the application to ensure compatibility with the City's development standards, previously approved plans, and all criteria applicable to the proposed use. This is a ministerial action. Should the project be tied to a discretionary action as well, e.g., two or more units developed on a site, the Site Plan and Design Review is referred to the Planning Commission in which case the action is changed from ministerial to discretionary review.

Table 4-7 identifies the typical processing times for projects subject to Site Plan and Design Review. Permits subject to approval by the Director of Community Development usually require 30-60 days for processing. Discretionary permits subject to Planning Commission approval are processed in approximately 3-6 months. Multifamily projects requiring discretionary approval typically need one meeting before the Planning Commission depending on the level of complexity for the project. Projects that require a zone change as well for example, would also require a second hearing before the City Council.

Discretionary review adds to the cost of housing given that a developer's carrying costs (i.e. property taxes, insurance, and interest) that accumulate during development are passed on to the purchaser. Discretionary review also adds an element of uncertainty for a developer; however, Program 6 and Program 17 of the Housing Plan will establish objective design standards for mixed-use and multifamily projects, which will provide uniform standards knowable by the development applicant.

The length of time between project approval and request for a building permit is minimal. Specifically, there is a 10-day appeal period following approval of a discretionary permit. In certain circumstances, a "hold harmless" letter may be filed and an applicant may submit their building

plans with the understanding that fees may be lost if an appeal results in denial of the project filed.

# Conditional Use Permit (CUP)

Chapter 20.550 of the Zoning Code regulates the issuance of Conditional Use Permits (CUP) and Minor Use Permits. Land uses that require a CUP generally have a unique and distinct impact on the area in which they are located or are capable of impacts to adjacent properties unless given special review and conditions. The following residential uses require a CUP:

- Single-family detached homes in the mixed-use overlay zones (GLMX, NGMX and SGMX);
- Mobile home parks in the residential zones (RE, RL, RM and RH);
- Group homes in the RM and RH zones;
- Senior residential projects in the RH zone;
- Large residential care facilities in the RM, RH, and mixed-use overlay zones; and
- Single-room occupancy housing in the RM and RH zones.

The Planning Commission may approve, conditionally approve, or deny a CUP or Minor Use Permit application unless the application includes concurrent processing of a permit that requires City Council action, in which case the Planning Commission makes a recommendation to the City Council. The approving body must make the following findings prior to approval, pursuant to Section 20.550.060 of the Zoning Code:

- 1. The proposed use is consistent with the General Plan and any applicable specific plan;
- 2. The proposed use is allowed within the applicable zone and complies with all other applicable provisions of this Zoning Code and the Municipal Code;
- 3. The design, location, size, and operating characteristics of the proposed activity will be compatible with the existing and future land uses in the vicinity;
- 4. The site is physically suitable in terms of:
  - a. Its design, location, shape, size, and operating characteristics of the proposed use;
  - b. The provision of public and emergency vehicle (e.g., fire and medical) access;
  - c. Public protection services (e.g., fire protection, police protection, etc.);
  - d. The provision of utilities (e.g., potable water, schools, solid waste collection and disposal, storm drainage, wastewater collection, treatment, and disposal, etc.); and
  - e. Served by highways and streets adequate in width and improvement to carry the kind and quantity of traffic the proposed use would likely generate.
- 5. The site's suitability ensures that the type, density, and intensity of use being proposed will not adversely affect the public convenience, health, interest, safety, or general welfare, constitute a nuisance, or be materially detrimental to the improvements, persons, property, or uses in the vicinity and zone in which the property is located; and
- 6. The applicant agrees in writing to comply with any and all of the conditions imposed by the review authority in the approval of the Conditional Use Permit or Minor Use Permit.

These findings apply to all uses that require a CUP; no special or unique findings are required for residential uses.

#### **Subdivisions**

This review process applies to all residential land divisions within the City. Title 19 of the Stanton Municipal Code includes the standards and processes for subdivisions. It is based primarily on the State Subdivision Map Act. As it relates to residential development, the regulations apply to all land divisions that create lots for single-family homes and lots, or condominiums, for multifamily development. As part of the review process for subdivisions, the City reviews applications for compliance with lot size and shape standards, the general layout of the subdivision, and infrastructure requirements. If the project complies with the subdivision standards and General Plan density, the project can proceed through the approval process.

#### Reasonable Accommodation

The City's process for providing reasonable accommodation allows individuals, or their representatives, to make requests for reasonable accommodations for persons with disabilities as part of the permit process. No additional permits are required or additional fees charged by the City. Requests for reasonable accommodation to meet the needs of persons with disabilities are generally approved administratively, and a use permit is not required. An exception would be a use (in contrast to an accessory structure or appurtenance) that requires a discretionary use permit (i.e. CUP), such as a residential care facility of seven or more persons. City staff is available to provide assistance regarding the processing of requests for the construction of accessory structures intended to accommodate persons with disabilities. Information regarding the approval of these structures is included within all public notices and agendas, as applicable.

## **FACILITATED ENVIRONMENTAL REVIEW**

The City has adopted uniform procedures for complying with the requirements of the California Environmental Quality Act (CEQA) for assessing the potential environmental impacts of those development applications determined to be a "project" as defined by Public Resources Code 21000-21177. Environmental review is required for most discretionary actions including Site Plan and Design Review, Conditional Use Permits, Subdivision Maps, and legislative actions including General Plan amendments, zone changes, and code amendments. Environmental review occurs while the application is being processed. An environmental determination by City staff for a project is made in order to prepare the appropriate environmental document that can be considered by the decision-making authority with the legislative or discretionary application.

In addition to the requirements of CEQA, the City of Stanton Municipal Code contains additional environmental standards for the City's environmental review process in SMC Section 20.500.070.

#### STREAMLINING APPROVALS

#### Lower Income Sites Included in Previous Elements

While the Site Plan and Design Review process is not considered a constraint to housing, Policy 2.5 has been included to comply with Government Code 65583.2. This program will allow by-right approval of housing developments proposed on non-vacant sites included in the previous housing element inventory and on vacant sites included in the two previous housing element inventories, provided that the proposed housing development includes at least 20% lower-income affordable housing units. This will increase certainty for affordable and multifamily developers related to residential sites throughout the community, as identified in Appendix A.

#### Senate Bill (SB) 35

SB 35 (Government Code Sections 65400 and 65582.1) includes provisions for streamlining projects based on a jurisdiction's progress towards its RHNA and timely submittal of the Housing

Element Annual Progress Report. Jurisdictions that have made insufficient progress toward their above moderate-income RHNA allocation and/or have not submitted the latest Housing Element Annual Progress Report are subject to the streamlined ministerial approval process for proposed developments with at least 10% affordability. As well, jurisdictions that have made insufficient progress toward their lower income RHNA (very low and low-income) are subject to the streamlined ministerial approval process for proposed developments with at least 50% affordability.

HCD reviews the annual progress report deadlines and RHNA progress on an annual basis. Stanton is currently subject to SB 35 streamlining provisions when proposed developments include at least 50% affordability. Program 17 in the Housing Plan has been provided to incorporate the mandatory streamlining provisions into the City's Zoning Code. These streamlining provisions will reduce approval requirements for projects that include a minimum of 50% of units affordable to lower income households and that meet the criteria specified by state law.

#### FLEXIBILITY IN DEVELOPMENT STANDARDS

Development standards affect the financials of a residential project, both from the revenue side (through achievable density) and through the costs of complying with specific development standards. However, there is no specific threshold that determines whether a particular standard or set of standards constrains the affordability or supply of housing. Many factors determine project feasibility. While prior sections discussed how to reduce development costs, the following describes ways that the Zoning Code offers flexibility in development standards.

# Density Bonus Ordinance

In 2013, the City updated the Zoning Code to allow density bonuses for affordable and senior residential projects in accordance with state Density Bonus law. Chapter 20.330 of the Zoning Code requires density bonuses and other incentives for housing and/or child care facilities to be granted in accordance with the requirements of state law, including Government Code Title 7, Division 1, Chapter 4.3 (Density Bonuses and Other Incentives).

#### Planned Development Permit

The Planned Development Permit (PDP) allows for the provision of flexible development standards designed to appropriately integrate a project into its physical setting and surrounding neighborhood context and can accommodate a range of uses including residential, commercial, and industrial uses that are mutually-supportive and compatible with existing development on surrounding properties. The PDP allows for creative development standards to encourage consolidation of lots and the efficient development of land while ensuring high design standards and the incorporation of enhanced amenities (e.g., additional open space, public art, improvements to public facilities such as parks or trails, etc.). The PDP may adjust or modify, where necessary and justifiable, all applicable development standards (e.g., building coverage, FAR, height, and setbacks, as well as fence and wall heights, landscaping, parking, open space, street layout, etc.) identified in the Zoning Code, with the exception of an increase in the applicable density or intensity above the allowable maximums.

# **Inclusionary Housing**

The City does not have any requirements that obligate developers to provide or fund housing at specific affordability levels.

#### Short-Term Rentals

The City does not have an ordinance that addresses short-term rentals, but does restrict rentals to more than 30 days. Nonetheless, there were three rentals listed on *Airbnb.com* in May 2021;

however, none of the rentals were for an entire house. All three rentals were limited to a room or suite within a home and do not decrease the amount of housing stock available for permanent occupancy.

#### **BUILDING CODES AND ENFORCEMENT**

New construction in Stanton, including additions and remodels, must comply with the 2019 California Building Code (CBC). The City adopted the 2019 California Building Code with all required updates. The Building Code establishes construction standards necessary to protect public health, safety, and welfare, and the local enforcement of this code does not unduly constrain development of housing. The 2019 California Building Code, Title 24, Part 2, Volumes 1 and 2, published by the International Code Council, was adopted by the City by reference as Chapter 16 of the City's Municipal Code and subject to the amendments contained in that chapter.

No local amendment to the Building Code has either been initiated or approved that directly impacts housing standards or processes. Code enforcement is conducted by the City and is based upon issues identified by the community and reported to City staff. The City maintains general records of neighborhoods where code complaints are most prevalent and works proactively with these neighborhoods to address potential issues before they become significant concerns. The City enforces its code requirements equitably throughout the community, as necessary. Program 13 in the Housing Plan has been included to help support homeowners with rehabilitating substandard housing. The Code Enforcement Division works with property owners and renters to assist in meeting state health and safety codes.

# **4A.3 Development Fees**

The City of Stanton charges fees to process plans submitted for residential projects and to fund the provision of important services that are needed to accommodate housing and population growth. Fees and exactions are used to finance public facilities, roadways, water and sewer infrastructure, schools, and other community services. Nearly all these fees are assessed through a pro rata share system, based on the magnitude of the project's impact or the extent of the benefit that will be derived. Failure to adequately plan for residential development is a key reason why jurisdictions are so financially constrained today. Furthermore, the City's fees have not been found to act as a constraint to the development of housing in Stanton.

For new residential projects, developers in Stanton may be required to pay one or more of the following fees depending on the location, type, and size of the project:

<u>Planning</u>, <u>Building</u>, <u>and Environmental Fees</u>: The City of Stanton charges developers standard plan check fees, fees for processing applications, building permits, tentative tract maps, environmental initial study, variance, conditional use permit, or other permits to pay for the cost of processing applications and conducting inspections for specific projects. This does not include additional fees paid by the developer for project-specific environmental impact reports.

<u>City Impact Fees</u>: The City charges impact fees to finance new or expanded infrastructure and public facilities required to serve residents. The fee must have a reasonable relationship to the infrastructure costs and represent the marginal cost of improvements required to serve residents of the new residential projects. The City charges fees to offset impacts to public streets, drainage facilities, water quality, and parks. Other fees and assessments may apply depending on the location.

Regional Impact Fees: Regional impact fees include water and sewer fees collected by the water

district and sanitation district, and school impact fees collected by the school districts as allowed by state law to finance the construction and expansion of schools to accommodate student enrollment. The water, sanitation, and school districts have the authority to set the fee levels; the City does not have any ability to adjust these fees.

Planning and permitting fees are charged on an at-cost basis to cover staff services and administrative expenses for processing development applications. Development impact fees are required to provide essential services and infrastructure to serve new residents. Impact fees are governed by state law to demonstrate a nexus between development and potential impacts. State law also requires the proportionality test to ensure the pro rata share of costs to provide services and infrastructure by individual developments is reasonable. The City recognizes that planning/permitting and development fees add to the cost of residential development. To mitigate the impact of planning/permitting and impact fees on the cost of residential development, the City may use CDBG, HOME, as well as other funding sources to gap-finance affordable housing development.

Table 4-8 details the City's Planning Division processing fees for development project entitlements and Table 4-9 describes the fee schedule for residential building permits. One or more of the entitlements would be required to process a residential project depending on the scale and complexity of the project, and a building permit is required for each residential structure.

TABLE 4-8: DEVELOPMENT PROJECT PROCESSING FEES (EFFECTIVE 01/01/2019)

Entitlements				
Planning and Application Fees				
Site Plan and Design Review	\$3,070			
Planned Development Permit	\$3,090			
Conditional Use Permit	\$2,485			
Variance	\$2,450			
Zoning Code Amendment	\$3,595			
Zone Change	\$2,645			
Specific Plan Amendment	Consultant costs			
General Plan Amendment	\$4,000			
Development Agreement	\$7,440 Deposit			
Subdivisions				
Lot Line Adjustment	\$1,535			
Tentative Parcel Map	\$2,500			
Tentative Tract Map	\$3,730			
Environmental Review				
Categorical Exemption Notice	\$75			
Negative Declaration	\$2,030			
Mitigated Negative Declaration	Consultant costs			
Environmental Impact Report (Review)	\$4,505			

Source: City of Stanton, 2021

Note: This is only a partial list of typical Planning fees.

The residential building permit fees described in Table 4-9 are based on a hypothetical 2,500 square foot single-family detached dwelling unit with a 400 square foot garage valued at \$357,950 (\$143.18/sf).

**TABLE 4-9: RESIDENTIAL BUILDING PERMIT FEES** 

Permits/Development Impact Fees				
Building				
Plan Check	\$1,524.60 (includes \$464.10 Energy and \$227.50 Mechanical PC Fee)			
Building	\$2,380.00			
Electrical	\$240.85			
Mechanical	\$760.00			
Plumbing	\$573.75			
Grading	\$23.00			
Energy	\$714			
SMIP	\$46.53			
Permit Issuance Fees	\$10.00			
Residential Development Impact Fees				
Park-In-Lieu Fee (New Construction)	\$11,173			
Street Fee	Low Density: \$650/unit			
Traffic Fee	Low Density: \$795/unit			
Community Center Fee	Low Density: \$295/unit			
Police Facilities Fee	Low Density: \$267/unit			
Water	n/a			
Sewer	\$4,269			
Sanitation District	n/a			
School	\$4,200 - \$8,000 (depending on school district)			

Sources: City of Stanton, 2021; Anaheim Union High School District, 2021; Magnolia School District, 2021; Garden Grove Unified School District, 2021

Table 4-10 illustrates the total typical development fees for single-family and multifamily applications. Table 4-11 compares residential fees between neighboring jurisdictions.

**TABLE 4-10: TYPICAL DEVELOPMENT FEES** 

Fees	Single-Family Unit	Multifamily Project (per unit) <sup>1</sup>
Planning Fees		
Site Plan and Design Review	\$3,070.00	\$767.50
Conditional Use Permit		\$621.25
Environmental Review (CEQA)		\$507.50
Environmental Review (CEQA)		(or consultant costs)
Tentative Subdivision Map		\$625.00
Building Permit Fees (building permit, plan check, electrical, etc.)	\$6,272.73	\$5,371.80
Development Impact Fees (water, sewer, etc.)	\$21,649.00	\$8,181.02
TOTAL FEES PER UNIT	\$30,991.73	\$16,074.07

Source: City of Stanton, 2021

Notes:

**TABLE 4-11: RESIDENTIAL FEE COMPARISON** 

Jurisdiction	Single-Family	Multifamily
Stanton	\$30,991.73	\$16,074.07
Anaheim		
Garden Grove		
Cypress		
Westminster		
Orange County		

Source:

# 4B. Non-Governmental Constraints

Non-governmental constraints refer to market factors such as the demand for housing, the price of land, construction costs, availability of financing, and other factors that increase the cost of housing development.

# **DEVELOPMENT COSTS**

#### Land Prices

The cost to develop housing is influenced by the cost of the raw land, the cost of holding the land during the development process, and the cost of providing services to meet City standards for development. The cost of raw land is influenced by variables such as scarcity, location, availability of public utilities, zoning, and unique features like trees and adjoining uses. In Orange County, undeveloped land is limited and combined with a rapidly growing population land prices have generally increased. A review of lots for sale and recently sold, using *Zillow* and *LoopNet* listings, found only two vacant lots zoned for residential use in Stanton. The land price for the first was \$1,000,000 for 0.7 acres or \$32.80 per square foot of unentitled land. The price for the second was \$350,000 for 6,372 square feet or \$54.93 per square foot of unentitled land.

<sup>&</sup>lt;sup>1</sup> Based on a hypothetical 4-unit project.

A small number of underdeveloped parcels with a single-family unit that could be redeveloped with larger, single-family homes (with ADUs) or duplexes have been sold for \$200,000 to \$375,000 or \$34.01 to \$54.47 per square foot, largely depending on the location within the community.

It is difficult to ascertain the cost of raw land for multifamily development since there has been a limited number of recent multifamily sales in Stanton. An 8-unit property (two adjacent fourplexes) at 10550 Bell Street sold in February 2021 for \$1,999,999 or \$253.97 per square foot (\$250,000 per unit).

# Cost of Construction

Construction cost is determined primarily by the cost of labor and materials. The relative importance of each is a function of the complexity of the construction job and the desired quality of the finished product. As a result, builders are under constant pressure to complete a project for as low a price as possible while still providing a quality product. This pressure has led (and is still leading) to an emphasis on labor-saving materials and construction techniques.

The International Code Council (ICC) provides estimates for the average cost of labor and materials for typical Type VA protected, wood-frame housing. Estimates are based on "good-quality" construction, providing for materials and fixtures well above the minimum required by state and local building codes. In the 2018 edition of the Building Safety Journal, the ICC estimated that the average per square foot cost for good-quality housing in the Anaheim/Stanton area was \$129-167 per square foot for Type I or II multifamily construction, \$113-147 per square foot for Type V (Wood Frame) multifamily construction, and \$122-141 per square foot for Type V (Wood Frame) one-and two-family dwelling construction. Although construction costs are a substantial portion of the overall development cost, they are consistent throughout the Orange County area, and therefore are not considered a major constraint to housing production. The 2020 COVID-19 pandemic social distancing guidelines may increase constructions costs for an unknown period.

Construction cost increases, like land cost increases, affect the ability of consumers to pay for housing. Construction cost increases occur due to the cost of materials, labor, and higher government-imposed standards (e.g., energy conservation requirements). The development community is currently producing market rate for-sale housing that is affordable to moderate and above moderate-income households.

# Cost and Availability of Financing

Financing is critical to the housing market. Developers require construction financing and buyers require permanent financing. The two principal ways in which financing can serve as a constraint to new residential development are the availability and cost of construction financing and the availability and cost of permanent financing.

- If financing is not easily available, then more equity may be required for developing new projects and fewer homebuyers can purchase homes, since higher down payments are required.
- Higher construction period interest rates for developers result in higher development costs. For homebuyers, higher interest rates translate into higher mortgage payments (for the same loan amount), which therefore reduces the purchasing power of homebuyers.

On May 6, 2021, the reported average rate for a 30-year mortgage was 2.96% with 0.6 fees/points (Freddie Mac, 2021). From 2005 through 2021, average monthly mortgage rates have ranged from a high of 6.76% in July 2006 to today's record lows. For homebuyers, it is necessary to pay a higher down payment than in the recent past, and demonstrate credit worthiness and adequate incomes, so that loan applications meet standard underwriting criteria. While adherence to strict

underwriting criteria was not required during the early and mid-2000s, the return to stricter standards is consistent with loan standards prior to 2001.

# Approved and Built Densities

While the City's zoning regulations identify minimum and maximum densities that can be developed in Stanton, individual developers may opt to build at the lower, mid-range, or higher end of allowed densities. Recent projects in Stanton that are built or are under construction are consistent with the densities anticipated by the City's General Plan, Stanton Plaza Specific Plan, and Zoning Code and typically built within the maximum allowable density. The City has received feedback from the development community that the maximum density levels are realistic and achievable, and the City expects to continue to see projects built at or around the maximum allowable density.

Under the discussion of realistic capacity in Chapter 5, Housing Resources, the anticipated building densities are defined for the sites selected to accommodate the City's RHNA. Built density generally varies by lot size whereby the larger the property the more likely the development will meet or exceed the maximum density allowance. The realistic capacity assumptions take this into account and depending on the zone and site size, projects are conservatively anticipated to develop at 50%, 75%, or 80% of the maximum permitted density. These assumptions are based on recently approved projects and development trends. Therefore, it is acknowledged and factored in that developers may request project densities below the maximum allowed and this does not present a complicating constraint to housing development.

#### AFFORDABLE HOUSING DEVELOPMENT CONSTRAINTS

In addition to the constraints to market rate housing development discussed above, affordable housing projects face other constraints. While there is a range of sites available for potential affordable housing projects, as well as projects that focus on special needs populations, financial assistance for the development of affordable housing is limited and highly competitive.

Multiple funding sources are typically needed to construct an affordable housing project since substantial subsidies are required to make the units affordable to extremely low, very low, and low-income households. It is not unusual to see five or more funding sources assembled to make a project financially feasible. Each of these sources may have different requirements and application deadlines, and some sources may require that the project has already successfully secured financing commitments. Since financing is so critical and is also generally competitive, organizations and agencies that provide funding can often effectively dictate the type and size of projects. Thus, in some years senior housing may be favored by financing programs, while in other years family housing may be preferred. Target income levels can also vary from year to year.

This situation has worsened in recent years. Federal and state funding has decreased and limited amounts of housing funds are available. Tax credits, often a fundamental source of financing for affordable housing, are no longer selling on a one for one basis. In other words, once a project has received authorization to sell a specified amount of tax credits to equity investors, the investors are no longer purchasing the credits at face value but are purchasing them at a discount.

Nonetheless, the City has had success in collaborating with other stakeholders for the development of affordable housing in Stanton. In partnership with Orange County and Jamboree Housing Corporation, state funding was recently reserved for the conversion of two local motels to permanent supportive housing that will create a total of 132 new affordable homes for people experiencing homelessness. As well, the City recently partnered with Habitat for Humanity on the construction of six new moderate-income units.

# 4C. Environmental Constraints

Environmental hazards affecting residential development in the City include geologic and seismic conditions, which provide the greatest threat to the built environment, and flooding hazards. The following hazards may impact development of residential units in Stanton.

# Geologic and Seismic Hazards

Similar to other southern California cities, the City of Stanton is located in an area of high seismic activity. Although no active or potentially active faults traverse the City, Stanton is close to five major fault zones: Newport-Inglewood-Rose Canyon Fault Zone, Elsinore Fault Zone (Whittier section), Norwalk Fault, Elysian Park Fault, and the San Andreas Fault. Surface rupture in Stanton is unlikely since no faults have been identified within the city boundaries. However, the City is likely to experience ground shaking, the degree to which would be based on the fault from which the earthquake occurs, distance from the City, and the magnitude. Impacts of an earthquake include potential liquefaction, which occurs when the strength and stiffness of a soil is reduced by intense ground shaking. As shown in Exhibit 6-2 of the Community Health & Safety Element, the entire City of Stanton is located in a liquefaction hazard zone. Structures particularly susceptible to earthquake damage include tilt-up structures, unreinforced masonry buildings, older buildings, and mobile homes. After the 1971 San Fernando earthquake, building codes and design criteria were updated to address seismic occurrences, and therefore any new development on the identified housing sites would be subject to building code standards related to seismic activity. Note that there are no unreinforced masonry buildings within the City.

#### Flood Hazards

Although Stanton contains no natural, permanent water features, the entire city is located within a flood zone according to the Federal Emergency Management Agency (FEMA). Flood Zone X is defined as an area within a 500-year flood; an area within a 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; or an area protected by levees from a 100-year flood. This flood hazard zone is shown on Exhibit 6-3 in the Community Health & Safety Element. Additional building and safety standards for construction in a flood zone may result in increased construction cost on identified housing sites; however, the standards would allow housing units to withstand flooding impacts.

The City is located within the dam inundation areas of the Prado Dam and Carbon Canyon Dam. Prado Dam is a flood control and water conservation project constructed and operated by the U.S. Army Corps of Engineers, Los Angeles District. The dam provides flood control and water conservation storage for Orange County. The dam is located approximately 23 miles northeast of Stanton, on the Santa Ana River, west of the City of Corona. According to the U.S. Army Corps of Engineers dam inundation maps, in the event of dam failure the flood wave would reach Stanton in approximately 6.5 hours and would be approximately four feet deep. Carbon Canyon Dam provides flood control in and around the drainage basin. In conjunction with Brea and Fullerton Dams, Carbon Canyon Dam is vital for the flood protection of portions of the coastal plains in Orange County, including the cities of Brea, Fullerton, Placentia, and Anaheim. The dam is located approximately 12.5 miles northeast of Stanton, approximately four miles east of the City of Brea. According to the U.S. Army Corps of Engineers dam inundation maps, in the event of dam failure the flood wave would reach Stanton in approximately 7.5 hours and would be approximately one foot deep. This issue is also addressed in the General Plan Community Health and Safety Element.

# **4D. Infrastructure Constraints**

Another factor adding to the cost of new construction is the provision of adequate infrastructure:

major and local streets; curbs, gutters, and sidewalks; water and sewer lines; storm drains; and street lighting. All these improvements are required to be built or installed in conjunction with new development. In most cases, these improvements are dedicated to the City, which is then responsible for their maintenance. The cost of these facilities is borne by developers, added to the cost of new housing units, and eventually passed on to the homebuyer or property owner. As noted in the Resources chapter of this Housing Element, public infrastructure and services are available, or are programmed to be made available, for all the sites included in the sites inventory, including the capacity to accommodate Stanton's total share of the regional housing need (RHNA). Furthermore, General Plan Action ICS-2.1.1 (a) requires "all new development to pay its fair share of the cost of all essential linear infrastructure improvements, including improvements to the sewer, stormwater, and potable water city systems."

Senate Bill 1087 (enacted 2006) requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. Senate Bill 1087 also mandates priority sewage collection and treatment service to housing developments providing units affordable to lower income households. The City will provide a copy of the Housing Element to its water and sewer providers in compliance with Government Code Section 65589.7 and SB 1087. As well, the Community Development Department will continue to coordinate with the water and sewer providers to ensure priority service provision to affordable housing developments.

# Water Capacity

Water supply and distribution in Stanton is provided by Golden State Water Company's West Orange County System (WOCS) in the Los Alamitos service area. Water delivered to customers in the WOCS is a blend of groundwater pumped from the Orange County Groundwater Basin and imported water from the Colorado River Aqueduct and State Water Project, imported and distributed by the Metropolitan Water District of Southern California (MWD). Wells have historically supplied 85% of water in the WOCS. Deficient, undersized water mains are present in the City and will need to be replaced as new development proceeds.

The RHNA falls within the buildout projections of the General Plan. The General Plan Final Environmental Impact Report (FEIR) determined that existing water supply for the City is sufficient to meet projected water demands associated with the General Plan buildout, assuming source and supply capacities remain consistent with current conditions. Golden State Water Company (GSWC) facilities currently serving the West Orange County System, including the City of Stanton, are adequate to meet anticipated service demands associated with buildout of the General Plan. In addition, the City has outlined a series of goals, strategies, and actions in the General Plan to ensure the continued protection of its water resources. These goals include the maintenance of the existing water linear infrastructure. A fair share cost-sharing program is designed to hold individual projects responsible for water supply and service impacts. These measures, along with the conservation and management efforts by Municipal Water District of Orange County and GSWC to protect future water supplies, will help ensure adequate water capacity to accommodate the RHNA..

#### Sewer Capacity

The Public Works Department maintains and operates the City's sanitary sewer collection system. The system receives wastewater flows from 3,100 acres of tributary area. The City has three major trunk lines, with one lift station near the intersection of Court Street and Acacia Avenue. Wastewater flows from north to south delivering waste to the County District No. 3 facility.

The Orange County Sanitation District (OC San) provides wastewater collection, treatment, and

disposal services for the central and northwest portions of Orange County. OC San has two treatment plants serving the City of Stanton: Reclamation Plant No. 1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. Approximately 189 million gallons per day (mgd) of wastewater from residential, commercial, and industrial sources are treated at the two plants. During FY 2019-20, OC San's Capital Improvement Program included improvement projects at both plant facilities and to the wastewater collection system.

According to the City of Stanton Public Works Department, the local sanitary sewer system has adequate capacity to accommodate development associated with General Plan buildout projections. Nonetheless, individual developments would be reviewed by the Public Works Department and OC San to determine if sufficient sewer capacity exists to serve the proposed development. Both districts charge fees for connecting to the sewerage system or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. The fees are required to construct new sewer infrastructure and/or incremental expansions to the existing sewerage system to accommodate individual development.

# 5 Resources

This section of the Housing Element describes the various resources available for the development, rehabilitation, and preservation of housing in Stanton. This includes the availability of land resources, administrative resources available to assist in implementing Stanton's housing programs, financial resources available to support housing in the community, and resources for energy conservation.

# **5A. Regional Housing Needs Allocation (RHNA)**

California General Plan law requires each city and county to have land zoned to accommodate its fair share of the regional housing need. The Department of Housing and Community Development (HCD) allocates a numeric regional housing goal to the Southern California Association of Governments (SCAG). SCAG is then mandated to distribute the housing goal among the city and county jurisdictions in the region. This share for the SCAG region is known as the Regional Housing Needs Allocation, or RHNA. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the SCAG region so that every community provides for a mix of housing for all economic segments. The housing allocation targets are not building requirements; rather, they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period.

The final RHNA for the SCAG region was adopted on March 4, 2021. This RHNA covers an 8-year planning period (June 30, 2021 through October 15, 2029) and is divided into four income categories: very low, low, moderate, and above moderate.

As determined by SCAG, the City of Stanton's fair share allocation is 1,231 new housing units during this planning cycle, with the units divided among the four income categories as shown in Table 5-1. Pursuant to AB 2634, local jurisdictions are required to project the housing needs of extremely low-income households (0-30% Area Median Income or AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation; therefore, the City's very low-income RHNA of 165 units can be split into 82 extremely low-income and 83 very low-income units. Housing for lower income households is not typically provided in the Orange County market without some level of subsidy or regulatory requirement, and thus the Housing Element must provide sites at sufficient densities, combined with programs to support affordability, to address the housing needs of lower income households.

TABLE 5-1: RHNA 2021-2029

Income Group	Total Housing Units Allocated	Percentage of Units
Extremely/Very Low	165	13%
Low	145	12%
Moderate	231	19%
Above Moderate	690	56%
TOTAL	1,231	100%

Source: Southern California Association of Governments, 2021

#### PROGRESS TOWARDS THE RHNA

Since the RHNA uses June 30, 2021 as the baseline for growth projections for the 2021-2029 planning period, jurisdictions may count housing units that have been developed, are under construction, and/or have received their building permits after June 30, 2021 towards their RHNA. Since this date, 540 housing units have been developed, are under construction, or have received their building permits in Stanton (see Table 5-2).

Jurisdictions may also count projects that are approved/entitled but not yet built or under construction; 413 units across all income categories have been approved/entitled and are expected to be developed within the planning period. These credits towards meeting the City's RHNA are specified in Table 5-2, and the relative affordability of each unit type/project is described in the following sections.

**TABLE 5-2: CREDITS TOWARDS THE RHNA** 

	Extremely and Very Low-income (0-50% AMI)	Low-income (51-80% AMI)	Moderate- income (81- 120% AMI)	Above Moderate- income (121%+ AMI)	Total
Units Constructed/Under Const	ruction/Building	Permits Issued	since June 30, 2	021	
VRV - 12736 Beach Blvd			100*	200	300
7161 Katella Ave	72**				72
The Lighthouse - 10871 Western Ave				40	40
7162 Kermore Ln				4	4
7181 Kermore Ln				4	4
7922 W Cerritos Ave			6***		6
Lantana@Beach - 12631-12811 Beach Blvd				84	84
8771 Katella Ave				2	2
Accessory Dwelling Units	7	12	8	1	28
Subtotal	79	12	114	335	540
Approved/Entitled Units Not Ye	t Under Construc	ction			
11850 Beach Blvd	60**				60
10572 Lexington St				2	2
11752 Beach Blvd				17	17
Cloud House - 12331-12435 Beach Blvd			121*	200	321
7091 Kermore Ln				7	7
7320 Katella Ave				6	6
Subtotal	60	0	121	232	413
TOTAL	139	12	235	567	953

Source: City of Stanton, 2021

Notes:

<sup>\*</sup> These units do not have affordability restrictions. Market rate rents and sale prices for apartments and condominiums fall within levels affordable to households earning moderate incomes (81-120% AMI) and are allocated as such.

<sup>\*\*</sup> These units are all deed restricted to extremely low and very low-income households.

<sup>\*\*\*</sup> This project received a density bonus and is 100% affordable to moderate-income households.

#### AFFORDABILITY OF UNITS CREDITED TOWARDS THE RHNA

Units credited towards the RHNA are distributed among the four affordability groups (extremely/very low, low, moderate, and above moderate) based on affordability restrictions (as is the case with affordable housing projects) or housing cost for those specific types of units based on real home rental/sale rates and established affordability levels. For example, the market rate rents and sale prices for apartments and condominiums in Stanton fall within levels affordable to households earning moderate incomes (81-120% AMI) and are allocated as such, as discussed in the above Housing Affordability by Income Group discussion on page 37. The projected affordability of ADUs is based on SCAG's Regional Accessory Dwelling Unit Affordability Analysis (December 2020). The City has included a program to monitor the extent of ADU production to ensure that the ADU regulations are successful and that the Housing Element goals and RHNA production can be met (see Program 7).

Based on a review of rental ads on *Zillow.com* and *Apartments.com* in May 2021, the average rents reported for Stanton were \$1,201 for studio apartment units, \$1,570 for 1-bedroom apartments, \$1,997 for 2-bedroom apartments, \$2,149 for 3-bedroom apartments, and \$2,900 for apartments with four or more bedrooms. The average rent across all units in Stanton is \$1,870 per month. Based on this data and the housing affordability thresholds shown in Table 3-25 of the Needs Assessment, these apartment unit sizes are affordable to low-income (50-80% AMI) households. However, because it cannot be guaranteed that approved/entitled projects will deliver these smaller unit sizes at rents affordable to low-income families, all multifamily rental units are credits toward meeting the City's moderate-income RHNA (even though some units may ultimately be affordable to lower income households).

Condominium units are considered entry-level homes and based on pricing are allocated as affordable to 4-person, moderate-income households. According to *Zillow.com*, in May 2021 the median price for condominiums sold in the City was \$472,988. This price is within the affordability level for a 4-person, moderate-income family and is allocated as such. However, as the maximum affordable price for a 4-person, moderate-income family to purchase a home (as shown in Table 3-25 of the Needs Assessment) is \$476,828, if the condominiums were priced even modestly higher they would not be considered affordable. The market rate cost of single-family units is considered affordable to above moderate-income households.

# UNITS CONSTRUCTED OR UNDER CONSTRUCTION

According to City building permit records, since June 30, 2021, 540 new units have been constructed, are under construction, or have building permits pulled in Stanton, of which 91 are affordable to lower income households, 108 units are affordable to moderate-income households based on market rate rents, 6 units are deed restricted for moderate-income households, and the remaining 335 units are affordable to above moderate-income households. Constructed/under construction/building permits issued units include the following projects:

## • VRV | 12736 Beach Boulevard

VRV is a mixed-use development currently under construction in the South Gateway Mixed-Use Overlay zone. The project is located at 12736 Beach Boulevard and consists of a five-story, 300-unit, market-rate apartment community with a ground floor commercial component. This development is assumed to be affordable to moderate-income households as market-rate rents in Stanton are typically affordable to moderate-income households.



Source: AO Architects, 2021

# • 7161 Katella Avenue (formerly Stanton Inn & Suites)

As part of a coordinated effort between the City, Jamboree Housing, and the County of Orange, this redevelopment project is transforming the existing Stanton Inn & Suites motel into permanent supportive housing with services for vulnerable individuals, seniors, and veterans. The project is currently converting the motel to 72 studio units that will be affordable to extremely low and very low-income individuals. The housing and onsite services will help to ensure the health and stability necessary for formerly homeless residents to successfully live independently.

# • The Lighthouse | 10871 Western Avenue

The Lighthouse is a 40-unit detached condominium subdivision that is being developed on the site of the former Lighthouse Church. The project is a Planned Development on an underutilized site located at 10871 Western Avenue in the High Density Residential zone. This development is assumed to be affordable to above moderate-income households as new detached condominium construction in Stanton is typically affordable to above moderate-income households.



Source: KB Home, 2021

#### • 7162 Kermore Lane

The project is an infill development in the Medium Density Residential zone involving the construction of four single-family detached condominium units. This development is assumed to be affordable to above moderate-income households as new single-family home construction in Stanton is typically affordable to above moderate-income households.

## • 7181 Kermore Lane

The project is an infill development in the Medium Density Residential zone involving the construction of four single-family detached condominium units. This development is assumed to be affordable to above moderate-income households as new single-family home construction in Stanton is typically affordable to above moderate-income households.

#### • 7922 W Cerritos Avenue

The applicant for this project (Habitat for Humanity) received a density bonus to increase the number of allowed units from four to six. The project is deed restricted for 100% moderate-income housing. Six single-family detached condominium units will be constructed within the Medium Density Residential zone just west of Beach Boulevard. This development is affordable to moderate-income households.

# • Lantana@Beach/The Village Center | 12631-12811 Beach Boulevard

Lantana@Beach is part of a joint mixed-use development between Brookfield Residential and Frontier Real Estate Investments. The developers have overhauled a 10-acre retail complex at the intersection of Beach and Garden Grove Boulevards into approximately 95,000 square feet of stores, restaurants, and other businesses. The housing component of the project is located on an adjacent 12-acre site and includes 208 condominium units. The project is being developed in phases, the last 84 units of which were under construction as of June 30, 2021. This development is assumed to be affordable to moderate-income households as new multifamily home construction in Stanton, including condominiums, is typically affordable to moderate-income households.

#### • 8771 Katella Avenue

The project involves a subdivision to create two condominium lots for the construction of two single-family detached condominium units in the General Mixed-Use Overlay zone. This development is assumed to be affordable to above moderate-income households as new single-family home construction in Stanton is typically affordable to above moderate-income households.

#### UNITS APPROVED/ENTITLED

Based on City records, 413 units have been approved in Stanton. These units are not currently under construction but are expected to come online during the planning period. Of these 413 units, 60 are affordable to extremely low-income households/individuals, 121 units are affordable to moderate-income households (based on market rate rents that fall within affordable levels), and 232 are affordable to above moderate-income households. Projects that are approved but not yet constructed include the following:

# • 11850 Beach Boulevard (formerly Tahiti Motel)

In conjunction with the Stanton Inn & Suites project described above, Jamboree Housing is also currently converting a second motel - the Tahiti Motel - into 60 studio units for permanent supportive housing that will be affordable to extremely low and very low-income individuals, and which will provide onsite services that will assist residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community.

# • 10562 Lexington Street

The project is an infill development in the Medium Density Residential zone involving the construction of two single-family detached dwelling units. This development is assumed to be affordable to above moderate-income households as new single-family home construction in Stanton is typically affordable to above moderate-income households.

#### • 11752 Beach Boulevard

The project is for the construction of 17 three-story attached condominium units located at 11752 Beach Boulevard in the General Mixed-Use Overlay zone. The site is underutilized and currently developed with a stand-alone restaurant. This development is assumed to be affordable to above moderate-income households.

# • Cloud House | 12331-12435 Beach Boulevard

Cloud House will be the second Bonanni Development project constructed in the City following the development of VRV, which is currently under construction (see above). The project entails a new 321-unit apartment complex on a 3.75-acre site at 12331-12435 Beach Boulevard in the South Gateway Mixed-Use Overlay zone. This development is assumed to be affordable to moderate-income households as market-rate rents in Stanton are typically affordable to moderate-income households.

#### • 7091 Kermore Lane

The project is an infill development in the Medium Density Residential zone involving the construction of seven single-family detached condominium units. This development is assumed to be affordable to above moderate-income households as new single-family home construction in Stanton is typically affordable to above moderate-income households.

#### • 7320 Katella Avenue

The project is an infill development in the High Density Residential zone involving the construction of six townhome units. This development is assumed to be affordable to above moderate-income households.

#### **REMAINING RHNA**

The City has already achieved 77% of its overall RHNA with housing units constructed, under construction, or approved/entitled (953 units). With these units taken into account, the City has fulfilled its allocation of moderate-income units and has a remaining RHNA of 282 units (26 extremely low/very low-income units, 133 low-income units, and 123 above moderate-income units) as shown in Table 5-3.

**TABLE 5-3: REMAINING 6TH CYCLE RHNA** 

Status	Extremely and Very Low-income (0-50% AMI)	Low-income (51-80% AMI)	Moderate- income (81-120% AMI)	Above Moderate- income (121%+ AMI)	Total
RHNA Allocation	165	145	231	690	1,231
Constructed, Under					
Construction, Permits	79	12	114	335	540
Issued (Since 7/1/2021)					
Units Approved/Entitled	60	0	121	232	413
Remaining Allocation	26	133	0 (-4)	123	282

Sources: City of Stanton, 2021; Southern California Association of Governments, 2021

# **5B. Residential Sites Inventory**

Housing element law requires an inventory of land suitable and available for residential development (Government Code Section 65583(a)(3)). The key purpose of this inventory is to determine whether a jurisdiction has allocated sufficient land for the development of housing to meet the jurisdiction's share of the regional housing need, including housing to accommodate the needs of all household income levels.

This section provides an analysis of the land available within Stanton for residential development. In addition to assessing the quantity of land available to accommodate the City's total housing needs, this section also considers the availability of sites to accommodate a variety of housing types suitable for households with a range of income levels and housing needs. As indicated above, the City has met some of its identified regional need through projects that are currently in the pipeline. The City has a remaining RHNA of 282 units across all income categories and has available residential development opportunities with sufficient capacity to meet the identified housing need (see Figure 5-1, Housing Opportunity Sites). The opportunity sites shown here consist of proposed developments, vacant sites, and underutilized sites to accommodate the RHNA.

A citywide parcel database, aerial photos, and General Plan GIS data were used to locate parcels for this update. This update also considered the viability of sites identified in the prior planning period, many of which continue to be suitable sites for future development due to their proximity to transit, public services, goods, amenities, and activity centers. Parcel acreages by land use designation are based on assessor and GIS data.

#### SITES INVENTORY CONSIDERATIONS

#### Zoning for Lower income Households

The capacity of sites that allow development densities of at least 30 units per acre may be credited toward the lower income RHNA based on State law. Zones that allow less than 30 units per acre but facilitate multifamily housing are considered appropriate to accommodate housing for moderate-income households. Much of the moderate-income need will be met by private market construction of non-subsidized rental units and entry-level condominiums.

# Assembly Bill 1397

Consistent with updated housing element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower income sites inventory presented in this chapter is predominately limited to parcels that are between 0.5 and 10 acres in size, as the State has indicated these size

parameters are most adequate to accommodate lower income housing need.

AB 1397 also adds specific criteria for assessment of the realistic availability of nonvacant sites during the planning period. If nonvacant sites accommodate half or more of the lower income need, the housing element must detail "substantial evidence" that the existing use does not constitute an impediment for additional residential use on the site. Due to the built-out nature of Stanton, most sites have existing uses. Nonvacant sites included in the inventory have been chosen due to their location, existing uses, and potential for intensification. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain uses of local importance are not included, and clear criteria were used to evaluate all sites, as described below under Mixed-Use Sites.

AB 1397 requires that vacant sites identified in the previous two Housing Elements and nonvacant sites identified in the previous Housing Element only be deemed adequate to accommodate a portion of the housing need for lower income households if the site is zoned at residential densities consistent with the default density established by HCD (30 units per acre) and the site allows residential use by right for housing developments in which at least 20% of the units are affordable to lower income households. Nonvacant sites identified in the previous Housing Element and vacant sites identified in the previous two Housing Elements but credited toward the moderate or above moderate-income RHNA in the current Housing Element are not subject to the provisions of AB 1397 since they are not intended to meet the lower income RHNA.

#### No Net Loss Provision

Government Code Section 65863 stipulates that a jurisdiction must ensure that its housing element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the housing element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project. Program 2 is included in the Housing Plan to set up a process for compliance.

#### SITES TO ACCOMMODATE REMAINING RHNA

The following sections provide details on the City's 2021-2029 Housing Element sites inventory. The opportunity areas identified involve sites that can realistically be developed or redeveloped with residential units during the planning period. The sites chosen are either vacant or significantly underutilized given their size and location. As market forces continue to push toward higher densities, recycling of underutilized land is expected to occur at an increasing rate. If the trend continues, the City can anticipate increased recycling of land, particularly in higher-density areas where economies of scale can be realized.

The City of Stanton's 6<sup>th</sup> Cycle residential sites fall into four categories:

- 1) Proposed development sites;
- Accessory dwelling units;
- 3) Vacant residential parcels; and
- 4) Vacant and underutilized mixed-use parcels that are suitable for higher intensity mixed-use development/redevelopment.

As described in this section, the City has sufficient land appropriately zoned for residential or mixed-uses throughout the community to accommodate its RHNA for the 2021-2029 planning period. Moreover, Stanton has a proven track record of supporting the development of affordable projects, working with affordable housing developers, promoting home types that are affordable to lower income households including multifamily projects and mixed-use developments, and addressing needs of the community's vulnerable populations including seniors and homeless persons. These sites are illustrated on Figure 6-1, Housing Opportunity Sites, and detailed in Appendix A.

#### PROPOSED DEVELOPMENT SITES

Three projects in various stages of planning review are included as sites. The densities and unit counts proposed by these projects are realistic and consistent with similar projects that have been approved and successfully developed (or are under construction) in Stanton. The three sites are expected to yield 120 units, seven of which will be affordable to low-income households and 113 units affordable to above moderate-income households. The status of the following projects is as of June 2021. The projects are summarized below and quantified in Table 5-4.

#### • 12200 Beach Boulevard

The project tentatively known as The Bigsby at Beach will be the third Bonanni Development project in Stanton. The project will involve the construction of 79 townhomes, seven of which will be deed restricted for low-income households. The project is located in the General Mixed-Use Overlay zone.

# • KB Assemblage | 7455 Katella Avenue

The proposed project is an infill development in the General Mixed-Use Overlay zone involving the construction of 36 single-family detached condominium units. This development is assumed to be affordable to above moderate-income households as new single-family home construction in Stanton is typically affordable to above moderate-income households.

#### • 8222 Starr Street

The proposed project is a Planned Development in the North Gateway Mixed-Use Overlay zone involving the construction of five single-family detached dwelling units. This development is assumed to be affordable to above moderate-income households as new single-family home construction in Stanton is typically affordable to above moderate-income households.

TABLE 5-4: SUMMARY OF RESIDENTIAL CAPACITY ON PROPOSED DEVELOPMENT SITES

		Extremely and Very Low-income (0-50% AMI)	Low-income (51-80% AMI)	Moderate- income (81-120% AMI)	Above Moderate- income (121%+ AMI)	Total
12200 Beach Blvd			7		72	79
KB Assemblage -					36	36
7455 Katella Ave					30	30
8222 Starr St					5	5
	TOTAL	0	7	0	113	120

Source: City of Stanton, 2021

#### **ACCESSORY DWELLING UNITS**

Accessory dwelling units (ADUs), also referred to as second units and granny flats, are small, self-contained units that provide a kitchen, bathroom, and sleeping area. The unit can be attached to the main home with a separate entrance or can be a small detached unit in the rear yard or above a garage. Because of their small size, ADUs typically rent for less than apartments and can provide affordable rental options for smaller households, as well as rental income for the homeowner.

Between 2017-2019, the State adopted a series of additional requirements for local governments related to ADU ordinances. In response to these new ADU laws, Stanton has continually updated its Zoning Code to align with State law and better facilitate the production of ADUs and Junior ADUs. The City has been successful in its efforts, having issued building permits for 13 ADUs in 2018, 12 ADUs in 2019, and 19 ADUs in 2020, with additional permits currently pending.

Given Stanton's growing track record in producing ADUs, combined with the City's efforts to actively inform residents of the opportunity to construct ADUs, including providing FAQs on the Planning Division webpage with links to HCD's ADU guidance material, the sites inventory projects a minimum of 14.7 new ADUs to be produced annually, or 117 over the 2021-2029 planning period. The projected affordability of these ADUs is based on SCAG's Regional Accessory Dwelling Unit Affordability Analysis (December 2020). The City will continue to monitor the extent of ADU production to ensure that the ordinance is being successful and that the Housing Element goals and RHNA production numbers can be met.

# Realistic Capacity Assumption

A review of existing and proposed residential projects within the City helps to identify the realistic density that can be anticipated for potential development. To determine realistic capacity assumptions for the higher density residential zones and mixed-use overlays, the City surveyed recent projects to identify the densities that have been achieved in these areas.

In the RM and RH zones, projects have occurred at between 38 and 95 percent of maximum capacity, with projects in more recent years occurring closer to maximum density and with the project at 38% being somewhat of an anomaly since the subdivision of large (3,054 – 3,368 sq. ft.) homes will likely be the last of its kind to be constructed in the built-out City. Therefore, all RM and RH sites are conservatively assumed to develop at 75% of maximum capacity. Projects surveyed include: The Lighthouse is a 40-unit detached condominium subdivision in the High Density Residential zone. The project is currently under construction and developing at 17 du/ac or at 95% of maximum capacity. An approved/entitled project at 7320 Katella Avenue in the High Density Residential zone involving the construction of 6 townhome units is developing at 83% of maximum capacity. Chateau Estates is a subdivision that was developed in the previous planning period on one of the City's last large (5.06 acres) vacant residential sites. The project provided 35 single-family homes at a density of nearly 7 du/ac or 38% of maximum capacity.

TABLE 5-5: DEVELOPMENT ON HIGHER DENSITY RESIDENTIAL SITES

	# of Units	Density (% max capacity)	Туре	Affordability Level	Zone
The Lighthouse – 10871 Western Ave	40	17 du/ac (95%)	Detached condominiums	Above Mod	RH
7320 Katella Ave	6	15 du/ac (83%)	Townhomes	Above Mod	RH
Chateau Estates – Chateau Ct	35	7 du/ac (38%)	SFR	Above Mod	RH

Source: City of Stanton, 2021

For the mixed-use overlays, development trends vary by lot size whereby the larger the property the more likely the development will meet or exceed the maximum density allowance. Additionally, with larger projects, developers have more flexibility in using the density bonus program (although density bonus units are not assumed as part of this analysis). As such, properties that are less than 1.0 acre in size are assumed to develop at 50% of maximum capacity, while sites ≥1.0 acre in size are assumed to develop at 80% of maximum capacity. Projects surveyed include: VRV is a mixed-use development currently under construction on a 3.75-acre site in the South Gateway Mixed-Use Overlay zone on Beach Boulevard. In May 2020, a General Plan Amendment was approved for the project to allow an increase in density of up to 80 du/ac or over 100% of maximum capacity. Similarly, Cloud House is an approved/entitled 321-unit apartment project on a 3.75-acre site approved under a Planned Development Permit, which allowed for modifications to the development standards including an increase in density of up to 90 du/ac, also over 100% maximum capacity. For comparison, a 17-unit approved townhome project on a 0.92-acre site at 11752 Beach Boulevard in the General Mixed-Use Overlay zone will develop at 18 du/ac or at 41% of maximum capacity.

**TABLE 5-6: DEVELOPMENT ON MIXED-USE OVERLAY SITES** 

	# of Units	Density (% max capacity)	Туре	Affordability Level	Zone	
VRV –	300	80 du/ac	Mixed-use/	Moderate/	SGMX	
12736 Beach Blvd	300	(>100%)	apartments	Above Mod	SUIVIA	
Cloud House –	321	90 du/ac	Apartments	Moderate/	SGMX	
12331-12435 Beach Blvd	321	(>100%)	Apartinents	Above Mod	SOMV	
The Bigsby at Beach –	79	23 du/ac	Townhomes	Low/	GLMX	
12200 Beach Blvd	17	(51%)	TOWITIOTIES	Above Mod	GLIVIA	
11752 Beach Blvd	17	18 du/ac	Townhomes	Above Mod	GLMX	
	17	(41%)	Townhomes	Above wou	GLIVIA	

Source: City of Stanton, 2021

It must also be noted that the sites identified in the mixed-use overlay zones have the potential to develop with strictly commercial uses without a mixed-use or residential component. However, recent development trends in Stanton in the mixed-use overlays indicate a strong preference for housing development where it is allowed in the City, whether vertical or horizontal mixed-use, or strictly residential. Furthermore, as identified in Table 5-8, there is surplus capacity such that the loss of any one site to strictly commercial uses can be absorbed by the sites inventory and the remaining housing opportunity sites.

Table 5-5 summarizes how the various factors identified in housing element law (Government Code Section 65583.2(c)(2)) result in an adjusted site capacity of 80% of the maximum densities in the mixed-use overlay zones for sites 1.0 acre or greater in size.

TABLE 5-7: CAPACITY ADJUSTMENT FACTORS FOR MIXED-USE OVERLAY ZONES

Capacity Factor	Adjustment	Reasoning
Land Use Controls and Site Improvements	95%	For net acreage due to building setbacks and onsite improvements, including sidewalks, utility easements

Realistic capacity of the site	90%	Adjustment based on past development trends for residential redevelopment in the mixed-use zones
Typical densities	95%	Affordable housing projects are built out to almost maximum density
Infrastructure availability	No adjustment	Not applicable; no constraint
Environmental constraints	No adjustment	No known site constraint

#### **VACANT RESIDENTIAL SITES**

There are minimal areas of vacant land remaining in Stanton. Table 5-6 summarizes the vacant land in the City currently zoned for residential development (exclusive of the mixed-use overlays). Locations are shown in Figure 5-1. There are a total of 6 vacant parcels with the capacity for 37 residential units. It is assumed that the potential of 10 dwelling units on five of the parcels would be comprised of market-rate residential units. Parcels with RH (High Density Residential) zoning provide the capacity for 27 units to be counted toward meeting the City's lower income needs.

**TABLE 5-8: VACANT RESIDENTIAL SITES** 

Site No.	APN	General Plan Designation	Zoning Designation	Permitted Density	Parcel Size (Acres)	Net Unit Potential
Vacant	Residential					
1	079-771-36	HDR	RH	11.1 – 30 du/ac <sup>1</sup>	1.24	27
2	131-231-18	LDR	RL	2.1 – 6 du/ac	1.00	4
3	131-231-19	LDR	RL	2.1 – 6 du/ac	0.99	4
4	079-352-08	LDR	RL	2.1 – 6 du/ac	0.16	1
5	079-363-01	LDR	RL	2.1 – 6 du/ac	0.09	1
<u> </u>	079-363-16	LDR	RL	2.1 – 6 du/ac	0.07	'
				TOTAL	3.55	37

Source: City of Stanton, 2021

Notes:

#### **MIXED-USE SITES**

Stanton is an entirely built out city with very limited vacant land available to accommodate new development of any sort. The City has established three mixed-use districts to accommodate additional residential development in areas along major corridors. Current development trends in mixed-use areas show that high residential density is feasible and realistic, and appropriate to accommodate housing for all income levels, including the lower income RHNA. Site selection in the mixed-use overlay zones includes both vacant sites and underutilized sites, which were chosen given their size and location. Mixed-use sites are along major streets in the City, particularly along Beach Boulevard. The City's three mixed-use land use designations allow for high-density residential capacities up to 60 du/ac. Government Code Section 65583.2(c)(3)(B)(iv) allows jurisdictions in metropolitan counties, such as Stanton, to include sites with a minimum density of 30 units per acre as appropriate sites to accommodate lower income households, allowing sites in the mixed-use zones to be counted toward meeting housing needs for all income groups in the City (including lower income). Based on other successful projects in the area, it is assumed that the market can continue to create affordable units at this density. The City has evaluated the development capacity of the mixed-use areas to determine realistic potential development yield based upon evaluation of existing land uses, infrastructure capacity, land use controls, and site

<sup>&</sup>lt;sup>1</sup> RH zoning allows for densities of 11.1 – 18 du/ac and by-right allows development at a net density of 30 du/ac or greater to accommodate lower income households per Government Code Section 65583.2(c)(3)(B)(iv).

#### improvements.

Key sites with existing uses that are suitable for redevelopment typically contain older structures and are underutilized given the development potential afforded by the mixed-use development standards. Examples of existing uses include small-scale commercial uses, used car dealerships and auto repair shops, motels, restaurants, and structures with large surface parking lots. Some sites with existing residential uses provide the opportunity for significant capacity increases. The following criteria was used to identify underutilized parcels in mixed-use zones:

- Improvement value is less than half of the land value (ratio is less than 1.00)
- Structure was built prior to 1990 (and therefore over 30 years of age)
- General characteristics such as unit vacancy, declining uses, low existing floor-area ratio (FAR), etc.
- Location near recent mixed-use or residential development activities on properties exhibiting similar characteristics
- Known redevelopment interest

Table 5-7 summarizes the mixed-use sites identified to meet the RHNA, which can facilitate 1,288 units. These sites contain existing commercial and/or residential uses that are of marginal economic viability, are at or near the end of their useful life, and/or the existing intensity of development is substantially lower than allowed by existing zoning. Sites that are smaller than 0.5 acres have multiple parcels that are adjacent to each other and are appropriate for consolidation into larger development projects, achieving a lot size of at least 0.5 acres. These sites have common ownership, function as a part of a larger site currently, such as a commercial building with an adjacent parking lot, and/or are significantly underutilized and have been identified by developers for potential projects.

**TABLE 5-9: MIXED-USE SITES** 

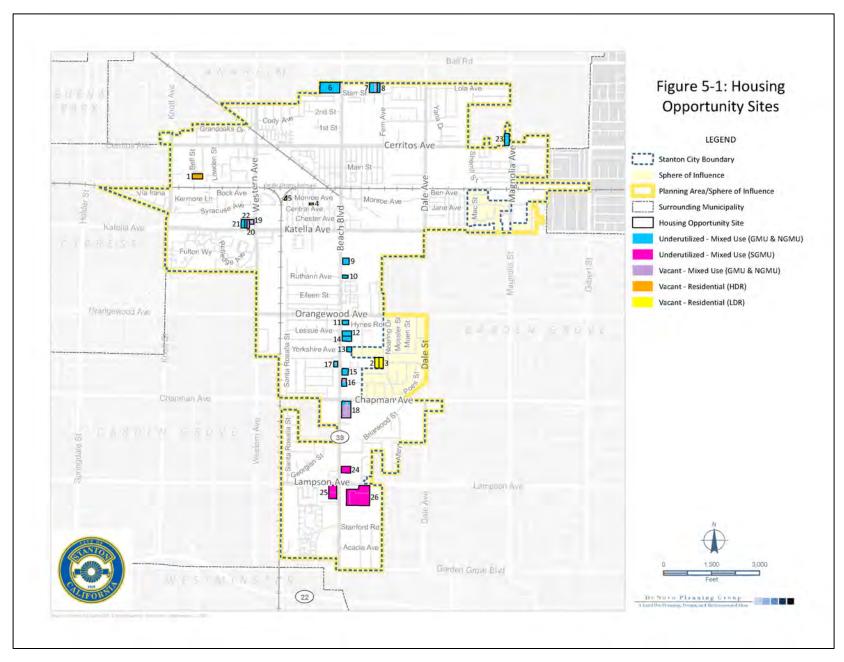
Site No.	APN	General Plan Designation	Zoning Designation	Permitted Density	Parcel Size (Acres)	Net Unit Potential
Mixed-U	se					
6	079-221-15	NGMU	NGMX	25 - 45 du/ac	4.75	171
	126-281-10	NGMU	NGMX	25 – 45 du/ac		
7	126-281-11	NGMU	NGMX	25 – 45 du/ac	1.71	61
	126-281-18	NGMU	NGMX	25 – 45 du/ac		
8	126-281-14	NGMU	NGMX	25 – 45 du/ac	0.57	12
9	131-131-07	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.94	21
10	131-131-05	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.40	9
11	131-211-02	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.64	14
12	131-211-21	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1.14	41
13	131-221-16	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.59	13
14	131-221-45	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1.09	39
15	131-241-45	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.96	21
14	131-241-07	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.04	10
16	131-241-21	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.84	18
	131-263-03	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		11
17	131-263-04	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.51	
	131-263-05	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
	131-411-15	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		126
	131-411-20	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
18	131-411-21	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	3.51	
	131-411-22	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
	131-411-25	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
19	079-371-13	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.49	11
19	079-371-12	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.49	11
20	079-371-09	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.48	10
21	079-371-26	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.69	15
22	079-371-27	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.46	10
	126-363-10	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
22	126-363-11	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1 21	47
23	126-363-16	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1.31	47
	126-363-17	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
24	131-482-36	SGMU	SGMX	30 - 60 du/ac	1.43	68
)E	131-592-21	SGMU	SGMX	30 – 60 du/ac	2.44	117
25	131-592-22	SGMU	SGMX	30 - 60 du/ac	2.44	117
27	131-491-08	SGMU	SGMX	30 - 60 du/ac	0.44	450
26	131-491-09	SGMU	SGMX	30 – 60 du/ac	9.44	453
				TOTAL	34.39	1,288

Source: City of Stanton, 2021

Notes:

<sup>&</sup>lt;sup>1</sup> The General Mixed-Use Overlay Zone allows for stand-alone residential development, subject to a conditional use permit, for properties that are a minimum distance of 150 feet away from intersections of Beach and Katella, Beach and Orangewood, and Beach and Chapman, as measured from the corner formed by a lot's property lines at the street intersection.

#### FIGURE 5-1: HOUSING OPPORTUNITY SITES



# ADEQUACY OF SITES TOWARD THE RHNA

As described previously in this section, the City was allocated 1,231 housing units by the SCAG Regional Housing Needs Allocation (RHNA) for 2021 through 2029. The City's progress to date includes 540 units that have been constructed, are under construction, or have received building permits since June 30, 2021. The City also has an additional 413 units that have been approved/entitled. Stanton has 282 units remaining to be accommodated.

As is shown in Table 5-8, the City has adequate sites to accommodate the RHNA for all income levels. For lower income units (extremely low, very low, and low-income), the City has a remaining allocation of 159 units and can accommodate 1,288 units on sites that allow densities of at least 30 units per acre, consistent with the assumptions for lower income sites established by Government Code Section 65583.2(c)(3)(B)(iv) and that are further supported by the City's history of successful mixed-use and affordable projects. The City also has a surplus of sites for moderate and above moderate-income units.

Including all vacant residential and underutilized mixed-use sites, ADU projections, and projects in the pipeline, the sites inventory identifies capacity for 1,562 units, 1,288 of which are on sites suitable for development of lower income housing. Overall, the City has the ability to adequately accommodate the remaining RHNA (Table 5-8). These sites and the densities allowed will provide opportunities to achieve the remaining RHNA goals for all income categories and can realistically be developed/redeveloped with residential units during the planning period. These areas are considered highly likely to experience recycling for two key reasons: 1) the high demand for more affordable housing throughout the Southern California region, and 2) the availability of underutilized land in areas designated for high-density mixed-use and residential use. The sites chosen are significantly underutilized given their size and location. In addition, recent developments and market interest, and new flexible and housing-supportive zoning standards will serve as a catalyst for more intense development.

Candidate sites within the mixed-use overlay districts are distributed into 25 percent lower income, 19 percent moderate-income, and 56 percent above moderate-income, which mirrors the RHNA distribution by income category assigned by SCAG. It should be noted that based on the allowable density in the General Mixed-Use Overlay (25.0-45.0 du/ac), North Gateway Mixed-Use Overlay (25.0-4 5.0 du/ac), and South Gateway Mixed-Use Overlay (30.0-60.0 du/acre), all mixed-use sites are considered suitable for lower income units.

**TABLE 5-10: SITES INVENTORY SUMMARY** 

Adjustment Factor	Extremely and Very Low-income (0-50% AMI)	Low-income (51-80% AMI)	Moderate- income (81-120% AMI)	Above Moderate- income (121%+ AMI)	Total Units
Minimum Density Guidelines	≥30 (	du/ac			
Remaining 6 <sup>th</sup> Cycle RHNA (Table 5-3)	26	133	0	123	282
Proposed Developments (Table 5-4)	0	7	0	113	120
Accessory Dwelling Units (ADU)	30	50	35	2	117
Vacant Residential Sites	0	27	0	10	37
Mixed-Use Sites	138	128	256	766	1,288
Total Capacity	168	212	291	891	1,562
Shortfall/Surplus	142	79	291	768	1,280

## **AVAILABILITY OF PUBLIC FACILITIES AND SERVICES**

As a highly urbanized community, the City of Stanton generally has in place all of the necessary infrastructure to support future development. All land currently designated for residential use is served by sewer and water lines, streets, storm drains, and telephone, electrical, and gas lines. To assure that future development can be properly served, the City collects various impact fees from developers to cover the costs of providing necessary services and infrastructure. These fees apply to new developments in the City.

SB 1087, effective January 2006, requires water and sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower income households. Pursuant to these statutes, upon adoption of its Housing Element, Stanton will immediately deliver the Element to local water and sewer providers, along with a summary of its regional housing needs allocation.

# 6C. Administrative and Financial Resources

# **ADMINISTRATIVE RESOURCES**

Agencies with administrative capacity to implement programs contained in the Housing Element include the City of Stanton, the regional housing authority, and local and regional non-profit affordable housing developers. The City of Stanton Community and Economic Development Department takes the lead in implementing Housing Element programs and policies. The City has also worked with non-profit developers to expand affordable housing opportunities in Stanton, including two projects in partnership with Jamboree Housing and the County of Orange to convert two motels into permanent supportive housing.

# Community and Economic Development Department

The Community and Economic Development Department consists of four divisions: Planning, Building, Housing, and Economic Development. Development activity within the City is coordinated by the Community and Economic Development Department to ensure orderly growth and the City's housing programs and related activities are managed by the Department. The Planning Division administers the General Plan and zoning and environmental regulations, and provides primary staff assistance to the Planning Commission. The Building Division provides plan review and inspection services to ensure that buildings are safe and sustainable and that construction complies with applicable building codes and regulations.

# Orange County Housing Authority (OCHA)

Orange County Housing Authority (OCHA) administers federally funded programs to provide monthly rental assistance to qualified tenants in privately owned rental housing. The largest such program is the Housing Choice Voucher Program. Participants who receive a Housing Voucher can use this rental assistance in a variety of rental dwellings and locations in Stanton with almost any property owner who is willing to participate in the program.

# Non-Profit Developers

The City has collaborated with affordable housing developers and service providers to accommodate the housing needs of Stanton residents. The following are affordable housing developers and service providers active in the City and County; several are included in the State's list of entities with the legal and managerial capacity to acquire and manage at-risk projects.

- BRIDGE Housing
- C&C Development
- Habitat for Humanity of Orange County
- Jamboree Housing Corporation
- Mercy Housing
- Meta Housing Corporation
- National CORE
- Orange Housing Development Corporation

#### **FINANCIAL RESOURCES**

Stanton has access to a variety of existing and potential funding sources available for affordable housing activities. They include programs from federal, state, local, and private resources and are summarized in Table 5-9. Described below are the three largest housing funding sources the City of Stanton can use for housing production, rehabilitation, or preservation: Community Development Block Grant funds, HOME Investment Partnership funds, and the Housing Choice Voucher Program.

Community Development Block Grants (CDBG): CDBG funds are awarded to entitlement communities on a formula basis for housing activities. Stanton participates in the Urban County Program, through which the County of Orange administers CDBG funds for the unincorporated County as well as cities that participate in the program. Funding is awarded on a competitive basis to each participating city. Activities eligible for CDBG funding include acquisition, rehabilitation, economic development, and public services. It is anticipated that the County will receive \$3,464,473 in CDBG funds for Fiscal Year 2021-2022. Of those funds, Stanton is

anticipated to receive a total of \$XXXXXX.

HOME Investment Partnerships Program: HOME funds are granted on a formula basis from HUD to increase the supply of decent, safe, sanitary, and affordable housing to lower income households. Eligible activities include new construction, acquisition, rehabilitation, and rental assistance. The City participates in the Urban County Program, through which the County of Orange administers HOME funds to projects in participating jurisdictions. County-administered HOME funds for first-time homebuyer assistance are made available to residents or employees of the local jurisdictions participating in the HOME program. New development projects are typically allocated funding on a competitive basis. For Fiscal Year 2021–2022, the County of Orange is anticipated to receive a total of \$1,384,437 in HOME funds.

Housing Choice Voucher Program: The Housing Choice Voucher Program (formerly Section 8) provides rental assistance to owners of private market-rate units on behalf of very low-income tenants. The program's objective is to assist low-income families by providing rental assistance so that they may lease decent, safe, and sanitary housing units in the private rental market. Stanton participates in a consortium to provide assistance to renters based upon a subsidy that is the difference between the tenant's affordable portion and the fair market rent. The program is administered by the Orange County Housing Authority. Approximately 190 households in Stanton receive Housing Choice Vouchers.

TABLE 5-11: FUNDING SOURCES FOR AFFORDABLE HOUSING ACTIVITIES

Program Name	Description	Eligible Activities
Federal Programs		
Community Development Block Grant (CDBG) Program	The Department of Housing and Urban Development (HUD) awards Community Development Block Grants annually to entitlement jurisdictions and states for general activities, including housing, and economic development activities. HUD also offers various other programs that can be utilized by the City and nonprofit and for profit agencies for the preservation of low-income housing units such as Section 202 and Section 108 loan guarantees.	<ul> <li>Acquisition</li> <li>Rehabilitation</li> <li>Homebuyer Assistance</li> <li>Economic Development Assistance</li> <li>Homeless Assistance</li> <li>Public Services</li> <li>Infrastructure Replacement</li> </ul>
HOME Investment Partnerships Program	HOME Investment Partnerships Program funds are awarded annually as formula grants to participating jurisdictions. HUD establishes HOME Investment Trust Funds for each grantee, providing a line of credit that the jurisdiction may draw upon as needed. The program's flexibility allows states and local governments to use HOME funds for grants, direct loans, loan guarantees, or other forms of credit enhancement or rental assistance or security deposits.	<ul><li>Acquisition</li><li>Rehabilitation</li><li>Homebuyer Assistance</li><li>Rental Assistance</li></ul>
Housing Choice Voucher (HCV) Program	Provides rental assistance payments to owners of market-rate properties on behalf of very low-income tenants. The program was formerly the Section 8 Rental Assistance Program.	Rental Assistance
Low Income Housing Tax Credits (LIHTC)	The LIHTC program encourages private investment in the acquisition, rehabilitation, and construction of low-income rental housing. Since high housing costs in California make it difficult, even with federal credits, to produce affordable rental housing, the California legislature created a state low-income housing tax credit program to supplement the federal credit. The state credit is essentially identical to the federal credit, the Tax Credit Allocation Committee allocates both, and state credits are only available to projects receiving federal credits. Twenty percent of federal credits are reserved for rural areas and 10% for nonprofit sponsors. To compete for the credit, rental housing developments must reserve units at affordable rents to households at or below 46% of area median income. The units must be reserved for the target population for 55 years.	New Construction
Mortgage Credit Certificate Program	Offers income tax credits to first-time homebuyers. The OCHA distributes the credits.	Homebuyer Assistance
National Housing Trust Fund (HTF)	The National Housing Trust Fund is a permanent federal program with dedicated sources of funding not subject to the annual appropriations. The funds can be used to increase and preserve the supply of affordable housing, with an emphasis on rental housing for extremely low-income households. California received	<ul><li>Acquisition</li><li>Rehabilitation</li><li>Preservation</li></ul>

Program Name	Description	Eligible Activities
	approximately \$10.1 million for the program in 2019. Funds are made available through a competitive process and are announced through a Notice of Funding Availability.	
Project-based Voucher Program (PBV)	The PBV program is a component of the Housing Choice Voucher program funded through HUD. The program's objective is to induce property owners to make standard housing available to low-income families at rents within the program limits. In return, the Housing Authority or HUD enters into a contract with the owner that guarantees a certain level of rents.	Rental Assistance
Section 811/202 Program (Supportive Housing for Persons with Disabilities/Elderly)	Nonprofit and consumer cooperatives can receive no interest capital advances from HUD under the Section 202 program for the construction of very low-income rental housing for seniors and persons with disabilities. These funds can be used in conjunction with Section 811, which can be used to develop group homes, independent living facilities, and immediate care facilities. Eligible activities include acquisition, rehabilitation, new construction, and rental assistance.	<ul><li>Acquisition</li><li>Rehabilitation</li><li>Homebuyer Assistance</li><li>Rental Assistance</li></ul>
Section 203(k)	Provides fixed-rate, low-interest loans to organizations wishing to acquire and rehabilitate property.	<ul><li>Acquisition</li><li>Rehabilitation</li><li>Refinancing of Existing Debt</li></ul>
Supplemental Security Income (SSI)	SSI is a federal welfare program for persons 65 and over and for blind or disabled persons of any age. "Disabled" means that the recipient has a physical or mental disability that keeps them from working for 12 months or longer, or will result in death. SSI may provide total monthly income or it may supplement a low income. In addition to cash payments, SSI recipients are automatically covered by Medi-Cal, the state health insurance plan.	Supplemental income for rental assistance
State Programs		
Affordable Housing and Sustainable Communities Program (AHSC)	The AHSC Program is administered by the Strategic Growth Council and implemented by the Department of Housing and Community Development (HCD), and funds land use, housing, transportation, and land preservation projects that support infill and compact development and reduce greenhouse gas (GHG) emissions. Funds are available in the form of grants and/or loans in three kinds of project areas: Transit Oriented Development (TOD) Project Areas, Integrated Connectivity Project (ICP) Project Areas, and Rural Innovation Project Areas (RIPA). There is an annual competitive funding cycle.	<ul> <li>New Construction</li> <li>Rehabilitation</li> <li>Housing-Related Infrastructure</li> <li>Sustainable Transportation Infrastructure</li> <li>Transportation-Related Amenities</li> <li>Program Costs</li> </ul>
CalHFA – Multifamily Housing Program	Program provides financing for the acquisition and rehabilitation of existing affordable rental housing. Priority is given to projects currently subject to regulatory restrictions that may be terminated. Assistance is provided through low interest construction and permanent loans. Eligible applicants include local government	<ul><li>Rental Acquisition</li><li>Rental Rehabilitation</li></ul>

Program Name	Description	Eligible Activities
	agencies, private nonprofit organizations, and for-profit organizations.	
CalHFA – Predevelopment Loan Program	Program provides funds to pay the initial costs of developing affordable housing projects. Priority is given to applications with matching financing from local redevelopment agencies or federal programs.	Pre-development
CalHOME Program	CalHOME provides grants to local public agencies and non-profit developers to assist low and very low-income households in becoming homeowners. CalHOME funds may be used for acquisition, predevelopment, development, and rehabilitation costs as well as downpayment assistance. While CalHOME funding has been limited to disaster assistance in recent years, this would be an appropriate program for the City to pursue to begin to develop a local portfolio of housing assistance programs and funds.	<ul> <li>Acquisition</li> <li>Rehabilitation</li> <li>New Construction (including predevelopment)</li> <li>Downpayment Assistance</li> </ul>
Emergency Solutions Grants Program (ESG)	Program makes grant funds available for projects serving homeless individuals and families through eligible non-profit organizations or local governments. Eligible activities include: the rehabilitation and conversion of buildings for use as emergency shelters; the provision of essential services to the homeless; operating support for emergency shelters; and homeless prevention/rapid rehousing activities.	<ul><li>Acquisition</li><li>Rehabilitation</li><li>Provision of supportive services</li></ul>
Golden State Acquisition Fund (GSAF)	Combined with matching funds, GSAF makes up to five-year loans to developers for acquisition or preservation of affordable housing. Loans are a maximum of \$13,950,000. Funds are made available on a first come first serve basis.	<ul><li>Acquisition</li><li>Rehabilitation</li></ul>
Housing for a Healthy California (HHC)	The HHC program provides funding on a competitive basis to developers to create supportive housing for individuals who are recipients of or eligible for health care provided through the California Department of Health Care Services, Medi-Cal program. The program utilizes federal National Housing Trust Funds (NHTF) and allocates these funds competitively to developers for operating reserve grants and capital loans. AB 74 also allows HCD to utilize revenues appropriated to the Department from other revenue sources for HHC purposes.	<ul><li>New Construction</li><li>Acquisition</li><li>Rehabilitation</li></ul>
Homekey	Homekey provides grants to local entities (including cities, counties, and other local public entities such as housing authorities and federally recognized tribes) to acquire and rehabilitate a variety of housing types – such as hotels, motels, vacant apartment buildings, and residential care facilities – in order to serve people experiencing homelessness or who are also at risk of serious illness from COVID-19.	<ul><li>Acquisition</li><li>Rehabilitation</li></ul>
Infill Infrastructure Grant Program (IIG)	The program funds infrastructure improvements to facilitate new housing development with an affordable component in residential or mixed-use infill projects and infill areas. Since all development in Stanton would be considered infill given the built-out nature of the City, this program could be useful to an affordable or special needs housing developer to fund infrastructure improvements. IIG is grant	Infrastructure improvements

Program Name	Description	Eligible Activities
	assistance, available as gap funding for necessary infrastructure improvements.	
Local Early Action Planning (LEAP) Grants	LEAP provides one-time grant funding to cities and counties to update their planning documents and implement process improvements that will facilitate the acceleration of housing production and help local governments prepare for their 6 <sup>th</sup> Cycle RHNA.	<ul> <li>Housing element updates</li> <li>Updates to zoning, plans, or procedures to increase/accelerate housing production</li> <li>Pre-approved arch. and site plans</li> <li>Establishing pro-housing policies</li> </ul>
Mobilehome Park Rehabilitation and Resident Ownership Program (MPRROP)	MPRROP makes short and long-term low interest rate loans for the preservation of affordable mobilehome parks for ownership or control by resident organizations, non-profit housing sponsors, or local public agencies. MPRROP also makes long-term loans to individuals to ensure continued affordability. Funds are made available through a periodic, competitive process.	Preservation
Multifamily Housing Program (MHP)	The MHP provides low interest loans to developers of permanent and transitional rental housing for lower income households. Funds may be used for new construction, rehabilitation, or acquisition and rehabilitation of permanent or transitional rental housing, and the conversion of nonresidential structures to rental housing. Funds are made available through a competitive process and are announced through a Notice of Funding Availability.	<ul><li>New Construction</li><li>Rehabilitation</li><li>Preservation</li></ul>
SB 2 Planning Grants Program	The program provides one-time funding and technical assistance to all eligible local governments in California to adopt and implement plans and process improvements that streamline housing approvals and accelerate housing production. Eligible activities include updating a variety of planning documents and processes such as general plans and zoning ordinances, conducting environmental analyses, and process improvements that expedite local planning and permitting. The planning grants program is funded through the Building Homes and Jobs Act Trust Fund (SB 2, Chapter 364, Statutes of 2017).	<ul> <li>Updates to planning documents</li> <li>Updates to zoning ordinances</li> <li>Environmental analyses that eliminate the need for project-specific review</li> <li>Local process improvements that expedite local planning and permitting</li> </ul>
Transit Oriented Development Housing Program (TOD)	The TOD program makes low-interest loans and grants for rental housing that includes affordable units that are located within one-quarter mile of a transit station. Eligible applicants include cities, counties, transit agencies, developers, and redevelopment agencies. Applications are accepted in response to a periodic Notice of Funding Availability.	<ul><li>New Construction</li><li>Rehabilitation</li><li>Infrastructure Improvements</li></ul>
Veterans Housing and Homelessness Prevention Program (VHHP)	VHHP makes long-term loans for development or preservation of rental housing for very low and low-income veterans and their families. Funds are made available to sponsors who are for-profit or nonprofit corporations and public agencies. Availability of funds is announced annually through a Notice of Funding Availability.	<ul><li>New Construction</li><li>Acquisition</li><li>Rehabilitation</li><li>Preservation</li></ul>

Program Name	Program Name Description			
Local Programs and Private Sources				
California Community Reinvestment Corporation (CCRC)	CCRC is a multifamily affordable housing lender whose mission is to increase the availability of affordable housing for low-income families, seniors, and residents with special needs by facilitating private capital flow from its investors for debt and equity financing to developers of affordable housing. Eligible activities include new construction, rehabilitation, and acquisition of properties.	<ul><li>Acquisition</li><li>Rehabilitation</li><li>New Construction</li></ul>		
Federal Home Loan Bank System	The program facilitates affordable housing programs (AHP), which subsidize the interest rates for affordable housing. The San Francisco Federal Home Loan Bank District provides local service within California. Interest rate subsidies under the AHP can be used to finance the purchase, construction, and/or rehabilitation of rental housing. Very low-income households must occupy at least 20% of the units for the useful life of the housing or the mortgage term.	<ul><li>Acquisition</li><li>Rehabilitation</li><li>New Construction</li></ul>		
Federal National Mortgage Association (Fannie Mae)	Fannie Mae offers a variety of mortgages, including traditional fixed-rate, low down-payment for underserved low-income areas, and mortgages that fund the purchase and rehabilitation of a home.	<ul><li>Homebuyer Assistance</li><li>Rehabilitation</li></ul>		
Freddie Mac HomeOne and Renovation Mortgages	Provides down-payment assistance to first-time homebuyers and second mortgages that include a rehabilitation loan.	<ul><li>Homebuyer Assistance</li><li>Rehabilitation</li></ul>		
Mortgage Revenue Bonds	Tax exempt mortgage revenue bonds can be provided, which require a developer to lease a fixed percentage of units to low-income families at specific rental rates.	<ul><li>Acquisition</li><li>Rehabilitation</li><li>New Construction</li></ul>		

# 5D. Opportunities for Energy Conservation

Planning to maximize energy efficiency and the incorporation of energy conservation and green building features can directly impact housing affordability, in addition to promoting sustainable community design and reduced dependence on vehicles. Such planning and development standards can also significantly contribute to reducing greenhouse gases.

### **GREEN BUILDING PRACTICES**

Green buildings are structures that are designed, renovated, re-used, or operated in a manner that enhances resource efficiency and sustainability. These structures reduce water consumption, improve energy efficiency, generate less waste, and lessen a building's overall environmental impact. Stanton has adopted the 2019 California Green Building Standards Code (CALGREEN) in its entirety, which establishes mandatory statewide green building standards. Furthermore, staff works with applicants early in the building plan check process to explain the State's Green Building Standards and the long-term financial and environmental benefits of integrating sustainable features in project design. As a means of educating the public on the new Code, the City disseminates handouts and provides information.

The City is a participating jurisdiction in the California Home Energy Renovation Opportunity (HERO) Program, providing property owners with low interest financing for energy and water efficiency improvements and electric vehicle charging infrastructure on their property. Property owners who wish to participate agree to repay the amount borrowed through an assessment on their property taxes.

### **ENERGY CONSERVATION IN STANTON GENERAL PLAN**

Stanton's General Plan contains goals, policies, and programs to create a more sustainable community for existing and future residents. These include:

### Action ICS-3.1.1 (d)

Investigate and adopt, if feasible, a green building program for public and private development projects.

### Action ICS-3.1.2 (e)

Develop a program to assist property and homeowners in installing energy and water-saving devises in their homes.

### Action RC-3.1.3 (b)

Encourage the use of energy star compliant technology such as heating equipment, water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces, boiler units, and other appliances.

### Action RC-3.1.3 (d)

Encourage residential building construction to exceed energy efficiency standards outlined in Title 24 of the California Administrative Code.

### Action RC-3.1.3(i)

Encourage the use of technology that utilizes energy off the main energy grid such as solar panels.

### Action RC-3.1.3 (j)

Encourage technology and designs that exceed the energy star compliance standards.

### Action RC-3.1.6 (b)

Include energy conservation actions in city operations.

### **ENERGY CONSERVATION PROGRAMS OFFERED THROUGH LOCAL UTILITIES**

In addition to green building, Stanton can promote energy conservation by advertising utility rebate programs and energy audits available through Southern California Edison (SCE) and Southern California Gas, particularly connected to housing rehabilitation programs. Lower income households are also eligible for state sponsored energy and weatherization programs.

SCE provides a variety of energy conservation services under its Customer Assistance Programs (CAP). These services are designed to help low-income households, senior citizens, permanently disabled, and non-English speaking customers control their energy use. The Southern California Gas Company offers an energy conservation service known as the Community Involvement Program (CIP). This service provides weatherization for the homes or apartments of low-income families, provided they meet the federally-established income guidelines. These services are provided to the low-income families free of charge while later being reimbursed by the Gas Company.

Income-qualified SCE and SoCal Gas customers may be eligible for the State's Energy Savings Assistance program, and/or a 20% bill discount under the California Alternate Rates for Energy (CARE) program.

### Energy Upgrade California (EUC)

This new statewide program offers up to \$4,000 in incentives to homeowners who complete select energy-saving home improvements on a single-family residence and 2-4 unit buildings. The incentive packages encourage customers to take the "whole house" approach by combining several improvements at one time to achieve greater energy efficiencies and savings. Homeowners are required to hire a contractor and perform an initial assessment. EUC has a list of participating contractors and raters. SCE and SoCal Gas are among the five utilities that participate in the EUC program across the State.

# 6 Affirmatively Furthering Fair Housing (AFFH)

As required by Assembly Bill 686, all housing elements due on or after January 1, 2021 must contain an analysis of fair housing consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015.<sup>3</sup> Under State law, "affirmatively further fair housing" means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities, and other protected classes. The assessment of fair housing must include the following components:

- A summary of fair housing issues and an assessment of the jurisdiction's fair housing enforcement and outreach capacity;
- An analysis of segregation patterns and trends, racially/ethnically concentrated areas of poverty, disparities in access to opportunities, and disproportionate housing needs;
- An assessment of contributing factors for the fair housing issues identified; and
- An identification of fair housing goals and actions/programs.

This analysis of fair housing issues in Stanton relies on the 2020 Orange County Analysis of Impediments to Fair Housing Choice (AI), California Department of Housing and Community Development (HCD) AFFH Data Viewer mapping tool, American Community Survey (ACS), U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data, HUD AFFH data, and additional local sources of information.

## 6A. Outreach

Appendix B of the Housing Element details the public participation that was undertaken as part of the Housing Element preparation process. The City of Stanton has made an effort to involve the public in the update of its Housing Element and has solicited input from the public throughout the year-long Housing Element process. Appendix B provides a summary of the key comments received during the update process and how they have been considered and

<sup>&</sup>lt;sup>3</sup> California Department of Housing and Community Development, AB 686 Summary of Requirements in Housing Element Law (April 23, 2020).

<sup>&</sup>lt;sup>4</sup> Government Code Section 8899.50(a)(1).

addressed in the Housing Element. The City implemented the following public outreach program.

### Project Website

A dedicated project website (<a href="https://letstalkstanton.com/housingelement">https://letstalkstanton.com/housingelement</a>) serves as the main conduit of information for individuals who can access material online. The project website launched in October 2020 and is regularly updated to reflect ongoing community input opportunities, advertise draft work products, and answer frequently asked questions.

### Virtual Workshop

As part of the community outreach, a virtual housing workshop was conducted to educate the community about housing issues and opportunities facing Stanton, and to gather input on housing-related topics. The virtual workshop was hosted on the project website throughout November and December 2020 (with Spanish translation). The extended timeframe was intended to allow community members and stakeholders to participate at their leisure and in accordance with their schedule and availability. The virtual housing workshop consisted of three parts:

- Part A: Overview video describing Housing Elements and why they are important
- Part B: PowerPoint presentation describing existing conditions in Stanton and the City's Housing Element Update process
- Part C: Housing Element Surveys (described below)

### Housing Element Surveys

The City hosted two online Housing Element surveys which were available from November 2, 2020 through February 26, 2021 and March 1, 2021 through April 30, 2021, respectively. The surveys asked for input on the community's housing priorities and strategies to address Stanton's future housing growth needs. A total of 163 individuals responded to the first survey, which focused on issues of home type, affordability, living conditions, and housing preference. A total of 39 individuals responded to the second survey, which focused exclusively on fair housing issues in the City. Summaries of the key survey results are provided in the Housing Element Introduction section, with the complete results included in Appendix B.

### Community Open House

The City hosted a community open house on the Public Draft Housing Element on November 11, 2021. At this open house, the City presented the Public Draft Housing Element and solicited feedback on the Element that was considered and reflected in the final document. The City specifically presented information related to fair housing and described the goals, policies, and programs that the City added to the Housing Element to address this topic.

### Advertisements and Emails

The City of Stanton maintains various social media accounts including Twitter, Facebook, Instagram, and Nextdoor. Starting in October 2020 and continuing throughout the project, the City posted updates to its social media platforms advertising opportunities to provide input and alerting the public to upcoming meetings and workshops.

The project team compiled a database of community members and stakeholders who registered to be notified via email of future public engagement opportunities and key deliverables. Direct emails were sent to these individuals to publicize the virtual housing workshop, the Housing Element surveys, the community open house, and the Public Review

Draft 2021-2029 Housing Element.

# 6B. Assessment of Fair Housing

### FAIR HOUSING ENFORCEMENT AND OUTREACH CAPACITY

The 2020 Orange County Analysis of Impediments to Fair Housing Choice (AI) "is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA)." The AI describes the agencies that handle fair housing enforcement and outreach in Stanton. The California Department of Fair Employment and Housing (DFEH) investigates complaints of employment and housing discrimination. The Fair Housing Council of Orange County (FHCOC) provides services throughout the Urban County, including Stanton, to ensure equal access to housing. FHCOC's services include outreach and education, homebuyer education, mortgage default counseling, tenant/landlord mediation, and limited low-cost advocacy. The Fair Housing Council investigates claims of housing discrimination and assists with referrals to DFEH. Community Legal Aid SoCal is a legal service provider serving low-income people in Orange County and southeast Los Angeles County.

According to HUD's Office of Fair Housing and Equal Opportunity (FHEO) records, Stanton received a total of five FHEO inquiries between January 2013 and March 2021. Of the five inquiries, none pertained to a specific basis of discrimination. Total FHEO inquiries in Stanton represent 0.13 inquiries per 1,000 people.

According to the 2020 Orange County AI, the FHCOC received 363 allegations of housing discrimination within the Urban County (which includes Stanton) during the 2015-19 reporting period. Of those allegations, 179 cases were opened for further investigation and/or action. Also, FHCOC assisted 7,664 households in addressing 24,766 tenant/landlord issues, disputes, and/or inquiries. The Urban County area has an approximate population of 545,000 and around 193,000 households. The number of fair housing cases and tenant/landlord issues addressed by FHCOC represents approximately 0.03 percent of the population and 4.0 percent of households in the Urban County area.

The FHCOC also conducted a variety of outreach activities in the Urban County between 2015 and 2019. Regionally, the organization conducted or participated in 467 education and/or outreach activities. The FHCOC also held training sessions, seminars, and workshops for managers and owners of rental property.

For the 2020 Orange County AI, a variety of tools were used for the community participation process, including community meetings, focus groups, and public hearings. The AI preparers also reached out to tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal services providers, social services providers, housing developers, and industry groups to hear directly about fair housing issues affecting residents of Orange County. Evening community meetings were held in Mission Viejo, Westminster/Garden Grove, Santa Ana, and Fullerton. Additional outreach was conducted for members of protected classes, including the Latino and Vietnamese communities. All community meetings had translation services available if requested in Spanish and Vietnamese. In addition, all meetings were held in

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<sup>&</sup>lt;sup>5</sup> Orange County Analysis of Impediments to Fair Housing Choice, prepared by the Orange County Jurisdictions and the Lawyers' Committee for Civil Rights Under Law, August 6, 2020.

locations accessible to people with mobility issues. 6

Locally, the City of Stanton provides outreach and education to assure community members are well aware of fair housing laws and rights by providing information from the Fair Housing Council of Orange County at City Hall, online, and on request. The City has included Program 20 in its Housing Plan to further strengthen its fair housing outreach capacity in a number of ways, including biennial updates to the City Council, additional advertisements and education on the City's social media platforms, and providing information to schools, libraries, and other community facilities for distribution. Together with its partners, the City of Stanton is committed to enforcing fair housing laws and conducting meaningful outreach to provide education and support to community members.

### STANTON CENSUS TRACTS AND DIVERSITY

Stanton is comprised of 13 census tracts, although several of these are only partially located in Stanton. Figure 6-1 shows the tract boundaries. Table 6-1 shows the racial/ethnic composition of each census tract. The HCD AFFH Data Viewer also has a map that illustrates the levels of diversity throughout the City. As shown in Figure 6-2, Stanton is considered a highly diverse community.

TABLE 6-1: RACE/ETHNICITY BY CENSUS TRACT (2020)

Census Tract <sup>1</sup>	% White	% Black	% Asian	% Hispanic <sup>2</sup>
878.01	29.4	2.3	27.9	43.1
878.02	23.5	3.0	28.7	48.4
878.03	16.9	2.3	26.2	61.4
878.05	19.2	3.1	23.7	57.2
878.06	22.6	2.5	22.4	57.5
879.01	22.3	1.6	37.3	42.1
879.02	16.8	0.8	32.7	56.0
881.01	34.5	3.8	21.0	44.6
881.04	27.2	2.0	32.7	39.8
881.05	22.5	0.9	49.7	29.0
881.06	22.4	1.7	41.7	36.2
1101.13	41.3	1.8	34.2	22.9
1102.03	44.1	1.9	26.4	28.8

Source: US Census, 2020 Census Demographic Data Map Viewer, August 2021

Tracking the diversity of cities and counties throughout California is crucial to understanding the shifting demographics of race and ethnicity in the state. Esri's Diversity Index captures the racial and ethnic diversity of a geographic area in a single number, from 0 to 100. Scores less than 40 represent lower diversity in the jurisdiction while scores of greater than 85 represent higher diversity. Additionally, scores between 40-55 represent low diversity, 55-70 represent moderate

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<sup>&</sup>lt;sup>1</sup> Census tracts cover large areas outside of the Stanton city boundaries.

<sup>&</sup>lt;sup>2</sup> Percentage of the total population that reported their ethnicity as Hispanic or Latino, but not as race alone.

<sup>&</sup>lt;sup>6</sup> Orange County Analysis of Impediments to Fair Housing Choice, prepared by the Orange County Jurisdictions and the Lawyers' Committee for Civil Rights Under Law, August 6, 2020.

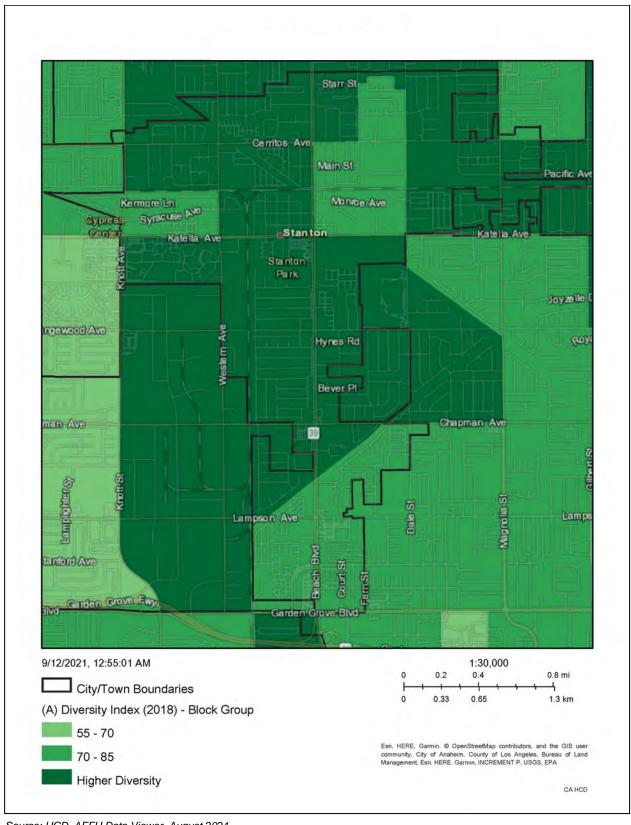
diversity, and 70-85 represent high diversity. There generally appears to be high and higher diversity index scores (70-85 and >85%) throughout the City of Stanton with almost the entire middle of the City showing the highest diversity. The lowest diversity index score (74.00) is for the census block group in the western part of the City, adjacent to Cypress Center, but which is largely outside of the City in neighboring Cypress. Communities in Orange County with higher diversity index scores are somewhat more likely to be located in the more racially and ethnically diverse northern and central portions of the County than they are in the southern and coastal portions of the County.

Census Tract **Boundaries** 110203 LEGEND 087803 Stanton City Boundary 087805 087802 087801 Planning Area/Sphere of Influence Surrounding Municipality 110113 Census Tract Boundary 088101 087901 Chapman Av 088104 088106 Garden Grove Blvd (22)

FIGURE 6-1: CENSUS TRACT BOUNDARIES

Source: De Novo Planning Group, August 2021

**FIGURE 6-2: DIVERSITY INDEX** 



### **INTEGRATION AND SEGREGATION PATTERNS AND TRENDS**

To inform priorities, policies, and actions, Stanton has included an analysis of integration and segregation, including patterns and trends, related to people with protected characteristics. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Conversely, integration refers to a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. The following analyzes levels of integration and segregation for race and ethnicity, persons with disabilities, familial status, and income to identify the groups in Stanton that experience the highest levels of segregation.

### Race and Ethnicity

The racial and ethnic composition of a city is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. Dissimilarity indices can be used to measure the evenness of distribution between two groups in an area. A dissimilarity index is a comparison between two groups, and measures their relative separation (high dissimilarity) or integration (low dissimilarity) across a neighborhood or other area. The Department of Housing and Urban Development (HUD) views the various levels of a dissimilarity index as follows:

- <40: Low Segregation</p>
- 40-54: Moderate Segregation
- >55: High Segregation

There are a number of reasons why patterns of racial segregation exist (or don't exist) within a community. Some of these reasons may be institutional (e.g., discriminatory lending practices) while others can be cultural (e.g., persons of similar backgrounds or lifestyles choosing to live near one another to provide support and familiarity). As such, discussions regarding segregation are complicated and there is not a "one size fits all" approach to addressing patterns of racial segregation.

According to the 2014-2018 ACS, approximately 46.8% of the Stanton population belongs to a racial or ethnic minority group. In comparison, only 38.3% of Orange County residents belong to a racial or ethnic minority group.

Figure 6-3 shows the dissimilarity between each of the identified race and ethnic groups and White population for the City of Stanton and the Orange County metropolitan region. The White (not Hispanic or Latino) population within Stanton makes up approximately 53% of the City's population. The higher scores indicate higher levels of segregation among those race and ethnic groups. The City does not have any racial or ethnic groups with scores higher than 55 (indicating high similarity and segregation). Only the Native Hawaiian race and ethnic group exhibits a moderate level of dissimilarity and segregation in Stanton; however, because the Native Hawaiian group's population is small (362 pop.), its dissimilarity index may be high even if the group's members are evenly distributed throughout the City. Such small populations can indicate a pattern of segregation that is not of significant concern. In general, based on HUD's definition of the various levels of the index, segregation between non-White and White Stanton residents is low and the City is more integrated than the region. Compared to the County as a whole,

segregation is very low in Stanton.

Dissimilarity Index 35.6 Hispanic 21.1 23.9 Two or More Races\* Other\* 41.8 Native Hawaiian\* 55.9 21.3 Asian\* 44.1 26.8 American Indian\* 40.3 28.8 Black\* 43.8 0.0 10.0 20.0 30.0 40.0 50.0 60.0 70.0 ■ Stanton ■ Orange County

FIGURE 6-3: RACIAL/ETHNIC DISSIMILARITY INDEX

	Black*	American Indian*	Asian*	Native Hawaiian*	Other*	Two or More Races*	Hispanic
Orange County	43.8	40.3	44.1	55.9	44.7	23.9	58.9
Stanton	28.8	26.8	21.3	41.8	38.8	21.1	35.6

Source: Census Scope, Social Science Data Analysis Network

Figure 6-4 shows that the coastal communities in Orange County, including Seal Beach, Huntington Beach, and Newport Beach, generally have smaller non-White populations. Stanton's neighboring cities such as Anaheim, Garden Grove, Westminster, and Santa Ana have higher concentrations of racial/ethnic minorities, which are comparable to concentrations found in Los Angeles County.

Figure 6-5 and Figure 6-6 compare racial and ethnic minority concentrations in 2010 and 2018. In all block groups in Stanton, racial/ethnic minorities make up the majority of the population. Consistent with this trend citywide, there has been an increase in racial/ethnic minority populations throughout the entire City since 2010.

Figure 6-6 also shows the sites inventory used to meet Stanton's 2021-2029 Regional Housing Needs Allocation (RHNA). RHNA sites are generally distributed throughout the City with some alignment along Stanton's main transportation corridor, Beach Boulevard. The sites inventory and RHNA are described in depth in Chapter 5, Resources, of this Housing Element. Approximately 97% of RHNA units, including 84.3% of lower income units, 100% of moderate-income units, and 100% of above moderate-income units, are in block groups where racial/ethnic minority groups make up more than 61% of the population (Table 6-3).

<sup>\*</sup> Not Hispanic or Latino

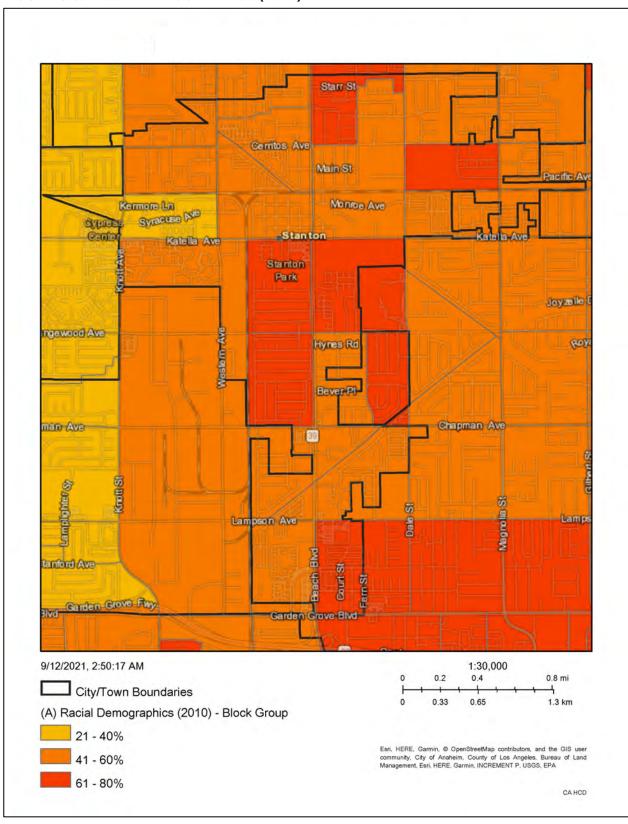
TABLE 6-2: RHNA UNITS BY RACIAL/ETHNIC MINORITY CONCENTRATION

Racial/Ethnic Minority Population (Block Group)	Lower Income RHNA Units	Moderate Income RHNA Units	Above Moderate Income RHNA Units	All RHNA Units
41-60%	46 (15.7%)	-	-	46 (3.5%)
61-80%	27 (9.2%)	121 (47.3%)	363 (46.8%)	511 (38.6%)
>81%	220 (75.1%)	135 (52.7%)	413 (53.2%)	768 (58.0%)
TOTAL	293	256	776	1,325

Naval Warpoon Station Seal 12/26/2021, 12:10:42 PM 1:200,000 1.25 2.5 5 mi City/Town Boundaries (R) Racial Demographics (2018) - Block Group 2.25 9 km 4.5 ≤ 20% 21 - 40% Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, City of Anaheim, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS 41 - 60% 61 - 80% > 81%

FIGURE 6-4: REGIONAL RACIAL DEMOGRAPHICS (2018)

FIGURE 6-5: RACIAL DEMOGRAPHICS (2010)



W Ball Rd Starr St Cernitos Ave Main St Monroe Ave Kermore Ln Syracuse Ave Cypress Katella Ave Stanton Center Park Joyzelle ngewood Ave Western Ave Hynes Rd Bever Pl man Ave Magnolia-Lampson Ave tanford Ave Garden Grove Fun Garden Grove Blvd 9/12/2021, 2:48:23 AM 1:30,000 0.2 0.4 0.8 mi Stanton\_HousingOpportunitySites\_1-26 0.33 0.65 0 1.3 km City/Town Boundaries (R) Racial Demographics (2018) - Block Group 41 - 60% Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, City of Anaheim, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA 61 - 80% > 81%

FIGURE 6-6: RACIAL DEMOGRAPHICS AND RHNA SITES (2018)

### Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Approximately 43.4% of Stanton households have one or more children under the age of 18. The City's share of households with children is greater than the County's (35.1%).

Single-parent households are also protected by fair housing law. Approximately 14.7% of family households in the City are single-parent households. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Approximately 11.2% of family households in Stanton are single, female-headed households with children. As shown in Figure 6-7, the percentage of children in married-couple households is fairly consistent throughout the City with the exception of three tracts in the northwest and central sections of Stanton where there are slightly fewer married-couple families with children. The percent of children in female-headed households is less uniform throughout Stanton. There are pockets of larger populations of children in female-headed households within the City. From a regional perspective, the percentage of children in married-couple households appears to be higher in the coastal communities and lower in urban centers such as Los Angeles. The communities around Stanton show similar patterns to the City. Likewise, the incidence of female-headed households decreases towards the coast and with Stanton's neighboring cities (i.e. Anaheim, Garden Grove, Westminster) exhibiting patterns similar to Stanton.

Table 6-4 and Table 6-5 show the breakdown of RHNA units by percent of children living in married couple and female-headed households. Most units (69.0%) are in tracts where 60% to 80% of children live in married-couple households. A similar breakdown of units occurs for female-headed households, with most units (63.5%) located in tracts where 20% to 40% of children live in female-headed households.

TABLE 6-3: RHNA UNITS BY PERCENT OF CHILDREN IN MARRIED-COUPLE HOUSEHOLDS

Children in Married Couple Households (Tract)	Lower Income RHNA Units	Moderate Income RHNA Units	Above Moderate Income RHNA Units	All RHNA Units
40-60%	216 (73.7%)	48 (18.8%)	147 (18.9%)	411 (31.0%)
60-80%	77 (26.3%)	208 (81.3%)	629 (81.1%)	914 (69.0%)
TOTAL	293	256	776	1,325

TABLE 6-4: RHNA UNITS BY PERCENT OF CHILDREN IN FEMALE-HEADED HOUSEHOLDS

Children in Female-Headed Households (Tract)	Lower Income RHNA Units	Moderate Income RHNA Units	Above Moderate Income RHNA Units	All RHNA Units
≤20%	220 (75.1%)	65 (25.4%)	198 (25.5%)	483 (36.5%)
20-40%	73 (24.9%)	191 (74.6%)	578 (74.5%)	842 (63.5%)
TOTAL	293	256	776	1,325

W-Ball-Rd-W Ball Rd Starr St Cernitos Ave Main St Pacific A Kermore Ln Monroe Ave Syraguse INIB Cypress Katella Ave Stanton Center Stanton Park Joyzella gewood-Ave Western Ave Hyrnes Rd CO Bever Pl Chapman Ave man Ave 39 Magnolla Lampson Ave Lamps tanford Ave Court St 3lvd Garden Grove Fwy Garden Grove Blvd 9/12/2021, 1:14:13 AM 1:30,000 0.2 0.4 0.8 mi Stanton\_HousingOpportunitySites\_1-26 0.33 0.65 City/Town Boundaries 1.3 km (R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract 20% - 40% Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, City of Anaheim, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA 40% - 60% 60% - 80% > 80% CA HCD

FIGURE 6-7: CHILDREN IN MARRIED-COUPLE HOUSEHOLDS AND RHNA SITES

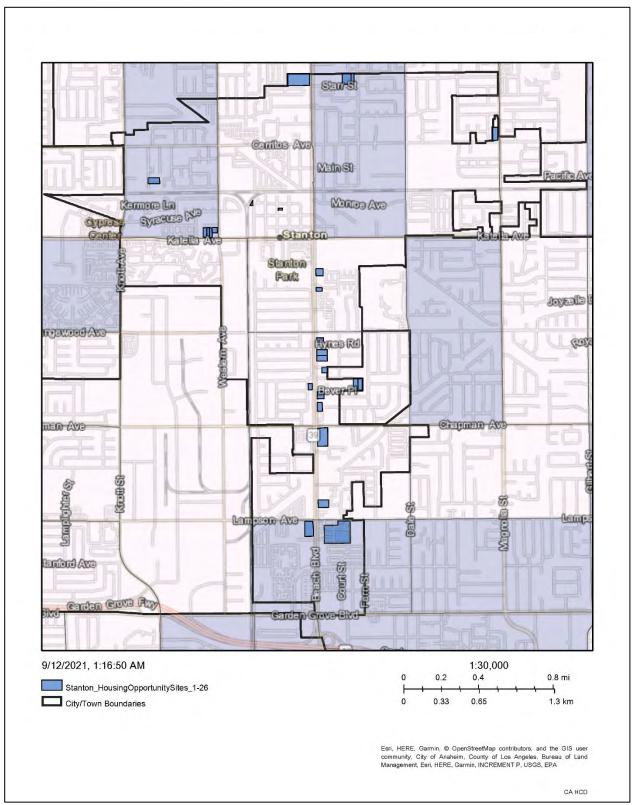


FIGURE 6-8: CHILDREN IN FEMALE-HEADED HOUSEHOLDS AND RHNA SITES

### Persons with Disabilities

Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability. According to the 2014-2018 ACS, approximately 10.3% of Stanton residents experience a disability compared to 8.5% of Orange County residents. The concentration of persons with disabilities is generally comparable to the neighboring communities, but more highly concentrated than the region. As shown in Figure 6-9, census tracts that have a disabled population between 10% and 20% are located in the core with the highest percentage in Tract 881.05 at 16.9%. Tracts with a disabled population below 10% are located in the northwest, northeast, and southern sections of the City.

The County AI found that across Orange County, concentrations of persons with particular types of disabilities vary widely. In communities such as Aliso Viejo, Irvine, Laguna Niguel, Lake Forest, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin, concentrations of persons with various types of disabilities are generally lower than they are countywide. Communities with higher concentrations of persons with disabilities are somewhat more likely to be located in the more racially and ethnically diverse northern portion of the County than they are in the southern portion of the County. From a regional perspective, the trend appears to be correlated to median income and the concentration of low to moderate income population in that higher concentrations of disabled persons are associated with lower median incomes and higher concentrations of low to moderate income populations.

### Income

Identifying low or moderate-income (LMI) areas and individuals is important to overcome patterns of segregation. The Housing Needs Assessment identified that 76.1% of Stanton households earn 80% or less than the area median income and are considered lower income. According to the 2014-2018 ACS, the median household income in Stanton is \$56,506, considerably lower than \$85,398 for the County.

Figures 6-10 and 6-11 show the lower and moderate-income areas in the region and City. HUD defines a LMI area as a census tract or block group where over 51% of the population is LMI. As shown in Figure 6-10, concentrations of LMI households in Orange County are more likely to be located in the more racially and ethnically diverse northern and central portion of the County than they are in the southern and coastal portions of the County. In the northern portion of the County, LMI households are concentrated along the 405 Freeway (northeast side) and I-5 Freeway, where there are greater concentrations of multifamily and more affordable housing. Communities east of Stanton (e.g., Anaheim, Garden Grove) have similar LMI populations. Communities to the west have fewer LMI households (e.g., Cypress, Los Alamitos). Block groups in Stanton with higher LMI populations are most concentrated on the eastern side of the City (east of Beach Boulevard). A majority of block groups have LMI populations between 50% and 75%, although three block groups on the east side (in Tract 878.03 and Tract 878.06) have a LMI population exceeding 85%.

Since the City has only two small block groups where LMI households make up less than 50% of the population, the sites used to meet the City's 2021-2029 RHNA are generally in areas with a higher percentage of LMI households (see Figure 6-11).

### Summary of Fair Housing Issues

The City has considered patterns and trends related to integration and segregation based on racial and ethnic factors, familial status, disability, and concentrations of low to moderate-income households.

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Racial/ethnic minorities make up the majority of the population in all Stanton block groups. Racial/ethnic minority groups are generally the same citywide and there are no distinguishable patterns of segregation with regard to race and ethnicity. A larger proportion of RHNA units (58.0%) is proposed in the block groups where >81% of the population belongs to a racial/ethnic minority group.

In most tracts, 60-80% of children live in married-couple households. Concentrations of female-headed households are more dispersed and there is only a slight correlation between female-headed households and low and moderate-income households. Most lower income units used to meet the RHNA (75.1%) are in tracts where  $\leq$ 20% of children live in female-headed households.

Stanton has a larger population of persons with disabilities compared to the County. Disabled populations are more concentrated in the middle of the City.

The majority of block groups in Stanton have low and moderate-income populations between 50% and 75%. There are three areas in the City where LMI concentrated block groups with 75-100% LMI households also have more children living in female-headed households (see Figure 6-8 and Figure 6-11). The area to the northeast of Beach Boulevard and Katella Avenue is also an area with a population of households in renter-occupied housing units >80%. The sites used to meet the City's 2021-2029 RHNA are generally located in areas with a high percentage of LMI households as few block groups in the City have LMI household concentrations less than 50%. However, this would also include all proposed sites for lower income units, which would be affordable to LMI households.

As part of the City's regular participation in the Orange County Analysis of Impediments to Fair Housing Choice, the City will continue to consider these patterns to identify any changes from current conditions.

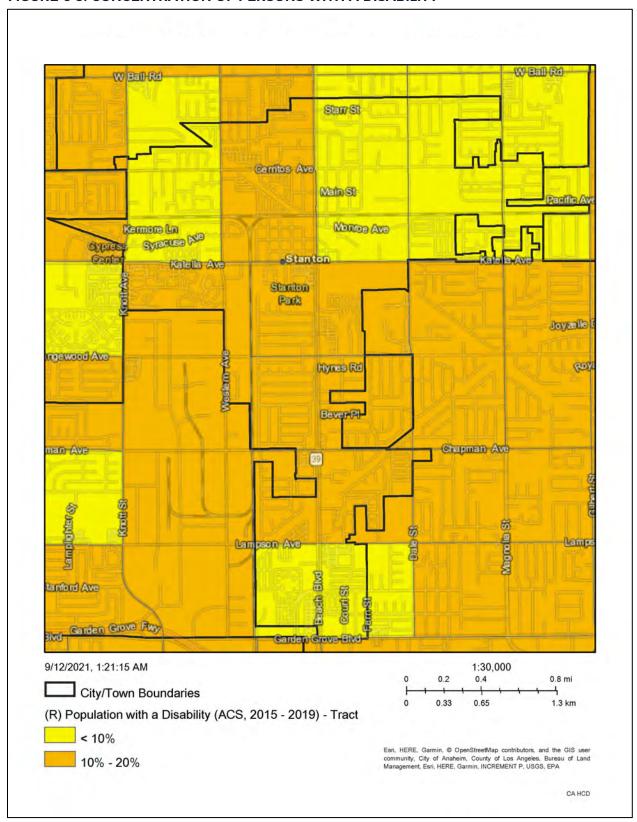
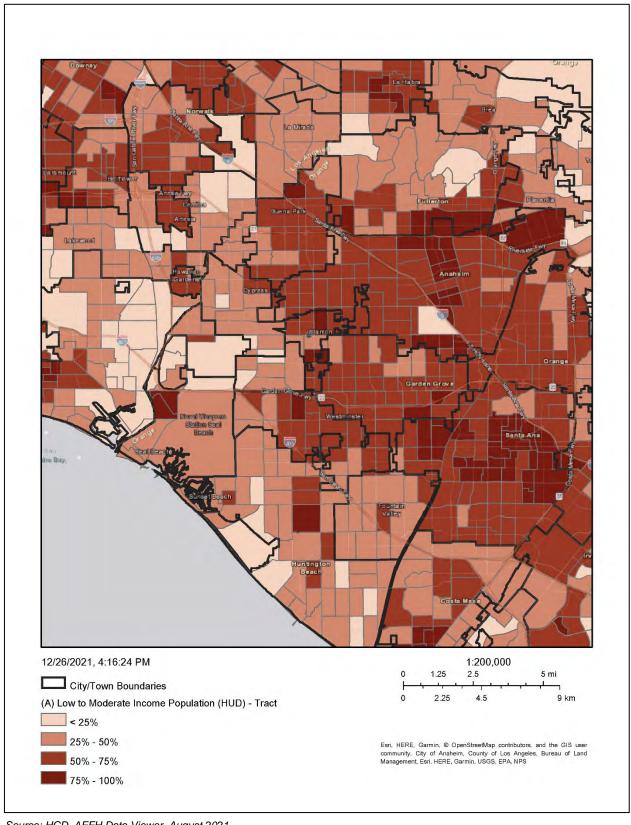


FIGURE 6-9: CONCENTRATION OF PERSONS WITH A DISABILITY

FIGURE 6-10: CONCENTRATION OF LMI HOUSEHOLDS - REGIONAL



Starr-St Cernitos Ave Main St Pacific Av Monroe Ave Kermore Ln Syracuse Nie Cypics Katella Ave Stanton Stanton Park Joyzelle ngewood Ave Western Ave Hynes Rd ROY Bever Pl man Ave Chapman Ave Lamplighter S. Magnolia St Lampson Ave Beach Blvd lanford Ave Court St Fern St Carden Crove Am Garden Grove Blvd 9/12/2021, 1:25:14 AM 1:30,000 0.2 0.4 0.8 mi Stanton\_HousingOpportunitySites\_1-26 0.33 0.65 City/Town Boundaries 0 1.3 km (A) Low to Moderate Income Population (HUD) - Block Group < 25% Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, City of Anaheim, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA 25% - 50% 50% - 75% 75% - 100% CA HCD

FIGURE 6-11: CONCENTRATION OF LMI HOUSEHOLDS AND RHNA SITES

### RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

To assist communities in identifying racially or ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is a non-White population of 50 percent or more. The poverty threshold is census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. According to HCD's 2020 AFFH mapping tool based on the 2009-2013 ACS, there are no R/ECAPs in Stanton as shown in Figure 6-12.

The 2020 Orange County AI performed an analysis of R/ECAPs within the County. There are four R/ECAPs in the County, two of which are found in Santa Ana and two of which are in Irvine. The two R/ECAPs in Santa Ana are predominantly Hispanic and are close to the I-5 Freeway. The northernmost R/ECAP is located along North Spurgeon Street, while the more southern R/ECAP is found along South Standard Avenue. The R/ECAPs found in Irvine are adjacent to each other and located on the campus of University of California, Irvine, making it likely that they qualify as R/ECAPs due to the high proportions of students. These R/ECAPs have a much more diverse group of residents, with some White, Asian or Pacific Islander, Hispanic, and Black residents. No R/ECAPs were identified in the City of Stanton by the 2020 AI.

Furthermore, HUD defines racially concentrated areas of affluence (RCAAs) as affluent, White communities where 80% or more of the population is White and the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016). In the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.

As shown in Figure 6-13, there is a small predominantly White neighborhood on the far west side of the City. However, as shown in Figure 6-14 which presents median income by block group, there is no block group in the City where the median income exceeds \$125,000. In fact, the majority of block groups in Stanton have median incomes lower than the 2020 state median income of \$87,100. Therefore, there are no areas in Stanton that are considered RCAAs.

### Summary of Fair Housing Issues

Although there are no R/ECAPs in the City, nearly 19% of the Stanton population is below the poverty level. Less than 20% of the population in most Stanton tracts is under the poverty level. However, census tracts in the core of the City and in the area northeast of Beach Boulevard and Katella Avenue (Census Tract 878.03) have populations of 20-30% below the poverty level. Tract 878.03 also has more children living in female-headed households (see Figure 6-8). There are no RCAAs in Stanton. All block groups have racial/ethnic minority populations that make up the majority of the population and most have median incomes below the state average.

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FIGURE 6-7: RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/EAPS)

FIGURE 6-10: WHITE MAJORITY POPULATION

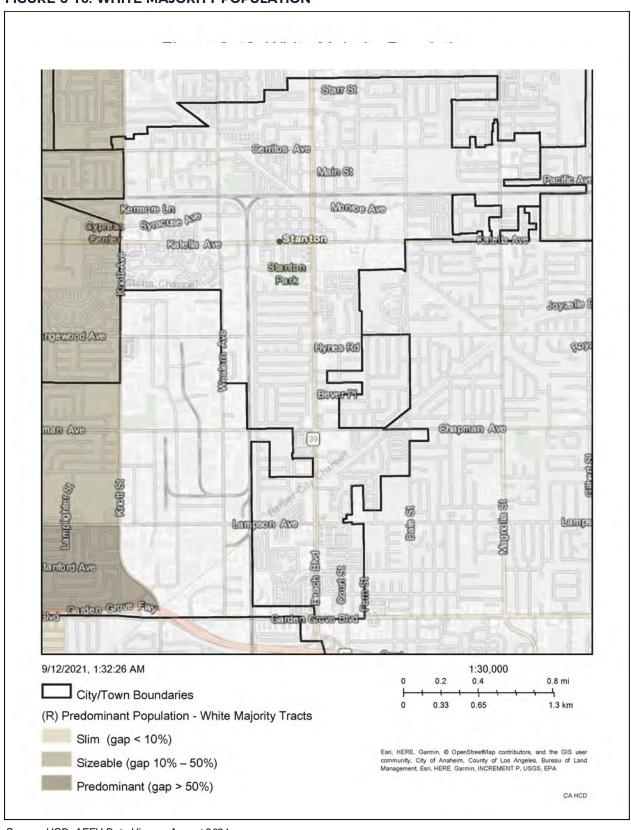
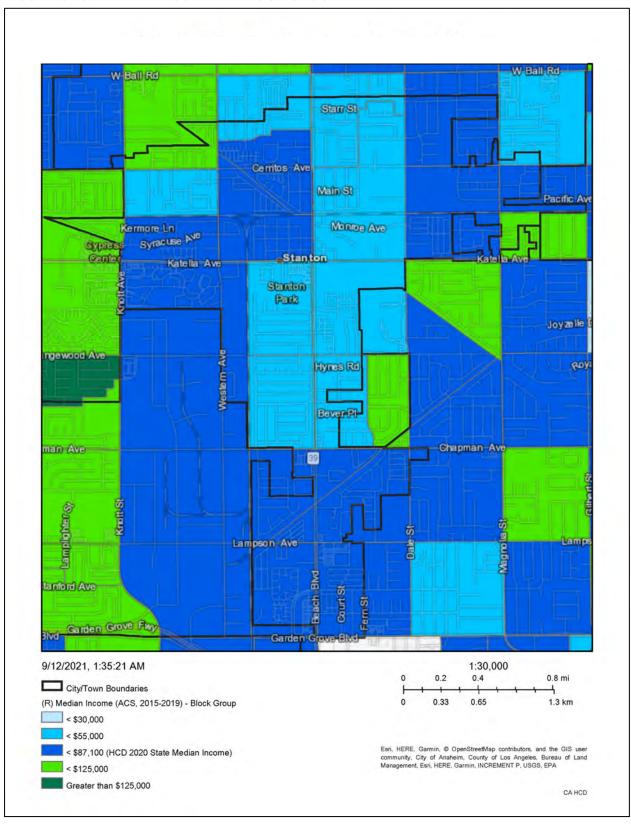


FIGURE 6-13: MEDIAN INCOME BY BLOCK GROUP



### **DISPARITIES IN ACCESS TO OPPORTUNITY**

The Department of Housing and Community Development and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD)." The Task Force has created Opportunity Maps to understand how public and private resources are spatially distributed. The Task Force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. These opportunity maps are made from composite scores of three different domains made up of a set of indicators related to economic, environmental, and educational opportunities and poverty and racial segregation. Based on these domain scores, tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. Table 6-6 shows the full list of indicators.

TABLE 6-5: DOMAINS AND LIST OF INDICATORS FOR OPPORTUNITY MAPS

Domain	Indicator
Economic	<ul> <li>Poverty</li> <li>Adult education</li> <li>Employment</li> <li>Job proximity</li> <li>Median home value</li> </ul>
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	<ul> <li>Math proficiency</li> <li>Reading proficiency</li> <li>High school graduation rates</li> <li>Student poverty rates</li> </ul>
Poverty and Racial Segregation	<ul> <li>Poverty: Tracts with at least 30% of population under federal poverty line</li> <li>Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County</li> </ul>

Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020

Opportunity map scores for Stanton census tracts are presented in Figure 6-15 along with the City's sites inventory. Although there are areas on the western side of the City characterized as Moderate Resource (four tracts), the large majority of Stanton is characterized as Low Resource (eight tracts). The small portion of Tract 881.05 located in the City is also considered Moderate Resource. Opportunity area categorization and domain scores for Stanton census tracts are shown in Table 6-7. There are no tracts in the City that are classified as areas of High Segregation and Poverty; however, there are also no tracts in the City categorized as High Resource.

TABLE 6-6: TCAC OPPORTUNITY MAP SCORES BY TRACT

Census Tract <sup>1</sup>	Economic Score	Education Score	Environmental Score	Composite Index Score	Opportunity Category
878.01	0.29	0.29	0.62	-0.46	Moderate Resource
878.02	0.16	0.19	0.68	-0.42	Low Resource
878.03	0.07	0.24	0.51	-0.49	Low Resource
878.05	0.09	0.15	0.49	-0.55	Low Resource
878.06	0.06	0.12	0.67	-0.59	Low Resource
879.01	0.22	0.15	0.45	-0.46	Low Resource
879.02	0.13	0.17	0.46	-0.51	Low Resource
881.01	0.25	0.47	0.12	-0.25	Moderate Resource
881.04	0.24	0.16	0.54	-0.42	Low Resource
881.05	0.35	0.40	0.73	-0.06	Moderate Resource
881.06	0.16	0.26	0.43	-0.42	Low Resource
1101.13	0.79	0.44	0.32	0.06	Moderate Resource
1102.03	0.42	0.44	0.83	0.07	Moderate Resource (Rapidly Changing)

Nearly all units used to meet Stanton's 2021-2029 RHNA are in low resource tracts (95.0% of units). Of the 293 lower income RHNA units, 24.9% are in moderate resource tracts and 75.1% are in low resource tracts.

From a regional perspective (see Figure 6-16), high and highest resource areas are most concentrated in coastal communities from Seal Beach to Newport Beach, and in areas west of Stanton including Cypress, Los Alamitos, and east Long Beach. Communities in north central Orange County such as Anaheim, Garden Grove, Westminster, and Santa Ana have similar patterns of opportunity areas to Stanton.

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FIGURE 6-16: TCAC OPPORTUNITY AREAS BY TRACT AND RHNA SITES

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FIGURE 6-18: TCAC OPPORTUNITY AREAS BY TRACT - REGIONAL

#### **Economic**

As described above, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. According to the 2021 Task Force map presented in Figure 6-17, most tracts in the City have a low economic score with the exception being an area on the far west side. The low resource areas have concentrations of racial/ethnic minorities and LMI households (see Figure 6-6 and Figure 6-11). The tract located along the western border received the highest economic score (0.79). The rest of Stanton received an economic score between 0.07 and 0.29, which is reflective of lower household incomes, poor proximity to employment, low home values relative to the region, etc.

Figure 6-18 shows economic scores for the region. Consistent with the composite TCAC Opportunity Areas (Figure 6-16), tracts with the highest economic scores are more concentrated in the coastal communities from Seal Beach to Newport Beach, and in areas west of Stanton including Cypress, Los Alamitos, and east Long Beach. Tracts with economic scores in the lowest quartile are concentrated in north central Orange County including Stanton, Anaheim, Garden Grove, Westminster, and Santa Ana.

#### **Education**

The Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. Large areas of the City have low education scores as shown in Figure 6-19. As with the economic scores, areas on the west side of the City tend to have higher education scores. The areas with lower education scores also tend to receive lower economic scores and are largely categorized as low resource (see Figure 6-17 and Figure 6-15).

Figure 6-18 shows education scores for the region, which are also consistent with the composite TCAC Opportunity Areas in Figure 6-16. Tracts with the highest education scores are in the coastal communities and in areas west of Stanton while tracts with lower education scores are concentrated in north central Orange County including Stanton, Anaheim, Garden Grove, Westminster, and Santa Ana.

FIGURE 6-21: TCAC ECONOMIC SCORE

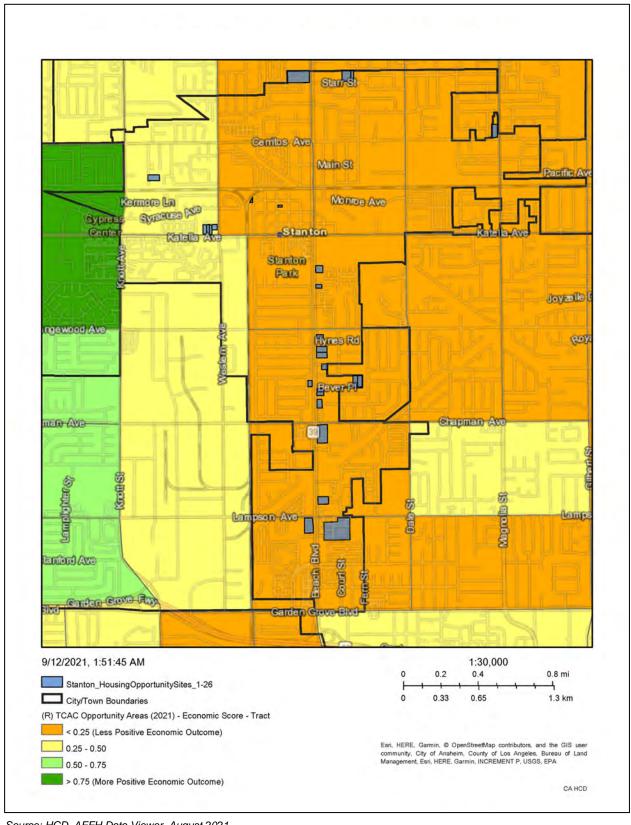


FIGURE 6-23: TCAC ECONOMIC SCORE - REGIONAL

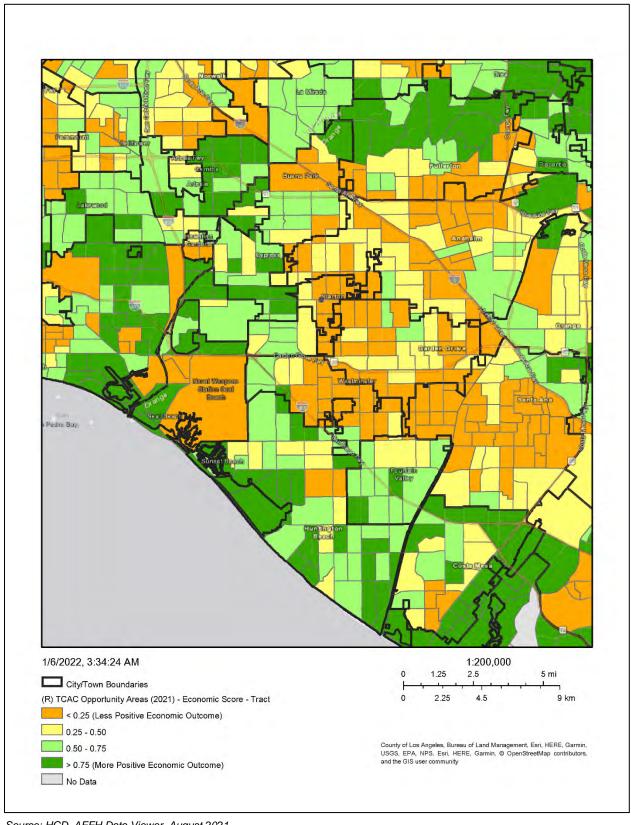


FIGURE 6-26: TCAC EDUCATION SCORE

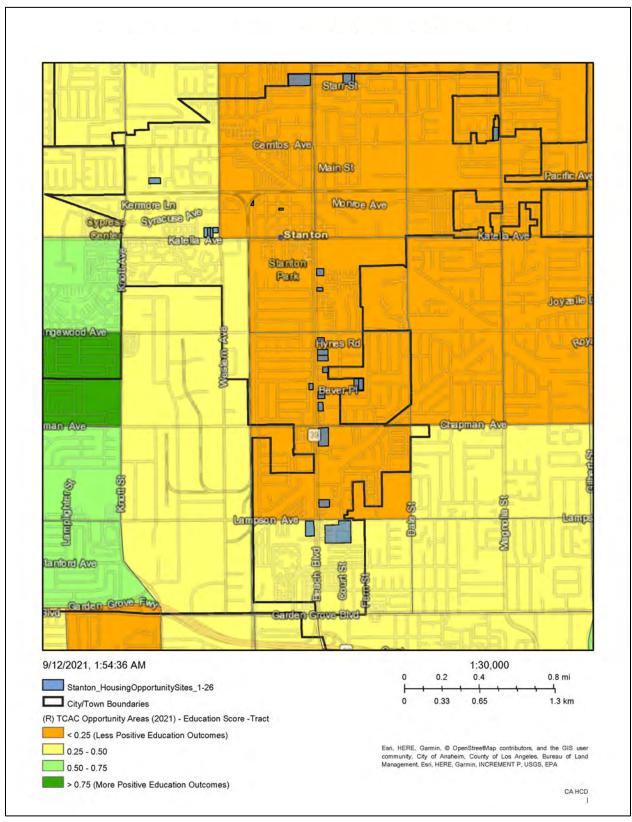
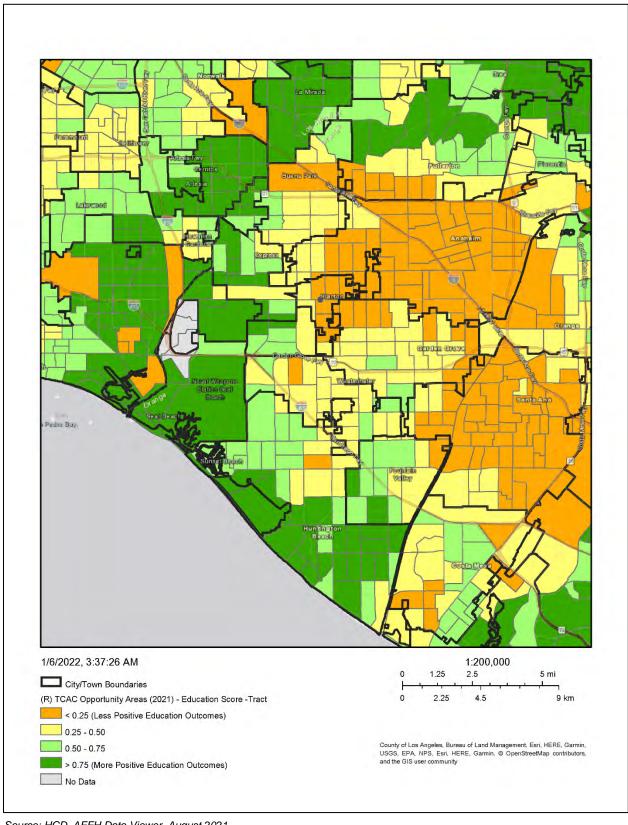


FIGURE 6-20: TCAC EDUCATION SCORE - REGIONAL



#### **Environmental**

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Figure 6-21 shows that an area in the southwest of the City has the lowest environmental score. Areas in the north part of the City and one in the south central part received higher environmental scores of 0.50 and above.

Regionally (see Figure 6-22), environmental scores are less positive in census tracts that align with major transportation corridors such as freeways, are near heavy industry such as oil refineries or major infrastructure such as the Port of Long Beach or LAX, or near military installations. Environmental scores generally improve toward the coastal communities and worsen to the east of Stanton (e.g., Fullerton, Anaheim, Orange).

The February 2021 update to the CalEnviroScreen (CalEnviroScreen 4.0) and the City's sites inventory are shown in Figure 6-23. A census tract's overall CalEnviroScreen percentile equals the percentage of all ordered CalEnviroScreen scores that fall below the score for that area. The areas with the highest (worst) scores are in the north central areas of the City. Scores generally improve in the south part of the City, but most tracts in the City scored in the 60th percentile or above relative to other census tracts. The distribution of RHNA units by CalEnviroScreen 4.0 score is presented in Table 6-8. Only 7.8% of all RHNA units are in tracts that fall within the highest (worst) percentile score, including 10.2% of lower income units, 7.0% of moderate-income units, and 7.1% of above moderate-income units.

TABLE 6-7: RHNA UNITS BY CALENVIROSCREEN SCORE

CalEnviroScreen Percentile Score (Tract)	Lower Income RHNA Units	Moderate Income RHNA Units	Above Moderate Income RHNA Units	All RHNA Units
51-60%	-	48 (18.8%)	146 (18.8%)	194 (14.6%)
61-70%	-	142 (55.5%)	428 (55.2%)	570 (43.0%)
71-80%	263 (89.8%)	48 (18.8%)	147 (18.9%)	458 (34.6%)
81-90%	-	-	-	-
91-100%	30 (10.2%)	18 (7.0%)	55 (7.1%)	103 (7.8%)
TOTAL	293	256	776	1,325

#### **Transportation**

HUD's Jobs Proximity Index can be used to show transportation need geographically. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation to access employment. Stanton residents generally have poorer access to employment opportunities. As shown in Figure 6-24, access to employment opportunities improves from east to west. Employment opportunities are less accessible to residents in the northeastern areas of Stanton due in part to the lack of availability, type, frequency, and reliability of public transportation. One block group at the far northeast received a jobs proximity score of 3, the lowest in the City.

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As shown in Figure 6-25, block groups toward Irvine, along major transportation corridors such as the 55 and 57 Freeways, and closer to the region's major employment centers have the highest jobs proximity index scores indicating employment opportunities are most accessible in these areas. Certain north central Orange County communities such as Stanton, west Anaheim, Garden Grove, and Westminster have lower jobs proximity index scores.

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. SCAG developed a mapping tool for High Quality Transit Areas (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. Figure 6-26 shows that Stanton benefits from Beach Boulevard, Katella Avenue, and Chapman Avenue being HQTAs.

#### Summary of Fair Housing Issues

Overall, it appears that there are lower levels of access to opportunities in Stanton with areas on the west side of the City having slightly better economic, education, and job proximity scores than areas on the east side. Relative to the region, Stanton has similar access to opportunities to its neighboring cities on the east. There is somewhat of a correlation between the concentration of LMI households and Low Resource census tracts; however, much of the City is considered Low Resource. Access to opportunity does not appear correlated to the location of any other special needs groups like persons with disabilities, female-headed households, or seniors.

FIGURE 6-21: TCAC ENVIRONMENTAL SCORE

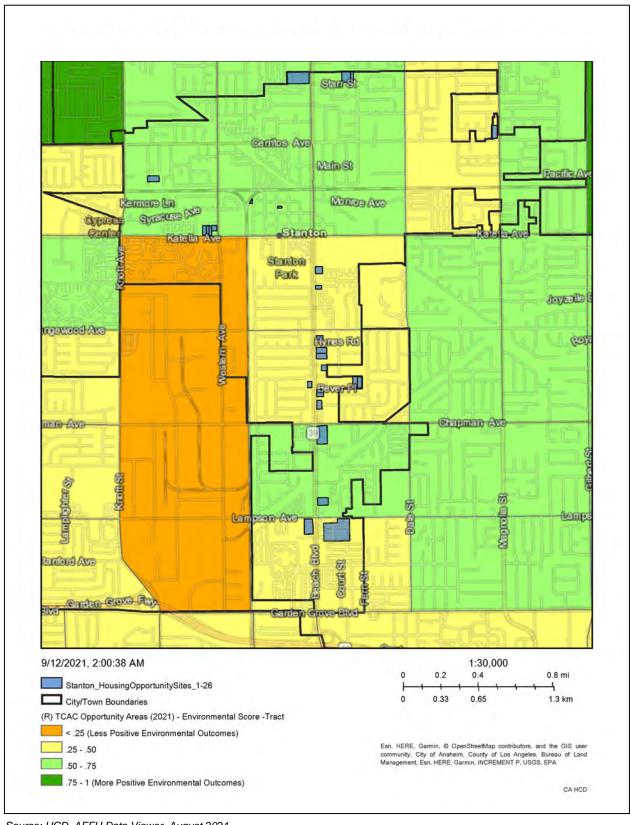


FIGURE 6-22: TCAC ENVIRONMENTAL SCORE - REGIONAL

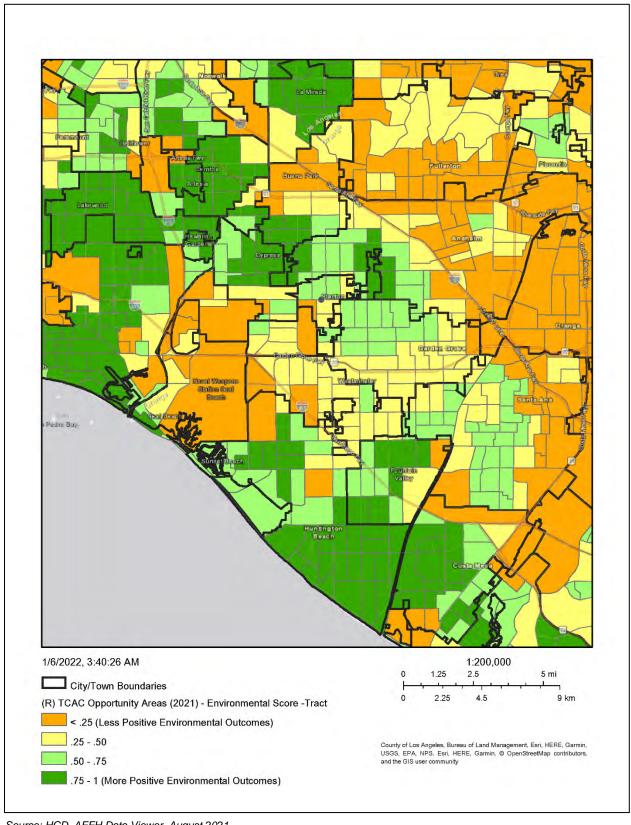


FIGURE 6-23: CALENVIROSCREEN 4.0 SCORE

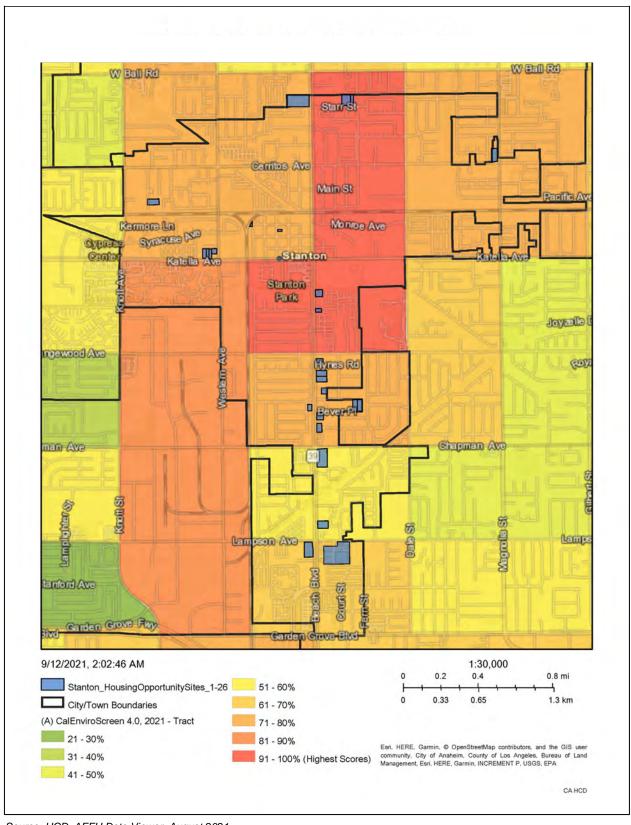


FIGURE 6-24: JOBS PROXIMITY INDEX

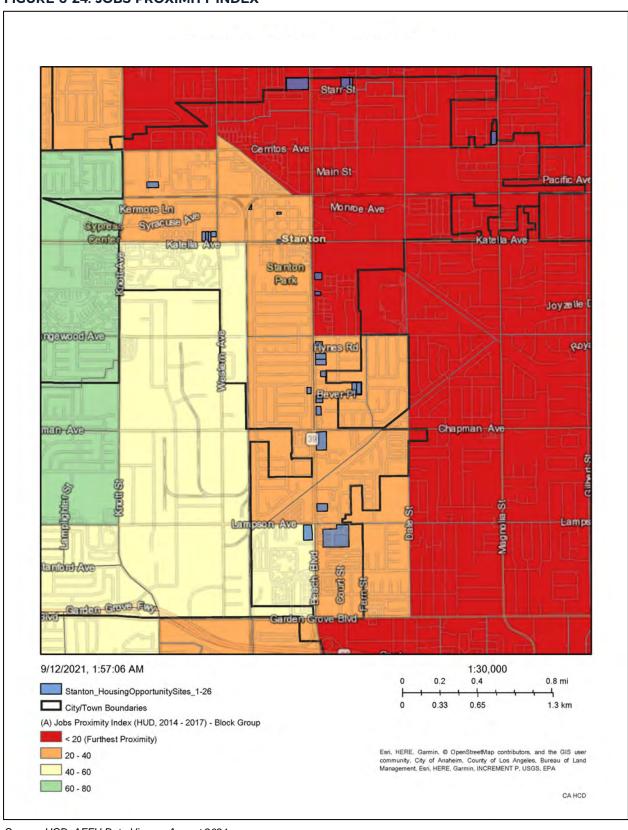
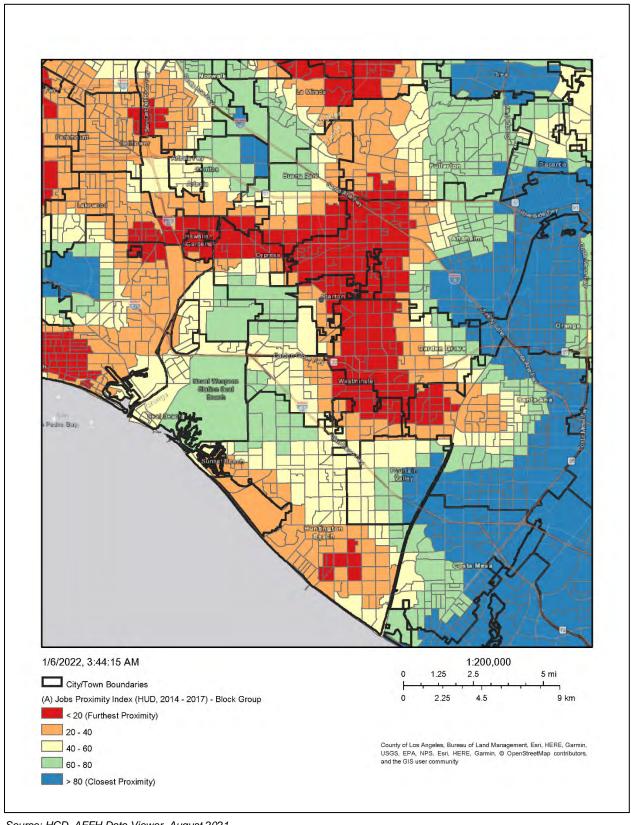


FIGURE 6-25: JOBS PROXIMITY INDEX - REGIONAL



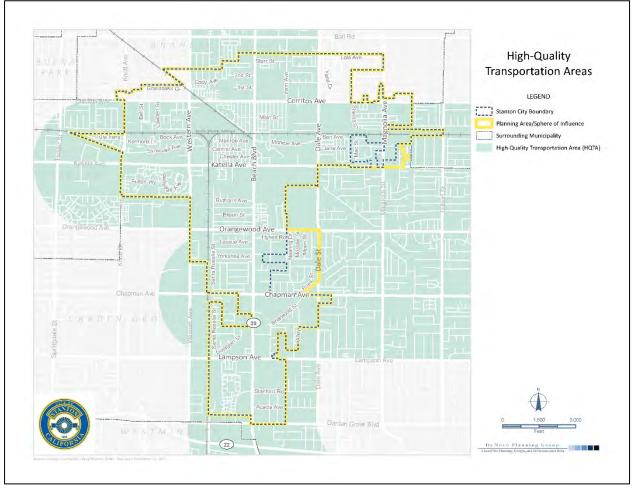


FIGURE 6-26: HIGH QUALITY TRANSIT AREAS (HQTA)

Source: SCAG HQTA Database, August 2021

#### **DISPROPORTIONATE HOUSING NEEDS**

HUD defines four housing problems, which are: housing costs greater than 30% (cost burden); more than one person per room (overcrowding); and incomplete kitchen facilities or incomplete plumbing facilities (combined as substandard housing). Housing problems for Stanton were calculated using HUD's 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS.

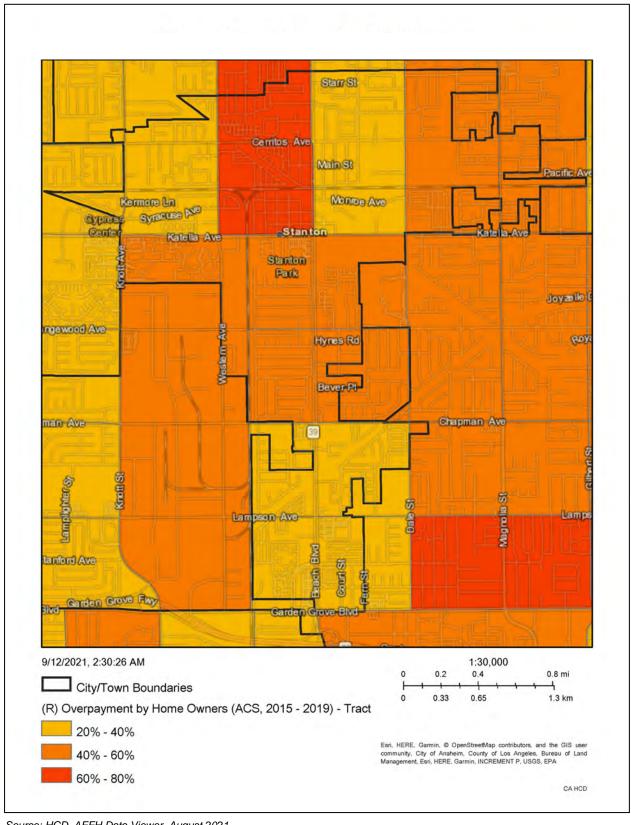
In Stanton, 41.5% of owner-occupied households and 70.0% of renter-occupied households have one or more housing problems. The City has a larger proportion of households with a housing problem compared to the County, where 34.3% of owner-occupied households and 60.2% of renter-occupied households experience a housing problem.

#### Cost Burden

As discussed in the Housing Needs Assessment, overpayment is an issue for Stanton residents, particularly for lower income households. HUD's 2020 CHAS data identifies that 35.0% of homeowners spend more than 30% of their income on housing (this is higher than the 31.4% countywide). For renters, 60.9% overpay for housing (52.9% countywide). Overpayment is most pronounced amongst lower income renter households, with 84.2% in the extremely low-income group and 84.5% in the very low-income group overpaying for housing. As a household's income increases, the level of overpayment declines. The impact of housing overpayment on Stanton's lower income households is significant, with the community's special needs populations – seniors, persons with disabilities, and female-headed households with children – most vulnerable to losing their housing due to an inability to pay. Figure 6-27 and Figure 6-29 show overpayment levels throughout Stanton by tenure. The census tracts with the highest percentages of cost-burdened households are Tract 878.02 (63.1% of owners) located north of Katella Avenue and west of Beach Boulevard, and Tract 879.02 (74.7% of renters) located between Orangewood Avenue and Chapman Avenue.

From a regional perspective (see Figure 6-28 and Figure 6-30), cost burden is prevalent throughout Orange County with 40.5% of Orange County households overpaying for housing, including 31.4% of owner-occupied households and 52.9% of renter-occupied households. This is largely a reflection of the high cost of housing throughout southern California. The incidence of cost burden is distributed across Orange County for both owners and renters without a clearly discernable pattern, although for renters there is somewhat of a concentration of overpaying households in the north central area around Stanton.

FIGURE 6-30: COST-BURDENED OWNER HOUSEHOLDS

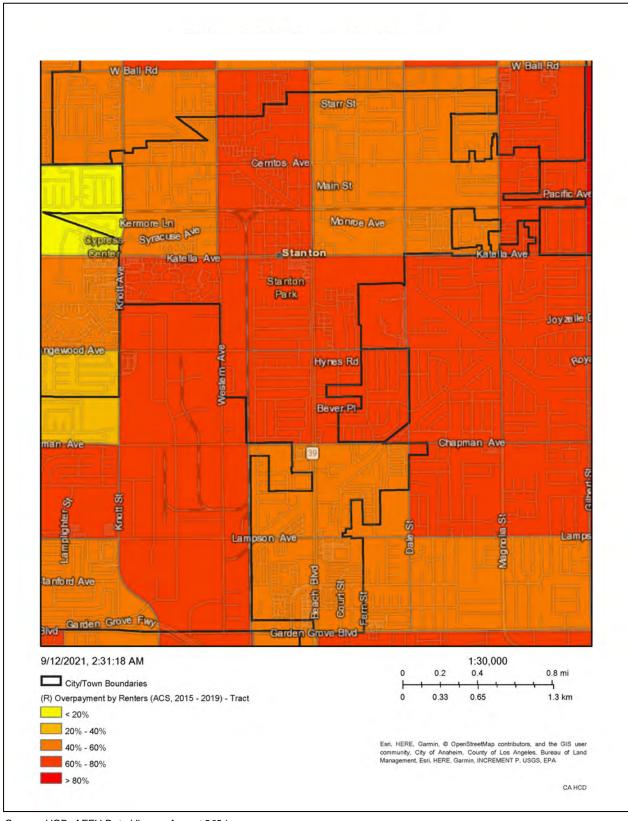


La Minada Placentla Lakewood Orange Pedia Bay 1/6/2022, 3:48:51 AM 1:200,000 1.25 2.5 5 mi City/Town Boundaries 2.25 9 km (R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract 4.5 20% - 40% County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, @ OpenStreetMap contributors, and the GIS user community 40% - 60% 60% - 80%

FIGURE 6-338: COST-BURDENED OWNER HOUSEHOLDS - REGIONAL

> 80%

FIGURE 6-359: COST-BURDENED RENTER HOUSEHOLDS



Placentla Naval Weapons Station Soal Beach Padra Buy 1/6/2022, 3:50:14 AM 1:200,000 1.25 2.5 5 mi City/Town Boundaries 2.25 9 km (R) Overpayment by Renters (ACS, 2015 - 2019) - Tract 4.5 20% - 40% County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community 40% - 60% 60% - 80% > 80%

FIGURE 6-30: COST-BURDENED RENTER HOUSEHOLDS - REGIONAL

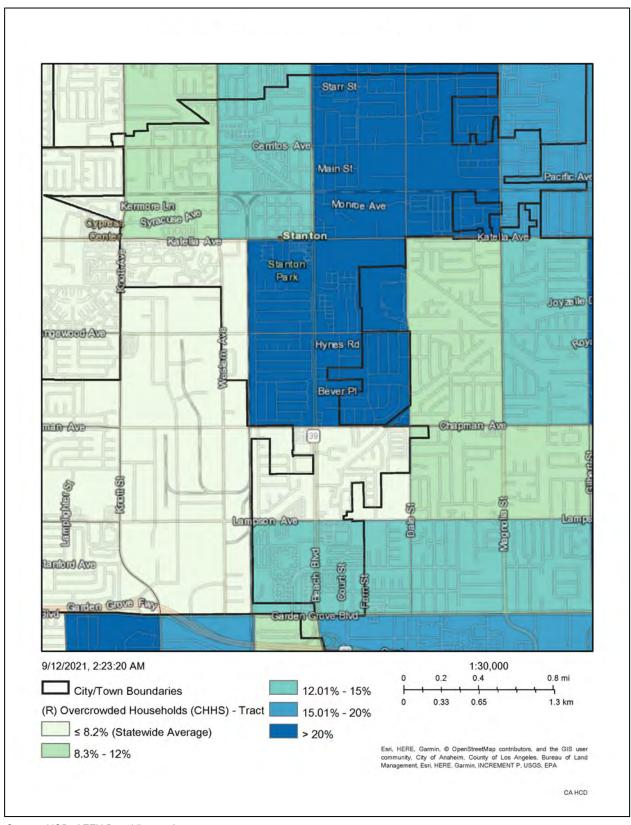
#### **Overcrowding**

A household is considered overcrowded if there is more than one person per room and severely overcrowded is there is more than 1.5 persons per room. Table 3-18 of the Housing Needs Assessment identified that approximately 9.5% of owner-occupied households and 23.3% of renter-occupied households in Stanton are overcrowded. Countywide, only 3.8% of owner-occupied households are overcrowded and 15.3% of renter-occupied households are overcrowded.

Figure 6-31 shows the prevalence of overcrowded households in Stanton by census tract. There is a concentration of overcrowded households in the central and northeast areas of the City, where more than 20% of households in those tracts are overcrowded. Less than 8.2% of households (statewide average) in tracts along the western city boundary and in an area on the south side of the City are overcrowded. The tracts with larger proportions of overcrowded households are also categorized as low resource areas and have concentrations of racial/ethnic minorities and LMI households (see Figure 6-6 and Figure 6-11). Cost-burdened renters are also more prominent in this area (see Figure 6-28).

Within the region, overcrowding is concentrated in the north central area of Orange County in cities that include Santa Ana, Westminster, Garden Grove, Anaheim, and Stanton where there are also higher concentrations of racial/ethnic minorities and LMI households. Conversely, the coastal communities and south Orange County have percentages of overcrowded households below the statewide average.

FIGURE 6-31: OVERCROWDED HOUSEHOLDS



#### Substandard Housing

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. In Stanton, no households lack complete plumbing, but 2.3% of households lack complete kitchen facilities. Substandard housing conditions are comparable in Stanton to Orange County, where 0.3% of households lack complete plumbing and 1.5% of households lack complete kitchen facilities.

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. According to the 2014-2018 ACS, approximately 86.2% of the housing stock in Stanton was built prior to 1990 and may be susceptible to deterioration, including 48.8% built before 1970 which may require major repairs. In comparison, 76.2% of housing units countywide were built prior to 1990. Figure 6-32 shows the median year built for housing units by census tract. Tract 879.02 in the center of the City has older housing units while tracts immediately to the north and south consist of newer housing.

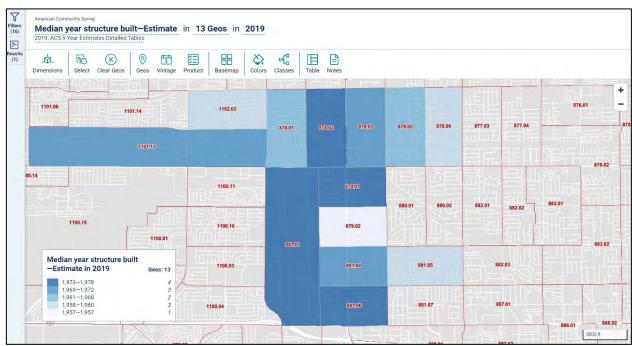


FIGURE 6-32: MEDIAN YEAR HOUSING UNITS BUILT

Source: US Census, 2014-2018 ACS

#### Displacement Risk

HCD defines sensitive communities as "communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost." The following characteristics define a sensitive community:

- The share of very low-income residents is above 20%; and
- The tract meets two of the following criteria:
  - Share of renters is above 40%,

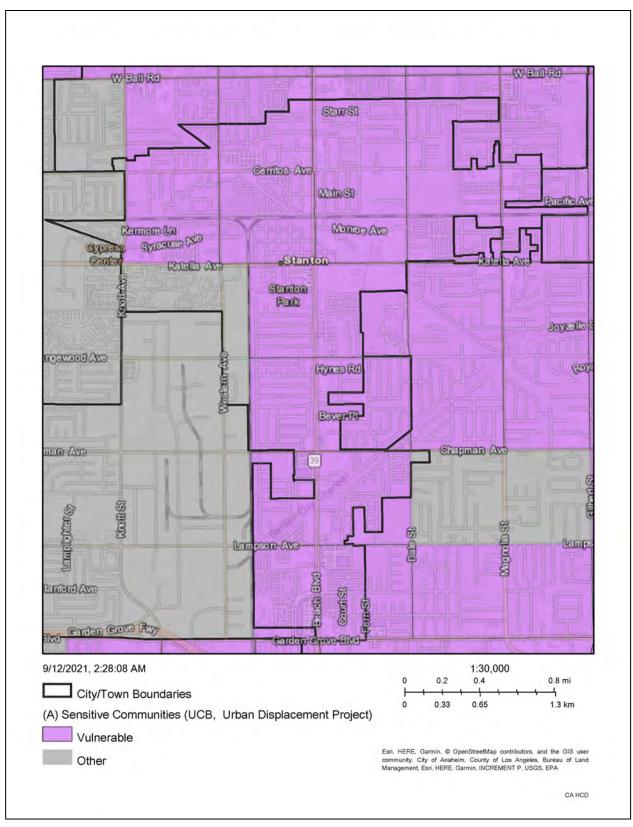
- o Share of people of color is above 50%,
- o Share of very low-income households (50% AMI or below) that are severely cost-burdened households is above the County median,
- o The area or areas in close proximity have been experiencing displacement pressures (percent change in rent above County median for rent increases), or
- o Difference between tract median rent and median rent for surrounding tracts is above the median for all tracts in the County (rent gap).

As shown in Figure 6-33, the large majority of tracts in Stanton are considered sensitive communities where the population is vulnerable to displacement in the event of increased redevelopment or shifts in housing cost. Four tracts at the periphery of the City, which also contain areas largely outside of Stanton, are not considered vulnerable communities. With the exception of Tract 878.01 in the northwest section of the City, all vulnerable tracts are also categorized as low resource areas (see Figure 6-15). As discussed previously, nearly all block groups in Stanton have racial/ethnic minority concentrations exceeding 61% (see Figure 6-6). Many of the sensitive communities also have larger shares of LMI households, cost-burdened owners and renters, overcrowded households, and children in female-headed households (see Figure 6-11, Figure 6-27, Figure 6-28, Figure 6-31, and Figure 6-8).

From a regional perspective (see Figure 6-34), sensitive communities are clustered in the north central area of Orange County around the cities of Buena Park, Anaheim, Garden Grove, Westminster, Santa Ana, Orange, and Stanton.

Since Stanton's census tracts are almost entirely considered sensitive communities, 100 percent of RHNA units are located in these areas. Despite the concentration of units in sensitive communities, sites selected to meet the RHNA are generally well distributed throughout the City. The high concentration of units in communities at risk of displacement is a reflection of the high rate of these communities citywide.

FIGURE 6-33: SENSITIVE COMMUNITIES AT RISK OF DISPLACEMENT



to Citado Pedra Bay 1/6/2022, 3:58:08 AM 1:200,000 1.25 2.5 5 mi City/Town Boundaries 2.25 9 km 4.5 (A) Sensitive Communities (UCB, Urban Displacement Project) Vulnerable County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, @ OpenStreetMap contributors, and the GIS user community Other

FIGURE 6-34: SENSITIVE COMMUNITIES AT RISK OF DISPLACEMENT - REGIONAL

#### Homelessness

The Orange County Continuum of Care's 2019 Point-In-Time Count identified 116 people in the City of Stanton experiencing homelessness, representing 1.7% of Orange County's total homeless count (6,860 individuals). An estimated 71 (61.2%) of the 116 homeless individuals in Stanton were unsheltered and an estimated 45 (38.8%) were sheltered. Countywide, there has been a sharp increase in the recorded homeless population since the 2017 homeless survey, partially due to more accurate counting measures. The Orange County Continuum of Care (CoC) saw a 43.2% increase in persons experiencing homelessness in 2019 compared to 2017 (2,068 more individuals).

The most recent inventory of resources available within Orange County for emergency shelters, transitional housing, and permanent supportive housing units comes from the 2019 Housing Inventory reported to HUD by the Orange County CoC. Table 6-9 shows the total beds offered by homeless facilities in the Orange County CoC area.

TABLE 6-8: HOMELESS FACILITIES (2019)\*

	Orange County CoC Region									
Facility Type		Family Units	Family Beds	Adult-Only Beds	Total Year- Round Beds					
Emergency Shelter		170	574	1,401	1,989					
Transitional Housing		272	816	289	1,105					
Permanent Supportive Housing		213	518	1,725	2,243					
Rapid Re-Housing		149	615	159	774					
Other Permanent Housing		8	16	92	108					
	TOTAL	812	2,539	3,666	6,219					

\*Numbers are for the total Orange County Continuum of Care region for which Stanton is a participating member Source: HUD 2019 Continuum of Care Homeless Assistance Programs, Housing Inventory Count Report

#### Summary of Fair Housing Issues

Approximately 42% of owner households and 70% of renter households in Stanton experience a housing problem. In general, overpayment is more pronounced for renters with tracts in the center of the City having higher concentrations of cost-burdened renter households. These areas correspond with low resource areas, tracts that have high concentrations of racial and ethnic minorities, and concentrations of lower income households. Some of these tracts also have higher concentrations of overcrowded households. The large majority of tracts in Stanton are considered sensitive communities where the population is vulnerable to displacement in the event of increased redevelopment or shifts in housing cost.

The City recognizes that even though it has identified sufficient land and programs to accommodate its RHNA allocation at all income levels, there is still the potential for economic displacement because of new development and investment. This "knock-on" effect can occur at any time and it can be challenging for the City to predict market changes and development patterns that have the potential to impact rental rates and sales prices for housing available in the marketplace. To date, the City has no evidence that new development (affordable or marketrate) has resulted in economic displacement. However, the City recognizes that economic displacement might occur in the future and has developed Program 21 to study and address potential issues related to displacement.

The City has also considered the risk of displacement specifically for protected classes, including persons with disabilities, female-headed households, seniors, and non-White residents (as discussed previously in this chapter). Although the proposed RHNA sites are distributed throughout the City, in some instances residential development is planned in areas where higher levels of persons with disabilities, female-headed households, and lower income households are located, and the risk of displacement to these groups may be high. However, as discussed above, Program 21 has been included in the City's Housing Plan to study and address issues related to future displacement and the City remains committed to maintaining its existing affordable housing stock, which includes affordable units throughout the City, including in census tracts with concentrations of protected classes.

To the extent that future development occurs in areas where there is existing housing, all housing must be replaced according to SB 330's replacement housing provisions (Government Code Section 66300). SB 330 also provides relocation payments to existing low-income tenants. Moreover, the State has adopted "just cause" eviction provisions and statewide rent control to protect tenants from displacement.

# **6B. Sites Inventory**

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification includes not only an analysis of site capacity to accommodate the RHNA (provided in the Housing Resources chapter), but also considers whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. This section analyzes the role of all sites, regardless of income level, in assisting to affirmatively further fair housing. However, special attention is paid to those sites identified to accommodate a portion of the City's lower income RHNA to ensure that the City is thinking carefully about how the development of new affordable housing options can promote patterns of equality and inclusiveness.

#### Integration and Segregation

The City finds that there are no known historic patterns of segregation by race and ethnicity, persons with disabilities, familial status, or income. Nonetheless, as described throughout this Housing Element, the City is committed to supporting the development of housing to promote a balanced and integrated community. This is highlighted in Table 5-8 in the Housing Resources chapter, as the City has identified a surplus of sites and excess development capacity for housing for all income levels.

Figure 6-6 shows the sites identified to meet Stanton's RHNA allocation in relation to racial/ethnic diversity. As shown, proposed sites, including those very low and low-income RHNA sites (i.e. underutilized mixed-use sites allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas of low diversity. The vast majority of sites are located in areas where racial/ethnic minority groups make up more than 61% of the population.

Figure 6-8 shows the sites designated to meet Stanton's RHNA allocation in relation to female-headed households. As shown, proposed sites, including very low and low-income sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas with high levels of female-headed

households. The locations of sites designated to meet the City's RHNA allocation are not expected to contribute to patterns of isolation or segregation for female-headed households.

Figure 6-9 shows the sites designated to meet Stanton's RHNA allocation in relation to the concentration of persons with disabilities. As shown, proposed sites, including those very low and low-income sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac), are located throughout the community and are not concentrated in areas with high proportions of persons with disabilities. Sites are divided between census tracts with 10% or less of the population indicating a disability and sites in areas with 10-20% of residents indicating a disability. Additionally, the City's mixed-use areas are located near transit corridors and activity centers, which also benefits persons with disabilities. However, these sites are not concentrated in areas with already high levels of disability. The locations of sites designated to meet the City's RHNA allocation are not expected to contribute to patterns of isolation or segregation for persons with disabilities.

Figure 6-11 shows the sites designated to meet Stanton's RHNA allocation in relation to low and moderate-income households. As shown, proposed sites, including very low and low-income RHNA sites (underutilized mixed-use sites allowing for densities of at least 30 du/ac), are distributed throughout the community, but since the City has only two small block groups where LMI households make up less than 50% of the population, the sites used to meet the City's 2021-2029 RHNA are generally in areas with a higher percentage of LMI households. Some of these block groups are home to mobile/manufactured homes, which are not proposed for redevelopment. Development is expected to occur on other sites where nonresidential uses are currently located. The location of new development to meet the City's RHNA is not expected to contribute to patterns of isolation or segregation for lower income households. Furthermore, the City remains committed to studying and addressing any issues related to future displacement and has included Program 21 in the Housing Plan as it pertains to economic displacement risk.

#### R/ECAPS

The City does not have any racially or ethnically concentrated areas of poverty (R/ECAPs) and the identification of sites to accommodate the City's RHNA is not expected to alter this finding.

#### Disparities in Access to Opportunity

Although Stanton is comparable to its neighboring cities in this regard, it appears that there are lower levels of access to opportunities in Stanton with a correlation between the concentration of LMI households and low resource census tracts. And given that the City is largely considered low resource, nearly all units used to meet Stanton's 2021-2029 RHNA are in low resource tracts (95.0% of units). Of the 293 lower income RHNA units, 24.9% are in moderate resource tracts and 75.1% are in low resource tracts.

However, as demonstrated by the recent revitalization of sites in the City's southern section along Beach Boulevard (e.g., the Lantana@Beach and Rodeo 39 mixed-use project), new mixed-use development in the identified areas will help to create more housing affordable to households at lower income levels, introduce new residents to the areas which can contribute to greater neighborhood stability, and expand opportunities for people to live and work in the same area. Taken together, new mixed-use development in the identified areas, which is focused on underutilized commercial sites, will help to diversify the land use pattern without displacing existing residents.

#### Disproportionate Housing Needs

Figure 6-27 and 6-28 show the sites designated to meet the RHNA allocation in relation to

percent of owner households and renter households overburdened by housing costs, by census tract. Some sites (located in the center of the City or aligned with Beach Boulevard) are located in the census tracts with the highest levels of cost-burdened renter households and some sites (located in the northern part of the City or aligned with Beach Boulevard) are located in the census tracts with the highest levels of cost-burdened homeowner households. These patterns appear to be generally consistent with the prior analyses regarding low and moderate-income households and access to opportunity. The intent of introducing new residential development in these areas (primarily at underutilized locations developed with existing commercial uses) is to add new housing to desirable areas and provide a range of housing choices at different prices to current and future residents. With only a few exceptions, the sites designated to accommodate the City's RHNA are not currently developed with residential uses and are not expected to displace current residents.

#### Site Analysis Findings

To accommodate the City's RHNA allocation, key focus areas include the City's mixed-use districts, all of which allow and incentivize mixed-use development at the densities needed to stimulate affordable housing development. These areas, located along transportation corridors and near activity centers, are designated for mixed-use development in the City's General Plan. The sites identified to meet the City's RHNA at all income levels are largely accommodated in these locations, which do not represent extremely concentrated racial or ethnic populations, persons with disabilities, female-headed households, senior households, or LMI households. However, the City has included a program to encourage additional development of lower income units throughout the community by way of its accessory dwelling unit program. For these reasons, the City finds that the sites proposed to accommodate its RHNA allocation do not unduly burden existing areas of concentrated racial or ethnic homogeneity, poverty, or other characteristics. Moreover, the sites affirmatively further fair housing by helping to stimulate investment in areas where additional opportunities are desired, and where new residential and/or mixed-use development can help to improve some of the opportunity level characteristics discussed earlier in this chapter.

# 6C. Contributing Factors, Goals, and Actions/Programs

The 2015 Affirmatively Furthering Fair Housing Rule Guidebook prepared by HUD identifies examples of contributing factors by each fair housing issue area: outreach, fair housing enforcement and outreach capacity, integration and segregation, racially and ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

The following are contributing factors that have been identified based on the fair housing issues presented in the County Analysis of Impediments (AI) and the analysis in this document that affect fair housing choice in Stanton. Table 6-10 lists the fair housing issues and contributing factors that exist in the City of Stanton and outlines the meaningful actions to be taken to address affirmatively furthering fair housing in the community. The meaningful actions listed in the table relate to the actions identified in the Housing Plan.

TABLE 6-10: FAIR HOUSING ISSUES AND ACTIONS

Fair Housing Issue	Contributing Factors	Priority Level	Meaningful Actions			
Outreach	<ul> <li>Lack of resources for fair housing agencies and organizations</li> </ul>	Medium	<ul><li> Program 18</li><li> Program 19</li></ul>			
Fair Housing Enforcement and Outreach Capacity	<ul> <li>Lack of local private fair housing outreach and enforcement</li> <li>Lack of resources for fair housing agencies and organizations</li> </ul>	High	<ul><li>Program 18</li><li>Program 19</li></ul>			
ntegration and Segregation	<ul> <li>Community opposition</li> <li>Displacement of residents due to economic pressures</li> <li>Lack of local or regional cooperation</li> <li>Land use and zoning laws</li> <li>Location and type of affordable housing</li> <li>Private discrimination</li> <li>Lack of public investment in specific neighborhoods, including services or amenities</li> </ul>	Medium	<ul> <li>Program 1</li> <li>Program 2</li> <li>Program 3</li> <li>Program 4</li> <li>Program 5</li> <li>Program 19</li> <li>Program 20</li> <li>Program 21</li> </ul>			
Disparities in Access to Opportunity	<ul> <li>Community opposition</li> <li>Displacement of residents due to economic pressures</li> <li>Impediments to mobility</li> <li>Lack of access to opportunity due to high housing costs</li> <li>Lack of local or regional cooperation</li> <li>Land use and zoning laws</li> <li>Quality of affordable housing information programs</li> <li>Lack of public investment in specific neighborhoods, including services or amenities</li> <li>Access to transportation for persons with disabilities</li> <li>Lack of affordable in-home or community-based supportive services</li> </ul>	High	<ul> <li>Program 1</li> <li>Program 2</li> <li>Program 3</li> <li>Program 4</li> <li>Program 5</li> <li>Program 19</li> <li>Program 20</li> <li>Program 21</li> </ul>			
Disproportionate Housing Needs and Displacement Risk	<ul> <li>Availability of affordable units in a range of sizes</li> <li>Displacement of residents due to economic pressures</li> <li>Lack of access to opportunity due to high housing costs</li> <li>Land use and zoning laws</li> <li>Lack of public investment in specific neighborhoods, including services or amenities</li> </ul>	High	<ul> <li>Program 1</li> <li>Program 2</li> <li>Program 3</li> <li>Program 4</li> <li>Program 5</li> <li>Program 19</li> <li>Program 20</li> <li>Program 21</li> </ul>			

# 7 Other Requirements

# 7A. Consistency with General Plan

Government Code Section 65300.5 states: "In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." Additionally, Government Code Section 65583(c)(7) requires the identification of "means by which consistency will be achieved with other general plan elements and community goals."

The housing element of a general plan sets out a city's overall long-range planning strategy for providing housing for all segments of the community. The California Government Code requires general plans to contain an integrated, consistent set of goals and policies. The housing element is, therefore, affected by policies contained in other elements of a general plan. The housing element is most intricately related to the land use element. The land use element establishes the framework for development of housing by laying out the land use designations for residential development and indicating the type and density permitted by a city.

Working within this framework, the City of Stanton's Housing Element identifies priority goals, objectives, and program actions for the 2021-2029 planning period that directly address the housing needs of Stanton's existing and future residents. The policies contained in other elements of the City's General Plan affect many aspects of life that residents enjoy such as the amount and variety of open space; the preservation of natural, historic, and cultural resources; permitted noise levels in residential areas; and the safety of the residents in the event of a natural or man-made disaster. The Housing Element has been reviewed for consistency with the City's other General Plan elements and the policies and programs in this Element do not conflict with the policy direction contained in other parts of the General Plan. As portions of the General Plan are amended in the future, the Housing Element will be reviewed to ensure that internal consistency is maintained.

## 7B. Relationship to Other City Plans and Policies

The Housing Element identifies priority goals, objectives, policies, and action programs for the next eight years that directly address the housing needs of Stanton. The City's other plans and policies, including its Municipal Code, Zoning Code, and Specific Plans must all remain consistent with the Housing Element. As revisions are considered to the City's Zoning Code and various plans, each revision will be reviewed to ensure that no conflicts with the Housing Flement occur.

## 7C. Priority for Water and Sewer

Per Chapter 727, Statues of 2004 (SB 1087), upon completion of an amended or adopted housing element, a local government is responsible for immediately distributing a copy of the element to area water and sewer providers. Water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower income households. As the responsible agency, the City of Stanton will supply a copy of the adopted Housing Element to Golden State Water Company and the Orange County Sanitation District, as well as to all other water and sewer providers serving the City. The City is also preparing policy language to ensure that all lower income housing projects receive priority for water and sewer service, consistent with State law.

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TABLE A-1: SUMMARY OF VACANT RES. SITES (SEE BACKGROUND REPORT TABLE 5-6)

Site No.	APN	General Zoning P∈ Plan Designation Designation		Permitted Density	Parcel Size (Acres)	Net Unit Potential
Vacant Residential						
1	079-771-36	HDR	RH	11.1 – 30 du/ac <sup>1</sup>	1.24	27
2	131-231-18	LDR	RL	2.1 – 6 du/ac	1.00	4
3	131-231-19	LDR	RL	2.1 – 6 du/ac	0.99	4
4	079-352-08	LDR	RL	2.1 – 6 du/ac	0.16	1
5	079-363-01	LDR	RL	2.1 – 6 du/ac	0.09	1
5	079-363-16	LDR	RL	2.1 – 6 du/ac	0.07	I
				TOTAL	3.55	37

TABLE A-2: SUMMARY OF MIXED-USE SITES (SEE BACKGROUND REPORT TABLE 5-7)

Site No.	APN	General Plan Designation	Zoning Designation	Permitted Density	Parcel Size (Acres)	Net Unit Potential
Mixed-	Use					
6	079-221-15	NGMU	NGMX	25 – 45 du/ac	4.75	171
	126-281-10	NGMU	NGMX	25 – 45 du/ac		
7	126-281-11	NGMU	NGMX	25 – 45 du/ac	1.71	61
	126-281-18	NGMU	NGMX	25 – 45 du/ac		
8	126-281-14	NGMU	NGMX	25 – 45 du/ac	0.57	12
9	131-131-07	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.94	21
10	131-131-05	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.40	9
11	131-211-02	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.64	14
12	131-211-21	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1.14	41
13	131-221-16	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.59	13
14	131-221-45	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1.09	39
15	131-241-45	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.96	21
16	131-241-07	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.84	18
10	131-241-21	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.84	Ιδ
	131-263-03	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
17	131-263-04	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.51	11
	131-263-05	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
	131-411-15	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
	131-411-20	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
18	131-411-21	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	3.51	126
	131-411-22	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
	131-411-25	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
19	079-371-13	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.49	11
17	079-371-12	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.49	11
20	079-371-09	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.48	10
21	079-371-26	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.69	15

22	079-371-27	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	0.46	10
	126-363-10	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
23	126-363-11	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1.31	47
23	126-363-16	GMU	GLMX <sup>1</sup>	25 – 45 du/ac	1.31	47
	126-363-17	GMU	GLMX <sup>1</sup>	25 – 45 du/ac		
24	131-482-36	SGMU	SGMX	30 – 60 du/ac	1.43	68
25	131-592-21	SGMU	SGMX	30 – 60 du/ac	2.44	117
23	131-592-22	SGMU	SGMX	30 – 60 du/ac	2.44	117
26	131-491-08	131-491-08 SGMU SGMX 3		30 – 60 du/ac	9.44	453
20	131-491-09	SGMU	SGMX	30 – 60 du/ac	7.44	400
				TOTAL	34.39	1,288

TABLE A-3: HOUSING ELEMENT SITES INVENTORY

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel	Consolidated General P		ing Designation Minimum Density	Max Density Allowed	Parcel Size (Acres)	Existing	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)			Above Moderate	Total Capacity	Optional	Optional	Optional
-			Number =	Sites Designation (C		(Current) Allowed (units/acre	(units/acre)	-	Use/Vacancy					Capacity =	Capacity	Income Capaci	-	Information1	Information2	
STANTON	10651 LEXINGTON ST		079-771-36	High Density Resi			18 du/ac	1.24114044		YES - Current	YES - City-Owned	Available		27		ļ .	27		Vacant	N/A
STANTON STANTON	8191 BEVER PL REVER PI		131-231-18 131-231-19	Low Density Resident Programme Low Density Resident		2.1 du/ac 2.1 du/ac	6 du/ac 6 du/ac	0.993971133	Vacant	YES - Current YES - Current	NO - Privately-Owned NO - Privately-Owned	Available Available				4	4		Vacant Vacant	N/A N/A
STANTON	CEDAR ST		131-231-19 079-352-08	Low Density Resi		2.1 du/ac 2.1 du/ac	6 du/ac	0.993971133		YES - Current	NO - Privately-Owned NO - Privately-Owned	Available				4	4		Vacant	N/A N/A
STANTON	DATE ST		079-363-01	A Low Density Resi		2.1 du/ac	6 du/ac	0.086287589		YES - Current	NO - Privately-Owned	Available				-	- 1		Vacant	N/A
STANTON	DATE ST		079-363-16	B Low Density Resi			6 du/ac		Vacant	YES - Current	NO - Privately-Owned	Available							Vacant	N/A
STANTON	10181 BEACH BLVD		079-221-15	North Gateway N			45 du/ac	4.748392014		y YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	42	2	2 06	171		Underutilized	N/A 1967
STANTON	8171 STARR ST		126-281-10	A North Gateway N			45 du/ac	0.566516186		YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant					-	Underutilized	1927
STANTON	R191 STARR ST		126-281-11	B North Gateway N			45 du/ac	0.569617031	Residential 1	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant						Underutilized	1937
STANTON	8201 STARR ST		126-281-18	C North Gateway N			45 du/ac	0.569674081		YES - Current	NO - Privately-Owned	Available	Osed in Fried Housing Element - Non-Vacant	15		2.0	61		Underdenzed	N/A
STANTON	8221 STARR ST		126-281-14	North Gateway N			45 du/ac	0.569733973	Residential 1	YES - Current	NO - Privately-Owned	Available		- 13	_	2 10	12		Underutilized	1029
STANTON	11182 REACH RIVD		131-131-07	General Mixed II			45 du/ac	0.936379257	Commercial	YES - Current	NO - Privately-Owned	Available				7 14	21		Stanton Plaza Sne	cif. 1957
STANTON	11296 REACH RIVD		131-131-05	General Mixed-U			45 du/ac	0.394982712	Commercial 5 25	D YES - Current	NO - Privately-Owned	Available						10	Stanton Plaza Spe	
STANTON	11550 BEACH BLVD		131-211-02	General Mixed-U			45 du/ac		Commercial: use		NO - Privately-Owned	Available				4 10	14	11	Underutilized	1970
STANTON	11626 BEACH BLVD		131-211-21	General Mixed-U			45 du/ac	1 140493589		c YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		- 1	0 22	41	12	Underutilized	1955
STANTON	8022 LA MONTE BLVD		131-221-16	General Mixed-U			45 du/ac	0.589587808		ch YES - Current	NO - Privately-Owned	Available	Osed III File Housing Chillient - Noir-Vacant			2 10	12	12	Inderutilized	1949
STANTON	11632 REACH BLVD		131-221-45	General Mixed-U			45 du/ac	1.093054649		el VES - Current	NO - Privately-Owned	Available			- 1	2 26	20	1/	Underutilized	1002
STANTON	11810 REACH BLVD		131-241-45	General Mixed-U			45 du/ac	0.956342186		ileYES - Current	NO - Privately-Owned	Available			-	7 14	21	19	Underutilized	1972
STANTON	11892 REACH BLVD		131-241-07	A General Mixed-U			45 du/ac	0.336342100		el VES - Current	NO - Privately-Owned	Available				4		16	Underutilized	1959
STANTON	11870 BEACH BLVD		131-241-21	B General Mixed-U			45 du/ac	0.396043725	Vacant	YES - Current	NO - Privately-Owned	Available				6 12	18	16	Vacant	1975
STANTON	11763 BEACH BLVD	90680	131-263-03	A General Mixed-U	e GLM3	X 30 du/ac	45 du/ac	0.165965124	Commercial: auto	m YES - Current	NO - Privately-Owned	Available						17	Underutilized: pot	en N/A
STANTON	11793 BEACH BLVD	90680	131-263-04	B General Mixed-U	e GLM3	X 30 du/ac	45 du/ac	0.16619198	Commercial: auto	m YES - Current	NO - Privately-Owned	Available						17	Underutilized: pot	en N/A
STANTON	11793 BEACH BLVD	90680	131-263-05	C General Mixed-U	e GLM3	X 30 du/ac	45 du/ac	0.166440956	Commercial: auto	m YES - Current	NO - Privately-Owned	Available				11	11	17	Underutilized: pot	en N/A
STANTON	8040 CHAPMAN AVE	90680	131-411-15	A General Mixed-U	e GLM3	X 30 du/ac	45 du/ac	1.560720183	Commercial: ban	k YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant					18	Underutilized	1971
STANTON	12080 BEACH BLVD	90680	131-411-20	B General Mixed-U	e GLMD	X 30 du/ac	45 du/ac	0.445466666	Vacant	YES - Current	NO - Privately-Owned	Available						18	Vacant	1973
STANTON	12000 BEACH BLVD	90680	131-411-21	C General Mixed-U	e GLM0	X 30 du/ac	45 du/ac	0.392644659	Commercial	YES - Current	YES - State-Owned	Available	Used in Prior Housing Element - Non-Vacant					18	Underutilized	1959
STANTON	12050 BEACH BLVD	90680	131-411-22	D General Mixed-U	e GLMD	X 30 du/ac	45 du/ac	0.826608689	Vacant	YES - Current	NO - Privately-Owned	Available						18	Vacant	1963
STANTON	8040 CHAPMAN AVE	90680	131-411-25	E General Mixed-U	e GLM0	X 30 du/ac	45 du/ac	0.275502093	Commercial; rest	au YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	31		4 71	126	18	Underutilized	1959
STANTON	10921 WESTERN AVE	90680	079-371-13	A General Mixed-U	e GLM3	X 30 du/ac	45 du/ac	0.247407699	Vacant	YES - Current	NO - Privately-Owned	Available						19	Vacant	N/A
STANTON	10941 WESTERN AVE	90680	079-371-12	B General Mixed-U	e GLM3	X 30 du/ac	45 du/ac	0.242976051	Vacant	YES - Current	NO - Privately-Owned	Available				11	11	19	Vacant	N/A
STANTON	7455 KATELLA AVE	90680	079-371-09	General Mixed-U	e GLM0	X 30 du/ac	45 du/ac	0.478179342	Vacant	YES - Current	YES - City-Owned	Pending Project	d .			10	10	20	Vacant	N/A
STANTON	7401 KATELLA AVE	90680	079-371-26	General Mixed-U	e GLM0		45 du/ac	0.68494663	Residential, 1 uni	t YES - Current	NO - Privately-Owned	Available				4 11	15	21		1935
STANTON	7421 KATELLA AVE	90680	079-371-27	General Mixed-U	e GLM0	X 30 du/ac	45 du/ac	0.455979458	Residential, 1 uni	t YES - Current	NO - Privately-Owned	Available				10	10	22	!	1969
STANTON	10471 MAGNOLIA AVE	92804	126-363-10	A General Mixed-U	e GLM0	X 30 du/ac	45 du/ac	0.511907734	Commercial; vaca	int YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant					23	Underutilized	1970
STANTON	10441 MAGNOLIA AVE	92804	126-363-11	B General Mixed-U	e GLM0	X 30 du/ac	45 du/ac	0.275569657	Commercial; rest	au YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant					23	Underutilized	1965
STANTON	10425 MAGNOLIA AVE	92804	126-363-16	C General Mixed-U	e GLM0		45 du/ac	0.344448049	Converted comm	er YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant					23	Underutilized	N/A
STANTON	10425 MAGNOLIA AVE	92804	126-363-17	D General Mixed-U	e GLM0	X 30 du/ac	45 du/ac	0.172215816	Converted comm	er YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	10	1	1 26	47	23	Underutilized	N/A
STANTON	12392 BEACH BLVD	90680	131-482-36	South Gateway N	xed-Use SGM	X 30 du/ac	60 du/ac	1.434335304	Commercial; equ	ipr YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	17	1	3 38	68	24	Underutilized	1955
STANTON	12605 BEACH BLVD		131-592-21	A South Gateway N	xed-Use SGM		60 du/ac	1.148291707	Commercial; reta	II YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant					25	Underutilized	1963
STANTON	12505 BEACH BLVD	90680	131-592-22	B South Gateway N	xed-Use SGM	X 30 du/ac	60 du/ac	1.288819343	Commercial plaza	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	29	2	2 66	117	25	Underutilized	1989
STANTON	12540 BEACH BLVD		131-491-08	A South Gateway N			60 du/ac	5.825245218		nerYES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant					26	Underutilized; vac	an 1988
STANTON	LAMPSON AVE	92841	131-491-09	B South Gateway N	xed-Use SGM2	X 30 du/ac	60 du/ac	3.607933631	Commercial; parl	in YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	113	8	6 254	453	26	Underutilized	N/A

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#### **SITE DETAILS: 10181 BEACH BOULEVARD**

Housing Opportunity Sites Reference No.	6
Acreage	4.75
Accessor Parcel Number	079-221-15
Ownership	PNM Properties
Existing Use	Commercial, auto part salvage yard; Pick Your Part
Existing Lot Coverage	N/A; small buildings exist on site
Existing Floor Area Ratio	N/A
Existing General Plan	North Gateway Mixed-Use
Existing Zoning	NGMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	171 Net Unit Potential (80% of max. capacity)
	(43 Lower, 32 Moderate, 96 Above Moderate)
Factors Supporting Development	The property owner has expressed interest in redeveloping the site. The site is essentially a large parking lot and highly underutilized, with small accessory buildings existing on the site. The allowable density is 25-45 du/ac.

#### Site Boundary (Aerial with Parcel Boundary)





#### SITE DETAILS: 8171, 8191 & 8201 STARR STREET

Housing Opportunity Sites Reference No.	7
Acreage	1.71
Accessor Parcel Number	126-281-10, 126-281-11 and 126-281-18
Ownership	JJPA LLC and CA JJPA
Existing Use	126-281-10 – Residential, one SFR
	126-281-11 – Residential, one SFR
	126-281-18 – Vacant
Existing Lot Coverage	N/A; 638 sf. dwelling and 1,343 sf. dwelling
Existing Floor Area Ratio	N/A
Existing General Plan	North Gateway Mixed-Use
Existing Zoning	NGMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	61 Net Unit Potential (80% of max. capacity)
	(15 Lower, 12 Moderate, 34 Above Moderate)
Factors Supporting Development	Neighboring properties with similar characteristics recently developed in the 5 <sup>th</sup> Cycle planning period. The combined site is highly underutilized with two small residential units on two of the parcels and the third parcel being vacant. The three parcels making up the site have common ownership.

### Site Boundary (Aerial with Parcel Boundary)







#### **SITE DETAILS: 8221 STARR STREET**

Housing Opportunity Sites Reference No.	8
Acreage	0.57
Accessor Parcel Number	126-281-14
Ownership	Thomas Jay & Valerie Lynn Handzus
Existing Use	Residential, one SFR
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	North Gateway Mixed-Use
Existing Zoning	NGMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	12 Net Unit Potential (50% of max. capacity)
	(2 Moderate, 10 Above Moderate)
Factors Supporting Development	Neighboring properties with similar characteristics recently developed in the 5th Cycle planning period. The site is underutilized with one small residential unit on-site, but with the capacity for 12.

### Site Boundary (Aerial with Parcel Boundary)





### **SITE DETAILS: 11182 BEACH BOULEVARD**

Housing Opportunity Sites Reference No.	9
Acreage	0.94
Accessor Parcel Number	131-131-07
Ownership	Ronnenberg Inc
Existing Use	Commercial
Existing Lot Coverage	N/A; 3,146 sf. building
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	21 Net Unit Potential (50% of max. capacity) (7 Moderate, 14 Above Moderate)
Factors Supporting Development	The site is underutilized with an Improvement to Land Value Ratio of 0.79. There is an unspecified commercial use on-site consisting of accessory buildings. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)





#### SITE DETAILS: 11296 BEACH BOULEVARD

Housing Opportunity Sites Reference No.	10
Acreage	0.40
Accessor Parcel Number	131-131-05
Ownership	Ronnenberg Inc
Existing Use	Commercial, office
Existing Lot Coverage	N/A; 4,500 sf. building
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	9 Net Unit Potential (50% of max. capacity)
	(9 Above Moderate)
Factors Supporting Development	The site is underutilized with the tenant space having had much turnover throughout recent years. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)





#### SITE DETAILS: 11550 BEACH BOULEVARD

Housing Opportunity Sites Reference No.	11
Acreage	0.64
Accessor Parcel Number	131-211-02
Ownership	Gamanlal B Patel
Existing Use	Commercial, used automobile sales
Existing Lot Coverage	N/A; 1,764 sf. building
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	14 Net Unit Potential (50% of max. capacity)
	(4 Moderate, 10 Above Moderate)
Factors Supporting Development	The site is highly underutilized and operating as a used car sales business with only a small building existing on-site. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)





### **SITE DETAILS: 11626 BEACH BOULEVARD**

Housing Opportunity Sites Reference No.	12
Acreage	1.14
Accessor Parcel Number	131-211-21
Ownership	Ajaz Siddiq
Existing Use	Commercial, used automobile sales
Existing Lot Coverage	N/A; small buildings exist on site
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	41 Net Unit Potential (80% of max. capacity)
	(8 Lower, 10 Moderate, 23 Above Moderate)
Factors Supporting Development	The site is highly underutilized with an Improvement to Land Value Ratio of 0.25, and with only small buildings existing on the site. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)



#### **SITE DETAILS: 8022 LA MONTE ROAD**

Housing Opportunity Sites Reference No.	13
Acreage	0.59
Accessor Parcel Number	131-221-16
Ownership	Athula & Mariel Ianthie Meepe
Existing Use	Commercial, preschool
Existing Lot Coverage	N/A; 4,161 sf. building and other accessory structures
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	13 Net Unit Potential (50% of max. capacity)
	(3 Moderate, 10 Above Moderate)
Factors Supporting Development	The site is underutilized with an Improvement to Land Value Ratio of only 0.06. Development pressure in the area will make this a viable site during the planning period. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)



#### **SITE DETAILS: 11632 BEACH BOULEVARD**

Housing Opportunity Sites Reference No.	14
Acreage	1.09
Accessor Parcel Number	131-221-45
Ownership	California One Hospitality
Existing Use	Commercial, motel
Existing Lot Coverage	N/A; 14,264 sf. building
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	39 Net Unit Potential (80% of max. capacity) (13 Moderate, 26 Above Moderate)
Factors Supporting Development	The site is highly underutilized with an Improvement to Land Value Ratio of 0.23. Structure is almost 40 years old. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)





#### **SITE DETAILS: 11810 BEACH BOULEVARD**

Housing Opportunity Sites Reference No.	15
Acreage	0.96
Accessor Parcel Number	131-241-45
Ownership	Blue Carpet Mobile Homes
Existing Use	Commercial, mobile home sales
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	21 Net Unit Potential (50% of max. capacity)
	(7 Moderate, 14 Above Moderate)
Factors Supporting Development	The site is highly underutilized with an Improvement to Land Value Ratio of 0.14. All structures on-site are model manufactured homes without a permanent foundation. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)





#### SITE DETAILS: 11870 BEACH BOULEVARD

Housing Opportunity Sites Reference No.	16
Acreage	0.84
Accessor Parcel Number	131-241-07 and 131-241-21
Ownership	Asaad Hakim
Existing Use	Vacant
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	18 Net Unit Potential (50% of max. capacity)
	(6 Moderate, 12 Above Moderate)
Factors Supporting Development	The site is vacant with the property owner having recently scraped the parcels in anticipation of redevelopment. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)





#### SITE DETAILS: 11763 & 11793 BEACH BOULEVARD

Housing Opportunity Sites Reference No.	17
Acreage	0.51
Accessor Parcel Number	131-263-03, 131-263-04 and 131-263-05
Ownership	Harvey D & Kazuko Y Kagasoff; Transcendent
	Properties
Existing Use	131-263-03 – Commercial, auto repair
	131-263-04 – Commercial, auto repair
	131-263-05 – Commercial, auto repair
Existing Lot Coverage	N/A; 836 sf. building (11763)
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	11 Net Unit Potential (50% of max. capacity)
	(11 Above Moderate)
Factors Supporting Development	The combined site is underutilized with an average Improvement to Land Value Ratio of 0.60. Development pressure in the area will make this a viable site during the planning period. The allowable density is 25-45 du/ac.

### Site Boundary (Aerial with Parcel Boundary)





# SITE DETAILS: 12000, 12050 & 12080 BEACH BLVD. & 8040 CHAPMAN AVE.

Housing Opportunity Sites Reference No.	18
Acreage	3.51
Accessor Parcel Number	131-411-15, 131-411-20, 131-411-21, 131-411-22 and 131-411-25
Ownership	US Bank National Association; Laan Mary Van Der; State of California; Diane E Daniels
Existing Use	131-411-15 – Vacant 131-411-20 – Vacant 131-411-21 – Commercial; U.S. Bank 131-411-22 – Vacant 131-411-25 – Commercial, restaurant
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	126 Net Unit Potential (80% of max. capacity) (31 Lower, 24 Moderate, 71 Above Moderate)
Factors Supporting Development	The site is primarily vacant with property owners having scraped the larger parcels in anticipation of redevelopment. The restaurant use is in a building that is over 60 years old. Although a U.S. Bank occupies the parcel at the corner of Beach Blvd and Chapman Ave, it is entirely feasible that the parcel would be absorbed into a larger redevelopment of the site.

#### Site Boundary (Aerial with Parcel Boundary)







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#### SITE DETAILS: 10941 & 10921 WESTERN AVENUE

Housing Opportunity Sites Reference No.	19
Acreage	0.49
Accessor Parcel Number	079-371-13 and 079-371-12
Ownership	Brill C Paet
Existing Use	Both vacant
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	11 Net Unit Potential (50% of max. capacity)
	(11 Above Moderate)
Factors Supporting Development	Both parcels comprising the site are vacant, have
	common ownership, and are on the market for development. The allowable density is 25-45 du/ac.
	development. The allowable defisity is 25-43 durac.

#### Site Boundary (Aerial with Parcel Boundary)





#### **SITE DETAILS: 7455 KATELLA AVENUE**

Housing Opportunity Sites Reference No.	20
Acreage	0.48
Accessor Parcel Number	079-371-09
Ownership	Stanton Housing Authority
Existing Use	Vacant
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	10 Net Unit Potential (50% of max. capacity) (10 Above Moderate)
Factors Supporting Development	The site is vacant, owned by the Housing Authority, and ready for development. The allowable density is 25-45 du/ac.

#### Site Boundary (Aerial with Parcel Boundary)





#### **SITE DETAILS: 7401 KATELLA AVENUE**

Housing Opportunity Sites Reference No.	21
Acreage	0.69
Accessor Parcel Number	079-371-26
Ownership	Melinda Gail Wallace
Existing Use	Residential, one SFR (1,916 sf.)
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	15 Net Unit Potential (50% of max. capacity) (4 Moderate, 11 Above Moderate)
Factors Supporting Development	The site is underutilized with a small SFR; zoning allows for higher desnity. The allowable density is 25-45 du/ac.

#### Site Boundary (Aerial with Parcel Boundary)





#### **SITE DETAILS: 7421 KATELLA AVENUE**

Housing Opportunity Sites Reference No.	22
Acreage	0.46
Accessor Parcel Number	079-371-27
Ownership	Melinda Gail Wallace
Existing Use	Residential, one SFR (1,562 sf.)
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	10 Net Unit Potential (50% of max. capacity) (10 Above Moderate)
Factors Supporting Development	The site is underutilized with a small SFR; zoning allows for higher desnity. The allowable density is 25-45 du/ac.

#### Site Boundary (Aerial with Parcel Boundary) Photographs





#### **SITE DETAILS: 10425, 10441 & 10471 MAGNOLIA AVENUE**

Housing Opportunity Sites Reference No.	23
Acreage	1.31
Accessor Parcel Number	126-363-10, 126-363-11, 126-363-16 and 126-363-17
Ownership	Massoud Hajnabi; William Loi Ngo; Plaza Gentle; Nahum Investment
Existing Use	126-363-10 – Commercial, vacant 126-363-11 – Commercial, restaurant 126-363-16 – Commercial, vacant 126-363-17 – Commercial, vacant
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	General Mixed-Use
Existing Zoning	GLMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	47 Net Unit Potential (80% of max. capacity) (10 Lower, 11 Moderate, 26 Above Moderate)
Factors Supporting Development	Commercial spaces are vacant with the exception of the restaurant use. The restaurant use is in a building that is over 50 years old. Each parcel is underutilized and could be redeveloped with 100% residential and it is feasible that the site could be assembled for a larger housing development.

### Site Boundary (Aerial with Parcel Boundary)







#### **SITE DETAILS: 12392 BEACH BOULEVARD**

Site Inventory Map Number Reference	24
Acreage	1.43
Accessor Parcel Number	131-482-36
Ownership	TM2 Property Management LLC
Existing Use	Commercial, equipment rental
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	South Gateway Mixed-Use
Existing Zoning	SGMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	68 Net Unit Potential (80% of max. capacity) (17 Lower, 13 Moderate, 38 Above Moderate)
Factors Supporting Development	The site is largely underutilized with only three small buildings constructed on-site. The open area is used to store equipment for rent, e.g., construction equipment, generators. Development in the southern portion of the City has been robust in recent years and there will be continued pressure on sites of this sort to redevelop.

### Site Boundary (Aerial with Parcel Boundary)





#### SITE DETAILS: 12505 & 12605 BEACH BOULEVARD

Site Inventory Map Number Reference	25	
Acreage	2.44	
Accessor Parcel Number	131-592-21 and 131-592-22	
Ownership	Jeong Suk Lee and Sanh V Truong	
Existing Use	Commercial plaza; commercial, furniture store	
Existing Lot Coverage	N/A	
Existing Floor Area Ratio	N/A	
Existing General Plan	South Gateway Mixed-Use	
Existing Zoning	SGMX	
Proposed General Plan	Same	
Proposed Zoning	Same	
Potential Capacity by Household Income Level	117 Net Unit Potential (80% of max. capacity)	
	(29 Lower, 22 Moderate, 66 Above Moderate)	
Factors Supporting Development	The parcel at 12605 Beach Blvd. has a single tenant in	
	a large commercial space (20,532 sf.) in a building	
	nearing 60 years old. The parcel is considered	
	underutilized with an I/L ratio of 0.90. The parcel at	
	12505 Beach Blvd. has multiple tenants, but is still	
	considered underutilized (I/L ratio of 0.76).	
	Development in the surrounding area has been robust	
	in recent years and there will be continued pressure on	
	sites of this sort to redevelop.	

### Site Boundary (Aerial with Parcel Boundary)







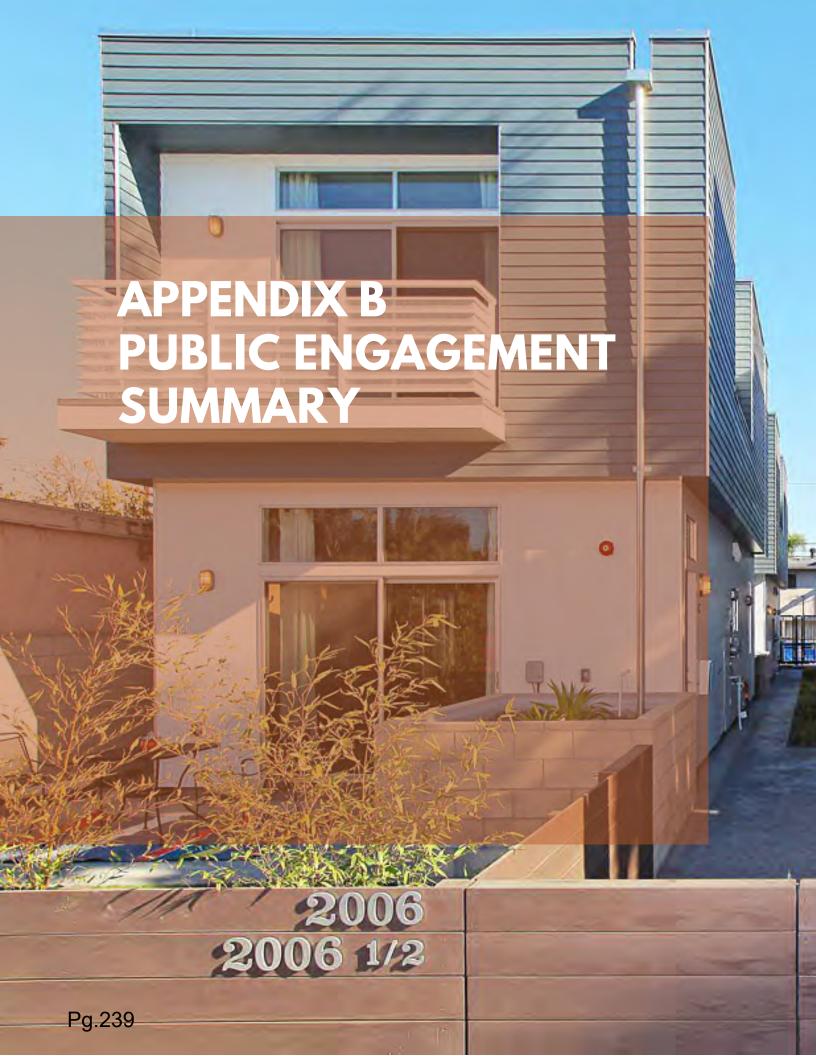
#### **SITE DETAILS: 12540 BEACH BOULEVARD**

Site Inventory Map Number Reference	26
Acreage	9.44
Accessor Parcel Number	131-491-08 and 131-491-09
Ownership	Nominees Mideb and Son Dinh Nguyen
Existing Use	Commercial; Vacant tenant space (formerly Sam's Club)
Existing Lot Coverage	N/A
Existing Floor Area Ratio	N/A
Existing General Plan	South Gateway Mixed-Use
Existing Zoning	SGMX
Proposed General Plan	Same
Proposed Zoning	Same
Potential Capacity by Household Income Level	453 Net Unit Potential (80% of max. capacity) (113 Lower, 86 Moderate, 254 Above Moderate)
Factors Supporting Development	The large commercial space (108,340 sf.) has been vacant since 2018, and with big box retail stores struggling in the face of on-line shopping, a single tenant is unlikely to occupy the building. This market reality could easily result in the site being redeveloped for mixed-use during the 2021-2029 planning period.

### Site Boundary (Aerial with Parcel Boundary)









# **Public Engagement Summary Report**

City of Stanton

Housing Element Update

January 2022

In partnership with De Novo Planning Group



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Feedback Influence	31



The City of Stanton updated its Housing Element as part of the 2021-2029 Housing Element Cycle (Cycle 6). Stanton is dedicated to meeting the future housing needs of its residents. The Housing Element Update process is a unique opportunity to connect with residents of Stanton and learn more about residents' values, priorities, concerns, and ideas.

The City's public engagement program connected to the Housing Element Update began in October 2020. Throughout the process, the City made efforts to involve all economic segments of the community in the Housing Element Update. This included efforts to involve low- and moderate-income households and representative organizations by sending direct advertisements, posting to social media, hosting surveys, facilitating workshops, and sharing summaries of feedback to validate what we heard. By using multiple outreach methods, different segments of the community were able to participate in a way that was most convenient for them. Throughout the public review period of the Draft Housing Element, the City continued to engage the community to seek feedback on the goals, policies, and programs included in the Housing Plan as well as input regarding key issues and challenges identified in the Background Report, including the City's plan to accommodate its fair share of future regional housing growth. The City provided direction on how individuals could direct letters to stakeholders engaged in housing services in and around Stanton.

The following activities have been conducted in support of the Housing Element Update and are summarized in this document; screenshots of key advertisements and links to presentations are included at the end of this document and are also available on the project website at <a href="https://letstalkstanton.com/housingelement">https://letstalkstanton.com/housingelement</a>.

- General Education and Advertisements
- Project Website
- Virtual Community Workshop
- Fair Housing Survey
- Public Review of Draft 2021-2029 Housing Element

# **Outreach Campaign**

The City engaged in a multifaceted campaign to advertise the update to the City's Housing Element and collect feedback.

## **Social Media**

The City of Stanton maintains various social media accounts including Twitter, Instagram, NextDoor, and Facebook. Starting in October 2020 and continuing throughout the project, the City posted updates to its social media platforms advertising opportunities to provide input and alerting the public to upcoming meetings and workshops.

### **Fact Sheet**

A fact sheet was prepared to answer commonly asked questions, provide information about the update process, and let people know how to get involved.







City of Stanton 2021-2029

#### **HOUSING ELEMENT UPDATE**

The City of Stanton is in the process of preparing the 2021-2029 Housing Element. This Fact Sheet is intended to answer commonly asked questions, provide information about the update process, and let you know how to get involved.

What is a Housing Element?
The Housing Element is a section of the City's General Plan that looks at housing needs and conditions within Stanton. It is a policy document that identifies goals, policies, and programs that the City uses to direct and guide actions related to housing.

#### Why is the City updating its Housing Element?

Each city and county in California is required to have a Housing Element and update it at least every 8 years. Updating the Housing Element gives the City a clear picture of housing-related issues such as housing supply and demand, the types of housing available within the City, housing affordability, and homelessness. Once the Housing Element is updated, it must be approved by the California Department of Housing and Community Development. Updating our Housing Element will ensure that we meet State requirements, and make Stanton eligible for State grants and other funding resources. It will also give our electand appointed officials clear guidance on housing issues facing Stanton. Each city and county in California is required to have a Housing Element

Some key features of the Housing Element include:

- Population and housing
- characteristics An assessment of fair
- housing An evaluation of housing constraints and existing resources An analysis of potential
- sites appropriate for
- sites appropriate for housing An evaluation of existing policies and programs Development of policies and programs to support housing production

The Community Health and Safety Element will also be updated to address climate change resiliency and emergency



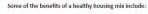






#### How does the Housing Element impact me?

How does the Housing Element Impact mer
The availability and cost of housing impact all of us and have direct impacts on our residents' quality of life.
Having a healthy mix of housing types and price ranges ensures that our community will continue to thrive by creating a healthy business and civic environment, and promoting well-being.



- Businesses are better able to attract or relocate potential employees
- Rent and mortgages are a manageable percentage of monthly income
- The community of Stanton is able to attract new employers to the area
- Kids that have grown up in Stanton can afford to rent or buy here

#### **Project Timeline**



PHASE 2





#### How can I get involved?

There are many ways that you can get involved and provide input. The success of the Housing Element depends on residents, like you, giving input and insight. It is important that the Housing Element reflects Station's values and priorities. There are a number of ways to get involved including:

- » Join the email list to stay informed
   » Participate in our outreach events
   » Complete a community survey
   » Call (714) 379-9222



#### What is the Regional Housing Needs Allocation (RHNA)?

The State of California is facing a housing shortage. As such, the State requires that every city and county must help accommodate a portion of new housing growth. Since people often live and work in different places, housing needs are assessed at a regional level based on population trends and other factors to determine how much growth each local jurisdiction will need to accommodate. This is called the "Regional Housing Needs Allocation" or "RHNA" for short. The RHNA quantifies the need for housing on a regional level, and then allocates a portion of new growth to each city and county.

RHNA stands for: Regional Housing Needs Allocation. The RHNA quantifies the

This means that Stanton is responsible for identifying areas that can This means that Stanton is responsible for identifying areas use, can accommodate 1.227 new housing units. Stanton's RHNA allocation is divided into income categories as seen in the table below. The City of Stanton is NOT responsible for building new homes. However, Stanton unstafnow that there is enough land zoned for housing to accommodate our allocated share of new homes. Furthermore, a special focus is placed on planning for affordable housing.

#### City of Stanton 2021-2029 RHNA Housing Needs Allocation

INCOME GROUP	% OF MEDIAN HOUSEHOLD INCOME	INCOME RANGE (4-PERSON HOUSEHOLD)		RHNA ALLOCATION (HOUSING UNITS)
		Min.	Max.	
Very-Low Income	<50% of AMI	\$<38,451	\$64,050	164
Low Income	50-80% of AMI	\$64,051	\$102,450	144
Moderate Income	80- 120% of AMI	\$102,451	\$123,600	231
Above-Moderate Income	>120% of AMI	\$123,601+		688
Total				1,227

AMI: Area Median Income. Orange County Area Median Income (AMI) for 2020 is \$103,000 (California Department of Hou Urban Development, 2020).





The project team compiled a database of community members and stakeholders who registered to be notified via email of future public engagement opportunities and key deliverables. Direct emails were sent to these individuals to advertise the Virtual Community Workshop, the Fair Housing Survey, and the Public Review Draft of the 2021-2029 Housing Element.

# **Project Website**

A dedicated project website (<a href="https://letstalkstanton.com/housingelement">https://letstalkstanton.com/housingelement</a>) serves as the main conduit of information for individuals who can access material online (in nearly all cases, material has also been made available in hard copy for people with limited interest access, but the temporary closure of public facilities and other gathering places due to the COVID-19 pandemic has limited opportunities for members of the public to access hard-copy materials). The project website launched in October 2020 and is regularly updated to reflect ongoing community input opportunities, advertise draft work products, and answer commonly asked questions. The project website includes the following information:

- What is a Housing Element?: Brief video explaining what a Housing Element is
- Fair Housing Survey: Link to the Fair Housing Survey
- Stay Informed: People can enter their email to receive project updates
- FAQs: A presentation of common questions and answers such as why a Housing Element is needed, what's including in the update, and a project timeline
- Housing Orange County: Videos about housing in Orange County
- Meetings & Events: Information regarding upcoming and past meetings and events, including public workshops, open houses, and hearings
- Documents & Maps: Library of relevant documents and maps prepared for the project



# **Virtual Community Workshop**

A virtual community workshop was conducted to educate the community about housing issues and opportunities facing Stanton and gather input on housing-related topics. The virtual workshop was hosted on November 17, 2020, at 6:00 PM on Zoom. A recording of the workshop was also posted in the project website to allow community members and stakeholders to watch at their leisure and in accordance with their schedule and availability. The Virtual Community Workshop consistent of three parts:

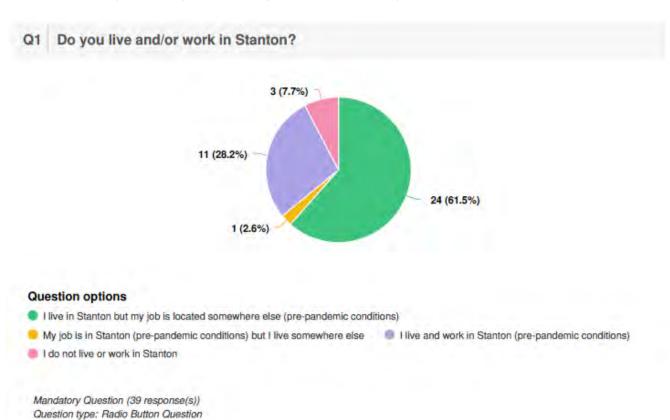
Part A: Overview video providing an overview of the Housing Element and why the City is updating it right now

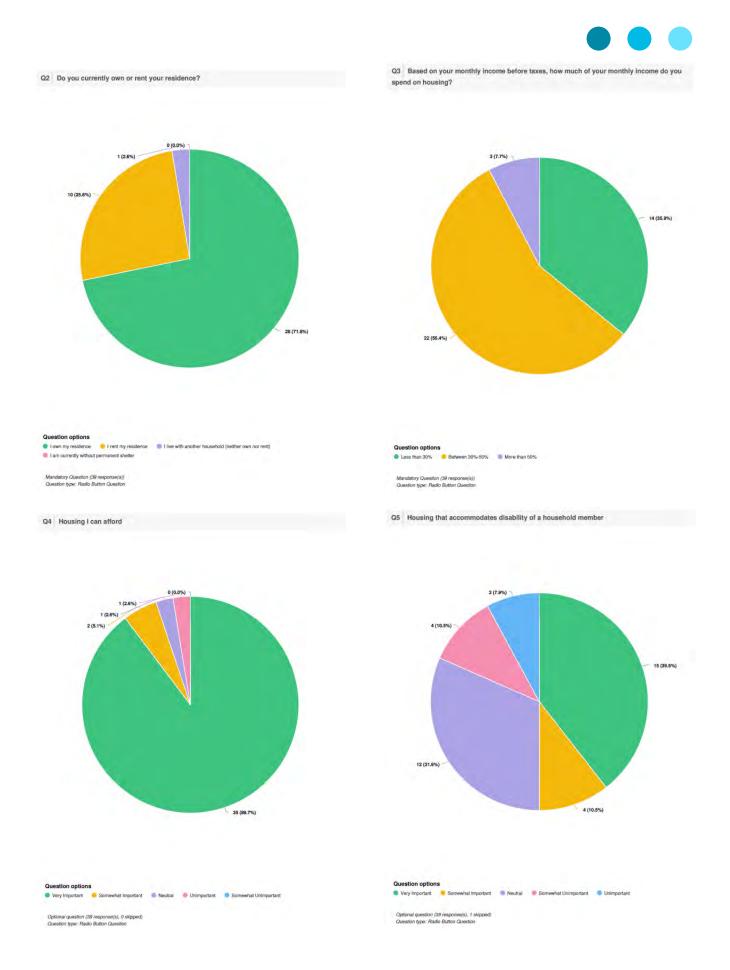
**Part B:** PowerPoint presentation describing existing conditions in Stanton and the City's Housing Element Update process (English and Spanish versions)

**Part C:** Survey to gather information on housing-related issues. The following section includes the results of the survey.

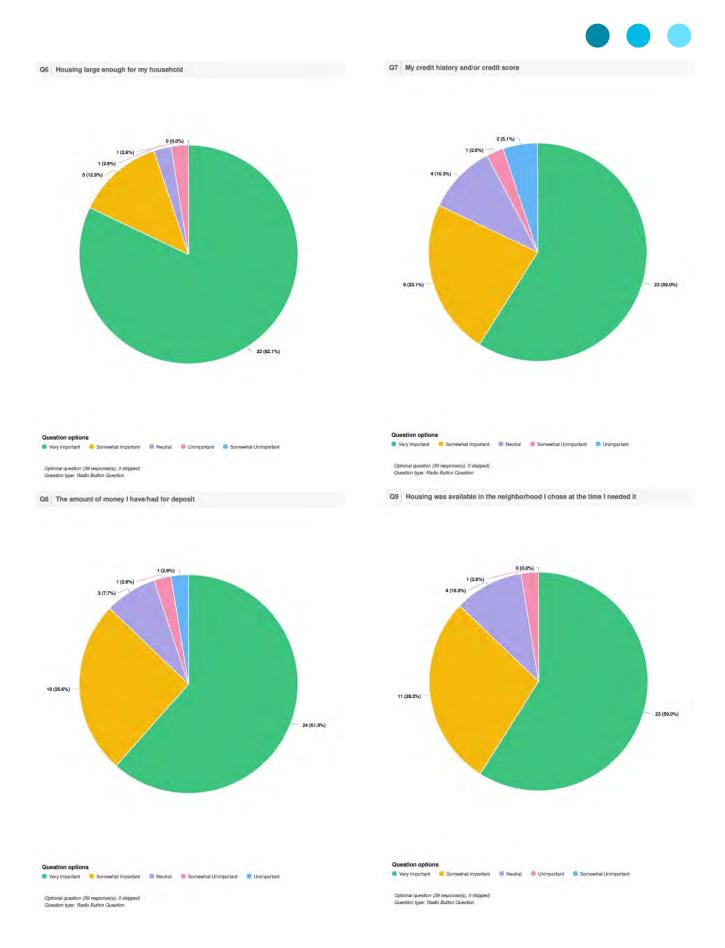
# **Fair Housing Survey**

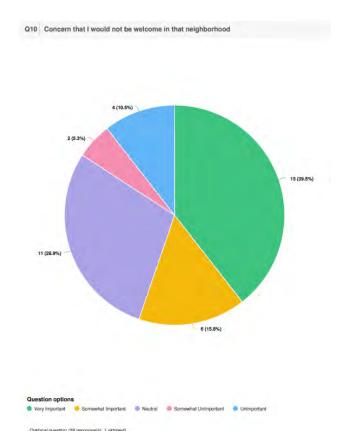
The survey was 32 questions long. It had 39 total responses.





City of Stanton GENERAL PLAN  $\mid$  Housing Element Appendix B  $\mid$  Page 7 Pg.246

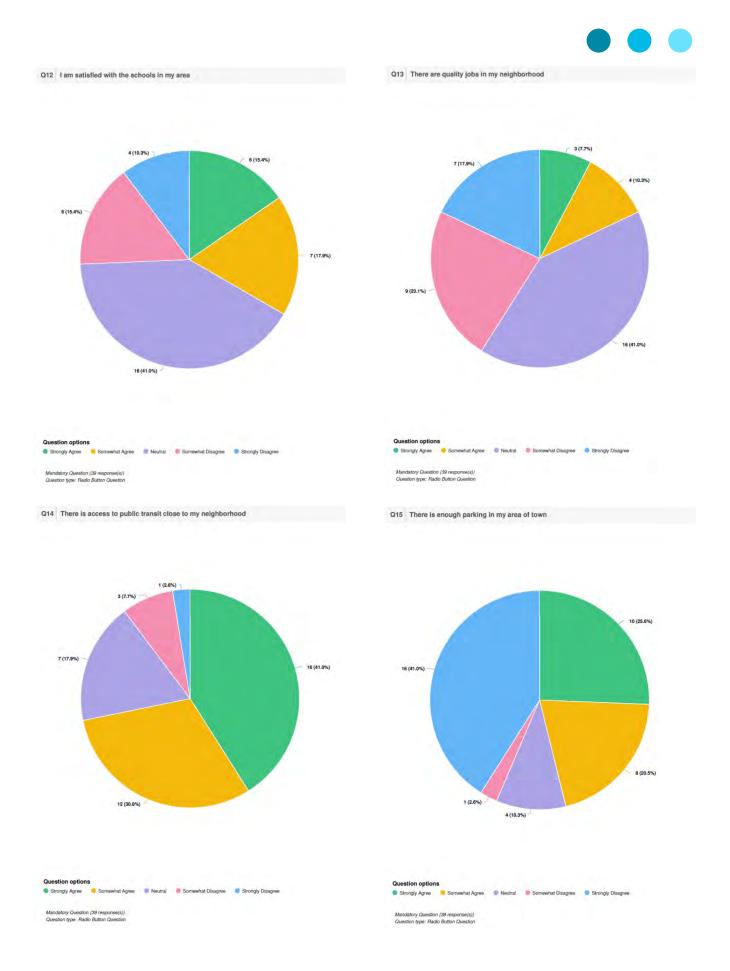


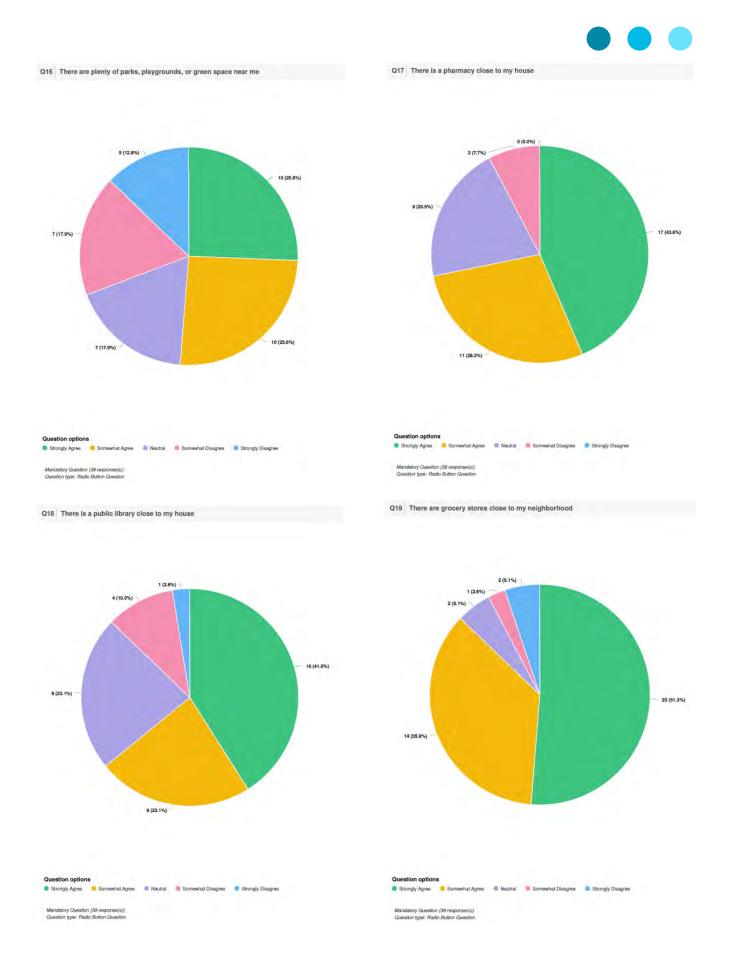


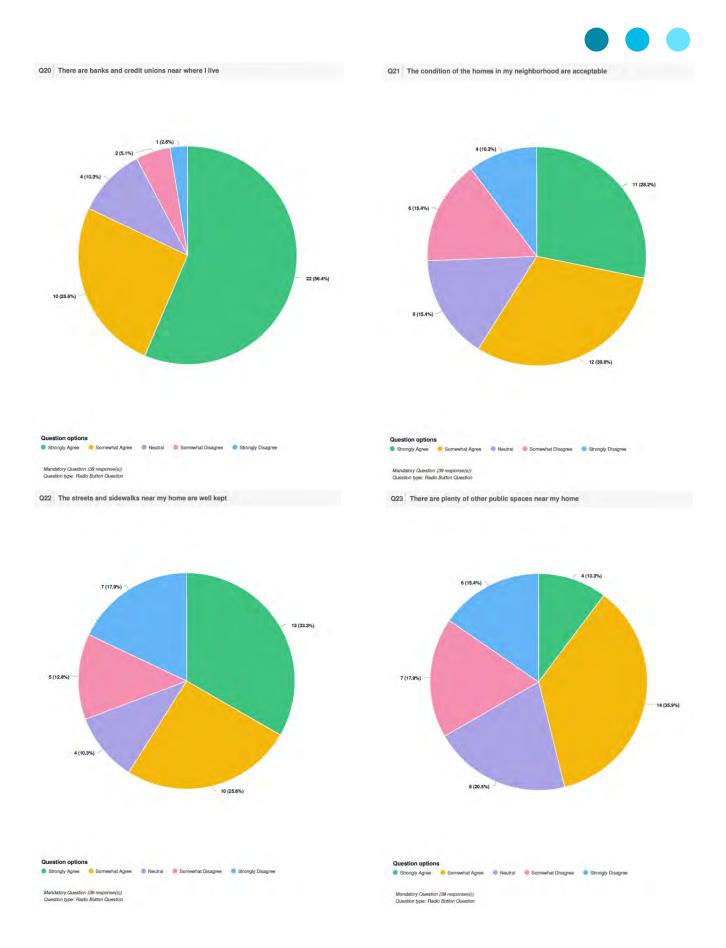
Anonymous	Too many homeless people in Stanton. Too many drug users in
urt v. zdzi i ugi ks MW	Stanton. Too many gangs and gang members in Stanton. Trash EVERYWHERE in Stanton. Too much crime in Stanton.
Anonymous	I live in a mobile home so own & rent both.
111/2021 U2:21 PM	
Anonymous	Somewhere that is relatively safe and no gangs or gunshots
9/11/2021 US:58 19/	
Anonymous	Gentrificación is happening all over Stanton, none of the current
5/11/2021 You'R PM	builds support a salary of people whom already live here. The
	rents are ridiculous and now you have moved away from single
	family homes, which is why we moved here on the first place
Anonymous	Low income homes for families - very important
SHV20ZI 10SS FM	
Anonymous	Parking lot is big issue everywhere, that is very important too.
2/11/2021 1 1:18 19/	
Anonymous	Housing that is safe, I live with a disabled adult and safety is
V122021 US56 NA	important
Accommon	Didn't support hampless accels that are this up as disconnected and
Anonymous	Didn't expect homeless people that are thieves or disrespectful and didn't think that the city of Stanton wouldn't do anything about it
STATES THE BY THE	had i known that I would have chose somewhere else to live
Anonymous	Proximity to transit, walkability to local services, diversity of
3/22/2021 NA 42 PM	housing types, diversity in the neighborhood population,
Anonymous	The upkeep of the area. Sad to see the prostitution and transient
SYZRIBUZ I OBIOS PIM	activities on Cerritos and Beach. We can do better.
Anonymous	Crime in the neighborhood and resources for the family.

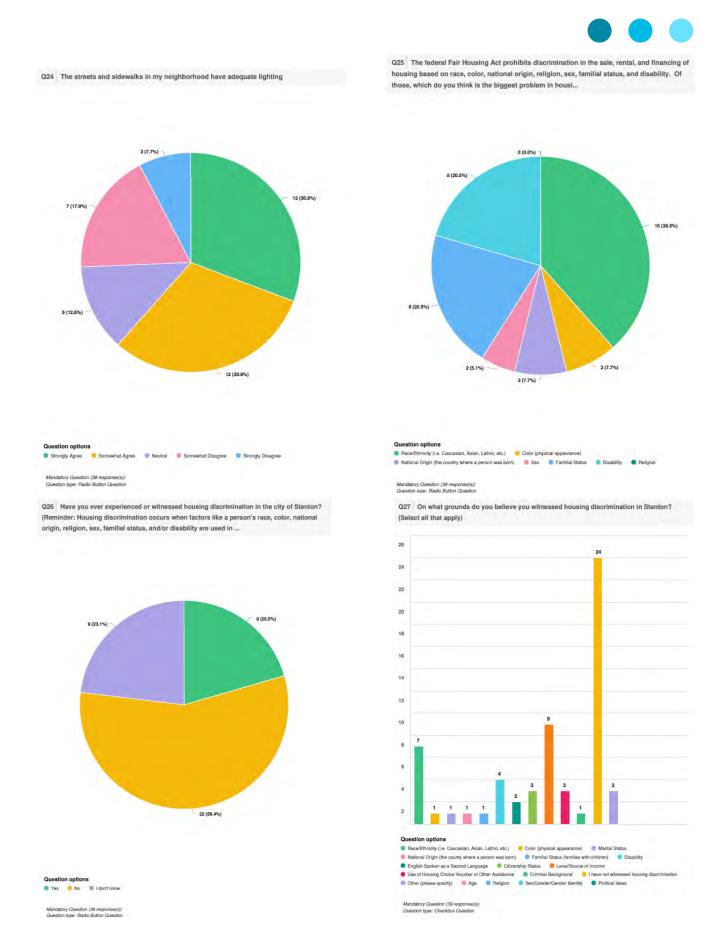
Optional question (11 response(s), 28 skipped)

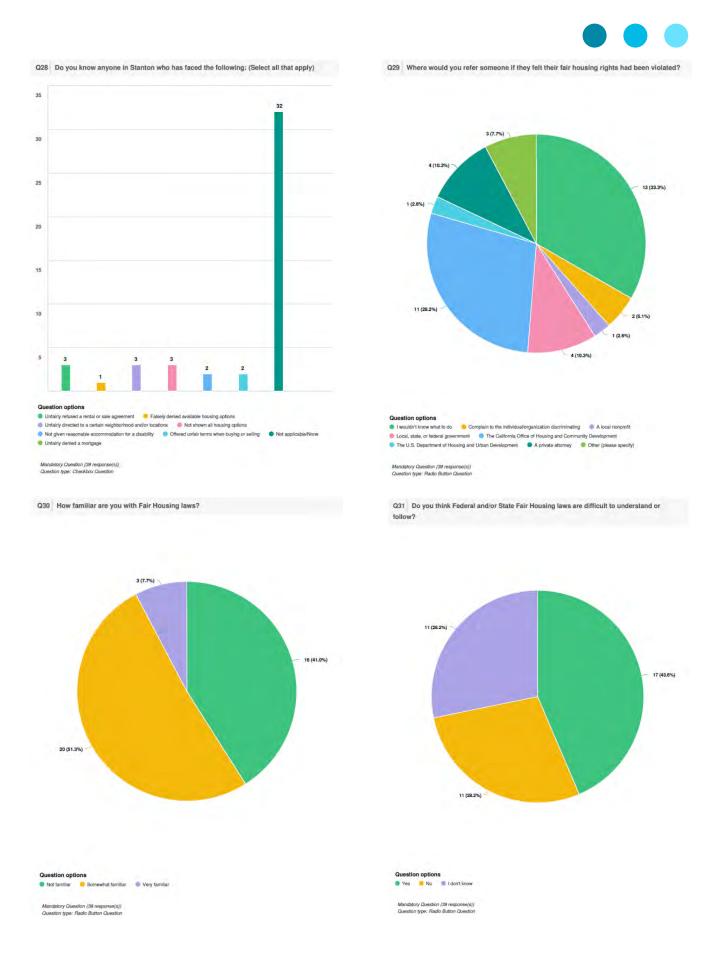
Question type: Essay Question

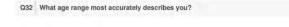


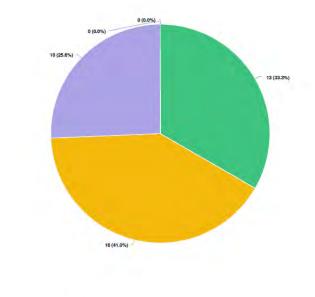












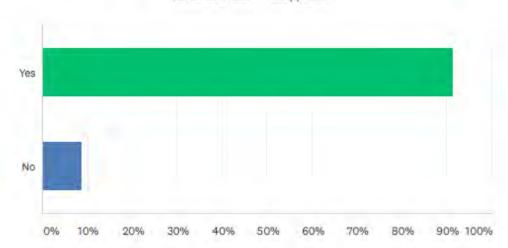


### **Housing & Safety Survey**

• The survey was 19 questions long. It had 163 total responses.

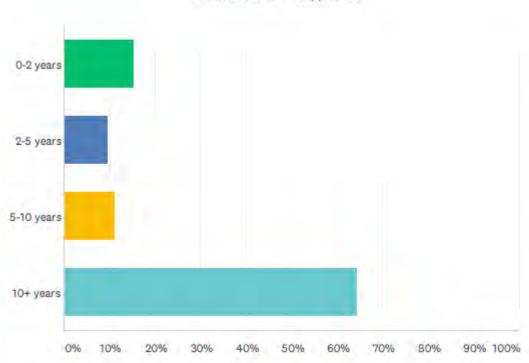
### Q1 Do you live in Stanton?





### Q2 How long have you lived in the City?





### Q3 What made you decide to live here? (Select all that apply)

Answered: 118 Skipped: 45

ANSWER CHOICES	RESPONSES	
Close to job/work	31.36%	37
Quality of housing	10.17%	12
Close to family and/or friends	37.29%	44
Affordable	54.24%	64
Quality of local school system	4.24%	5
Safety of neighborhood	5.93%	7
City services and programs	5.08%	6
Close to shopping and services	18.64%	22
Other (please specify)	20.34%	24
Total Respondents: 118		

#	OTHER (PLEASE SPECIFY)	
1	New home, affordable pricing, good commute	
2		
3	By chance. We found a home that met our needs at the time.	
4	house crisis made up relocate to a mobile home	
5	friend	
6	Born here, can't afford to move out	
7	The right house came up for sale	
8	Worked for City of Stanton	
9	We found a previously owned mobile home for the right price in a nice park.	
10	New housing development	
11	School	
12	Cheapest apt at the time I could find	
13	small community	
14	Rental was available	
15	Parents lived here first	
16	Parents homeowners	
17	Born and raise in stanton	
18	Born here	
19	Parents bought the house	
20	I grew up here!	
21	It is what i could afford at the time	
22	It's where I have lived most of my life. Like it here.	
23	Just happened to find the perfect townhouse to purchase for myself	
24	house size and monthly rent	

### Q4 Do you currently own or rent your home?

Answered: 117 Skipped: 46

ANSWER CHOICES RES		PONSES	
I own my home	68.38%	80	
I rent my home	23.93%	28	
I live with another household (neither own nor rent)	7.69%	9	
I am currently without permanent shelter	0.85%	1	
Total Respondents: 117			
ASTER MESERVITATION SERVICES			

### Q5 Select the type of housing that best describes your current home.

Answered: 118 Skipped: 45

ANSWER CHOICES	RESPONSES	
Single-family home (detached)	51.69%	61
Duplex/attached home	5.08%	6
Multi-family home (apartment/condominium)	35.59%	42
Accessory Dwelling Unit, granny flat, guest house	0.85%	1
Mobile home	4.24%	5
Currently without permanent shelter	0.00%	0
Other (please specify)	6.78%	8
Total Respondents: 118		

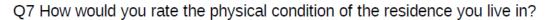
#	OTHER (PLEASE SPECIFY)
1	Single family attached.
2	APARTMENT
3	Room a room with sheared bathroom and no kitchen access
4	PUD
5	PUD - Townhouse
6	Townhome
7	Townhouse
8	Townhouse

### Q6 How satisfied are you with your current housing situation?

Answered: 119 Skipped: 44

ANSWER CHOICES	RESPONSES	
Very satisfied	26.89%	32
Somewhat satisfied	44.54%	53
Somewhat dissatisfied	16.81%	20
Dissatisfied	12.61%	15
Total Respondents: 119		

Total Resp	ondents: 119
#	PLEASE PROVIDE MORE INFORMATION BELOW.
1	Our home is lovely, but some of the areas surrounding us, not so much
2	Around my house are homeless people and prostitution no good for family and kids
3	Place keeps raising prices on different things that were free in the past
4	There is a home that was recently bought and renters who live their are trashing the neighborhood with their chop shop and possible drug dealing.
5	The Illumination Foundation wants to make the shelter right by my house The Stanton Inn into a permanent HUD housing project. We are already inundated with property crimes and homeless everywhere because of this group and the motel 6 opportunists that stalk our neighborhoods.
6	out land loard keep rasing the rent even through this crisis also we are paying for a street repayement that was unecessary and ists broken again for 10 years
7	Would like to own.
8	Neighbors and parking are difficult
9	Cost of ground lease continues to be raised as property values have climbed.
10	The homelessness with stealing and crime at an all time high
11	A lot of crime. A lot of homeless. The streets and shopping centers are dirty with trash and no cleaned compared to surrounding citys.
12	Homeless individuals and local crime make me look into moving elsewhere
13	want my own space saving for a home
14	The permit parking sucks you can't park anywhere without getting a ticket or your car towed away I wish I knew this before I moved here
15	I wish there were more parking spots and I wish it was more affordable to buy one of these condos instead of rent.
16	Costs are rising, lots of homeless and crime this year, too much new housing on Beach Blvd. dding to traffic congestion.
17	Safety issues with motels & homeless situation
18	Rental increases have made it difficult to consider staying.
19	The street parking sucks because everyone rents rooms out and I'm always have no parking for family and friends that come to visit
20	Traffic on Santa Rosalia is horrible cars go about 40mph we need road humps to slow down these people who are taking short cuts from Beach/Orangewoof and Chapman n Santa Rosalia. It's very dangerous
21	No parking
22	The property is very neglected, and the rent is very expensive.
23	Parking is an imprisonment. My husband and I can't have visitors because there is no parking Both us can't leave at the same time because upon our return guaranteed- no parking. Plus cars are getting broken into.
24	My house borders a railroad track which often has overgrown weeds and graffiti. It's also within walking distance of Stanton Central Park.
25	You are cramming people in our city creating more infrastructure issues/ parking is a HUGE issue and you insist on authorizing new construction with under amount of parking spaces, us homeowners are paying the price for this UNFAIR
26	House almost paid off
27	Would like to own.
28	Parking enforcement on my street has led to unexpected guests having their vehicle ticketed.



Answered: 117 Skipped: 46

ANSWE	ER CHOICES	RESPONS	ES
Excelle	nt condition	29.91%	35
Shows	signs of minor deferred maintenance (e.g., peeling paint, chipped stucco, etc.)	45.30%	53
Needs o	one or more modest rehabilitation improvements (e.g., new roof, new wood siding, etc.)	17.95%	21
Needs o	one or more major upgrades (e.g., new foundation, new plumbing, new electrical, etc.)	17.09%	20
Other (p	olease specify)	1.71%	2
Total Re	espondents: 117		
#	OTHER (PLEASE SPECIFY)		
1	Outside stucco, modernization of kitchen and bathrooms		
2	Needs security cameras & clickers for trash bin and newly installed gates. During pandemic,		

### Q8 Which of the following housing upgrades or expansions have you considered making on your home?

another thing to touch is not good.

Answered: 116 Skipped: 47

ANSWER CHOICES	RESPONSES	
Room addition	8.62%	10
Roofing	18.10%	21
HVAC	16.38%	19
Painting	30.17%	35
Solar	18.97%	22
Backup generator	6.03%	7
Accessory Dwelling Unit, granny flat, guest house	5.17%	6
Does not apply	37.07%	43
Other (please specify)	14.66%	17
Total Respondents: 116		

#	OTHER (PLEASE SPECIFY)
1	Just completely renovated my home last year.
2	kitchen, bathrooms, pre-fab studio
3	I already renovated my house and built an ADU
4	Replace front stairs and porch, upgrade electrical, remodel kitchen.
5	I want to put five 2 1/2 story homes on my small parcel like the Palazoo got to do.
6	Remodeling my backyard and upgrading features in my house.
7	Flooring
8	So many issues with SCE and power outages and flickering lights, as well as trouble with Spectrum internet.
9	Fencing
10	None
11	LED lights
12	Yard upgrade to newly built townhouse
13	New plumbing system, the wood for the patios and balconies are very bad conditions, many things here are bad.
14	Bathroom remodel
15	Currently have plans submitted to do a renovation
16	I inside paint and new floors
17	Remodel outdated plumbing

### Q9 Which of the following best describes your household type?

Answered: 125 Skipped: 38

RESPON	SES
11.20%	14
27.20%	34
21.60%	27
4.00%	5
1.60%	2
13.60%	17
18.40%	23
4.00%	5
0.80%	1
4.80%	6
	11.20% 27.20% 21.60% 4.00% 1.60% 13.60% 18.40% 4.00% 0.80%

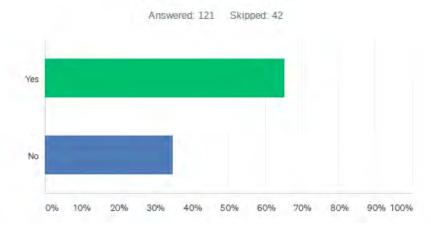
#	OTHER (PLEASE SPECIFY)
1	Habitat OC is a community stakeholder with families living in Stanton and new construction under way.
2	Co-owned with my brother as a result of our parents' deaths
3	Engaged couple that are first time home owners.
4	I'm single mom and my son with disabilities and live with other single mom
5	Co-owned with my brother as a result of our parents' deaths
6	Couple with special needs adult child

# Q10 If you wish to own a home in Stanton but do not currently own one, what issues are preventing you from owning a home at this time? (Select all that apply)

Answered: 124 Skipped: 39

ANSWER CHOICES	RESPONS	ES
I cannot find a home I can afford in Stanton	25.00%	31
I cannot afford a down payment	19.35%	24
I cannot afford a mortgage payment	16.13%	20
cannot find a home that meets my needs in Stanton (housing size, disability accommodations)	6.45%	8
cannot find a home that suits my quality standards in Stanton (safety, design/look, neighborhood)	11.29%	14
I do not currently wish to own or rent a home in Stanton	5.65%	7
I already own a home in Stanton	55.65%	69
Total Respondents: 124		

# Q11 Do you feel that the range of housing types in Stanton currently meets your housing needs (e.g., single-family homes, condominiums, apartments, etc.)?

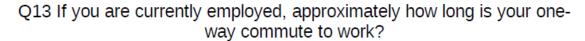


## Q12 What types of housing are most needed in the City of Stanton? (Select all that apply)

Answered: 122 Skipped: 41

ANSWER CHOICES	RESPONSE	S
Single-family (detached)	63.93%	78
Duplex/attached housing	22.95%	28
Condominiums (multi-family ownership homes)	27.05%	33
Apartments (multi-family rental homes)	14.75%	18
Senior housing	24.59%	30
Accessory Dwelling Unit, granny flat, guest house	7.38%	9
Housing for people with disabilities (please specify in comment field below)	8.20%	10
Housing for people that work in the City (please specify in comment field below)	4.92%	6
Other (please specify)	17.21%	21
Total Respondents: 122		

#	OTHER (PLEASE SPECIFY)
1	No more housing. The population is too dense already.
2	None, city needs to improve streets, lights and police needs to do their job, is criminal activity day and night
3	Homeless shelters
4	None
5	Homeless & Low Income
6	we don't need more housing in our city we are already overcrowded.
7	housing for homeless
8	we need good jobs not more housing.
9	We don't know. But we don't want high density becuase parking is a probem.
10	Don't know
11	We need places for good jobs, not housing.
12	Pud
13	Not apts because the permit parking
14	Affordable housing
15	Too many new buildings now on Beach, will be too crowded with the new style multi-unit condos and apartments.
16	Due to increased number of baby boomers, WE NEED MORE AFFORDABLE HOUSING!
17	Stop building 20 houses on lots that once held one house
18	Townhomes
19	Housing for the homeless
20	Low income housing
21	Mixed use development

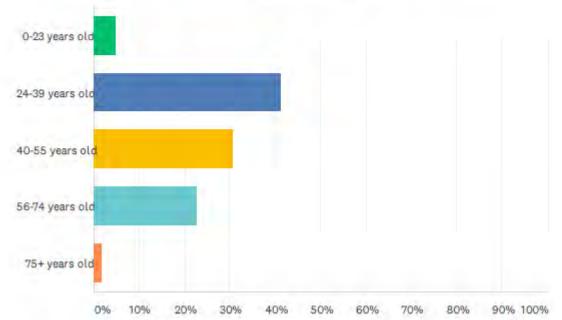


Answered: 120 Skipped: 43

ANSWER CHOICES	RESPONSES	
Less than 5 miles	15.83%	19
5-10 miles	20.83%	25
10-25 miles	28.33%	34
25-40 miles	7.50%	9
More than 40 miles	1.67%	2
am employed but work from my home	10.83%	13
am not currently employed	15.83%	19
Total Respondents: 120		

### Q14 What age range most accurately describes you?







## Q15 How important are the following housing priorities to you and your family?

Answered: 124 Skipped: 39

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL
Provide more housing for all income levels	49.59%	30.58%	18.18%	1.65%	
Control Control Control Control	60	37	22	2	121
Housing affordable to working families	67.50%	20.00%	11.67%	0.83%	
	81	24	14	1	120
Build more single-family housing	52.54%	25.42%	20.34%	1.69%	
	.62	30	24	2	118
Build more multi-family housing (apartments, condos, etc.)	29.66%	23.73%	44.07%	2.54%	
	35	28	52	3	118
Build more housing for young professionals	33.33%	36.75%	23.08%	6.84%	
	39	43	27	8	117
Rehabilitate existing housing	60.50%	29.41%	7.56%	2.52%	
	72	35	9	3	119
Encourage more senior housing	29.66%	37.29%	25.42%	7.63%	
	35	44	30	9	118
Provide ADA-accessible housing	31.36%	34.75%	20.34%	13.56%	
	37	41	24	16	118
Provide housing for homeless	31.93%	21.85%	40.34%	5.88%	
	38	26	48	7	119
Ensure that children who grow up in Stanton can afford to live in	59.02%	23.77%	13.11%	4.10%	
Stanton	72	29	16	5	122
Create more mixed-use (commercial/office and residential)	26.05%	30.25%	36.97%	6.72%	
projects to bring different land uses closer together	31	36	44	8	119
Integrate affordable housing throughout the community to create	36.07%	27.87%	31.97%	4.10%	
mixed-income neighborhoods	44	34	39	5	122
Establish programs to help at-risk homeowners keep their	57.72%	26.83%	13.82%	1.63%	
homes, including mortgage loan programs	71	33	17	2	123
Support fair/equitable housing opportunities and programs to help	50.00%	29.51%	17.21%	3.28%	
maintain and secure neighborhoods that have suffered foreclosures	61	36	21	4	122



### Q16 How important are the following resilience strategy priorities to you?

Answered: 116 Skipped: 47

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL
Drought response and planning	46.96% 54	36.52% 42	13.91% 16	2.61% 3	115
Community emergency preparedness training	57.39% 66	36.52% 42	5.22% 6	0.87%	115
Clean backup power for critical community facilities	56.52% 65	33.04% 38	6.96% 8	3.48% 4	115
Promotion of plans and programs that increase sustainable energy sources	46.96% 54	37.39% 43	13.91% 16	1.74%	115
Fire risk reduction in most fire prone areas	61.74% 71	27.83% 32	8.70% 10	1.74%	115
Further improve access to public health services	52.59% 61	37.07% 43	8.62% 10	1.72% 2	116
Designation of public cooling centers for periods of extreme heat	35.34% 41	39.66% 46	21.55% 25	3.45% 4	116
Infrastructure improvements to prevent flooding	46.55% 54	37.93% 44	14.66% 17	0.86%	116
Access to flood protection resources and services (signage, sandbags, etc.)	45.61% 52	36.84% 42	16.67% 19	0.88%	114



## Q17 If the list above does not reflect a resilience priority that you would like to see, please specify the priority below.

Answered: 21 Skipped: 142

#	RESPONSES
1	ensuring safety
2	Wider roads are needed
3	city cleanliness
4	Climate change, green initiatives, EV incentives/infrastructure
5	lower taxes, homeless clean up
6	Open more homeless shelters in industrial areas, away from housing and small businesses
7	mobile home landlords are raising rent
8	Community safety - Very Important.
9	Help get the homeless off the streets as promised.
10	I don't know
11	Get rid of the hookers and homeless out of the city. The hookers say they like beach cause the cops never hassle them
12	Safety of the community
13	Gang prevention
14	The motel 6 on western and katella has a lot of illegal activity going on with their tenants. Those people come into the Bradford condos and break into cars and garages. We are seeing more suspicious people every day! I wish we could have an increase of police presence within this neighborhood.
15	Parking. Put lines in the streets. People are too stupid to park right there taking parking away when parking is also scarce to begin with. This is one of the main reason for leaving Stanton this month. It shouldn't be a battle.
16	Address homelessness and safety along Beach Blvd
17	To help not increase the rental in general now, with the Covid-19 we live very hard times.
18	Redevelop Beach Blvd - get ride of hotels on Beach Blvd
19	Parking and safety
20	Neighborhood safety, crime, noise pollition
21	Cut funding for law enforcement and use for housing homeless

(Question 18 asked for names and emails. Those response are not included here.)

# Q19 Are there any comments or concerns you would like to share with the City of Stanton relevant to the upcoming Housing and Safety Element Update?

Answered: 34 Skipped: 129

	•
#	RESPONSES
1	This city has great potential, I just see too many empty areas, run down areas, and more homeless/transient activity. More police presence to keep homeless at bay. More housing, retail and popular food options to revive the city
2	There has to be some kind of rule where manages at a senior complex cant keep raising rents of parking spots or storage fees when every they want at a Low income complex
3	No need for more housing as much as clean up of city, respect for small businesses and homeless off sreets
4	Shelters in industrial areas
5	Keep the railroads clear of debris and transients. Reduce the sales taxes.
6	We do not need more low income housing in our neighborhoods. It only decrease our home values and our quality of life.
7	Too many homeless in our neighborhood
8	none
9	Illuminated street signs at major intersections.
10	Great job with all the improvements along Beach Blvd! Would love to see more of the old motels etc with a higher and better use or at least renovated.
11	Better parking on mains streets
12	Get rid of the homeless, we still need them off the streets . We spent money on housing and they won't go there. Quit wasting our money .
13	There needs to be a proactive policy of adding additional lighting within the community. The city has many areas that are not well lit that create breeding for illegal activity. Any new development or redevelopment needs to address lighting concerns.
14	People will move where they can afford. We need parking for all the housing being crammed into the city
15	The survey is biased. Ask the residents what THEY want instead of forcing tiny housing on them then pretending they were part of the process. They are just along for the ride.
16	No
17	I highly disagree with the change of housing, especially turning "Stanton Inn and Suites" in to a homeless/veteran/low income housing. The crime rate and drug use is getting worse by the day in this area and the "Stanton Inn and Suites" is directly across from 2 huge housing complex that are heavily populated with Children and Family's and even schools near by. The other locations off of Beach Blvd are not next to heavily populated complex's with Children and familys or even schools near by. This locations needs to seriously be reconsidered.
18	They need less motels and apartments, they are bringing the problems to the area. They are loading these apartments with so many people that's there's no parking on the streets of almost all areas. You need to start making parking passes for the WHOLE city.
19	Homeless problem is getting too big of a problem, we don't feel safe

20	I am now looking for affordable housing or low income please help.
21	We need more police snd/or security patrolling communities. I live in an apt complex which has dumpster divers, cars vandalized or stolen and now beginning to see more tagging of properties. Criminals will need to learn there are consequences to their actions! If you can't keep criminals in jail, then start having them do REAL COMMUNITY SERVICE!!!
22	Traffic on residential streets. Horrible on Santa Rosalia
23	Carie Ln apartments need rehab
24	Suspicious people from motel 6 on katella and western has many suspicious people that come into the Bradford condos. Then cars and garages get broken into. Bikes, tools, change stolen
	from cars. Many people within the Bradford community would love to see more police presence in this neighborhood. We think it would help deter them from whats been going on.
25	Improve your parking
26	Almost all need help in this hard time with the COVID-19, and more pay rents.
27	there will soon be 2 former motels converted to places for homeless housing. My neighborhood has a 'Illumination Foundation home for homeless and currently building a shelter for addiction rehab.I do feel that we have More than ENOUGH/our fair share of these types of places in our city. NO MORE!!!!
28	City needs to do much better job with regard to illegal fireworks, loud parties, zoning. Many single residence homes are being used as boarding houses. This creates unreasonable noise traffic and other issues in areas designed for single family homes
29	One of the biggest problems is the homless people camping out on railroad tracks withing the city.
30	First people move where they can afford to live, second if you only build housing and don't build any infrastructure we are going to look like downtown LA. We don't have enough public transportation and the roads are over crowded. We need to fix what we have first before bringing more people into a mess. our
31	Too many condos in Katella and Western going up
32	KEEP THE HOMELESS PEOPLE OUT OF STANTON
33	I live off of Bell st, and I am thankful for the added public parking lot that was created. If this goes away, there will be no place for people to park since other parts of the city require a parking pass and my street does not.
34	Please address the prostitution at Beach Blvd and Starr. It's an every night issue.



### **Public Review of Draft Housing Element**

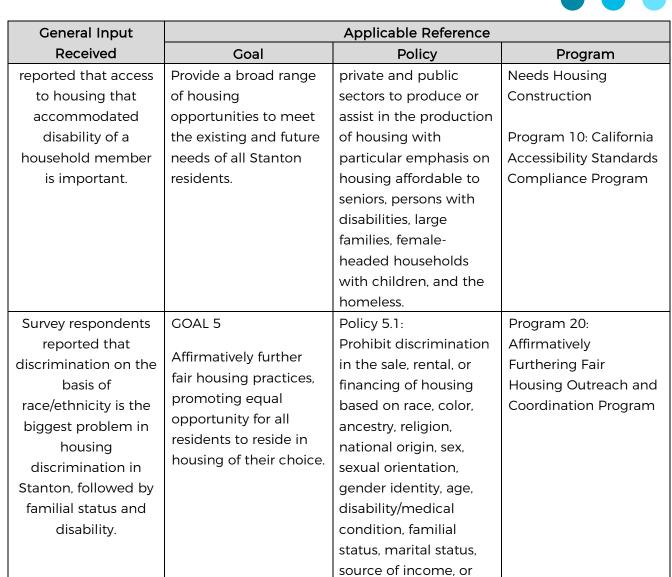
The Public Review Draft of the 2021-2029 Housing Element was posted to the project website from October 21<sup>st</sup> – November 20<sup>th</sup>, 2021. Individuals registered for project notifications received emails, a press release was posted to the City's main website, and the availability of the Public Review Draft was also advertised at public hearings. The City provided direction on how individuals could provide public comment via its social media channels and direct letters to stakeholders engaged in housing services in and around Stanton.

Interested parties were invited to submit public comments using a fillable comment card available on the project website, provide written comments via mail to City Hall, or email comments to the City's Housing Element Project Manager.

#### Feedback Influence

The feedback received from the public during preparation of the Housing Element and on the Public Draft Housing Element directly influenced the goals, policies, and programs included in the Housing Plan. The table below summarizes how public input is reflected in the Housing Plan.

General Input		Applicable Reference	
Received	Goal	Policy	Program
The majority (56.4%)	GOAL 2	Policy 2.1:	Program 1: Residential
of survey	Protect, encourage,	Preserve and expand	Sites Inventory
respondents	and provide housing	the City's supply of	
reported spending	opportunities for	affordable rental and	Program 2: Monitor
between 30-50% of	persons of lower and	ownership housing for	Residential Capacity
their monthly	moderate incomes.	lower and moderate-	(No Net Loss)
income on housing.		income households.	
			Program 5: Facilitate
			Affordable and Special
			Needs Housing
			Construction
			Program 7: Accessory
			Dwelling Units (ADUs)
			Program 11: Rental
			Assistance
Half of survey	GOAL 1	Policy 1.4:	Program 5: Facilitate
respondents		Encourage both the	Affordable and Special



		source of income, or		
		other protected		
		characteristics.		
Nearly half (45.3%) of	GOAL 3	Policy 3.1:	Program 13:	
survey respondents	Preserve and maintain	Promote programs	Homeowner	
reported that their		that improve the	Rehabilitation Program	
homes show signs of	the existing housing	overall quality and		
minor deferred	stock so that all	conditions of existing	Program 14: Proactive	
maintenance such as	residents live in	housing in Stanton	Code Enforcement	
peeling paint or	neighborhoods free	•	with an emphasis on	
shipped stucco. A	from blight and	housing that is	Program 16: Monitor	
sizeable number	deterioration.	affordable to lower	Changes in Federal	
(35%) reported their		income households.	and State Housing,	
homes need one or			Planning, and Zoning	
more modest or		Policy 3.2:	Laws	
major improvements				



ReceivedGoalPolicyProgramsuch as foundation, roof, siding, plumbing, or electrical repairs.Promote and facilitate the conservation and rehabilitation of substandard residential properties by homeowners and landlords.
roof, siding, plumbing, or electrical repairs.  the conservation and rehabilitation of substandard residential properties by homeowners and
plumbing, or electrical repairs. rehabilitation of substandard residential properties by homeowners and
electrical repairs.  substandard residential properties by homeowners and
properties by homeowners and
homeowners and
landlords.
Policy 3.3:
Subject to the
availability of funding,
continue to offer
rehabilitation and
home improvement
loans to qualified
households.
Policy 3.4:
Promote resources and
programs available to
homeowners and
landlords for residential
maintenance and
rehabilitation.
Policy 3.5:
Use the code
enforcement program
to bring substandard
units into compliance
with City codes and to
improve housing
quality and conditions.
The majority (64%) of GOAL 1 Policy 1.1: Program 1: Residential
survey respondents Allow for the Sites Inventory
reported that single- Provide a broad range development of a
family detached of housing variety of housing
housing is the most opportunities to meet opportunities
needed housing type the existing and future (ownership and rental)
in Stanton. needs of all Stanton in Stanton including
residents. low-density single-



General Input	Applicable Reference		
Received	Goal	Policy	Program
Received	GGai	family homes, moderate-density townhomes, higher- density apartments and multifamily projects, mixed-use development, accessory dwelling units, and mobile homes to fulfill regional housing needs.	Piogialii
Numerous comments received regarding concerns about the homeless population.	COAL 1  Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.	Policy 1.4: Encourage both the private and public sectors to produce or assist in the production of housing with particular emphasis on housing affordable to seniors, persons with disabilities, large families, femaleheaded households with children, and the homeless.  Policy 1.6: Continue to work with the County of Orange and surrounding jurisdictions to address the needs of the homeless on a regional basis.  Policy 5.5: Broaden the availability and accessibility of housing to special needs	



General Input	Applicable Reference		
Received	Goal	Policy	Program
		residents such as seniors, disabled persons, developmentally disabled, large households, families with children, femaleheaded households, and persons experiencing homelessness.	
The majority of survey respondents reported the following priorities as very important:			
Providing more housing for all income levels.	Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.	Policy 1.2: Maintain adequate capacity to accommodate the City's unmet Regional Housing Needs Allocation (RHNA) for all income categories throughout the planning period.	Program 1: Residential Sites Inventory  Program 2: Monitor Residential Capacity (No Net Loss)  Program 7: Accessory Dwelling Units (ADUs)
Housing affordable to working families.	GOAL 1  Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.  GOAL 4	Policy 2.1: Preserve and expand the City's supply of affordable rental and ownership housing for lower and moderate- income households.  Policy 2.3: Seek out partnerships	Program 1: Residential Sites Inventory  Program 2: Monitor Residential Capacity (No Net Loss)  Program 5: Facilitate Affordable and Special Needs Housing
	Reduce or remove governmental and nongovernmental constraints to the	with affordable housing developers, nonprofits, and other agencies to maximize	Construction  Program 11: Rental Assistance



General Input		Applicable Reference	
Received	Goal	Policy	Program
	development,	resources available for	
	improvement, and	the provision of	
	maintenance of	housing affordable to	
	housing where feasible	lower and moderate-	
	and legally permissible.	income households.	
		Policy 2.4:	
		Actively pursue state	
		and federal housing	
		program funds to	
		provide housing	
		assistance and to	
		support the	
		development of	
		housing affordable to	
		lower and moderate-	
		income households.	
		Policy 4.4:	
		Provide incentives and	
		regulatory concessions	
		for residential projects	
		constructed specifically	
		for lower and	
		moderate-income	
		households.	
Building more single-	GOAL 1	Policy 1.1:	Program 1: Residential
family housing.		Allow for the	Sites Inventory
	Provide a broad range	development of a	·
	of housing	variety of housing	
	opportunities to meet	opportunities	
	the existing and future	(ownership and	
	needs of all Stanton	rental) in Stanton	
	residents.	including low-	
		density single-	
		family homes,	
		moderate-density	
		townhomes,	
		higher-density	
		apartments and	



General Input	Applicable Reference		
Received	Goal	Policy	Program
		multifamily	
		projects, mixed-use	
		development,	
		accessory dwelling	
		units, and mobile	
		homes to fulfill	
		regional housing	
		needs.	
Rehabilitating	GOAL 3	Policy 3.1:	Program 13:
existing housing.	Droson to and maintain	Promote programs	Homeowner
	Preserve and maintain	that improve the	Rehabilitation Program
	the existing housing stock so that all	overall quality and	
	residents live in	conditions of existing	Program 14: Proactive
	neighborhoods free	housing in Stanton	Code Enforcement
	from blight and	with an emphasis on	
	deterioration.	housing that is	Program 16: Monitor
	deterioration.	affordable to lower	Changes in Federal
		income households.	and State Housing,
			Planning, and Zoning
		Policy 3.2:	Laws
		Promote and facilitate	
		the conservation and	
		rehabilitation of	
		substandard residential	
		properties by	
		homeowners and	
		landlords.	
		Policy 3.3:	
		Subject to the	
		availability of funding,	
		continue to offer	
		rehabilitation and	
		home improvement	
		loans to qualified	
		households.	
		Policy 3.4:	
		Promote resources and	
		programs available to	
		homeowners and	



General Input	Applicable Reference		
Received	Goal	Policy	Program
		landlords for residential maintenance and rehabilitation.  Policy 3.5: Use the code enforcement program to bring substandard units into compliance with City codes and to improve housing	
		quality and conditions.	
Ensuring that children who grow up in Stanton can afford to live in Stanton.	Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.  GOAL 4  Reduce or remove governmental and nongovernmental and nongovernmental constraints to the development, improvement, and maintenance of housing where feasible and legally permissible.	Policy 2.1: Preserve and expand the City's supply of affordable rental and ownership housing for lower and moderate- income households.  Policy 2.3: Seek out partnerships with affordable housing developers, nonprofits, and other agencies to maximize resources available for the provision of housing affordable to lower and moderate- income households.	Program 1: Residential Sites Inventory  Program 2: Monitor Residential Capacity (No Net Loss)  Program 5: Facilitate Affordable and Special Needs Housing Construction  Program 11: Rental Assistance
		Policy 2.4: Actively pursue state and federal housing program funds to provide housing assistance and to support the development of housing affordable to	



General Input	Applicable Reference		
Received	Goal	Policy	Program
		lower and moderate-income households.  Policy 4.4: Provide incentives and regulatory concessions for residential projects constructed specifically for lower and moderate-income	
Integrating affordable housing throughout the community to create mixed-income neighborhoods.	GOAL 1  Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.  GOAL 2  Protect, encourage, and provide housing opportunities for persons of lower and moderate incomes.	households.  Policy 1.1:  Allow for the development of a variety of housing opportunities (ownership and rental) in Stanton including low-density single-family homes, moderate-density townhomes, higher-density apartments and multifamily projects, mixed-use development, accessory dwelling units, and mobile homes to fulfill regional housing needs.  Policy 1.2: Maintain adequate capacity to accommodate the City's unmet Regional Housing Needs Allocation (RHNA) for all income categories	Program 11: Rental Assistance  Program 20: Affirmatively Furthering Fair Housing Outreach and Coordination Program



General Input	Applicable Reference		
Received	Goal	Policy	Program
		throughout the planning period.	
Establishing programs to help atrisk homeowners keep their homes, including mortgage loan programs.	Preserve and maintain the existing housing stock so that all residents live in neighborhoods free from blight and deterioration.  GOAL 5  Affirmatively further fair housing practices, promoting equal opportunity for all residents to reside in	Policy 3.7: Monitor "at-risk" affordable housing and proactively address potential conversion of affordable units to market-rate units prior to their transition.	Program 11: Rental Assistance  Program 12: Preservation of Existing Affordable Units  Program 19: Fair Housing Services
Supporting fair/equitable housing opportunities and programs to help maintain and secure neighborhoods that have suffered foreclosures.	housing of their choice.  GOAL 3  Preserve and maintain the existing housing stock so that all residents live in neighborhoods free from blight and deterioration.  GOAL 5  Affirmatively further fair housing practices, promoting equal opportunity for all residents to reside in housing of their choice.	Policy 3.7: Monitor "at-risk" affordable housing and proactively address potential conversion of affordable units to market-rate units prior to their transition.	Program 11: Rental Assistance  Program 12: Preservation of Existing Affordable Units  Program 19: Fair Housing Services
The majority of survey respondents reported the following priorities as			



General Input	Applicable Reference		
Received	Goal	Policy	Program
somewhat			
important:			
Building more	GOAL 1	Policy 1.1:	Program 1: Residential
housing for young	Dunido e leverel vers	Allow for the	Sites Inventory
professionals.	Provide a broad range of housing	development of a	
	opportunities to meet	variety of housing	
	the existing and future	opportunities	
	needs of all Stanton	(ownership and rental)	
	residents.	in Stanton including	
	residents.	low-density single-	
		family homes,	
		moderate-density	
		townhomes, higher-	
		density apartments and multifamily	
		projects, mixed-use	
		development,	
		accessory dwelling	
		units, and mobile	
		homes to fulfill	
		regional housing	
		needs.	
Encouraging more	GOAL 1	Policy 1.4:	Program 7: Accessory
senior housing.		Encourage both the	Dwelling Units (ADUs)
	Provide a broad range	private and public	
	of housing opportunities to meet the existing and future needs of all Stanton	sectors to produce or	Program 11: Rental
		assist in the production	Assistance
		of housing with	
	residents.	particular emphasis on	
	residents.	housing affordable to	
	GOAL 5	seniors, persons with	
		disabilities, large	
	Affirmatively further	families, female-	
	fair housing practices,	headed households with children, and the	
	promoting equal	homeless.	
	opportunity for all	11011161622	
	residents to reside in	Policy 5.5:	
	housing of their choice.	Broaden the availability	
		and accessibility of	







General Input	Applicable Reference		
Received	Goal	Policy	Program
Providing ADA- accessible housing.	GOAL 1  Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.	housing to special needs residents such as seniors, disabled persons, developmentally disabled, large households, families with children, female-headed households, and persons experiencing homelessness.  Policy 1.4: Encourage both the private and public sectors to produce or assist in the production of housing with particular emphasis on housing affordable to seniors, persons with disabilities, large families, female-headed households with children, and the homeless.	Program 5: Facilitate Affordable and Special Needs Housing Construction  Program 10: California Accessibility Standards Compliance Program

### DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT DIVISION OF HOUSING POLICY DEVELOPMENT

2020 W. El Camino Avenue, Suite 500 Sacramento, CA 95833 (916) 263-2911 / FAX (916) 263-7453 www.hcd.ca.gov



December 17, 2021

Jennifer Lilley, Director Community & Economic Development Department City of Stanton 7800 Katella Avenue Stanton, CA 90680

Dear Jennifer Lilley:

#### RE: City of Stanton's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Stanton's (City) draft housing element received for review on October 18, 2021, along with revisions received on December 3, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on November 17, 2021, with you, Paige Montojo, Associate Planner, and Perry Banner, consultant.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

The City's statutory deadline to adopt a housing element was October 15, 2021. For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of this statutory deadline, then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption, and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: <a href="http://opr.ca.gov/docs/OPR">http://opr.ca.gov/docs/OPR</a> Appendix C final.pdf and <a href="http://opr.ca.gov/docs/Final\_6.26.15.pdf">http://opr.ca.gov/docs/Final\_6.26.15.pdf</a>.

HCD appreciates the responsiveness and dedication you, Paige Montojo, Associate Planner, and Perry Banner, consultant provided during the review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jose Ayala, of our staff, at <a href="mailto:Jose.Ayala@hcd.ca.gov">Jose.Ayala@hcd.ca.gov</a>.

Sincerely,

Paul McDougall

Senior Program Manager

Enclosure

### APPENDIX CITY OF STANTON

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <a href="http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml">http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml</a>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <a href="http://www.hcd.ca.gov/community-development/building-blocks/index.shtml">http://www.hcd.ca.gov/community-development/building-blocks/index.shtml</a> and includes the Government Code addressing State Housing Element Law and other resources.

#### A. Housing Needs, Resources, and Constraints

1. Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)

Outreach: Outreach specifically related to affirmatively furthering fair housing (AFFH) is foundational to a complete analysis and formulating appropriate goals and actions to overcome patterns of segregation and foster more inclusive communities. The City has made a tremendous outreach effort but must summarize and relate this input to all components of the AFFH analysis and modify or add goals and actions as appropriate. Further, the element mentions the County analysis of impediments to fair housing choice (AI) which includes outreach and had fair housing-related questions as part of the survey but should also tailor and summarize that outreach relative to the City's fair housing issues and formulate an appropriate programmatic response.

<u>Disproportionate Housing Need</u>: While the element provides data and analysis related to cost burden, overcrowding and substandard housing, it must also address persons experiencing homelessness for impacts on protected characteristics and disparities in access to opportunity. In addition, the element could consider Urban Displacement mapping data from the Urban Displacement project instead of the Sensitive Communities data.

Identified Sites and Affirmatively Furthering Fair Housing (AFFH): While the element includes some broad discussion and conclusions, it must identify and analyze sites throughout the community to foster inclusive communities and affirmatively further fair housing. For example, the analysis should address the location of sites by income group and the number of units, magnitude of the impact on existing patterns of socioeconomic characteristics, any isolation of the sites and number of units by income group and then conclude whether the identified sites improve or exacerbate each of the fair housing issue areas. For more information, See HCD's guidance at <a href="https://www.hcd.ca.gov/community-development/affh/index.shtml">https://www.hcd.ca.gov/community-development/affh/index.shtml</a>.

Local Data and Knowledge, and Other Relevant Factors: The element does not address this requirement. The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element should analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, demographic trends, historical patterns of segregation, or other information that may have impeded housing choices and mobility.

<u>Contributing Factors</u>: While the element currently establishes and prioritizes contributing factors, it should re-assess and prioritize contributing factors and make revisions as appropriate upon full analysis of the affirmatively furthering fair housing section.

Goals, Actions, Metrics, and Milestones: The element must be revised to add goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.

2. An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)

<u>Parcel Listing</u>: The parcel listing lists the existing uses for nonvacant sites. However, these descriptions are generic (e.g., commercial, industrial) and should be sufficiently detailed to facilitate an analysis that the use will likely discontinue in the planning period.

Realistic Capacity: The element assumes 75 percent of maximum density based on some recent projects and also assumes sites zoned with the mixed-use overlay will be developed with residential uses based on recent trends. However, the element should include supporting information. For example, related to 75 percent of maximum density, the element should list recent developments by the number of units, built density, zone and affordability. For residential uses in the mixed-use overlay, the element should list all recent projects in the mixed-use overlay by zone and resulting use (e.g., residential, commercial, mixed-use) with emphasis on how often 100 percent nonresidential uses occur.

<u>Suitability of Nonvacant Sites</u>: The element essentially only has a remaining need RHNA of 124 units for lower-income and 10 units for above moderate-income households. The element includes detailed descriptions of sites 6, 7, 18, 24, and 26 demonstrating the potential for redevelopment in the planning period. With this, the element demonstrates adequate sites. However, to utilize the remaining nonvacant sites toward maintaining adequate sites pursuant to Government Code section 65863, the element must demonstrate their potential for redevelopment. The element could utilize analysis similar to the revised Appendix A.

<u>Infrastructure</u>: The element describes water and sewer providers but is it must also clarify whether there is sufficient total water and sewer capacity (existing and planned) to accommodate the RHNA and include programs if necessary.

<u>Environmental Constraints</u>: While the element generally describes a few environmental conditions, it must relate those conditions to identified sites and describe any other known environmental or other constraints that could impact housing development on identified sites in the planning period.

<u>Electronic Sites Inventory</u>: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <a href="https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element">https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> for technical assistance.

Zoning for a Variety of Housing Types (Emergency Shelters): The element should identify and analyze development standards (Section 20.400.150), including parking requirements for consistency with statutory requirements. For your information, parking requirements should be only sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.

3. An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (a)(5).)

Land-Use Controls: While the element, through Program 18, commits to conduct a comprehensive review of the parking standards for residential development, and concludes that parking is not a constraint to residential development, additional analysis is required. For example, the City can incorporate developer comments regarding the parking requirements to conclude that parking requirements are not a constraint to development. Additionally, the element can include information regarding recent projects that have complied with the parking requirements, and the built densities of these projects.

In addition, for the Stanton Plaza Specific Plan, the element should specifically analyze minimum lot areas and unit sizes for impacts on cost, supply, housing choice, and ability to achieve maximum densities and include programs to address identified constraints.

<u>Processing and Permit Procedures</u>: The element notes all development is subject to a Site Plan and Design Review, including for most development, review by the Planning Commission. The element should include an analysis of this process, including the typical number of hearings, approval findings and other relevant information. The analysis should address impacts on housing cost, supply, timing, and approval certainty.

Zoning, Development Standards and Fees: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, if necessary.

Housing for Persons with Disabilities: While the element, through Program 17, has committed to removing the conditional use permit (CUP) requirement for residential care facilities of seven or more persons, the element must also expand the allowable zones to include the RE and RL zones. Additionally, the element must remove the parking requirement for the 2 spaces per site for drop-off and pick-up purposes and defer to the requirements for the dwelling unit.

4. An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)

<u>Approval Time and Requests Lesser Densities</u>: The element must include analysis of requests to develop housing at densities below those identified, the length of time between receiving approval for a housing development and submittal of an application for building permits. The element must address any hindrance to the development of housing and include programs as appropriate.

5. Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)

<u>Farmworkers</u>: The element indicates on Pages 49 and 50 that, given the limited agricultural operations in and around the City, it is likely that the 127 person American Community Survey (ACS) count overestimates the number of agricultural employees. However, the ACS likely underestimates the needs of farmworkers and farmworkers from the broader area and those employed seasonally may have housing needs, including within the City's boundaries. As a result, the element should at least acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) and include programs as appropriate.

#### **C.** Housing Programs

1. Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)

To have a beneficial impact in the planning period and address the goals of the housing element, all programs must have discrete timelines (e.g., month and year) and specific commitment. For example, programs to be revised with specific timelines include, but are not limited to, Programs 5 (Facilitate Affordable and Special Needs Housing Construction), 6 (Mixed-Use Development), 9 (Redevelop the Tina/Pacific Neighborhood), and 13 (Homeowner Rehabilitation Program). In addition:

- Program 3 (Public Property Conversion to Housing) should also commit to a schedule of actions to facilitate development such as how often the City will collaborate with the development community, identify opportunities, and process proposals.
- Program 7 (ADUs) should (a) go beyond evaluating incentives and commit to
  establishing incentives by a specified date early in the planning period, (b)
  amend the ADU ordinance by a specified date and (c) clearly commit to monitor
  production and affordability and take alternative action (e.g., additional
  incentives, rezone) if necessary within a specified time period (e.g., within six
  months).

- Program 8 (Density Bonus Implementation) should go beyond "review" the
  ordinance and include specific commitment to update the density bonus
  ordinance by a specified date early in the planning period.
- 2. Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)

As noted in Finding B2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.

3. Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)

As noted in Findings B3 and B4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

As noted in Finding B1, the element requires a complete analysis of affirmative furthering fair housing. Upon a full analysis, the element will need to add or modify existing programs.

# D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element must include quantified objectives to establish an estimate of housing units <u>by income category</u> that can be constructed, rehabilitated, and conserved over the planning period. While the element includes these new construction and conservation objectives, the element should also estimate the rehabilitation objectives for the planning period.

## E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd. (c)(8).)

While the element includes a general summary of the public participation process, the element should also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element could describe the efforts to circulate the housing element among low- and moderate-income households and organizations that represent them and to involve such groups and persons in the element throughout the process. In addition, the element should also summarize the public comments and describe how they were considered and incorporated into the element. For additional information, see the Building Blocks at <a href="http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml">http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml</a>.

In addition, HCD understands the City made the element available to the public shortly before submittal to HCD. Though the public had the opportunity to comment, two weeks is not an adequate timeframe to make the element available and consider public comments in the preparation of the draft housing element. By not providing substantial opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.



# CHAPTER 6

# A. INTRODUCTION

Community health and public safety is a high priority for the city. The city of Stanton has the potential of being exposed to multiple hazards that would disrupt the community. Potential hazards consist of both natural hazards and man-made hazards. Natural hazards include flooding, fire, geologic hazards, earthquakes and other seismic related hazards. Man-made hazards include fire, crime and those related to hazardous and toxic materials. This Element considers the health and safety of Stanton's residents from a comprehensive point of view. The purpose of the Element is to identify potential hazards, and establish goals, strategies and actions to reduce their impacts on the community.

Air quality, which is also an important dimension of health and safety, is addressed in Chapter 8, Regional Coordination, due to its substantial regional orientation.

#### B. BACKGROUND

### GEOLOGIC HAZARDS AND SEISMICITY

The following section describes the geologic nature of Stanton and the presence and characteristics of seismic hazards including earthquake faults, surface rupture, ground shaking, liquefaction and hazardous response.

### **Geology and Soils**

Alluvial sediments, deposited by an ancestral Santa Ana River, underlie the city of Stanton. Alluvium sediments are typically comprised of a variety of materials including fine particles of silt and clay and larger particles of sand and gravel. According to the U.S. Department of Agriculture Soil Conservation Service, the following three soil associations underlie Stanton:

<u>Hueneme-Bolsa association</u>. The Hueneme-Bolsa association is characterized by nearly level, poorly drained, and somewhat poorly drained, calcareous fine sandy loams, silt loams and silty clay loams on alluvial fans and flood plains.

<u>Metz-San Emigdio association</u>. The Metz-San Emigdio association is characterized by nearly level, somewhat excessively drained and well drained, calcareous loamy sands and fine sandy loams on alluvial fans and flood plains.

<u>Sorrento-Mocho association</u>. The Sorrento-Mocho association is characterized by nearly level to moderately sloping, well drained sandy loams, loams or clay loams on alluvial fans and flood plains.

Specific soil types within the city include:

<u>Bolsa silt loam, drained</u>. This nearly level soil generally occurs on large alluvial fans. If the soil is bare, runoff is slow and the erosion hazard is slight. The water capacity of this soil is 11.5 to 12.5 inches, which is the range of available water that can be stored in soil and available for growing crops.

**ATTACHMENT C** 



<u>Hueneme fine sandy loam, drained</u>. This nearly level soil generally occurs on large alluvial fans or flood plains. If the soil is bare, runoff is slow and the erosion hazard is slight. The water capacity of this soil is 7.0 to 9.0 inches.

<u>Metz loamy sand</u>. This nearly level to gently sloping soil generally occurs on large fans and on flood plains. If the soil is bare, runoff is slow and the erosion hazard is slight. It has a water capacity of 4.0 to 6.0 inches.

<u>San Emigdio fine sandy loam, 0 to 2 percent slopes</u>. This nearly level soil generally occupies alluvial fans on flood plains and along stream channels. If the soil is bare, runoff is slow and the erosion hazard is slight. The soil has an available water capacity of 7.0 to 9.0 inches.

San Emigdio fine sandy loam, moderately fine substratum, 0 to 2 percent slopes. This nearly level soil generally occurs on alluvial fans on flood plains and along stream channels. Permeability is moderately slow in the underlying material. Runoff is slow and the erosion hazard is slight. Available water capacity for this soil is 7.0 to 10.0 inches.

#### Seismic Hazards

### **Earthquake Faults**

Active faults characterize southern California. There are no Alquist Priolo Earthquake Fault Zones located within the city of Stanton. However, there are several potentially active faults within proximity to the city. Exhibit 6-1, Regional Fault Map, depicts the location of faults in southern California.

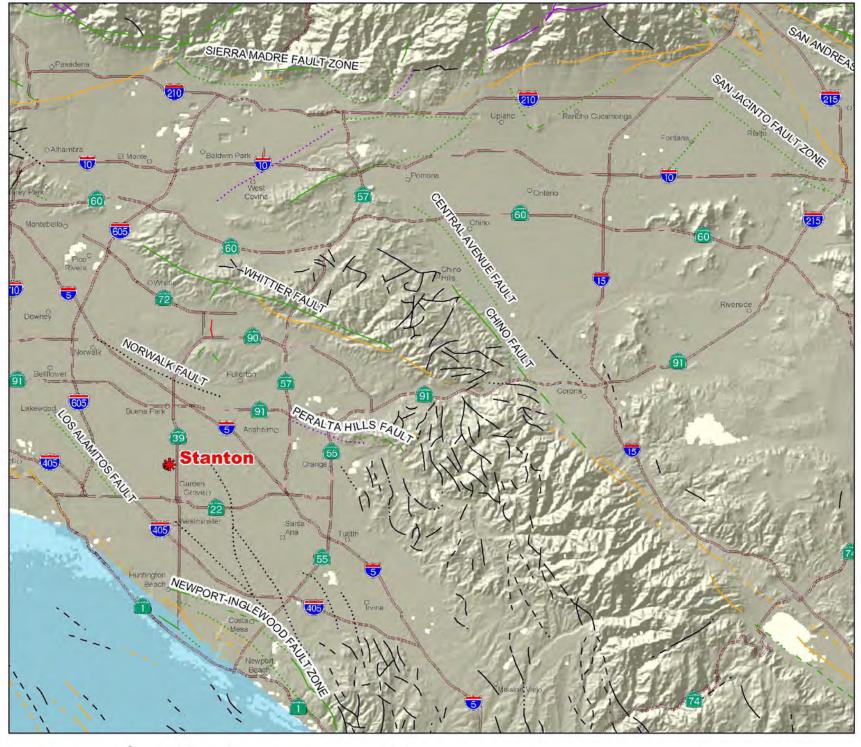
<u>Newport-Inglewood – Rose Canyon Fault Zone</u>. The Newport-Inglewood – Rose Canyon Fault Zone is a series of echelon northwest-trending and vertically-dipping faults extending from the southern edge of the Santa Monica Mountains southeastward to the offshore area near Newport Beach. The zone is seismically active with a number of recorded earthquakes, including the historic 6.3 magnitude Long Beach Earthquake. This fault zone could generate a 7.6-plus magnitude maximum credible earthquake.

Elsinore Fault Zone – Whittier Section. The Whittier section of the Elsinore Fault Zone extends over 20 miles from the Whittier Narrows southeasterly to the Santa Ana River where it merges with the southeasterly trending Elsinore fault and other smaller faults. Seismic history indicates that the fault is able to produce a seismic event of magnitude 6.0 or greater.

Norwalk Fault. The Norwalk Fault is approximately 16 miles long and is located north of Stanton. Seismic activity has occurred along the fault.

<u>Elysian Park Fault</u>. The Elysian Park Fault is located in the Montebello and Monterey Park areas, north of Stanton. The fault produced the 5.9 magnitude Whittier Narrows earthquake in 1987.





Geologic Time Scale		ogic	Years Before Present (Approx.)	Fault Symbol	Recency	DESCRIPTION		
					of Movement	ON LAND	OFFSHORE	
Quaternary		Historic	200	}		Displacement during historic time (e. Includes areas of known fault creep.	g. San Andreas fault 1906).	
	Late Quaternary	Holocene Fiistoric	200 —	_	5.0.0.0	Displacement during Holocene time.	Fault offsets seafloor sediments or strata of Holocene age.	
	Late Q		10.000	}	200	Paults showing evidence of displace- ment during late Quaternary time.  Undivided Quaternary faults raost	Fault cuts strata of Pleistocene age.	
	Ш	Pleistocene	700,000			faults in this category show evidence		
	Early Quaternary			-3	of displacement during the lest 1,600,000 years; possible exceptions are faults which displace rocks of undifferentiated Pflo- Pfoi stocene age.	Fault cuts strata of Quaternary age.		
			1,600,000-	-		Late Cenozoic faults within the Sierra Nevada, including parts of, but not restricted to, the Foothills fault system. These faults may have		
			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		1	been active in Quaternary time.		
Pre-Quaternary						Faults without recognized Quater- nary displacement or showing evictonce of no displacement during Quaternary time. Not necessarily inactive.  Pre-Quaternary faults not shown in	Fault cuts strata of Pliceene or older age.	
			4.5 billion (Age of earth)			Nevada and Oregon.		

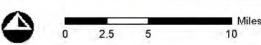
Users of this map should be aware that active faults and earthquakes are the subject of continuing research and that refinements to fault zones will occur through time.

Fault traces on land are indicated by solid lines where well located, by dashed lines where approximately located or inferred, and by dotted lines where concealed by younger rocks or by lakes or bays.

Source: Digital Database of Faults from the Fault Activity Map of California and Adjacent Areas, California Geological

Survey, Division of Mines and Geology (2000)

RBF GIS



Stanton General Plan Update
Regional Fault Map

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Exhibit 6-1



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# COMMUNITY HEALTH & SAFETY



<u>San Andreas Fault</u>. Although located farther from Stanton than other faults, the San Andreas Fault has the potential for larger magnitude earthquakes. The San Andreas Fault extends more than 600 miles over the length of California. The fault is divided into segments. An earthquake along the San Andreas Fault could affect most of southern California. Several earthquakes have been attributed to this fault. It is estimated by geologists that this fault may be capable of generating an earthquake of magnitude 8.5 on the Richter scale, which is designated as the maximum credible earthquake.

#### Surface Rupture and Ground Shaking

Surface rupture as a result of earthquakes is unlikely to occur within Stanton since no faults have been identified within the city's boundaries. The impacts of earthquakes on the city depends upon the fault from which the earthquake occurred, fault location, distance from the city and the magnitude of the earthquake. The combination of these factors would determine the degree of shaking experienced by the city.

#### **Liquefaction Hazards**

According to the California Department of Conservation, Division of Mines and Geology (Los Alamitos 7.5 Minute Quadrangle [March 25, 1999] and Anaheim and Newport Beach 7.5 Minute Quadrangle [April 15, 2998]), the entire city of Stanton is located in a liquefaction hazard zone; refer to Exhibit 6-2, Potential Liquefaction Areas. Liquefaction occurs when the strength and stiffness of a soil is reduced by intense ground shaking, typically associated with an earthquake. Liquefaction occurs in saturated soils, where the space between individual particles is completely filled with water. The water exerts a pressure on the soil particles that influences how tightly the particles themselves are pressed together. Earthquake shaking can cause the water pressure to increase to the point where the soil particles can readily move with respect to each other. Liquefaction is generally associated with shallow ground water conditions and the presence of loose and sandy soils or alluvial deposits.

#### **Hazardous Buildings**

During a seismic event, high levels of ground shaking may result in substantial damage to buildings within the city. Structures particularly susceptible to earthquake damage include tilt-up structures, unreinforced masonry buildings, older buildings and mobile homes. After the 1971 San Fernando earthquake, building codes and design criteria were updated to address seismic occurrences. There are no unreinforced masonry buildings within the city.

#### **LANDSLIDES**

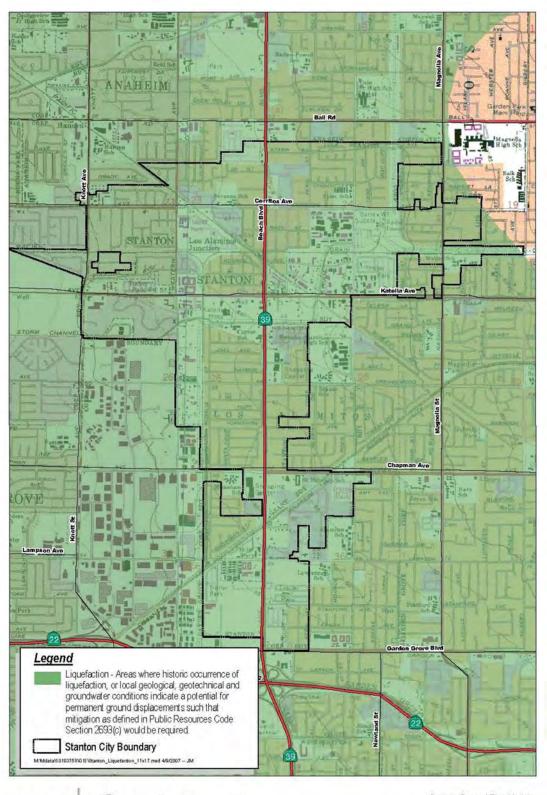
According to the California Department of Conservation, Division of Mines and Geology (Los Alamitos 7.5 Minute Quadrangle [March 25, 1999] and Anaheim and Newport Beach 7.5 Minute Quadrangle [April 15, 2998]), the city of Stanton does not have the potential for landslides.

#### DRAINAGE/FLOOD HAZARDS

The city of Stanton contains no natural, permanent water features. According to the Federal Emergency Management Agency (FEMA), the entire city is located within flood zone X; refer to Exhibit 6-3, Flood Map. Flood zone X is defined as areas of 500 year flood; areas of 100 year flood with average depths of less than I foot or with drainage areas less than I square mile; and areas protected by levees from 100 year flood.

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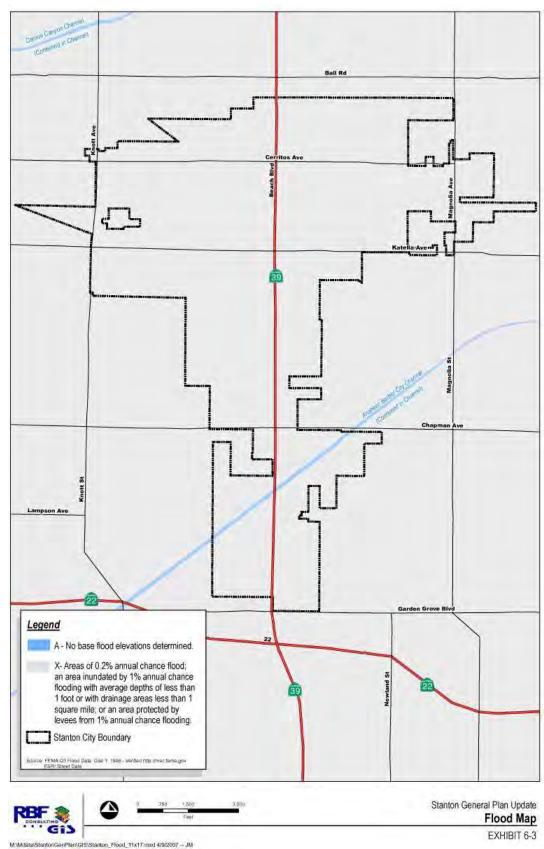
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Stanton General Plan Update
Potential Liquefaction Areas

EXHIBIT 6-2





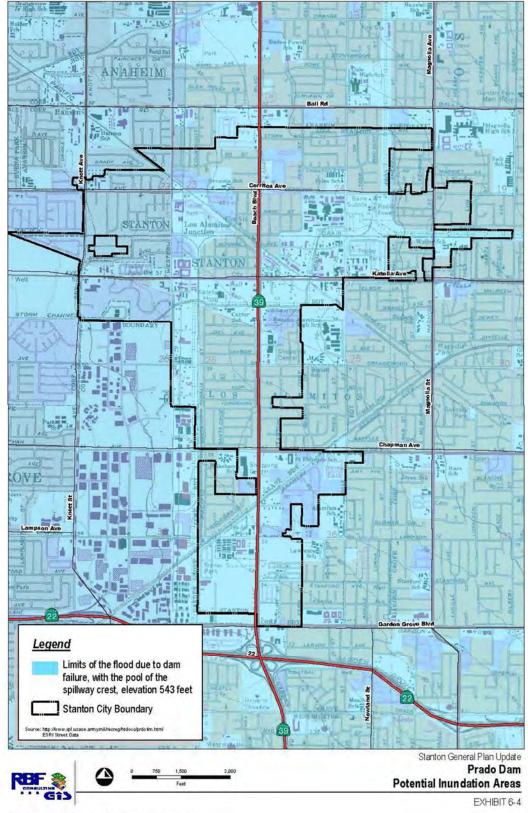
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The city is located within the dam inundation areas of the Prado Dam and Carbon Canyon Dam; refer to Exhibit 6-4, Prado Dam Inundation Area and Exhibit 6-5, Carbon Canyon Dam Inundation Area. Prado Dam is a flood control and water conservation project constructed and operated by the U.S. Army Corps of Engineers, Los Angeles District. The dam provides flood control and water conservation storage for Orange County. The dam is located approximately 23 miles northeast of Stanton, on the Santa Ana River, west of the city of Corona. According to the U.S. Army Corps of Engineers dam inundation maps, in the event of dam failure the flood wave would reach Stanton in approximately 6.5 hours and would be approximately four feet deep.

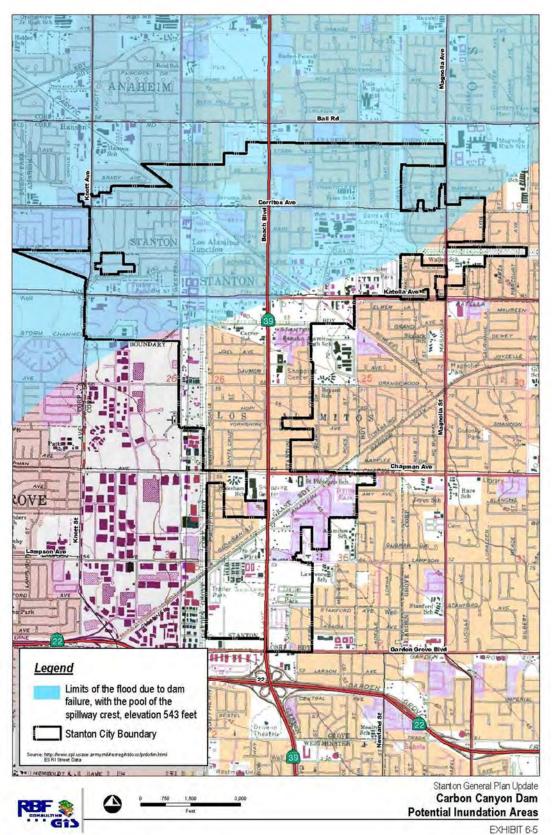
Carbon Canyon Dam provides flood control in and around the drainage basin. In conjunction with Brea and Fullerton Dams, Carbon Canyon Dam is vital for the flood protection of portions of the coastal plains in Orange County, including the cities of Brea, Fullerton, Placentia, and Anaheim. The dam is located approximately 12.5 miles northeast of Stanton, approximately four miles east of the city of Brea. According to the U.S. Army Corps of Engineers dam inundation maps, in the event of dam failure the flood wave would reach Stanton in approximately 7.5 hours and would be approximately one foot deep.





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#### **NOISE**

The Noise Element of the General Plan provides a framework to limit noise exposure within the city. Existing and future noise environments and the compatibility of land uses are considered in the Element, as well as sensitive receptors and generators of stationary noise. Projected noise levels are included to help guide future land use policy and prevent high noise levels in sensitive areas at build-out. In addition, noise contours in the form of community noise equivalent level (CNEL) or day-night average level (Ldn) are provided for all referenced sources.

Various measures are described in order to mitigate potential noise conflicts. These measures are designed to lessen impacts from unavoidable noise conflicts within the city. The Noise Element also serves as a guideline for compliance with the State's Noise Insulation Standards.

The State of California requires every jurisdiction to include a Noise element in their General Plan. The Noise element for this General Plan presents several different aspects of noise evaluation. The city's goals, objectives, and policies for meeting noise standards are first identified, and then the method in which the noise levels are measured are described. The most general ways to quantify noise levels are by CNEL, Leq, and Ldn, which are measured in decibels using the A-weighted sound pressure level (dBA). These measures are discussed in more detail below.

Also presented in the Noise element are Federal, State, and Local noise standards, and related laws, standards, ordinances, and regulations, such as the U.S. Noise Control Act and California Office of Planning and Research Guidelines.

Noise in Stanton comes from two primary sources: transportation and non-transportation noise sources. Noise levels associated with mobile sources or transportation noise can be reliably predicted using formulas that take into account traffic volume, speed and percentage of trucks. Stationary or non-transportation noise sources include commercial and industrial land uses located near residential areas currently generate occasional noise impacts. The primary noise sources associated with these facilities are caused by delivery trucks, air compressors, generators, outdoor loudspeakers and gas venting. Residential land uses and areas identified as noise-sensitive must be protected from excessive noise from transportation and non-transportation noise sources.

#### **Noise Scale and Definitions**

Sound is described in terms of the loudness (amplitude) of the sound and frequency (pitch) of the sound. The standard unit of measurement of the loudness of sound is the decibel (dB). Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by differentiating among frequencies in a manner approximating the sensitivity of the human ear.

Decibels are based on the logarithmic scale. The logarithmic scale compresses the wide range in sound pressure levels to a more usable range of numbers in a manner similar to the Richter scale used to measure earthquakes. In terms of human response to noise, a sound 10 dBA higher than another is perceived to be twice as loud and 20 dBA higher is perceived to be four times as loud, and so forth. Everyday sounds normally range from 30 dBA (very quiet) to 100 dBA (very loud). Examples of various sound levels in different environments are illustrated on Exhibit 6-6, Common Environmental Noise Levels.

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Many methods have been developed for evaluating community noise to account for, among other things:

- The variation of noise levels over time;
- The influence of periodic individual loud events; and
- The community response to changes in the community noise environment.

Table 6-1, Noise Descriptors, provides a listing of methods to measure sound over a period of time.

Table 6-1 Noise Descriptors								
Term	Definition							
Decibel (dB)	The unit for measuring the volume of sound equal to 10 times the logarithm (base 10) of the ratio of the pressure of a measured sound to a reference pressure (20 micropascals).							
A-Weighted Decibel (dBA)	A sound measurement scale that adjusts the pressure of individual frequencies according to human sensitivities. The scale accounts for the fact that the region of highest sensitivity for the human ear is between 2,000 and 4,000 cycles per second (hertz).							
Equivalent Sound Level (L <sub>eq</sub> )	The sound level containing the same total energy as a time varying signal over a given time period. The $L_{\rm eq}$ is the value that expresses the time averaged total energy of a fluctuating sound level.							
Maximum Sound Level (L <sub>max</sub> )	The highest individual sound level (dBA) occurring over a given time period.							
Minimum Sound Level (L <sub>min</sub> )	The lowest individual sound level (dBA) occurring over a given time period.							
Community Noise Equivalent Level (CNEL)	A rating of community noise exposure to all sources of sound that differentiates between daytime, evening, and nighttime noise exposure. These adjustments are +5 dBA for the evening, 7:00 p.m. to 10:00 p.m., and +10 dBA for the night, 10:00 p.m. to 7:00 a.m							
Day/Night Average (L <sub>dn</sub> )	The $L_{dn}$ is a measure of the 24-hour average noise level at a given location. It was adopted by the U.S. EnvironmentalProtection Agency for developing criteria for the evaluation of community noise exposure. It is based on a measure of the average noise level over a given time period called the $L_{eq}$ . The $L_{dn}$ is calculated by averaging the $L_{eq}$ 's for each hour of the day at a given location after penalizing the "sleeping hours" (defined as I0:00 p.m. to 7:00 a.m.) by I0 dBA to account for the increased sensitivity of people to noises that occur at night.							
Exceedance Level (Ln)	The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% ( $L_{01}$ , $L_{10}$ , $L_{50}$ , $L_{90}$ , respectively) of the time during the measurement period.							
Source: Cyril M. Harris, Handbook of Noise Control, 1979.								



#### **Health Effects of Noise**

Human response to sound is highly individualized. Annoyance is the most common issue regarding community noise. The percentage of people claiming to be annoyed by noise generally increases with the environmental sound level. However, many factors also influence people's response to noise. The factors can include the character of the noise, the variability of the sound level, the presence of tones or impulses, and the time of day of the occurrence. Additionally, non-acoustical factors, such as the person's opinion of the noise source, the ability to adapt to the noise, the attitude towards the source and those associated with it, and the predictability of the noise, all influence people's response. As such, response to noise varies widely from one person to another and with any particular noise, individual responses will range from "not annoyed" to "highly annoyed."

When the noise level of an activity rises above 70 dBA, the chance of receiving a complaint is possible, and as the noise level rises, dissatisfaction among the public steadily increases. However, an individual's reaction to a particular noise depends on many factors, such as the source of the sound, its loudness relative to the background noise, and the time of day. The reaction to noise can also be highly subjective; the perceived effect of a particular noise can vary widely among individuals in a community.

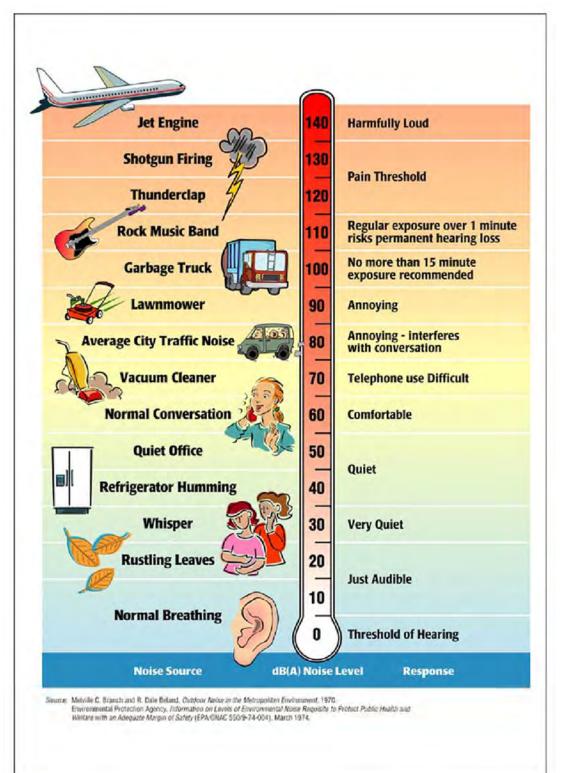
The effects of noise are often only transitory, but adverse effects can be cumulative with prolonged or repeated exposure. The effects of noise on the community can be organized into six broad categories:

- Noise-Induced Hearing Loss;
- Interference with Communication;
- Effects of Noise on Sleep;
- Effects on Performance and Behavior:
- Extra-Auditory Health Effects; and
- Annoyance.

Although it often causes discomfort and sometimes pain, noise-induced hearing loss usually takes years to develop. Noise-induced hearing loss can impair the quality of life through a reduction in the ability to hear important sounds and to communicate with family and friends. Hearing loss is one of the most obvious and easily quantified effects of excessive exposure to noise. While the loss may be temporary at first, it could become permanent after continued exposure. When combined with hearing loss associated with aging, the amount of hearing loss directly caused by the environment is difficult to quantify. Although the major cause of noise-induced hearing loss is occupational, substantial damage can be caused by non-occupational sources.

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Stanton General Plan Update

Common Environmental Noise Levels

EXHIBIT 6-6

# COMMUNITY HEALTH & SAFETY



According to the United States Public Health Service, nearly ten million of the estimated 21 million Americans with hearing impairments owe their losses to noise exposure. Noise can mask important sounds and disrupt communication between individuals in a variety of settings. This process can cause anything from a slight irritation to a serious safety hazard, depending on the circumstance. Noise can disrupt face-to-face communication and telephone communication, and the enjoyment of music and television in the home. It can also disrupt effective communication between teachers and pupils in schools, and can cause fatigue and vocal strain in those who need to communicate in spite of the noise.

Interference with communication has proved to be one of the most important components of noise-related annoyance. Noise-induced sleep interference is one of the critical components of community annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern, or level of sleep. It can produce short-term adverse effects on mood changes and job performance, with the possibility of more serious effects on health if it continues over long periods. Noise can cause adverse effects on task performance and behavior at work, and non-occupational and social settings. These effects are the subject of some controversy, since the presence and degree of effects depends on a variety of intervening variables. Most research in this area has focused mainly on occupational settings, where noise levels must be sufficiently high and the task sufficiently complex for effects on performance to occur.

Recent research indicates that more moderate noise levels can produce disruptive after-effects, commonly manifested as a reduced tolerance for frustration, increased anxiety, decreased incidence of "helping" behavior, and increased incidence of "hostile" behavior. Noise has been implicated in the development or exacerbation of a variety of health problems, ranging from hypertension to psychosis. As with other categories, quantifying these effects is difficult due to the amount of variables that need to be considered in each situation. As a biological stressor, noise can influence the entire physiological system. Most effects seem to be transitory, but with continued exposure some effects have been shown to be chronic in laboratory animals.

Annoyance can be viewed as the expression of negative feelings resulting from interference with activities, as well as the disruption of one's peace of mind and the enjoyment of one's environment. Field evaluations of community annoyance are useful for predicting the consequences of planned actions involving highways, airports, road traffic, railroads, or other noise sources. The consequences of noise-induced annoyance are privately held dissatisfaction, publicly expressed complaints to authorities, and potential adverse health effects, as discussed above. In a study conducted by the United States Department of Transportation, the effects of annoyance to the community were quantified. In areas where noise levels were consistently above 60 dBA CNEL, approximately nine percent of the community is highly annoyed. When levels exceed 65 dBA CNEL, that percentage rises to 15 percent. Although evidence for the various effects of noise have differing levels of certainty, it is clear that noise can affect human health. Most of the effects are, to a varying degree, stress related.

#### Laws, Ordinances, Regulations, and Standards

Land uses deemed sensitive by the State of California (State) include schools, hospitals, rest homes, and long-term care and mental care facilities. Many jurisdictions also consider residential uses particularly noise-sensitive because families and individuals expect to use time in the home for rest and relaxation, and noise can interfere with those activities. Some jurisdictions may also

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identify other noise-sensitive uses such as churches, libraries, and parks. Land uses that are relatively insensitive to noise include office, commercial, and retail developments. There is a range of insensitive noise receptors that include uses that generate significant noise levels and that typically have a low level of human occupancy.

This noise analysis was conducted in accordance with Federal, State, and local criteria described in the following sections.

#### Federal Noise Standards

The United States Noise Control Act of 1972 (NCA) recognized the role of the Federal government in dealing with major commercial noise sources in order to provide for uniform treatment of such sources. As Congress has the authority to regulate interstate and foreign commerce, regulation of noise generated by such commerce also falls under congressional authority. The Federal government specifically preempts local control of noise emissions from aircraft, railroad and interstate highways.

#### **U.S.** Environmental Protection Agency

The EPA offers guidelines for community noise exposure in the publication Noise Effects Handbook – A Desk Reference to Health and Welfare Effects of Noise. These guidelines consider occupational noise exposure as well as noise exposure in homes. The EPA recognizes an exterior noise level of 55 dB Ldn as a general goal to protect the public from hearing loss, activity interference, sleep disturbance, and annoyance. The EPA and other Federal agencies have adopted suggested land use compatibility guidelines that indicate that residential noise exposures of 55 to 65 dB Ldn are acceptable. The EPA notes, however, that these levels are not regulatory goals, but are levels defined by a negotiated scientific consensus, without concern for economic and technological feasibility or the needs and desires of any particular community.

#### State of California

The State Office of Planning and Research *Noise Element Guidelines* include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The Office of Planning and Research *Noise Element Guidelines* contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of community noise equivalent level (CNEL). A CNEL is defined as the 24-hour average noise level measured in A-weighted sound pressure level for a 24-hour period with different weighting factors for the noise levels occurring during the day, evening, and nighttime periods. A noise environment of 50 to 60 CNEL is considered to be "normally acceptable" for residential uses. The Office of Planning and Research recommendations also note that, under certain conditions, more restrictive standards than the maximum levels cited may be appropriate. As an example, the standards for quiet suburban and rural communities may be reduced by 5 to 10 dB to reflect their lower existing outdoor noise levels in comparison with urban environments. Table 6-2, Land Use Compatibility Noise Guidelines – California, illustrates the State guidelines established by the State Department of Health Services for acceptable noise levels for each county and city.



Table 6-2 Land Use Compatibility Noise Guidelines — California									
	Community Noise Exposure (L <sub>dn</sub> or CNEL, dBA)								
Land Use Category	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable					
Residential - Low Density, Single-Family, Duplex, Mobile Homes	50 - 60	55 - 70	70-75	75-85					
Residential - Multiple Family	50 - 65	60 - 70	70 - 75	70 - 85					
Transient Lodging - Motels, and Hotels	50 - 65	60 - 70	70 - 80	80 - 85					
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	80 - 85					
Auditoriums, Concert Halls, Amphitheaters	NA	50 - 70	NA	65 - 85					
Sports Arenas, Outdoor Spectator Sports	NA	50 - 75	NA	70 - 85					
Playgrounds, Neighborhood Parks	50 - 70	NA	67.5 - 75	72.5 - 85					
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 70	NA	70 - 80	80 - 85					
Office Buildings, Business Commercial and Professional	50 - 70	67.5 - 77.5	75 - 85	NA					
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	75 - 85	NA					

NA: Not Applicable

Source: General Plan Guidelines, Office of Planning and Research, California, October 2003.

**Normally Acceptable** — Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

**Conditionally Acceptable** — New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

**Normally Unacceptable** — New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable - New construction or development should generally not be undertaken.

#### City Noise Standards

The city of Stanton maintains a comprehensive Noise Control Ordinance within the Municipal Code that sets standards for noise levels citywide and provides the means to enforce the reduction of obnoxious or offensive noises. Chapter 9.28 of the Stanton Municipal Code establishes noise standards and enforcement procedures.

The city of Stanton has adopted a local Noise Control Ordinance (*Municipal Code 9.28*) in order to control unnecessary, excessive, and annoying sounds emanating from incorporated areas of the city. The Ordinance is designed to control unnecessary, excessive, and annoying sounds in residential neighborhoods by the following noise standards:

- Exterior and interior noise of 55 dBA during the hours of 7:00 a.m. to 10:00 p.m.;
- Exterior noise of 50 dBA during the hours of 10:00 p.m. to 7:00 a.m.; and,
- Interior noise of 45 dBA during the hours of 10:00 p.m. to 7:00 a.m.

The Ordinance prohibits exterior noise sources to exceed the following:

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- The noise standard for a cumulative period of more than thirty minutes in any hour; or
- The noise standard plus 5 dB(A) for a cumulative period of more than fifteen minutes in any hour; or
- The noise standard plus 10 dB(A) for a cumulative period of more than five minutes in any hour; or
- The noise standard plus 15 dB(A) for a cumulative period of more than one minute in any hour; or
- The noise standard plus 20 dB(A) for any period of time.

Interior noise sources cannot exceed the following:

- The interior noise standard for a cumulative period of more than five minutes in any hour;
   or
- The interior noise standard plus 5 dB(A) for a cumulative period of more than one minute in any hour; or
- The interior noise standard plus 10 dB(A) for any period of time.

#### **Noise Analysis**

Human response to noise varies widely depending on the type of noise, time of day, and sensitivity of the receptor. The effects of noise on humans can range from temporary or permanent hearing loss to mild stress and annoyance due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Noise, or the lack of it, is a factor in the aesthetic perception of some settings, particularly those with religious or cultural significance.

Noise impacts can be mitigated in three basic ways: by reducing the sound level of the noise generator, by increasing the distance between the source and receiver, and by insulating the receiver. Noise reduction can be accomplished by placement of walls, landscaped berms, or a combination of the two, between the noise source and the receiver. Generally, effective noise shielding requires a solid barrier with a mass of at least four pounds per square-foot of surface area which is large enough to block the line of sight between source and receiver. Variations may be appropriate in individual cases based on distance, nature and orientation of buildings behind the barrier, and a number of other factors. Garages or other buildings may be used to shield dwelling units and outdoor living areas from traffic noise.

In addition to site design techniques, noise insulation can be accomplished through proper design of buildings. Nearby noise generators should be recognized in determining the location of doors, windows and vent openings. Sound-rated windows (extra thick or multi-paned) and wall insulation are also effective. None of these measures, however, can realize their full potential unless care is taken in actual construction: doors and windows fitted properly, openings sealed, joints caulked, plumbing adequately insulated from structural members. Of course, sound-rated doors and windows will have little effect if left open. This may require installation of air conditioning for adequate ventilation. The chain of design, construction, and operation is only as effective as its weakest link.

Noise impacts can be reduced by insulating noise sensitive uses, such as residences, schools, libraries, hospitals, nursing and care homes and some types of commercial activities. But perhaps a more efficient approach involves limiting the level of noise generation at the source. State and



Federal statutes have largely preempted local control over vehicular noise emissions but commercial and industrial operations and certain residential activities provide opportunities for local government to assist in noise abatement. Local ordinances may establish maximum levels for noise generated on-site. This usually takes the form of limiting the level of noise permitted to leave the property where it may impact other uses.

Although vehicular noise emission standards are established at the State and Federal levels, local agencies can play a significant part in reducing traffic noise by controlling traffic volume and congestion. Traffic noise is greatest at intersections due to acceleration, deceleration, and gear shifting. Measures such as signal synchronization can help to minimize this problem. Likewise, reduction of congestion aids in reduction of noise. This can be accomplished through the application of traffic engineering techniques such as channelization of turning movements, parking restrictions, separation of modes (bus, auto, bicycle, pedestrian), and restrictions on truck traffic.

Noise reduction through reduction of traffic volumes can also be accomplished with incentive programs for use of public transit facilities and high-occupancy vehicles, staggering of work hours and land use controls. Vehicle trips can be turned into pedestrian trips with integration of housing and employment into the same project or area, construction of high-density, affordable housing in proximity to employment, shopping and public transit facilities and other techniques.

### **FIRE PROTECTION**

The Orange County Fire Authority (OCFA) is a regional fire service agency that provides fire protection services to 22 cities in Orange County, including the city of Stanton and unincorporated areas of Orange County. Established in 1956, OCFA Fire Station #46 is located at 7871 Pacific Street in Stanton. Fire Station #46 currently maintains an Engine and Paramedic Assessment Unit (PAU) with six captains, six engineers and nine firefighters. According to the OCFA, Fire Station #46 responded to 2,352 emergency incidents in 2005, which included fire, emergency medical, hazardous material, false alarms and other incidents.

OCFA's Dispatch Center receives and dispatches emergency calls using a Computer Aided Dispatching (CAD) system. The Mapping and Geo-file Group maintains the Fire Station Order file (a key component of CAD to ensure the closest emergency apparatus is sent to an emergency) and produces District Maps for use by emergency apparatus to respond to the emergency scenes.<sup>2</sup> It takes approximately three to five minutes for engines to arrive on scene after an emergency (911) call has been placed.<sup>3</sup>

#### Fire Hazards

As growth and development continues within the city, and Orange County, urban fires become a greater threat. Within urbanized areas the incidence of structural fires increases. Some of the most difficult fire protection problems within urbanized areas are: multiple story, wood frame, high density apartment developments; large contiguous developed areas with combustible roof-covering materials, storage, handling and use of hazardous materials on site; and natural disasters. Opportunities to reduce the incidence and effects of urban fires include adherence to the

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<sup>&</sup>lt;sup>1</sup> Orange County Fire Authority, "Orange County Fire Authority Partner City Stanton", www.ocfa.org (accessed October 2006).

<sup>&</sup>lt;sup>2</sup> Orange County Fire Authority, "Emergency Communications", www.ocfa.org (accessed October 2006).

<sup>&</sup>lt;sup>3</sup> Orange County Fire Authority, "Frequently Asked Questions", www.ocfa.org (accessed October 2006).



Uniform Building Code requiring built in fire protection devices, improving the planning and construction of new development, public education and installing fire protection devices in older structures.

There are no CAL FIRE identified Fire Hazard Severity Zones, State Responsibility Areas, Very High Fire Hazard Severity Zones, or Local Responsibility Areas within the City of Stanton.

#### Fire Prevention

OCFA's Planning and Development Services Section works with local jurisdictions and developers to meet fire protection requirements for buildings and developments by reviewing all architectural blue prints, development plans, and proposals submitted in OCFA's jurisdiction. This includes tract and parcel maps, permits for conditional use, site development, coastal development, environmental impact reports, and other items related to the development process.

The city's Building Division enforces local, State and Federal laws to protect the public safety and general welfare of Stanton. The city has adopted the 2015 California Fire Code. The Building Division administers and enforces compliance with the provisions of the city's *Municipal Code* to protect life and property from fire hazards. The *Municipal Code* requires that prior to approval, new development projects obtain a guarantee from a water purveyor or appropriate government agency that adequate water supply is available to meet fire protection needs.

The Safety & Environmental Services Section of the OCFA conducts safety inspections to enforce applicable fire codes and ordinances. This Section also maintains inventories of chemicals stored, handled and used within the jurisdiction and coordinates hazardous materials emergency plans.

An important component of fire prevention is education. OCFA provides education and training programs and informational materials for fire safety and prevention, as well as general health and safety. Programs focus on safety at home, safety at school and safety in the water.

#### **Medical Emergencies**

Generally, an OCFA paramedic engine or paramedic van accompanied by an engine responds to a medical emergency. In the event transportation to a hospital is necessary, a private ambulance company would be called, as OCFA does not maintain ambulances for patient transport.

#### POLICE PROTECTION

The Orange County Sheriff's Department (OCSD) provides local law enforcement services for 12 cities, including the city of Stanton and unincorporated areas of Orange County. Police services are provided by the West Operations Division, which operate out of the West Station, located in the Stanton Civic Center at 11100 Cedar Street. With the exception of parking control, crossing guard services and code enforcement, OCSD provides full police services for the city. The West Station has 24 deputy sheriffs, one motor officer, five sergeants, four investigators and eight civilian employees.

The city is divided into three geographical areas for patrol and general crimes investigations. Each area has a team of deputies, an Investigator that conducts follow-up investigative work on general crimes occurring within the area and a supervisor designated as the area liaison. The supervisor is the designated liaison with community groups and concerned persons within that area and is



responsible for coordinating and resolving law enforcement issues within the area.4

The investigative unit includes one sergeant, four investigators and one investigative assistant. This unit provides investigative services for the city of Stanton, pursuing cases generated from reports taken by the patrol deputies. These cases involve all crimes except homicide, rape, fraud, or narcotics, which are handled by the appropriate specialty detail of the OCSD's Criminal Investigations Division.

The OCSD maintains crime statistics based on the type of crime or offense. Part I offenses include crimes such as homicides, rapes, robberies, assaults, burglary, larceny and auto theft. Part II offenses include crimes such as forgery, vandalism, narcotics, and driving while intoxicated. Part III offenses are non-criminal cases such as traffic accidents, missing persons and medical aid. In 2005, the OCSD responded to I,086 Part I offenses, which was approximately six percent greater thanthe number responded to in 2004 (1,202).<sup>5</sup>

#### HAZARDOUS MATERIALS

Although definitions of hazardous materials vary, Federal, State and county agencies have generally recognized toxic substances as chemicals or mixtures whose manufacture, process, distribution, use or disposal may present an unreasonable risk to human health or the environment. The OCFA's Hazardous Materials Area Plan provides a detailed hazard analysis of chemical hazards within Orange County.

#### Transportation of Hazardous Materials

Major transportation routes within Stanton include surface streets and railroads. Additionally, the Garden Grove Freeway (SR-22) is located south of the city. These transportation routes are used to transport hazardous materials from suppliers to users. Transportation accidents involving hazardous materials could occur on any of the routes, potentially resulting in explosions, physical contact by emergency response personnel, environmental degradation and exposure to the public via airborne exposure.

The Federal Department of Transportation (DOT) is the primary regulatory authority for the interstate transport of hazardous materials. The DOT establishes regulations for safe handling procedures (i.e., packaging, marking, labeling and routing). The California Highway Patrol (CHP) enforces the intrastate transport of hazardous materials and hazardous waste.

#### **Hazardous Waste Management**

State Assembly Bill (AB) 2948, enacted legislation authorizing local governments to develop comprehensive hazardous waste management plans. The intent of each plan is to ensure that adequate treatment and disposal capacity is available to manage the hazardous wastes generated within its jurisdiction.

The Orange County Hazardous Waste Management Plan (Plan) provides policy direction and action

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<sup>&</sup>lt;sup>4</sup> Orange County Sheriff 's Department, "OCSD Patrol Areas City of Stanton", www.ocsd.org (accessed October 2006).

<sup>&</sup>lt;sup>5</sup> Orange County Sheriff's Department, "UCR Stats and Graphs", www.ocsd.org, (accessed October 2006).



programs to address current and future hazardous waste management issues that require local responsibility and involvement in Orange County. The *Plan* discusses hazardous waste issues and analyzes current and future hazardous waste generation in the County. The Integrated Waste Management Department (IWMD) of Orange County owns and operates three active landfills, four household hazardous waste collection centers (HHWCC) and monitors ten closed landfills.

The city of Stanton adopted its Household Hazardous Waste (HHW) Element in October 1991. Section 10 of AB 2707 requires the local agency in preparing the HHW Element to comply with several requirements including using feasible methods to properly reduce, collect, recycle, treat and dispose of household hazardous waste generated within its jurisdiction; devote expenditures to the safe reduction, collection, recycling, treatment and disposal of household hazardous waste; make reasonable efforts to inform the public of and to encourage public participation in the household hazardous waste program; and the collection program be made available to all households. The HHW supports the countywide strategy to collect and dispose of household hazardous waste from the community.

Orange County and the city of Stanton have identified permanent HHWCC to managehousehold hazardous waste. The HHWCC are located in Anaheim, Huntington Beach, Irvine and San Juan Capistrano. The HHWCC are free of charge to Orange County residents and acceptproducts such as latex and oil base paint, antifreeze, batteries, used oil, fertilizers, pesticides, herbicides and hobby supplies.

The California Health and Safety Code (H&SC) establishes regulations requiring businesses within the city to complete a chemical inventory to disclose hazardous materials stored, used, or handled on site. The disclosure information is intended to assist emergency responders in planning for and handling emergencies involving hazardous materials. The main program objective is to safeguard the lives of emergency responders, the public, and to minimize property loss. The H&SC also requires a Business Emergency Plan (BEP) to assist in mitigating a release or threatened release of a hazardous material, and to minimize any potential harm or damage to human health or the environment. Disclosure of hazardous materials is updated annually. The Fire Prevention Department of the OCFA is responsible for the distribution and handling of disclosure forms. Additionally, the OCFA maintains the files of all chemical inventory information and business plans, which are made available for public inspection.

#### CLIMATE ADAPTATION AND RESILIENCY PLANNING

The City prepared a Climate Vulnerability Assessment (CVA) in 2021 to promote effective and integrated actions to safeguard against anticipated impacts from climate change. The City is also in the process of creating a Local Hazard Mitigation Plan. The purpose of the LHMP is to promote sound public policy designed to protect residents, critical facilities, infrastructure, key resources, private property, and the environment from natural hazards, and it will include a discussion of climate change and anticipated impacts. Additionally, the County of Orange and Orange County Fire Authority collaboratively developed a Local Hazard Mitigation Plan (LHMP) in 2015. In May 2021, an update to the County's LHMP was made available for public review, which also includes a discussion of climate change and associated risks. Goals, strategies, and actions are included in this Element to address the key findings of the CVA and supplement the climate change discussion within the LHMP. The CVA is included as Appendix A to the Community Health & Safety Element.



#### **AIRCRAFT OPERATIONS**

The Joint Forces Training Base (JFTB) is a full-service joint military training center, airfield and State Disaster Support Area located on approximately 1300 acres within the city of Los Alamitos. The installation serves a wide variety of military, government and public interests and makes critical assets available to the Nation and State in the event of regional disaster or emergency. On-site facilities include two runways and associated taxiways, ramp space and hangers.

### Airport Environs Land Use Plan (AELUP)

The Airport Land Use Commission (ALUC) is responsible for formulating a comprehensive airport land use plan for the anticipated growth of each public use airport and its environs. The Airport Land Use Commission of Orange County has adopted the Airport Environs Land Use Plan (AELUP), which includes the Joint Forces Training Base (JFTB). City and County General Plans are required to be consistent with the AELUP unless the local legislative body can make specific findings. For consistency between local General Plans and the AELUP, the county focuses on noise, safety and building height. The majority of the city is located within the AELUP Height Restriction Zone for JFTB and the northwest corner of the city is located within the 60 CNEL noise contour for JFTB.

#### **EMERGENCY RESPONSE AND OPERATIONS**

In 1993, Government Code §8607 directed the Governor's Office of Emergency Services (OES), in coordination with all interested State agencies with designated response roles in the State emergency plan and interested local emergency management agencies, to establish by regulation the Standardized Emergency Management System (SEMS). SEMS is the system required for managing response to multi-agency and multi-jurisdiction emergencies in California. The purpose of SEMS is to improve the mobilization, deployment, utilization, tracking, and demobilization of needed mutual aid resources. The intent is to reduce the incidence of poor coordination and communications and reduce duplication of resources. Local governments are responsible for coordinating emergency response and recovery activities within their jurisdiction. However, local governments must use SEMS to be eligible for funding of their personnel related costs under State disaster assistance programs.

The city of Stanton Emergency Operations Plan (adopted September, 2008) establishes policies and procedures to guide the city during emergency situations. The Plan provides for coordination of planning efforts of various members of the emergency staff and service elements utilizing SEMS. The responsible parties and duties during an emergency are identified. The Plan outlines the four primary phases of emergency management: Mitigation, Preparedness, Response and Recovery, which address the city's activities before, during and after an emergency has occurred.

The *Plan* also identifies the city's Emergency Operations Center (EOC) as the location from which centralized emergency management would be performed during a major emergency or disaster. The EOC is located at the Stanton City Hall and provides a central location of authority and information and face-to-face coordination among personnel who make emergency decisions. The management and coordination of emergency operations would occur from the EOC including receiving and disseminating information, maintaining contact with other EOCs and providing instructions to the public.

Emergency evacuation activities are coordinated by the OCSD. The OCSD will coordinate all law

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enforcement and traffic control operations during a disaster including activation of any public warning systems. The unpredictability of the impact of any disaster on existing streets and highways makes evacuation route designation difficult. Although the routes to be used for an evacuation would depend upon the location of the incident, assuming major streets and freeways are functional, generally the routes would include major arterials and regional routes.

The City prepared an analysis consistent with Senate Bill 99 to identify residential developments in high hazard zones that do not have at least two emergency evacuation routes. The analysis found that there are no residential developments within Stanton that do not have at least two emergency evacuation routes. A White Paper describing the methodology used to map the high hazard zones and evacuation routes is included as Appendix B to the Community Health & Safety Element.

### C. KEY ISSUES

## CHS-1 Seismic

The city of Stanton is located within a seismically active area of southern California. Ground failure hazards resulting from the high potential for liquefaction within the city should be reduced if possible. The standards for development should be regulated to minimize structural damage and loss of life as a result of seismic activity.

#### Goal CHS-1.1

Minimize loss of life, injury, and property damage from seismic events and resulting hazards.

### Strategy CHS-1.1.1

Ensure that building code standards are enforced and maintained so that new development is located and designed to reduce the effects of a seismic event.

### Action CHS-1.1.1 (a)

Continue to implement the Uniform Building Code's seismic standards for construction of new buildings and to maintain seismic safety of existing structures.

## Action CHS-1.1.1 (b)

Require the review of soils and geologic conditions to determine liquefaction susceptibility of a proposed project site.

# CHS-2 Flooding

Flooding has the potential to affect the safety of Stanton residents and severely impact the economic integrity of the city. Therefore, it is important to ensure that facilities and programs are maintained and operable to prevent excessive flood damage.



#### Goal CHS-2.1

Protect Stanton residents from potential flood hazards, including dam inundation.

### Strategy CHS-2.1.1

Ensure that facilities and programs are maintained and operable to prevent flood damage.

# Action CHS-2.1.1 (a)

Minimize potential flood damage through the identification of necessary storm drain improvements.

# Action CHS-2.1.1 (b)

Continue the maintenance of flood control facilities within Stanton to ensure their efficient operation.

# Strategy CHS-2.1.2

Expand the amount of pervious surfaces within the City to help prevent flooding.

# Action CHS-2.1.2 (a)

Encourage permeable, pervious, and porous surfaces (e.g. landscape, permeable paving, turf block, etc.), bioswales, and/or catch basins.

# CHS-3 Noise

The effects of noise on humans can range from temporary or permanent hearing loss to mild stress and annoyance due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Noise, or the lack of it, is a factor in the aesthetic perception of some settings, particularly those with religious or cultural significance. Noise impacts can be mitigated in three basic ways: by reducing the sound level of the noise generator, by increasing the distance between the source and receiver, and by insulating the receiver.

#### Goal CHS-3.1

Reduce noise impacts from transportation sources throughout Stanton.

# Strategy CHS-3.1.1

Maintain and reduce where feasible background noise levels emanating from citywide transportation sources.

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# Action CHS-3.1.1 (a)

Ensure noise mitigation measures are included in the design of new developments.

# Action CHS-3.1.1 (b)

Encourage programs to retrofit existing homes to reduce noise impacts in the homes.

# Action CHS-3.1.1 (c)

Encourage the use of double-paned windows for residential uses along major arterials and the rail line.

## Action CHS-3.1.1 (d)

Limit construction, delivery, and through truck traffic to designated routes.

# Action CHS-3.1.1 (e)

Encourage, support, and enforce all State and Federal legislation designed to abate and control noise pollution.

### Action CHS-3.1.1 (f)

Encourage the use of rubberized asphalt city streets.

### Action CHS-3.1.1 (g)

Encourage acoustical materials in all new residential and commercial developments where noise levels exceed the compatibility standards outlined in the Noise Element.

# Action CHS-3.1.1 (h)

Ensure Community Noise Equivalent Levels (CNEL) levels for noise sensitive land uses meet or exceed normally acceptable levels, as defined by State of California standards.

# Goal CHS-3.2

Develop measures to control non-transportation noise impacts throughout Stanton.



# Strategy CHS-3.2.1

Commercial and industrial uses, construction activity and other non-transportation related sources of noise can contribute negatively to the noise environment. Identifying and mitigating these potential noise sources will reduce negative impacts.

# Action CHS-3.2.1 (a)

Periodically review the Noise Control Ordinance to ensure noise generating uses are adequately addressed.

# Action CHS-3.2.1 (b)

Strive to resolve existing and potential conflicts between noise generating uses and human activities.

# Action CHS-3.2.1 (c)

Prohibit significant noise generating activities from being located adjacent to residential neighborhoods and near schools.

# Action CHS-3.2.1 (d)

Evaluate the noise impacts from projects and existing uses in adjacent cities and work cooperatively with these cities to develop mitigation measures that will improve ambient noise conditions in Stanton.

### Goal CHS-3.3

Establish land uses which are compatible with noise levels within the community

## Strategy CHS-3.3.1

Land use planning decisions directly relate to potential noise impacts. Therefore, careful consideration of noise impacts should be a part of all land use decisions.

# Action CHS-3.3.1 (a)

Establish a system of locating land uses according to the maximum noise levels they generate.

# Action CHS-3.3.1 (b)

Incorporate noise reduction measures into all development proposals, as necessary.

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# Action CHS-3.3.1 (c)

Enforce limits set by the State to control noise levels, particularly those governing motor vehicles.

Action CHS-3.3.1 (d)

Ensure that construction noise does not cause an adverse impact to the residents of the city.

# CHS-4 Fire and Police Protection

As Stanton continues to grow, maintaining a high level of community health and safety will remain a priority. Additional development in the city will place new demands on the OCFA and OCSD which may result in the need for new fire and police protection resources within the city. Greater demand for resources may require additional personnel, equipment and/or facilities. With increased growth it is important that response times and services remain adequate to protect the community.

#### Goal CHS-4.1

Provide and maintain a high level of fire protection services necessary to adequately serve the community.

# Strategy CHS-4.1.1

Ensure that adequate fire facilities and personnel are maintained by the County and contracted by the city to provide adequate service levels.

# Action CHS-4.1.1 (a)

Periodically review response times to ensure emergency response meet or exceed the standards of the OCFA.

# Action CHS-4.1.1 (b)

Work directly with the OCFA to annually assess fire protection services and to evaluate the adequacy of facilities and resources serving the city.

# Action CHS-4.1.1 (c)

Use the development review process to assess the impact of new development on fire protection services and to ensure that increased demand for emergency services will be adequately served.

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# Action CHS-4.1.1 (d)

Work with the OCFA, OCSD, Caltrans, and other agencies to install/implement a traffic signal pre-emption program for emergency responders.

### Goal CHS-4.2

Minimize loss of life, injury, and property damage from urban fires.

# Strategy CHS-4.2.1

Ensure that existing and new developments maintain or exceed standards for fire prevention to minimize the risk of fire.

## Action CHS-4.2.1 (a)

Continue to involve the OCFA in the development review process by forwarding development proposals for their review and comment regarding fire prevention measures.

## Action CHS-4.2.1 (b)

Ensure city building codes and standards provide for adequate fire protection and meet or exceed State standards.

### Action CHS-4.2.1 (c)

Locate, design, and construct new development to minimize the risk of structural loss from fires.

# Action CHS-4.2.1 (d)

Install visible home and street addressing and signage.

### Action CHS-4.2.1 (e)

Consider fire safe design (i.e., fire-resistant building and site design, materials, and landscaping) as part of the development review process.

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# Strategy CHS-4.2.2

Promote community education in fire prevention and fire safety.

# Action CHS-4.2.2 (a)

Work with the local school districts and OCFA to establish an education program focused on fire prevention and public safety.

# Action CHS-4.2.2 (b)

Work with OCFA in developing programs and brochures to be made available to all city residents on fire safety, including information on the importance of vegetation management, kitchen and grease fires, and home evacuation plans.

### Goal CHS-4.3

Provide and maintain a high level of police protection services necessary to adequately serve the community and provide a sense of safety to residents.

# Strategy CHS-4.3.1

Ensure that sufficient Sheriff's facilities and personnel are maintained by the County and contracted by the city to provide adequate service levels.

# Action CHS-4.3.1 (a)

Periodically review response times to ensure emergency response reflects the standards of the Sheriff's Department.

# Action CHS-4.3.1 (b)

Work directly with the Sheriff's Department to annually assess crime prevention and law enforcement services and to evaluate the adequacy of facilities and resources serving the city.

# Action CHS-4.3.1 (c)

Evaluate Sheriff Department services to determine what services are being received, the specific cost elements of the contract, and what service enhancements could be added. As part of this review, evaluate alternatives available to the city for obtaining police services.



# Action CHS-4.3.1 (d)

Use the development review process to assess the impact of new development on police protection services and to ensure that increased demand for emergency services will be adequately served.

# Action CHS-4.3.1 (e)

Evaluate the feasibility of opening the Stanton Police Station to the public seven days a week.

### Goal CHS-4.4

Provide safe communities by discouraging criminal activity and encouraging safety through design.

# Strategy CHS-4.4.1

Ensure that new development is designed to discourage criminal activity and provide a level of safety.

## Action CHS-4.4.1 (a)

Involve the Sheriff's Department in the development review process by forwarding development proposals for their review and comment regarding crime and safety measures.

### Action CHS-4.4.1 (b)

Encourage the use of design measures that address security and safety in residential and non-residential developments such as lighting, landscaping, access, placement of buildings, etc.

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#### Goal CHS-4.5

Promote community involvement in crime prevention and public safety.

## Strategy CHS-4.5.1

Provide opportunities for community involvement in crime prevention and encourage safety and crime prevention at the neighborhood level.

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# Action CHS-4.5.1 (a)

Continue to support the Neighborhood Watch Program by encouraging participation in mutual assistance, training and crime prevention techniques among residents.

# Action CHS-4.5.1 (b)

Provide support to the Chamber of Commerce in the establishment of a Business Watch Program to encourage participation among business owners and an increased awareness of suspicious activity.

# Action CHS-4.5.1 (c)

Work with local school districts and Sheriff's Department to establish an education program focused on discouraging criminal, gang and drug activities.

# Action CHS-4.5.1 (d)

Continue to sponsor an annual crime prevention week in Stanton involving partnerships between the city, community groups and the Sheriff's Department.

# Action CHS-4.5.1 (e)

Explore opportunities to establish a local citizen police academy.

# Action CHS-4.5.1 (f)

Explore the potential of creating a volunteer core in Stanton to assist in activities such as patrolling handicap parking spaces.



# CHS-5 Emergency Response

Although Stanton is responsible for coordinating emergency response and recovery activities within the city, a major emergency or disaster will most likely affect communities beyond Stanton, potentially resulting in the need for emergency management coordination on a local, regional, State and/or Federal level. The city will need to closely monitor its *Emergency Operations Plan* and make necessary revisions or updates to ensure a quick and appropriate response will occur in the event of an emergency or disaster.

#### Goal CHS-5.1

Maintain a level of preparedness to respond to emergency situations in order to reduce the loss of life, injury and property damage to the community.

# Strategy CHS-5.1.1

Ensure that the city is prepared to respond to natural and manmade emergencies or disasters in a coordinated and efficient manner.

## Action CHS-5.1.1 (a)

Annually assess the status of the city's Emergency Operations Plan and make necessary revisions to ensure the Plan is current.

## Action CHS-5.1.1 (b)

Work with adjacent jurisdictions and regional and State agencies to coordinate emergency response efforts and ensure a maximum level of preparedness.

### Action CHS-5.1.1 (c)

Continue to participate proactively in Orange County Cities' Emergency Management Organization.

## Action CHS-5.1.1 (d)

Maintain regular training and exercises for disaster responders.

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# Action CHS-5.1.1 (e)

Identify construction methods or other methods to minimize damage to critical facilities such as hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communication facilities to ensure they continue to function after a disaster.

# Action CHS-5.1.1 (f)

Work with the OCFA, Sheriff's Department and County to define minimum standards for evacuation of residential areas and to maintain, update, and regularly exercise emergency access, protocols, and evacuation routes to assess their effectiveness under a range of emergency scenarios. If areas with inadequate evacuation routes are identified, develop appropriate mitigation measures, improvement plans, or education programs to ensure safe evacuation.

# Strategy CHS- 5. 1. 2

Increase resident preparedness for a major emergency or disaster, focusing on education programs and materials.

# Action CHS-5.1.2 (a)

Work with the OCFA, Sheriff's Department and County to establish an education program focused on home-based emergency preparedness procedures.

# Action CHS-5.1.2 (b)

Work with responders to develop disaster preparedness materials and brochures to education residents about evacuation procedures, community readiness, and emergency response facilities in the city. Make these materials available through the city website, and at civic locations throughout the city.

# Action CHS-5.1.2 (c)

Develop an Emergency Operations Center, in consultation with the OCSD and OCFA.

# Action CHS-5.1.2 (d)

Identify ways to involve citizens in emergency preparedness and response, such as Community Emergency Response Teams.



### CHS-6 Hazardous Materials

A number of businesses within Stanton utilize or store hazardous materials. Accidental release or upset of hazardous materials could endanger the community. Additionally, residential uses within the city use and dispose of hazardous materials, which could impact the environment if not disposed of properly. Hazardous materials transported through the city pose an additional concern, as accidents involving hazardous waste would most likely occur on major arterials potentially affecting surrounding communities.

### Goal CHS-6.1

Protect the community and property from injury, damage or destruction from the use, transport and disposition of hazardous materials.

### Strategy CHS-6.1.1

Ensure that activities within the city transport, use, store, and dispose of hazardous materials in a safe, efficient and responsible manner, which protects the public health and safety.

### Action CHS-6.1.1 (a)

Coordinate with the County to ensure that commercial and industrial activities comply with all Federal, State, county, and local laws regulating hazardous materials and wastes and to identify and inventory all users of hazardous materials and all hazardous waste generators.

### Action CHS-6.1.1 (b)

Support efforts of the County, CR&R, and other agencies to accept items for recycling such as used oil and batteries and accept, segregate, package and label waste by properly trained staff.

### Action CHS-6.1.1 (c)

Coordinate with CR&R and other agencies to provide informational brochures and sponsor workshops identifying regulations, alternatives to disposal and available services.

### Action CHS-6.1.1 (d)

Coordinate with property owners on the cleanup of active hazardous waste sites identified by the California Department of Toxic Substances Control and the State Water Board.

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# CHS-7 Climate Change and Resiliency Planning

Senate Bill 379 requires each city in California to update their Safety Element to consider climate impacts facing the state as well as methods to adapt and increase resiliency to climate change at the city level. While climate change may not be a stand-alone hazard, it has the effect of intensifying the frequency and severity of many natural hazards. In Stanton, for example, it is anticipated that an increased variance in climate patterns could result in more intense and frequent heat waves and extended drought.

### Goal CHS-7.1

A resilient, sustainable, and equitable community where risks to life, property, the economy, and the environment resulting from climate change, including extreme weather events, are minimized.

### Strategy CHS-7.1.1

Promote a well-prepared City that can effectively overcome natural disasters and scarcity of resources due to climate change.

### Action CHS-7.1.1 (a)

Provide information and resources to the public and businesses regarding steps the City is taking to address the issue of climate change.

### Action CHS-7.1.1 (b)

Develop a strategy to reduce greenhouse gas emissions citywide consistent with other City policy objectives. Consider developing a climate action plan or other document that defines that strategy.

### Strategy CHS-7.1.2

Collaborate with local, regional, state and/or federal jurisdictions and agencies on climate resiliency and adaptation strategies.

### Action CHS-7.1.2 (a)

Reduce communitywide greenhouse gas emissions locally by actively supporting regional efforts to reduce greenhouse gases throughout the county.

Action CHS-7.1.2 (b)

Work with responsible federal, state, and county agencies to

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decrease air pollution emissions occurring within the air basin to reduce the risk posed by air pollution.

### Action CHS-7.1.2 (c)

Coordinate with utility providers to protect interconnected infrastructure.

### Action CHS-7.1.2 (d)

Explore the feasibility of decentralized energy systems powered by renewable energy.

### Action CHS-7.1.2 (e)

Continue to promote the goal and policies of the Active Transportation Plan, which encourages active transportation (biking, walking, alternative modes of transportation), and continue to evaluate and update the plan as needed.

### Action CHS-7.1.2 (f)

Explore opportunities associated with new development to retrofit existing public transportation facilities to withstand climate risks such as natural disasters and extreme heat to ensure these transport options are safe and reliable in the long-term.

### Action CHS-7.1.2 (g)

Monitor climate change-related effects with local, regional, state, and/or federal partners and provide information about the effectiveness of existing infrastructure and programs.

### Strategy CHS-7.1.3

Promote plans and programs that increase sustainable energy sources.

### Action CHS-7.1.3 (a)

Study the transition to energy-efficient streetlights, traffic lights, and other electrical uses to energy efficient bulbs and/or LEDs, for City-owned light facilities.

### Action CHS-7.1.3 (b)

Explore the feasibility of purchasing only electric or alternativeenergy vehicles for the City vehicle fleet, as appropriate, based on the intended use of the vehicle.

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### Action CHS-7.1.3 (c)

Evaluate the feasibility for government-constructed and/or - operated new development to exceed the CalGreen Tier I, or successor program, standards.

### Action CHS-7.1.3 (d)

Promote the use of sustainable and carbon-neutral energy sources in new development.

### Action CHS-7.1.3 (e)

Explore using renewable energy and clean generation technologies such as solar, wind, biogas, or fuel cells to power City facilities where appropriate.

### Strategy CHS-7.1.4

Implement necessary actions and programs to improve preparation and response for the most vulnerable community members.

### Action CHS-7.1.4 (a)

Coordinate with Community Services and/or OCTA to address the needs of individuals with limited mobility or limited access to transportation for access to safe and comfortable shelter during extreme heat events or other severe weather events.

### Action CHS-7.1.4 (b)

Provide information on seismic retrofitting for older homes in the City.

### Action CHS-7.1.4 (c)

Keep the public informed as to the location of important emergency facilities, such as reception centers, cooling centers, and emergency shelters point of distributions (PODS) for administering medical countermeasures (i.e., vaccines or medical testing), and distribution of emergency supplies and/or food.

### Strategy CHS-7.1.5

Implement programs that promote resiliency to drought.

### Action CHS-7.1.5 (a)

Continue to require water-efficient and drought resistant landscaping in new developments and redevelopments.

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Action	CHS-7.1	5 (b)

Replace median landscaping with water-efficient plants.

Action CHS-7.1.5 (c)

Explore rebate programs for residents to replace lawns with water-efficient landscaping.

Action CHS-7.1.5 (d)

Encourage residents to use captured rainwater for landscape irrigation.

Action CHS-7.1.5 (e)

Promote the use of low water usage appliances.

Action CHS-7.1.5 (f)

Collaborate with utility providers on leak detection programs.

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# Climate Vulnerability Assessment

November 2021

Appendix A to the Community Health & Safety Element

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# A. Introduction

Communities in California are increasingly vulnerable to the effects of climate change. California's Fourth Climate Change Assessment, conducted in 2018, identifies the Los Angeles Region as especially vulnerable to humans since approximately half the population of the state calls the region home. Climate change refers to changes in conditions that result from increased atmospheric greenhouse gas (GHG) concentrations, which are linked to an increase in average global temperature. The increase in global temperature and GHG result in a series of changes to the global climate, including: shifts in seasonal temperature patterns; altered precipitation timing, volume, and location; sea-level rise; ocean acidification due to increased carbon dioxide (CO2) absorption; and altered wind and storm event frequency, severity, and location. These outcomes interact, and the potential consequences may result not only of the shifts in global climate, but also changes to a variety of characteristics that define biophysical systems and human progression.

### What is a Climate Vulnerability Assessment?

The purpose of a Climate Vulnerability Assessment (CVA) is to inform City policies, plans, programs, and guidance to promote effective and integrated action to safeguard from climate change. In addition to increasing global average temperature, climate change has the effect of intensifying the frequency and the effects of many natural hazards, adding to concerns otherwise addressed in hazard mitigation planning. Climate change results in an increase in variance of climate patterns. The increase in variance means that extreme events may exhibit changes in severity, frequency, and location. For example, the increased variance in climate patterns will result in more frequent incidence of severe events, such as extreme rainfall, wind, wildfire, extreme heat, and extended drought. The increased variance therefore creates challenges for hazards planning, which previously used historic recurrence rates to predict future events.

### **Addressing Climate Change**

Climate change can be viewed from two scales: global and local. Addressing climate change relies on two high-level approaches at both scales: mitigation and adaptation. Climate change mitigation involves the reduction of GHG emissions. Whereas, climate adaptation aims to reduce harm from the effects of a changing climate. At the global scale, mitigation appears as less dependency on fossil fuels for energy production and a shift towards renewable forms of energy; and at the local scale, an example of mitigation appears as mutli-modal and active transportation networks. At the global scale, climate adaptation can be seen as expanded emergency response teams and climate refugee aid. On the local scale, adaptation can be the preparation taken for inevitable climate-induced emergencies and the spin-off social impacts that could emerge from them. Both approaches at both scales are necessary; however, this

document focuses on identifying vulnerabilities and adaptation strategies on the local level within the City of Stanton.

### **Regulatory Framework**

There are currently numerous laws and regulations set in place in the State of California that are aimed at reducing the impacts of climate change hazards. For decades, California has continued to adopt, update, and amend Senate and Assembly Bills; create monitoring and mitigation programs; and fund state, regional, and local agencies to promote environmental preservation. A list of relevant bills and documents adopted by the State, region, and City are included as Appendix A. While these documents create general goals and guidelines for the State to achieve and follow, each municipality is unique and therefore can best thrive and meet environmental regulations in its own unique way. The regulatory documents included in Appendix A provide a framework for the direction Stanton should be headed, but it is up to the City to implement programs and designs to reduce the effects of climate change.

### **Addressing Vulnerabilities**

The vulnerability that a community experiences resulting from climate change is a product of its geographical and biophysical setting in combination with the characteristics of the community, ranging from its built pattern to social, political, and economic characteristics. Put simply, the level of climate vulnerability can be calculated using the following formula:

### Exposure + Sensitivity - Adaptive Capacity = Vulnerability

### Where:

- **Exposure** refers to the nature and degree to which a system or sub-population is exposed to significant climatic variations.
- **Sensitivity** refers to the degree to which a system or sub-population is affected by climate-related stimuli.
- Adaptive Capacity refers to the adaptability of a system or sub-population to adjust to climate change, to moderate potential damages, or to cope with the consequences.

### Here is an example:

It is 100 degrees Fahrenheit (exposure) on a playground at a Stanton elementary school. Inside a classroom, Cindy is a student with a pre-existing condition (sensitivity) that leaves her at-risk of hyperthermia; however, the classroom is air-conditioned (adaptive capacity), so Cindy is able to continue learning with the rest of the students.

As shown by the example above, many factors are at play when determining the level of climate vulnerability. The California Adaptation Planning Guide identifies five steps in assessing the vulnerability of a community to climate change:

- 1. Exposure: what climate change effects will a community experience?
- 2. **Sensitivity:** what aspects of a community (people, structures, and functions) will be affected?
- 3. Potential impacts: how will climate change affect the points of sensitivity?
- 4. Adaptative capacity: what is currently being done to address the impacts?
- 5. Risk and onset: how likely are the impacts and how quickly they occur?

Not only do impacts vary, but vulnerability varies across specific areas and groups. For example, future climate changes, especially increases in extreme heat, are expected to disproportionately burden low-income residents and communities of color across the region. The City of Stanton is home to people of diverse income groups and backgrounds, not all residents are expected to be equally impacted. The City of Stanton, according to the California Office of Environmental Health Hazard Assessment, contains disadvantaged communities; the linkage between the disproportional effects of climate change on disadvantaged communities is discussed further in this assessment.

This CVA describes vulnerabilities in terms of social vulnerabilities and physical vulnerabilities. Social vulnerabilities examine how populations, communities, and social systems are affected by climate change. Physical vulnerabilities examine how infrastructure, critical facilities, and land are affected by climate change.

# B. Climate Impacts & Vulnerability Assessment

An assessment of a community's vulnerability to climate change begins with an understanding of local exposure to climate impacts. A primary objective of this document is to identify geographic areas, populations, and infrastructure in Stanton with heightened risk to projected climate impacts. This section first describes the methodology used to obtain climate impact projections. It then highlights each major impact projected in Stanton and asks the following questions:

- What is the local exposure?
- Where and when does this impact occur?
  - o To what extent will the City be exposed to this impact?
  - o Who (or what) is the most vulnerable?
- How does this impact affect or tie into other impacts or hazards?
- How is the City currently addressing this impact?

### Methodology

While the science is highly certain that California (and the world) will continue to warm and experience greater impacts from climate change in the future, specific outcomes are inherently uncertain. Future outcomes vary depending on the level of global GHG emissions. Accordingly, most climate models include a range of possible scenarios based on the level of global GHG emissions

This document sites and pulls data, and data analysis, from California's Fourth Climate Change Assessment published in 2018. The data discussed in the assessment, derived from 32 coarse-resolution (~ 100 km) global climate models (GCMs), were bias corrected and downscaled using the Localized Constructed Analogues (LOCA) statistical method. The data cover 1950-2005 for the historical period and 2006-2100 for two future climate projections using medium and high greenhouse gas and aerosol emissions scenarios.

For city-specific predictions, this document uses climate modeling from Cal-Adapt, a tool that came about as a key recommendation of the 2009 California Climate Adaptation Strategy and created with oversight from the California Energy Commission (CEC) and California Strategic Growth Council. Cal-Adapt makes two predictions for the period of 2006 to 2100 using medium and high GHG and aerosol emissions scenarios. These scenarios are known as Representative Concentration Pathways (RCP). Each RCP represents a standardized set of assumptions of humanity's trajectory in the coming years. The Medium Emissions Scenario (RCP 4.5) represents a mitigation scenario where global CO2 emissions peak by 2040 and then decline. Statewide, temperature is projected to increase 2-4 °C for this scenario by the end of this century. The High Emissions Scenario (RCP 8.5) represents a scenario where CO2 emissions continue to rise throughout the 21st century. Statewide, temperature is projected to 4-7 °C by the end of this century. Precipitation shows fewer wet days, wetter winters, drier springs and autumns, and an increase in dry years as well as maximum precipitation in a single day. Cal-Adapt also specifies that its data is derived from the 32 LOCA downscaled climate projections generated to support California's Fourth Climate Change Assessment, observed historical data is derived from Gridded Observed Meteorological Data, and the data presented are aggregated over all LOCA grid cells that intersect Stanton's boundaries.

In addition to the range of potential outcomes, climate change can produce a variety of impacts depending on location. California is expected to experience warmer temperatures, increased drought, and more extreme weather events (IPCC, 2007). This is why climate change projections include both drought and increased precipitation leading to flooding. The range of impacts anticipated in Stanton are summarized below.

### **Impacts**

### **Extreme Heat & Weather**

### What is it?

Climate change alters seasonal temperature patterns. Effects can include changes in average temperature, the timing of seasons, and the degree of cooling that occurs in the evening. In addition to new seasonal temperature patterns, extreme events such as heat waves are projected to occur more frequently and/or last for longer periods of time. In California, temperature increases are expected to be more pronounced in the summer and in inland areas. Phenomena such as heat waves are projected to increase not only in frequency but in geographic extent (CNRA, 2009). The degree of change experienced partially depends on global GHG emissions and atmospheric concentrations. By 2050, however, temperature increases between 1.8°F to 5.4°F are projected under both emissions scenarios examined by the State (CNRA, 2009).

### Local exposure

Temperatures in Stanton are relatively mild. Stanton is not in a location subject to dangerous storms (hurricane, tornados, blizzards, etc.), tsunamis, or intense winters. Average daily temperatures peak in the afternoon between the months of April through October (climate-data.org). Over the period from 1950 to 2006, the City observed average annual average maximum temperatures of 75.2°F (Cal-Adapt, 2021). Figure 1 shows the number of days in a year when the daily maximum temperature is above a threshold temperature of 97.2°F. This threshold temperature is the 98th percentile value of historical daily maximum/minimum summer temperatures (from 1961–1990, between April and October) observed within Stanton.

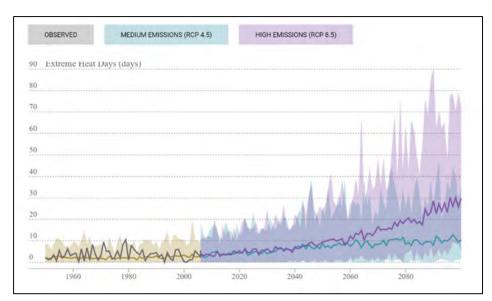


Figure 1: Extreme Heat Days in Stanton

Source: Cal-Adapt, accessed October 25, 2021. https://cal-adapt.org/tools/local-climate-change-snapshot/

As shown <u>Figure 1</u>, climate change is expected to increase the number of extreme heat events per year in Stanton. <u>Table 1</u> supports <u>Figure 1</u> in that they both demonstrate the number of annual extreme heat days is going to increase over the next century. The Baseline (1961 to 1990) modeled historical data shows a yearly average of two days that exceeded the 98<sup>th</sup> percentile high-heat threshold. By mid-century (2035 to 2064), the number of days exceeding 98th percentile high-heat threshold is expected to more than double from the Baseline average (from 2 to 7 days) under the Medium Emissions scenario (RCP 4.5) and increase by seven days (from 2 to 9 days) under the High Emissions (RCP 8.5) scenario. By the end of the century (2070 to 2099), the average number of extreme heat days is expected to increase by 8 days and 19 days past baseline for Medium and High Emissions scenarios, respectively.

Table 1: Average Number of Days Exceeding 98th Percentile Summertime (April to October) High-Heat Threshold for Stanton

Time Period	Scenario	30yr Average	30yr Range	Change from baseline
Baseline (1961- 1990)	Modeled Historical	2 days*	1 - 3 days	-
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	7 days	4 - 17 days	+ 5 days
	High Emissions (RCP 8.5)	9 days	6 - 20 days	+ 7 days
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	10 days	6 - 28 days	+ 8 days
	High Emissions (RCP 8.5)	21 days	12 - 55 days	+ 19 days

Source: Cal-Adapt, accessed October 25, 2021. <a href="https://cal-adapt.org/tools/local-climate-change-snapshot/">https://cal-adapt.org/tools/local-climate-change-snapshot/</a>\*Observed 30-year average from 1961 to 1990: 4 days

Heat waves and extreme heat days are made worse by the urban heat island effect depicted in Figure 2. Heat islands are urbanized areas that experience higher temperatures than rural areas. This is because an urbanized area's buildings, roads, and other infrastructure absorb and re-emit the sun's heat. Daytime temperatures in urban areas are about 1-7°F higher than temperatures in outlying areas and nighttime temperatures are about 2-5°F higher (EPA, 2008). Because Stanton is a built-out, urban community, the effects of heat island are pronounced. Heat islands can affect communities by increasing summertime peak energy demand, air conditioning costs, air pollution and GHG emissions, heat-related illness and mortality, and water quality. As the community continues to grow and accommodate new development in infill locations, it can be expected that the impacts related to the urban heat island effect will continue.

Rural Suburban Residential City Urban Residential Residential Farmland

Figure 2: Heat Island Effect

Source: https://www.researchgate.net/figure/The-effect-of-Urban-Heat-Island-UHI\_fig1\_326316773

### Who is most vulnerable?

Everybody can be affected by extreme weather and heat, but certain groups are more sensitive and thus more vulnerable. Social vulnerabilities include people with pre-existing health conditions; people who depend on walking, biking, or transit to get around; children and older adults; and people who work outdoors. Children are at a higher risk for being adversely affected by extreme weather because they spend much of their time outdoors playing or exercising thereby increasing their body temperature already; increased activity in more extreme weather more easily leads to dehydration and skin burning. Older adults are considered highly vulnerable to extreme heat and weather because human body's regulatory and immune systems tend to deteriorate with age and are not as prepared to be resilient against drastic changes. People experiencing homelessness are also more vulnerable to extreme weather; without safe, consistent, access to shelter, people are exposed to the natural elements more than sheltered counterparts. According to SCAG, there were 116 total individuals in 2019 experiencing homelessness in Stanton, with 71 of them classified as unsheltered (SCAG 2020).

According to the US Census, the population of Stanton is predominantly working adults (age 25-64 years), representing approximately 53 percent of the total population. Seniors (65 years and older) represent approximately 12 percent of the population, and youths (19 years and younger) represent 28 percent. This demonstrates that approximately 40 percent of the population is at heightened vulnerability due to their age.

Physical vulnerabilities include energy and transportation sectors, water delivery, water treatment, and parks and open space. As temperatures increase, an increased demand on cooling can cause strain on the energy grid and lead to blackouts. The effects of heat on the physical energy grid such as power lines can also cause strain and lead to fires. Parks and open space are affected because extreme heat can harm vegetation and wildlife. Heat can cause transportation delays or malfunctions, or damage transportation infrastructure such as roads.

One way to combat the negative effects of extreme weather and heat, and a way to reduce the impact of urban heat islands, is through incorporation of green space and urban forestry. Open green spaces replace the amount of asphalt and concrete within an area with greenery and foliage, thereby reducing the increased temperatures created by the urban environment. Urban forests can be installed within green spaces or within the urban environment (along sidewalks, road medians, plazas, and in landscaping). Trees provide shade and protect people, sidewalks, buildings and streets, from the sun, thereby decreasing temperatures. The Stanton Active Transportation Plan contains proposals and ideas to create a more comfortable and walkable city. One Recommended Pedestrian Project contained in the Active Transportation Plan focuses on green infrastructure and implementing more trees, landscaping, and other efforts to provide shade, increase habitat, and improve comfort for people to walk and bike. More people walking rather than driving, and more trees and greenery all contribute to less GHG emissions in the air, less cars on the road, and a cooler environment.

### Flooding

### What is it?

Flooding occurs when greater amounts of rain falls over a shorter period, even if there is less overall rain. Vegetated and pervious surfaces such as grass and soil do not have enough time to absorb the rainfall, overwhelming stormwater infrastructure. In combination, changes in temperature and precipitation may exacerbate impacts. Heavy stormwater runoff can contaminate the surrounding bodies of water with other bacteria (Cal EMA, 2012). Intense rainstorms could require evacuation and temporary or permanent displacement of people and result in property damage or loss.

### Local exposure

Changes in precipitation are not expected to have major effects on Stanton (projections are not too far off current precipitation as seen in <u>Table 2</u>); however, increased incidences of rainfall

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could lead to flooding. The City of Stanton contains no natural, permanent water features. According to FEMA, the entire city is located within flood zone X; flood zone X is defined as areas of 500-year flood; areas of 100 year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100 year flood. The City is located within the dam inundation areas of the Prado Dam and Carbon Canyon Dam.

Prado Dam is a flood control and water conservation project constructed and operated by the U.S. Army Corps of Engineers, Los Angeles District. The dam provides flood control and water conservation storage for Orange County. The dam is located approximately 23 miles northeast of Stanton, on the Santa Ana River, west of the city of Corona. According to the U.S. Army Corps of Engineers dam inundation maps, in the event of dam failure the flood wave would reach Stanton in approximately 6.5 hours and would be approximately four feet deep.

Carbon Canyon Dam provides flood control in and around the drainage basin. In conjunction with Brea and Fullerton Dams, Carbon Canyon Dam is vital for the flood protection of portions of the coastal plains in Orange County, including the cities of Brea, Fullerton, Placentia, and Anaheim. The dam is located approximately 12.5 miles northeast of Stanton, approximately four miles east of the city of Brea. According to the U.S. Army Corps of Engineers dam inundation maps, in the event of dam failure the flood wave would reach Stanton in approximately 7.5 hours and would be approximately one foot deep.

While California does not see the average annual precipitation changing significantly in the next 50-75 years, precipitation will likely be delivered in more intense storms and within a shorter wet season (Cal-Adapt). As a built-out, urbanized area, Stanton is especially vulnerable to flooding due to the large area of impervious surfaces such as asphalt and concrete which block rainwater from absorbing into the ground, causing runoff.

<u>Table 2</u> demonstrates the predicted increase in one-day rainfall over the next century. The Baseline average is approximately 1.4 inches of rain in one day. By mid-century (2035-2064), the average rainfall within a day is expected to increase between 0.07 to 0.12 inches whereas the end of century model (2070-2099) is predicted to increase between 0.14 and 0.22 inches in one day. While these increases are not necessarily dramatic on their own, compounding them with other predicted futures (i.e. hotter days with larger fires) intensifies impacts on the City, and on the region.

Table 2: Maximum One-Day Precipitation in Stanton

Time Period	Scenario	30yr Average	30yr Range	Change from baseline
Baseline (1961- 1990)	Modeled Historical	1.477* inches	1.246 - 1.750 inches	-
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	1.546 inches	1.246 - 1.861 inches	+0.069 inches
	High Emissions (RCP 8.5)	1.592 inches	1.221 - 1.962 inches	+0.115 inches
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	1.616 inches	1.250 - 1.946 inches	+0.139 inches
	High Emissions (RCP 8.5)	1.693 inches	1.172 - 2.189 inches	+0.216 inches

Source: Cal-Adapt, accessed October 27, 2021. https://cal-adapt.org/tools/local-climate-change-snapshot/

Regional water plans, such as The OC Plan, further elaborate on water infrastructure capacity and emergency response operations. The City of Stanton does not have stormwater or integrated water management plans since its water infrastructure is a part of the broader Orange County water infrastructure network. These multi-regional plans and networks work in accordance with other utility and emergency agencies to ensure residents have safe access to clean water.

### Who is most vulnerable?

Flooding impacts generally are not linked to specific populations, such as seniors, children, or individuals with disabilities. However, older housing inventories are sometimes located in low-lying, more flood-prone areas near where the community was originally established. SCAG demonstrates that a majority of the housing stock in Stanton was built between 1950 and 1980; approximately 80% of the housing stock is over 40 years old (SCAG, 2020). In such areas, there may tend to be greater concentrations of renters, elderly, and communities of color, and such neighborhoods are likely to be more affected by historical flooding than more recently developed communities. Especially vulnerable infrastructure is that which is located in low-lying,

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<sup>\*</sup> Observed 30-year average from 1961 to 1990: 1.512 inches

more flood-prone areas and includes transportation (especially roadways and tunnels); public and community centers; and older buildings and roadways; for the City of Stanton, everything within City limits is all within a floodplain zone.

Potential flooding hazards can be decreased by expanding the amount of impervious surfaces within City limits. This can look like more greenery and landscaping throughout the urban, built-up environment, or implementation of strategic landscaping tools such as bioswales and catch basins. Bioswales, as depicted in <u>Figure 3</u>, allow for greater volumes of water to be held at once, and slowly drain and percolate the water at a rate that the water systems and natural environment can handle. Stanton's General Plan Infrastructure and Community Services Element emphasizes goals and policies dedicated to expanding and preserving green open spaces.

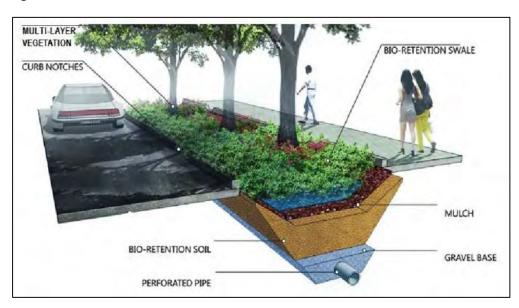


Figure 3: Flood Control- Bioswale

Source: Green Earth Operations

### **Drought**

### What is it?

California's highly variable climate is susceptible to prolonged dry spells. A warming climate will compound drought impacts, as evidenced during recent precipitation deficits in the 2000's Southwest drought (Colorado River basin), and during the 2012-2015 drought in California and neighboring states (Pierce, et al, 2018). Furthermore, recent research suggests that extended drought occurrence ("mega-drought") could become more pervasive in future decades (Pierce, et al, 2018).

### Local exposure

California has experienced prolonged droughts off and on throughout the decades, including Southern California. The Golden State Water Company (GSWC) supplies potable water in the City of Stanton. The City is part of the West Orange County System (WOCS). Stanton, through WOCS, obtains water through a blend of groundwater pumped from the Orange County Groundwater Basin and imported water from the Colorado River Aqueduct and State Water Project (imported and distributed by Metropolitan Water District of Southern California) (GSWC). Wells have historically supplied 85% of water in the WOCS. Since the City relies on imported water to meet its potable water needs, it is highly vulnerable to multi-regional drought. In addition, some customers use recycled water for irrigation and/or industrial uses.

Table 3, Maximum Length of Dry Spell in Stanton shows the differences in maximum dry spell lengths in the City from Baseline measurements to predicted future variations. The Baseline scenario states that the 30-year average length of a dry spell was approximately 165 days. Dry spells are predicted to increase by 8 to 9 days over Baseline conditions by the middle of the century (2035-2064), and 8 to 15 days over the baseline conditions by the End of the Century (2070-2099).

Table 3: Maximum Length of Dry Spell in Stanton

Time Period	Scenario	30yr Average	30yr Range	Change from baseline
Baseline (1961-1990)	Modeled Historical	165 days*	152 - 177 days	-
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	173 days	154 - 196 days	+8 days
	High Emissions (RCP 8.5)	174 days	154 - 200 days	+9 days
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	173 days	155 - 198 days	+8 days
	High Emissions (RCP 8.5)	180 days	155 - 212 days	+15 days

Source: Cal-Adapt, accessed October 25, 2021. https://cal-adapt.org/tools/local-climate-change-snapshot/

<sup>\*</sup> Observed 30-year average from 1961 to 1990: 155 days

### Who is most vulnerable?

Extreme drought (and heat) decreases soil moisture and increase plant mortality; these changes in temperature and precipitation regimes will have adverse impacts on the vegetation and foliage in the entire southern California region. Plant die-offs cause a domino effect by reducing available shade and evaporative cooling, thereby raising surrounding temperatures and reducing the thermal comfort of pedestrians.

A vulnerable group highly affected by droughts are farmers and agricultural industries. While there isn't an established/dedicated agricultural hub in Stanton, the broader agricultural industry in the Southern California and Central Valley region will likely be adversely impacted by increased droughts, which will have reverberated effects on the City and City residents. More frequent occurrences of extreme events similar to the 2011-2016 drought could significantly decrease groundwater recharge, which is essential for the region to thrive.

People with pre-existing respiratory conditions are also extremely vulnerable: in the absence of rainfall during prolonged periods of drought, the region could experience increased concentrations of resuspended road particulates (dust), which have adverse respiratory impacts (Hall, et al. 2018).

Especially vulnerable infrastructure includes water importing systems. For Stanton this includes all water infrastructure within the GSWC and the greater Orange County area as all systems, wells, and utilities are interconnected. Water importing agencies, primarily the large Metropolitan Water District of Southern California (MWD), built a system for acquiring water from northern California, the Sierra Nevada Mountains, and the Colorado River Basin for situations such as the predicted futures (Hall, et al. 2018).

To help protect vulnerable populations and infrastructure, Stanton can enact varying water restrictions. Some water restrictions in place in other cities and counties in California include personal and individual restrictions and limitations or increased costs. Other restrictions are designed to limit commercial and industrial water use and water waste.

### Liquefaction

### What is it?

Liquefaction is caused by a shock or strain from an earthquake, and involves the sudden loss of soil strength and cohesion and the temporary transformation of soil into a fluid mass. Liquefaction occurring beneath buildings can lead to major damage.

### Local exposure

Stanton is located in a seismically active area that has historically been affected by moderate to occasionally high levels of ground motion. According to the California Department of

Conservation, Division of Mines and Geology, the entire city of Stanton is located in a liquefaction hazard zone. This is also illustrated in Exhibit 6-2 of the City's General Plan. This puts all residents and infrastructure at risk for damages associated with seismic activity and liquefaction.

### Who is most vulnerable?

In terms of climate change, no one is more susceptible to liquefaction than others. Older structures within the City are vulnerable to loss by liquefaction as they may not have been constructed or reinforced to meet earthquake standards. As discussed, approximately 80 percent of Stanton's housing stock is over 40 years old, generating a high risk for liquefaction hazards. The most vulnerable areas are those in a liquefaction zone: the entire City of Stanton. The most vulnerable people are all residents living within the City.

Pipeline transportation infrastructure (water, gas, electricity, sanitation) is also highly vulnerable to ground motion due to the majority of it being buried underground. Seismic activity, liquefaction, or land subsidence could damage one pipe, or area, and have a cascading effect throughout the City and region. A large earthquake, or liquefaction incident could also trigger a number of other hazards that could be exacerbated due to climate change. For example, if a strong liquefaction incident were to occur, it could rupture pipelines or electricity poles; with temperatures expected to rise and the climate expected to be more drought prone, knocked over electricity poles could more easily cause an urban fire.

### **Hazardous Materials**

### What is it?

Hazardous materials are defined as a detrimental substance, including but not limited to: pesticides, herbicides, toxic metals and chemicals, liquefied natural gas, explosives, volatile chemicals, and nuclear fuels. All materials whether they be the intentional product, or resulting by-product that can cause harm to people's individual health, public health, or environmental health are all considered toxic and must be handled and contained safely. It is imperative to note environmental justice issues here as they are related to potential health impacts associated with land use decisions, including enforcement actions to reduce the adverse health effects of hazardous materials, industrial activity and other land uses, on residents regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location.

### Local exposure

According to the California Department of Toxic Substances Control EnviroStar Tool, the City of Stanton has two active hazardous waste and substances sites: All Metals Processing Company or Orange County and Quicksand. All Metals Processing Company or Orange County is located at 8401 Standustrial Avenue in an industrial zone. Quicksand is located at 8358 Standustrial Avenue and is also in an industrial zone. The nearest sensitive receptors to both sites are Low Density, Medium Density, and High Density Residential areas surrounding the industrial park.

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The Low and High Density Residential areas are north of Cerritos Avenue (north or the industrial park), with the Medium Density Residential west and east of the active sites. While residential areas surround this industrial sector, the hazardous sites are towards the middle of the industrial area, creating somewhat of a buffer between them and the sensitive land uses.

In addition to these two hazardous sites, the City also contains nine "Open Sites" under the State Water Board's GeoTracker list of Leaking Underground Storage Tank (LUST) Sites. These include: Tosco-76 #4778 (10460 Magnolia), G & M Oil #50 (10961 Beach), G & M Oil #61 (10502 Magnolia), Saranick Station (10632 Beach Boulevard), Thrifty Oil #361 (11500 Beach), Tosco-76 #5635 (7501 Katella), Rados Property (11972 Beach), Stanton 25 LLC (8971 Katella), and Imperial Stations #1 (8221 Garden Grove). These sites are all either Open yet eligible for closure (Tosco-76 #4778 and Rados Property); Open for site assessment (G & M Oil #50 and Stanton 25 LLC); Open for remediation (G & M Oil #61, Thrifty Oil #361, Tosco-76 #5635, and Imperial Stations #1); or Open for assessment and interim remediation (Saranick Station).

Imperial Stations #1, Thrifty Oil #361, Tosco-76 #5635, Stanton 25 LLC, and Rados Property are adjacent to High Density housing; and the G & M Oil #50 site is adjacent to Low Density residential housing.

As discussed, pipeline infrastructure, namely pipelines that carry oil and gas, are susceptible to becoming damaged in some way (through seismic ground shaking as an example), and could easily release hazardous materials in the ground, water, and air. This puts sensitive land uses, such as residential areas, at possible heightened risk; for Stanton this includes all housing units adjacent to the LUST sites.

### Who is most vulnerable?

The most vulnerable populations to hazardous waste and materials are people and communities living closest to toxic sites. For Stanton, these are the communities closets to all the sites listed under the State Water Board's LUST list; the high density areas adjacent to Imperial Stations #1, Thrifty Oil #361, Tosco-76 #5635, Stanton 25 LLC, and Rados Property; and the low density community adjacent to G & M Oil #50.

Local habitats, animals, and plants are extremely vulnerable if natural resources become contaminated by hazardous materials. Polluted water and air sources have an expanding impact as the species living in the immediate contaminated area either move themselves or are consumed by others and moved throughout the ecosystem then.

### **Extraneous Impacts Acknowledged**

While several climate change hazards pose a direct threat to the residents and environment of Stanton, there are climate concerns that do not necessarily originate in the City but can affect regional spaces. This section recognizes threats that pose a danger to Orange County and the

greater Southern California region. Events such as wildfires are highly unlikely to occur directly in Stanton but the impacts created by these events, such as poor air quality, are highly likely to cascade outwards to Stanton and its residents.

### Wildland & Urban Fires

### What is it?

As California is expected to experience increased temperatures and reduced precipitation, there will likely be more frequent and intense wildfires and longer fire seasons. Fires spread more quickly on dry, windy days and move more easily in an uphill direction and in areas with higher-density vegetation. Weather is one of the most significant factors in determining the severity of fires; natural fire patterns are driven by conditions such as drought, temperature, precipitation, and wind, and also by changes to vegetation structure and fuel (i.e., biomass) availability. Wildfires pose a great threat to life and property, particularly when they move from forest or rangeland into developed areas.

Climate change is projected to increase the frequency of wildfire events, the extent of burned areas across California, and the duration of wildfire seasons. Wildfire seasons are projected to begin earlier in the spring due to drier and warmer spring conditions on average, potentially requiring longer periods for firefighting services. Greater inter-annual variability in temperature and precipitation may also affect wildfire intensity. For example, multiple wet years can result in larger fuel buildup in landscapes. This may result in increasingly intense and frequent wildfires, if followed by drought years. Wildfire risk will also vary depending on population growth and land use characteristics, including rates of residential expansion and infrastructure into fire prone areas over the next century.

### Local exposure

Fire protection and emergency services in the City are provided by Division 7 of the Orange County Fire Authority (OCFA). OCFA Fire Station #46 is located at 7871 Pacific Street in Stanton and currently maintains an Engine and Paramedic. CAL FIRE does not have a city-specific Very High Fire Hazard Severity Zones (VHFHSZ) map for the City of Stanton because they have not had to make any recommendations for the City. Additionally, the built-out nature of the City makes Stanton much less vulnerable to the threat of wildfire. However, climate change increases the risk of urban fires originating in Stanton or in surrounding areas. Fires in other locations could cause reduced air quality, putting the health of sensitive populations at risk.

VHFHSZs, as identified by CAL FIRE, within close proximity to Stanton include Crystal Cove State Park (Laguna Canyon), Chino Hills State Park, and Santiago, Silverado, Modjeska, and Trabuco Canyons, the Santa Ana Mountains, etc.

Orange County data was utilized to see the impact wildfires could have on the City of Stanton since the City has no wildland areas within City boundaries. <u>Table 4. Average Annual Area Burned, Orange County,</u> shows that Orange County is expected to burn approximately two to 18 additional acres around the middle of the century (2035-2064) compared to the Baseline acreage; whereas the end of century (2070-2099) is predicted to burn anywhere from 73 fewer acres compared to the Baseline to an additional 69 acres of land. While this land is not necessarily being burned within Stanton city limits, surrounding ecosystems affected are all interconnected, resulting in an adverse effect for Stanton.

Table 4: Average Annual Area Burned, Orange County

Time Period	Scenario	30yr Average	30yr Range	Change from Baseline
Baseline (1961- 1990)	Medium Emissions (RCP 4.5)	2919.9 acres	2849.8 - 295 8.7acres	
	High Emissions (RCP 8.5)	2,903.4 acres	2780.0 - 307 9.1 acres	
Mid-Century (2035-2064)	Medium Emissions (RCP 4.5)	2,938.6 acres	2768.5 - 309 9.0acres	+18.7 acres
	High Emissions (RCP 8.5)	2,932.5 acres	2557.5 - 310 3.1acres	+2.1 acres
End of Century (2070-2099)	Medium Emissions (RCP 4.5)	2,989.6 acres	2750.9 - 316 9.1 acres	+69.7 acres
	High Emissions (RCP 8.5)	2,856.6 acres	2525.4 - 311 6.9 acres	-73.8 acres

Source: Cal-Adapt, accessed October 27, 2021. <a href="https://cal-adapt.org/tools/local-climate-change-snapshot/">https://cal-adapt.org/tools/local-climate-change-snapshot/</a>

### Who is most vulnerable?

Especially vulnerable people include people with pre-existing health conditions that make them more sensitive to hazardous air, such as those with asthma. Additionally, households without access to a car may have difficulty running errands, going outside, or evacuating when the air is hazardous. As indicated by the California Office of Environmental Health Hazard Assessment, Stanton contains disadvantaged communities; people living within disadvantaged communities often times do not have access to cars. Individuals with physical disabilities or who live in isolation may have difficulty evacuating.

Vulnerable infrastructure includes energy infrastructure (fires in other areas could cause damage to power plants or power lines causing blackouts), communications, water (water quality reduced due to ash, etc.) Natural habitats and plants and animals are extremely vulnerable to wildfires; while Stanton and the surrounding area are almost completely built out, open spaces and urban forests provide homes to plant and animal species, which are susceptible to fire hazards. The City does not have an Emergency Operations Plan, but utilizes Orange County's various emergency resources. Orange County has a Local Hazard Mitigation Plan that discusses proper operations and procedures to take with regards to fire threats and emergencies. The Unified County of Orange and Orange County Operational Area Emergency Operations Plan, developed in 2019, also provides guidance and information for the County to prepare for natural disasters.

# C. Key Findings

The key findings for are summarized below to increase the City's adaptive capacity.

- Climate change has the potential to increase the severity of various natural hazards, impacts, and risks in the City of Stanton.
- Liquefaction due to earthquakes and seismic activity create the potentially-greatest hazard to the City of Stanton as the entire City sits on a liquefaction zone. Much of the existing infrastructure, namely residential housing units, are at an extremely high risk due to the excessive age of the general housing stock; between 40 and 70 years old.
- Utility infrastructure wastewater/sewage, water, stormwater/flood control, solid waste, electricity and gas are also at high risk of damage from drought impacts as much of the infrastructure is interconnected throughout the Orange County and Southern California regions. These facilities are also vulnerable to seismic activity, such as liquefaction, as they lay mainly in the ground and are interconnected over miles-long grids; if one pipe or facility were to be disturbed or ruptured by seismic activity, the rest of the system would be affected, creating a domino effect.
- Residents who live in older housing units (built between 1950-1959) are more vulnerable because not only are their homes more susceptible to seismic activity in general, but they are also placed on top of a liquefaction zone.
- Highly vulnerable populations are the elderly (approximately 12 percent of the City population) as they tend to live in older structures (susceptible to liquefaction) and tend to have a higher risk with regards to extreme heat and weather.
- People living near hazardous materials sites are also at high risk, especially when
  considering the seismic activity of the area, which could exacerbate hazardous spills and
  hazards. The residents living around the sites identified by the California Department of
  Toxic Substances Control EnviroStar Tool and State Water Board's LUST list are extremely
  vulnerable to hazardous materials. These include the Low and High Density residential
  communities adjacent to these sites.

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# **Appendix A: Regulatory Framework**

### STATE

### **CALIFORNIA AIR RESOURCES BOARD**

The California Air Resources Board is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA), which was adopted in 1988. The CCAA requires that all air districts in the state endeavor to achieve and maintain the California Ambient Air Quality Standards by the earliest practical date. The act specifies that districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

### **CALIFORNIA STRATEGIC FIRE PLAN**

This statewide plan guides fire policy for much of California. The plan is aimed at reducing wildfire risk through pre-fire mitigation efforts tailored to local areas. The most recent update is the 2018 Strategic Fire Plan. The 2018 Plan reflects CAL FIRE's focus on: 1) fire prevention and suppression activities to protect lives, property, and ecosystem services, and 2) natural resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. There are also Unit Fire Plans produced under the Strategic Fire Plan that are localized to a county or region; the City of Stanton falls under the Orange County Unit Fire Plan.

# STATE WATER RESOURCES CONTROL BOARD/REGIONAL WATER QUALITY CONTROL BOARD

In California, all wastewater treatment and disposal systems fall under the overall regulatory authority of the State Water Resources Control Board (SWRCB) and the nine California Regional Water Quality Control Board (RWQCBs), who are charged with the responsibility of protecting beneficial uses of State waters from a variety of waste discharges, including wastewater from individual and municipal systems. The City of Stanton falls within the jurisdiction of the Santa Ana Regional Water Quality Control Board.

The RWQCBs' regulatory role often involves the formation and implementation of basic water protection policies. These are reflected in the RWQCBs' Basin Plans, generally in the form of guidelines, criteria and prohibitions related to the siting, design, construction, and maintenance of on-site sewage disposal systems.

### STATE WATER BOARD STORM WATER STRATEGY

The Storm Water Strategy is founded on the results of the Storm Water Strategic Initiative, which serve to direct the State Water Board's role in storm water resources management and evolve the Storm Water Program by: a) developing guiding principles to serve as the foundation of the

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storm water program; b) identifying issues that support or inhibit the program from aligning with the guiding principles; and c) proposing and prioritizing projects that the Water Board could implement to address those issues. The State Water Board staff created a document called the Strategy to Optimize Management of Storm Water (STORMS). STORMS includes a program vision, mission, goals, objectives, projects, timelines, and consideration of the most effective integration of project outcomes into the Water Board's Storm Water Program.

### **URBAN WATER MANAGEMENT PLANNING ACT**

The Urban Water Management Planning Act has main objectives are the management of urban water demands and the efficient use of urban water. Under its provisions, every urban water supplier is required to prepare and adopt an urban water management plan. The plan must identify and quantify the existing and planned sources of water available to the supplier, quantify the projected water use for a period of 20 years, and describe the supplier's water demand management measures.

### CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

The Department of Public Health contains the Division of Radiation Safety and Environmental Management (DRSEM) which, is divided into three branches: the Radiologic Health Branch, the Environmental Health Branch, and the Drinking Water and Radiation Laboratory Branch. The Radiologic Health Branch enforces the laws and regulations designed to protect the public, radiation workers, and the environment. The Environmental Management Branch regulates the medical waste industry and recreational health (public swimming pools, ocean beaches and organized camps); provides sanitary surveillance of state institutions; administers the Registered Environmental Health Specialist (REHS) program; oversees radiological cleanup at military base closure facilities, coordinates the State's Indoor Radon Program, the Medical Waste Management Program and California Department of Public Health's Nuclear Emergency Response Program. The Drinking Water and Radiation Laboratory Branch is the State's primary drinking water quality testing laboratory and is the state laboratory capable of measuring chemical, microbiological, and radiochemical contaminants in drinking water and drinking water supplies.

### **CALIFORNIA WATER CODE**

California's primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act of 1970 (Division 7 of the California Water Code). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and each of the Regional Water Quality Control Boards (RWQCB) power to protect water quality and is the primary vehicle for implementation of California's responsibilities under the Federal Clean Water Act. The Porter-Cologne Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require

cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

Each RWQCB must formulate and adopt a Water Quality Control Plan (Basin Plan) for its region. The regional plans conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

### **CALIFORNIA BUILDING CODE**

The California Building Standards Code (CBSC) (California Code of Regulations, Title 24) is a statewide standard that is updated every three years, with the most recent update being in 2019. The CBSC is a compilation of three types of building standards from three different origins:

- Building standards that were adopted by state agencies without change from national model building codes
- Building standards that were adopted from national model codes but modified to address California-specific conditions
- Building standards, authorized by the California legislature, that constitute amendments not covered by national model codes, that were created to address particular California concerns.

The CBSC specifies materials requirements, construction methods, and maintenance standards for earthquake protection and resiliency. All building occupancies in California are subject to national model codes adopted into the CBSC, and occupancies are further subject to amendments adopted by state agencies. State law also authorizes local governments to enact ordinances making building standards amendments to the CBSC to address local conditions. The law includes specific requirements for the basis for a local amendment, how the amendment language and documents must be prepared, and how the amendment must be filed with either the CBSC, the California Department of Housing and Community Development, or other state agencies as required. The City of Stanton originally adopted Volumes 1 and 2 of the CBSC into the City Municipal Code under Chapter 16.04, Building Code. The City Council then amended the municipal code chapter, incorporating the 2019 Edition of the CBSC.

### **CALIFORNIA FIRE CODE**

The California Fire Code, as a part of Title 24, California Code of Regulations, establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and

assistance to fire fighters and emergency responders during emergency operations. The provisions of this code shall apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

The City of Stanton has adopted the California Fire Code into Title 16 Building and Construction, Chapter 16.21, Fire Code, of the Municipal Code.

### WILDFIRE PROTECTION RESPONSIBILITY IN CALIFORNIA

Local, state, tribal, and federal organizations all have legal and financial responsibility for wildfire protection. In many instances, two fire organizations have dual primary responsibility on the same parcel of land—one for wildfire protection and the other for structural fire protection. To address wildfire jurisdiction responsibilities, in 1981 the California State Legislature outlined various wildfire responsibilities, described below, in Cal. Pub. Res. Code § 4291.5 and Cal. Health & Safety Code § 13108.5.

### Federal Responsibility Areas (FRAs)

FRAs are fire-prone wildland areas that are owned or managed by a federal agency such as the U.S. Forest Service, National Park Service, Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Department of Defense. Primary financial and rule-making jurisdiction authority rests with the federal land agency. In many instances, FRAs are interspersed with private land ownership or leases. Fire protection for developed private property is usually the responsibility of the relevant local government agency, not the federal land management agency.

### State Responsibility Areas (SRAs)

SRAs are lands in California where the California Department of Forestry and Fire Protection (CAL FIRE) has legal and financial responsibility for wildfire protection. CAL FIRE administers fire hazard classifications and establishes development and building standard regulations in these areas. SRAs are defined as lands that:

- are in the unincorporated county areas
- are not federally-owned
- have wildland vegetation cover rather than agricultural or ornamental plants
- have row crops or seasonal crops, or
- have watershed, range, or forage values

CAL FIRE adopts SRA boundaries and updates them every 5 years. Where SRAs contain structures or development, the relevant local government agencies have fire protection responsibility for those improvements.

### Local Responsibility Areas (LRAs)

LRAs include land in cities, cultivated agriculture lands, unincorporated non-flammable areas, and lands that do not meet the criteria for SRA or FRA. LRA fire protection is typically provided by city or county fire departments, fire protection districts, or by CAL FIRE under contract to local governments. LRAs may include areas of flammable vegetation and WUI.

The City of Stanton does not contain any Fire Hazard Severity Zones.

# ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT & SEISMIC HAZARDS MAPPING ACT (1972)

The 1971 San Fernando Earthquake resulted in the destruction of numerous structures built along its fault. This led to passage of the Alquist-Priolo Earthquake Fault Zoning Act in 1972. This Act prohibits the construction of buildings for human occupancy across active faults in the state. Similarly, extensive damage caused by ground failure during the 1989 Loma Prieta Earthquake focuses attention on decreasing the impacts of landslides and liquefaction. This led to the creation of the Seismic Hazards Mapping Act (1990), which enhances construction standards at locations where ground failures are probable during earthquakes.

### SENATE BILL 610 & ASSEMBLY BILL 901 (2001)

SB 610 and AB 901 both modify the Urban Water Management Planning Act. SB 610 requires additional information in an urban water management plan if groundwater is identified as a water source supplier. It also requires that the plan include a description of all water supply projects and programs that may be undertaken to meet total projected water use. SB 610 also requires a city or county that determines a project is subject to CEQA to identify any public water system that may supply water to the project and to request identified public water systems to prepare a specified water supply assessment. The assessment must include, among other information, an identification of existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project, and water received in prior years pursuant to these entitlements, rights, and contracts.

AB 901 requires an urban water management plan to include information, to the extent practicable, relating to the quality of existing sources of water available to an urban water supplier over a given period of time. AB 901 also requires information on the how water quality affects water management strategies and supply reliability. The bill requires plans to supplement a water source that may not be available at a consistent level of use, to the extent practicable. Additional findings and declarations relating to water quality are required.

### **ASSEMBLY BILL 1007 (2005)**

Assembly Bill 1007 (Pavley, Chapter 371, Statutes of 2005) directs the California Energy Commission (CEC) to prepare a plan to increase the use of alternative fuels in California. As a

result, the CEC prepares the State Alternative Fuels Plan in consultation with state, federal, and local agencies. The plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The Plan assesses various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHC emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

### **CALIFORNIA EXECUTIVE ORDERS S-3-05 (2005)**

On June 1, 2005, Governor Arnold Schwarzenegger signs Executive Order S-3-05. The goal of this Executive Order is to reduce California's GHG emissions to: 1) 2000 levels by 2010, 2) 1990 levels by 2020 and 3) 80% below 1990 levels by 2050. While two of the benchmark years have passed, the City of Stanton, along with the rest of the State, can still aim to reduce GHG emissions 80% below the 1990 levels by the year 2050.

### ASSEMBLY BILL 32 & EXECUTIVE ORDER S-20-06 (2006)

In 2006, California adopts Assembly Bill (AB) 32, the Global Warming Solutions Act, as an effort to address the effects of climate change and help reach the goals presented in Executive Order S-3-05. AB 32 sets the same overall GHG emissions reduction goals while further mandating that CARB create a plan, which includes market mechanisms, and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases."

Executive Order S-20-06 further directs state agencies to begin implementing AB 32, including the recommendations made by the state's Climate Action Team.

### **BIOENERGY ACTION PLAN- EXECUTIVE ORDER S-06-06 (2006)**

Executive Order S-06-06 establishes targets for the use and production of biofuels and biopower. The order also directs state agencies to work together to advance biomass programs while providing environmental protection and mitigation. The executive order establishes targets to increase production and use of ethanol and biodiesel fuels by a minimum of 20% by 2010, 40% by 2020, and 75% by 2050. Additionally, the executive order sets targets for the state related to the use of biomass electricity and cogeneration facilities.

### **SENATE BILL 375 (2008)**

California's Sustainable Communities and Climate Protection Act of 2008 (SB 375) requires transportation agencies to develop a regional "Sustainable Communities Strategy" of land use, housing, and transportation policies that will move the region towards meeting the GHG reduction target set by the CARB. On September 3, 2020, the Southern California Association of Governments (SCAG), the metropolitan planning organization responsible for Stanton and surrounding regions, adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), which sets forth a long-range visioning plan that

balances future mobility and housing needs with economic, environmental, and public health goals.

### **ASSEMBLY BILL 162 (2009)**

This bill requires, upon the next revision of the housing element, on or after January 1, 2009, the Conservation Element of the General Plan to identify rivers, creeks, streams, flood corridors, riparian habitat, and land that may accommodate floodwater for purposes of groundwater recharge and stormwater management. By imposing new duties on local public officials, the bill creates a state-mandated local program.

This bill also requires, upon the next revision of the housing element, on or after January 1, 2009, the safety element to identify, among other things, information regarding flood hazards and to establish a set of comprehensive goals, policies, and objectives, based on specified information for the protection of the community from, among other things, the unreasonable risks of flooding.

### ASSEMBLY BILL 341 CALIFORNIA'S MANDATORY COMMERCIAL RECYCLING LAW (2012)

The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California.

### **CALIFORNIA SUSTAINABLE GROUNDWATER MANAGEMENT ACT (2014)**

On September 16, 2014, Governor Brown signs into law a package of bills (SB 1168, AB 1739 and SB 1319) collectively called the Sustainable Groundwater Management Act. The Act requires local governments and water agencies with high and medium priority groundwater basins to halt overdraft and bring basins into sustainable levels of pumping and recharge. For each basin, local agencies are required to form new groundwater sustainability agencies and prepare groundwater sustainability plans with quantifiable objectives for achievement of sustainability within 20 years.

### **SENATE BILL 379 (2015)**

SB 379 revises Government Code Section 65302(g)(4) to require cities and counties to update their safety elements to address climate adaptation and resiliency strategies applicable to their jurisdiction. The updates are required at the next update of their local hazard mitigation plan (LHMP) on or after January 1, 2017. Local jurisdictions without an LHMP must update their safety elements beginning on or before January 1, 2022. The safety element update must include:

- A vulnerability assessment identifying the risks that climate change poses to the local jurisdiction
- A set of goals, policies, and objectives based on a vulnerability assessment for the protection of the community

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 A set of feasible implementation strategies to carry out the goals, policies, and objectives

### **STATEWIDE EMERGENCY WATER CONSERVATION REGULATIONS (2016)**

In 2016, the State Water Resources Control Board (Water Board) adjusts emergency water conservation regulations in recognition of the differing water supply conditions and ongoing drought across the state to comply with the Governor's executive order declaring a drought emergency.

Executive Order B-37-16, Making Water Conservation a California Way of Life, updates temporary emergency water restrictions and transitions to permanent, long-term improvements in water use by:

- Providing for wiser water use
- Eliminating water waste
- Strengthening local drought resilience
- Improving agricultural water use efficiency and drought planning

In April 2017, a new Executive Order lifts the drought emergency, but retains many of the conservation requirements. Most regulations are still in effect except for water supply "stress test" requirements and conservation standards for urban water suppliers. The temporary restrictions establish a baseline of the types of benefits that are possible from water conservation requirements.

### **SENATE BILL 1383 (2016)**

In September 2016, Governor Brown signs SB 1383, Short-Lived Climate Pollutants: Organic Waste Methane Emissions Reductions, establishing methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of California's economy. The bill codifies the CARB's SLCP Reduction Strategy, established pursuant to SB 605 (2014), in order to achieve reductions in the statewide emissions of short-lived climate pollutants. Actions to reduce short-lived climate pollutants are essential to address the many impacts of climate change on human health, especially in California's most at-risk communities, and on the environment.

### **CALIFORNIA STATE HAZARD MITIGATION PLAN (2018)**

The 2018 California State Hazard Mitigation Plan is the state's primary hazard mitigation guidance document. It seeks to help communities with their mitigation and disaster resiliency efforts to reduce or eliminate potential risks and impacts of natural and human-caused disasters. The 2018 plan was approved by the Federal Emergency Management Agency (FEMA) on September 28, 2018, and includes:

• An updated statewide risk assessment, disaster history, and statistics

- Recent mitigation progress, success stories, and best practices
- Updated state hazard mitigation goals, objectives, and strategies
- Updated climate mitigation progress and adaptation strategies

## **CALIFORNIA WATER PLAN (2018)**

The California Water Plan is the state's strategic plan for sustainably managing and developing water resources for current and future generations. Required by Water Code Section 10005(a), it presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios. The plan is updated every 5 years, with the most recent update occurring in 2018.

## LOCAL

#### **CITY OF STANTON GENERAL PLAN**

A variety of policies contained in the existing City of Stanton General Plan address climate change vulnerabilities. Specific goals included within the General Plan that are most related to climate change include:

#### Land Use

 Goal LU-3.1: A range and balance of residential densities which are supported by adequate city services.

## Community Design

- Goal CD-4.1: Create a well-connected, multi-modal urban environment that increases mobility for all Stanton residents, whether they choose or are required to travel through the city by car, bicycle, foot, or public transportation modes.
- Strategy CD-4.1.1: Promote a pedestrian friendly environment with attractive, walkable neighborhoods and commercial areas.
- Strategy CD-4.1.2: Increase the number, quality, and connectivity of the city's bikeways and multi-use trails.

## Infrastructure & Community Services

- Goal ICS-3.1: Reduce the environmental impacts of the city's infrastructure systems, promoting sustainable continuation of services to Stanton residents.
- Strategy ICS-3.1.1: Reduce the quantity of waste generated by the city of Stanton by increasing the city's role in the source reduction and recycling components of waste management.
- Strategy ICS-3.1.2: Promote opportunities to decrease demand on the city's potable water supply and infrastructure.
- Strategy ICS-3.1.3: Encourage the protection of natural drainage methods.

- Strategy ICS-3.1.4: Encourage the mitigation of waterborne pollutants.
- Goal ICS-4.1: Create and maintain a system of public parks that are accessible to all residents, and provide a range of recreational amenities and opportunities.
- Strategy ICS-4.1.1: Seize opportunities to expand park acreage and maintain a higher ratio of park acreage per resident.

## Community Health & Safety

- CHS-1.1 Minimize loss of life, injury, and property damage from seismic events and resulting hazards.
- CHS-1.1.1 Ensure that building code standards are enforced and maintained so that new development is located and designed to reduce the effects of a seismic event.
- CHS-2.1 Protect Stanton residents from potential flood hazards, including dam inundation.
- CHS-2.1.1 Ensure that facilities and programs are maintained and operable to prevent flood damage.
- CHS-4.1 Provide and maintain a high level of fire protection services necessary to adequately serve the community.
- CHS-4.1.1 Ensure that adequate fire facilities and personnel are maintained by the County and contracted by the city to provide adequate service levels.
- CHS-4.2 Minimize loss of life, injury, and property damage from urban fires.
- CHS-4.2.1 Ensure that existing and new developments maintain or exceed standards for fire prevention to minimize the risk of fire.
- CHS-4.2.2 Promote community education in fire prevention and fire safety.
- CHS-5.1 Maintain a level of preparedness to respond to emergency situations in order to reduce the loss of life, injury and property damage to the community.
- CHS-5.1.1 Ensure that the city is prepared to respond to natural and manmade emergencies or disasters in a coordinated and efficient manner.
- CHS-5.1.2 Increase resident preparedness for a major emergency or disaster, focusing on education programs and materials.
- CHS-6.1 Protect the community and property from injury, damage or destruction from the use, transport and disposition of hazardous materials.
- CHS-6.1.1 Ensure that activities within the city transport, use, store, and dispose of hazardous materials in a safe, efficient and responsible manner, which protects the public health and safety.
- CHS-7.1 A resilient, sustainable, and equitable community where risks to life, property, the economy, and the environment resulting from climate change, including extreme weather events, are minimized.
- CHS-7.1.1 Promote a well-prepared City that can effectively overcome natural disasters and scarcity of resources due to climate change.

- CHS-7.1.2 Collaborate with local, regional, state and/or federal jurisdictions and agencies on climate resiliency and adaptation strategies.
- CHS-7.1.3 Promote plans and programs that increase sustainable energy sources.
- CHS-7.1.4 Implement necessary actions and programs to improve preparation and response for the most vulnerable community members.
- CHS-7.1.5 Implement programs that promote resiliency to drought.

## Regional Coordination

- Strategy RC-2.1.7: Develop land use strategies and incentives to reduce the amount of vehicle miles traveled within city limits.
- Goal RC-3.1: Clean and safe air quality.
- Strategy RC-3.1.1: Enact and support policies and efforts that not only limit and decrease emissions within the boundaries of Stanton but also the region as whole.
- Strategy RC-3.1.2: Reduce the negative impacts of poor air quality on the city's sensitive receptors.
- Strategy RC-3.1.3: Minimize stationary pollution sources (point sources and area sources) in urbanized land areas.
- Strategy RC-3.1.4: Implement control measures to reduce the amount of particulates in the city and the region.
- Strategy RC-3.1.6: Provide leadership in reducing employee-related air pollutant emissions.
- Strategy RC-3.1.7: Encourage the use of alternative fuel vehicles, alternative transportation methods, and reduction of vehicles on the road to reduce vehicle emissions.
- Strategy RC-3.1.8: Encourage the use of alternative fuel vehicles, alternative transportation methods, and reduction of vehicles on the road to reduce vehicle emissions.

#### CITY OF STANTON MUNICIPAL CODE

Title 6, Health and Sanitation (6.04 Integrated Waste Management; 6.20 Stormwater Discharge and Water Quality; 6.24 Water Conservation, and 6.28, Fats, Oils, and Grease Discharges into the Sanitary Sewer System) all pertain to proper handling, maintenance, and transportation of water, wastewater, sewer water that come into and out of the City.

Title 10, Vehicles and Traffic (10.20 Mobile Source Emissions) discusses various fees administered for the purpose funding mobile source air pollution reduction programs.

Title 11, Floodplain Management (11.08 General Provisions and 11.12 Provision for Flood Hazard Reduction) states that no structure or land shall be constructed, developed, located, extended, converted, or altered without full compliance with the terms of Title 11 and other applicable

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regulations. The Title then specifies standards for construction, utilities, subdivisions, manufactured homes, recreational vehicles, and floodways.

Title 13 Public Utilities (13.04 Sewer Construction, Maintenance, and Connections) covers regulations regarding sewer construction standards, infiltration, installation, inspections of private sewer facilities, sewage overflow, and prohibited discharges into sewer systems.

Title 14 Community Services (14.04 Parkland and Playground Use) aims to keep community and public facilities clean and safe for users. Chapter 14.04 provides rules and regulations that slow and prevent deterioration of parks and playgrounds with the goal of creating a clean, green space for children, families, and users.

Title 16, Building and Construction, Division I, Buildings and Construction, contains Stanton's adoption of the California Building Code (16.04.010), and its amendments (16.04.020). Title 16 also contains the City's Electrical Code (16.06), Plumbing Code (16.08), Energy Code (16.10), Green Building Standards Code (16.14), Fire Code (16.21), Wells code (16.40), Public Safety Radio System Protection Program (16.46), and Post-Disaster Recovery and Reconstruction plans (16.50). All of these codes and programs are incorporated into the City with the aim of decreasing potential hazards and risks and promoting general safety and public welfare.

Title 16, Building and Construction, Division II, Grading and Excavation Code, sets forth rules and regulations to control excavation, grading, and earthwork construction, including fills and embankments, and establishes administrative requirements for issuance of permits and approval of plans and inspection of grading construction in accordance with the requirements for grading and excavation as contained in the Uniform Building Code, as well as relevant water quality requirements.

Title 16, Building and Construction, Division III, Transportation Demand Management, intends to meet the requirements of AB 1791, Section 65089(b)(3) which requires development of a trip reduction and travel demand element to the congestion management plan (CMP), and Section 65089.3(b) which requires adoption and implementation of the trip reduction and travel demand ordinance.

Title 17, Fire (17.04 Safe and Sane Fireworks, 17.08 Fire Code, 17.17 Fees, and 17.30 Hazardous Materials Disclosure) is dedicated to reducing and extinguishing fire threats and hazards. The City of Stanton has adopted the California Fire Code, including amendments and appendices, as of 2016 (17.08.010). Chapter 17.30 requires that hazardous materials must be disclosed, and the proper way to file a hazardous materials disclosure form.

## **CITY OF STANTON ACTIVE TRANSPORTATION PLAN (2021)**

The City's Active Transportation Plan is part of a move away from the auto-centric approach of the past, and toward a sustainable, multi-modal transportation system that serves all residents,

regardless of age, ability, identity, or income. The recommendations for streets envision 23 miles of new bikeways and sidewalks, and represent an investment in multi-modal, equitable transportation in our community. Collectively the policies, programs, projects, and recommendations in this Plan will create an environment that enhances active transportation in Stanton, and makes walking and biking a safe, healthy, and enjoyable means of transportation and recreation.

## COUNTY OF ORANGE AND ORANGE COUNTY FIRE AUTHORITY DRAFT LOCAL HAZARD MITIGATION PLAN (LHMP) (2021)

An update to the 2015 LHMP was developed collaboratively with emergency management staff, County and external partners, and Orange County residents. As of the writing of this Climate Vulnerability Assessment, a draft of the LHMP is currently available for public review. The update is a critical step in continuing Orange County's commitment to hazard mitigation as one component of its comprehensive emergency management program. As a multi-jurisdiction plan, the LHMP focuses on mitigating all natural hazards impacting unincorporated areas of the County as well as County and Orange County Fire Authority owned facilities.

The mission of this LHMP is to promote sound public policy designed to protect residents, critical facilities, infrastructure, key resources, private property, and the environment from natural hazards in unincorporated areas, fire hazards in the Fire Authority service area, and County and Fire Authority owned facilities.

## UNIFIED COUNTY OF ORANGE & ORANGE COUNTY OPERATIONAL AREA EMERGENCY OPERATIONS PLAN (2019)

The Unified County of Orange (County) and Orange County Operational Area (OA) Emergency Operations Plan (EOP) provides guidance and procedures for the County and the County as the OA to prepare for and respond to natural, technological, conflict-related, and human-caused incidents creating situations requiring a coordinated response. It provides guidance for management concepts, identifies organizational structures and relationships and describes responsibilities and functions of the emergency organization to protect life and property. The plan describes the emergency organization and the process of preparing, responding to, and recovering from disasters.

## THE NORTH AND CENTRAL ORANGE COUNTY WATERSHED MANAGEMENT AREA INTEGRATED REGIONAL WATER MANAGEMENT (IRWM) PLAN- THE OC PLAN

The North and Central Orange County Watershed Management Area Integrated Regional Water Management (IRWM) Plan (The OC Plan) identifies and implements water management solutions on a regional scale. The OC Plan updates and combines two existing IRWM plans that were prepared by the County of Orange. The North Orange County Watershed Management Area Integrated Regional Water Management Plan was completed in 2011 and the Integrated

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Regional Water Management Plan: Central Orange County Management Area was completed in 2012. Preparation and implementation of The OC Plan builds on collaborative watershed planning in Orange County that began more than a decade ago.

The goals of The OC Plan are to increase water supply, protect water quality, enhance the environment and habitat, provide flood risk management, improve the quality of life, and address climate change. The OC Plan accomplishes these goals through an established process of ranking projects to help further state and regional goals.



# SB 99 Analysis White Paper

Residential Emergency Evacuation Route Analysis

November 2021

Appendix B to the Community Health & Safety Element

Prepared by:

DE NOVO PLANNING GROUP

## City of Stanton SB 99 Analysis White Paper

In coordination with its focused Community Health & Safety Element Update (2021), the City of Stanton has prepared an analysis consistent with Senate Bill 99 to identify residential developments in high hazard zones that do not have at least two emergency evacuation routes. The analysis found that there are no residential developments within Stanton that do not have at least two emergency evacuation routes. The following is an explanation of the methodology used to map the evacuation routes.

## **Definitions & Data Sources**

## **Residential Developments**

Residential developments were defined at the parcel level using the following criteria:

- Having an existing General Plan Land use of LDR, MDR, or HDR
- Having an assessed use of Residential Single Family or Residential Multiple Family

## **High Hazard Zones**

High Hazard Zones within the City of Stanton were defined as areas that are in one or more of the following pre-defined hazard zones:

- 1. FEMA's 100-year flood zone (present)
- 2. California OES dam inundation area (Completely inundated by Prado Dam, old Safety Element also shows inundation in the north by Carbon Canyon Dam)
- 3. California Geological Survey's Map Sheet 58 Landslide Susceptibility classes 8, 9, or 10 (only 0 and 7 present)
- 4. California Geological Survey's Potential Liquefaction Zones (present), Potential Landslide Zones (none present), and Fault Zones (none present), mapped as part of the California Seismic Hazard Zonation Program
- 5. CalFire's High and Very High Fire Threat zones (none present)
- 6. CalFire's Very High Fire Hazard Severity Zones in Local Responsibility Areas (none present)

The entire Stanton Planning Area is within the Prado Dam inundation area AND considered at high risk for seismic-induce liquefaction. Because these two hazards cover the entire mapped extent, they are not shown on the map on page 3.

#### **Evacuation Routes**

The Orange County roads database was used to identify points of exit from clusters (neighborhoods) of residential parcels. According to the Stanton General Plan (2008), the city's circulation consists of a grid of arterials connecting local streets. Therefore, the road centerlines were divided into two categories:

 Arterials - Cerritos Ave, Katella Ave, Orangewood Ave, Chapman Ave, Lampson Ave, Garden Grove Blvd (East-west trending) and Knott Ave, Western Ave, Beach Blvd (Highway 39), Dale Ave, and Magnolia Ave (north-south trending). 2. **Local/Minor Roads** - These roads are generally the first roads a resident will encounter when departing their residence, and these roads feed into the arterials.

## **Assumptions & Methodology**

## **Identification of Residential Developments in High Hazard Zones**

Because the entire Stanton Planning Area is within the Prado Dam inundation area AND considered at high risk for seismic-induce liquefaction, all residential developments within the Stanton Planning Area are within a High Hazard Zone.

## **Identification of Residential Development Exit Points**

The goal of this analysis was to find at least two separate points of exit from residential developments in High Hazard Zones by following a rudimentary roadway network in which vehicles move from Local/Minor Roads to Arterials, and eventually to a Freeway. The following assumptions apply:

- 1. Residential developments have immediate access to Local/Minor Roads but are distant from Freeways.
- 2. Arterials connect Local/Minor Roads to the Freeways.
- 3. Residential exit points are the points where Local/Minor Roads intersect Arterials, thereby providing eventual access to a Freeway.

## **Analysis & Results**

#### **Analysis**

Upon visual analysis, residential parcels within the Stanton Planning Area were assigned to one of four categories:

- 1. One exit point with some distance to a single arterial
- 2. One exit point directly onto a single arterial
- 3. Multiple exit points with access to a single arterial (loop road)
- 4. Multiple exit points with access to multiple arterials

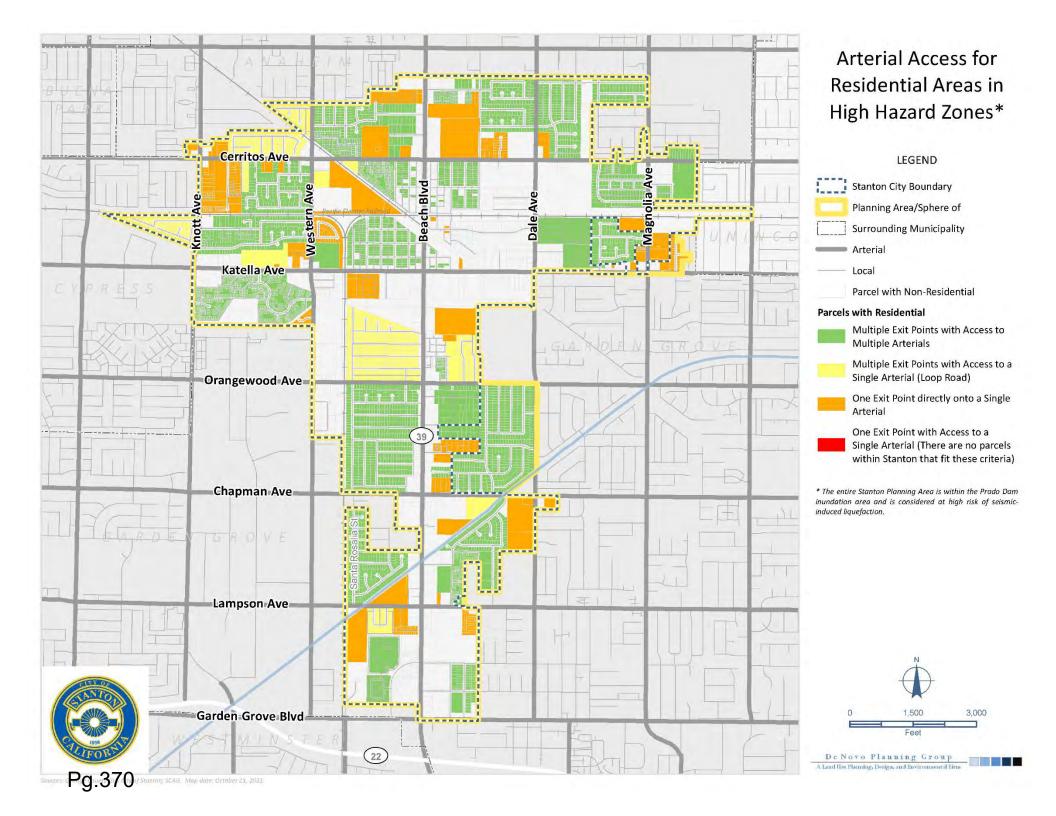
## **Results**

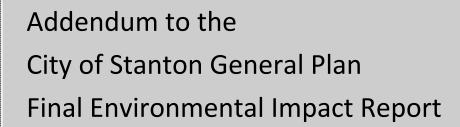
Because of Stanton's gridded street network, approximately 80% of the residential parcels have multiple exit points with access to multiple arterials. These parcels are shown in green on the map on page 3.

Approximately 12% of the parcels have multiple exit points with access to a single arterial. These parcels are shown in yellow on the map. They tend to be neighborhoods or condominium complexes characterized by a loop road.

Approximately 8% of the parcels have just one exit point, but that exit point is directly onto an arterial road. These parcels are shown in orange on the map. They are mostly apartment complexes with one entrance off an arterial road.

There are no residential areas within Stanton that have only one exit point with some distance to an arterial.





2021-2029 Housing Element Update and Community Health and Safety Element Update

December 2021

Prepared for:
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## ATTACHMENT D

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## 1 INTRODUCTION

## 1.1 PURPOSE AND BACKGROUND

The City of Stanton is the Lead Agency under the California Environmental Quality Act ("CEQA"). On September 23, 2008, the City Council adopted the City of Stanton General Plan, including the Housing Element, and certified the Stanton General Plan Final Environmental Impact Report ("FEIR") (State Clearinghouse No. 2008041050). The City Council then adopted the City of Stanton General Plan Housing Element (2014-2021 Housing Element) for the 5<sup>th</sup> cycle in October of 2013.

The City now proposes the current 2021-2029 Housing Element for the 6<sup>th</sup> cycle and Community Health and Safety Element Update (referenced herein as "Modified Project" or "Project"). The Modified Project involves minor changes/additions to the Housing Element in compliance with State Housing Element Law Government Code Sections 65580-65590 and minor changes/additions to the Community Health and Safety Element to meet the requirements of California Government Code Section 65302(g).

Following preliminary review of the proposed Housing Element Update and Community Health and Safety Element Update, the City of Stanton, as Lead Agency, has determined that the proposed Project is subject to CEQA (Public Resources Code [PRC] Sections 21000-21177). This Addendum to the FEIR has been prepared by the City to demonstrate that the proposed Housing Element Update and Community Health and Safety Element Update do not meet the conditions warranting preparation of a Subsequent or Supplemental EIR, as the potential environmental impacts associated with the Housing Element Update and Community Health and Safety Element Update do not result in any new or greater environmental impacts than were previously analyzed, disclosed, and mitigated, as described further.

## 1.2 CEQA REQUIREMENTS

The purpose of this Addendum is to analyze any potential differences between the impacts identified in the FEIR and those that would be associated with the proposed Project. Pursuant to provisions of CEQA and State CEQA Guidelines, the City is the Lead Agency charged with the responsibility of deciding whether to approve the Project. As part of its decision-making process, the City is required to review and consider whether the proposed Project would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in the General Plan FEIR.

Additional CEQA review beyond this Addendum would only be triggered if the Project created new significant impacts or impacts that are more severe than those disclosed in the FEIR used to approve the Stanton General Plan. To use an Addendum as the appropriate CEQA document for the proposed Project, the City must find that major revisions to the FEIR are not necessary and that none of the conditions described in State CEQA Guidelines Section 15162 calling for the preparation of additional CEQA documentation has occurred.

In accordance with the State CEQA Guidelines, prior to approving further discretionary action and depending upon the situation, the lead agency must generally either: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; (4) prepare an Addendum to the EIR or Negative Declaration; or (5) prepare no further documentation (see State CEQA Guidelines, §§ 15162 – 15164). State CEQA Guidelines Section 15162 states:

Introduction

Community Health and Safety Element Update 2021-01 Addendum to the General Plan FEIR

When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the State CEQA Guidelines explains when an Addendum to an EIR is appropriate. Per this section, where some changes or additions are necessary to the previously certified EIR, but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR (as described above) have occurred, then the lead agency is directed to prepare an Addendum to the certified EIR (State CEQA Guidelines, § 15164). Further, the Addendum should include a "brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162," and that "explanation must be supported by substantial evidence" (State CEQA Guidelines, § 15164 [e]). The Addendum need not be circulated for public review but may simply be attached to the certified EIR (State CEQA Guidelines, § 15164 [c]).

## 1.3 INCORPORATION BY REFERENCE

## **Stanton General Plan**

The City Council comprehensively adopted the Update to the City of Stanton General Plan on April September 23, 2008. The Stanton General Plan is a policy document designed to guide the city of Stanton in achieving its economic and community development goals. It outlines specific steps to be taken to direct Stanton's land use planning, economic development, image, and overall quality of life.

The General Plan is a comprehensive legal document that identifies a community vision for the future and establishes a framework to guide future decisions regarding development, resource management, public safety, public services, and the overall quality of the community. The General Plan is Stanton's fundamental policy document regarding community and economic development of the City. The General Plan describes Stanton's goals and strategies regarding land use, economic development, transportation, housing, open space/conservation, safety, public facilities, infrastructure and community design. Along with these goals and strategies is an action guide geared toward implementing these goals and strategies. In order to minimize redundancies or to better address local issues, general plans may merge or consolidate elements. The Stanton General Plan includes the mandatory "elements" in accordance with California Government Code Section 65302, which are organized into seven (7) chapters to most accurately reflect the issues and needs of Stanton. These chapters are: Community Development; Community Design; Economic Development; Infrastructure & Community Services; Community Health & Safety; Housing; and Regional Coordination.

The 6<sup>th</sup> Cycle Housing Element Update and Community Health and Safety Element Update are the subject of this Addendum.

## Stanton General Plan Final EIR

The City Council certified the General Plan FEIR in September of 2008. The General Plan FEIR provides a program-level analysis of the general environmental impacts resulting from the development of land uses and implementation of goals and strategies established within the Stanton General Plan. The General Plan FEIR's analysis is based on the change between development under existing conditions (at the time of document preparation) and those projected for likely development in accordance with the General Plan by theoretical expected development capacity. Based on General Plan FEIR Section 3.0, Project Description, the General Plan FEIR assumed and analyzed the environmental impacts resulting from the following: approximately 5,751 additional dwelling units and approximately 1.4 million fewer square feet of non-residential land uses over existing conditions. The General Plan FEIR concluded that full implementation of the General Plan would result in less than significant impacts or less than significant impacts with the implementation of mitigation measures for all issue areas analyzed except for Section 5.5, Air Quality (Short-Term Construction Emissions; Long-Term Mobile and Stationary Source Emissions; Short-Term Cumulative Construction Impacts; and General Plan Buildout Cumulative Impacts.), Section 5.6, Noise (Long-Term Operational Impacts; and Long-Term Cumulative Operational Impacts.), and Section 5.15, Parks and Recreation Facilities (Parks and Recreational Facilities and Cumulative Park and Recreational Facilities Impacts) which were determined to be significant Community Health and Safety Element Update 2021-01 Addendum to the General Plan FEIR

environmental effects which cannot be avoided with the implementation of the proposed General Plan.

## **Stanton Municipal Code**

The City of Stanton Municipal Code consists of the City's regulatory and penal ordinances, and certain administrative ordinances. The City's Zoning Ordinance is codified into Title 20, Zoning. The purpose of the Zoning Ordinance is to carry out the strategies and actions of the Stanton General Plan by classifying and regulating the uses of land and structures within the City consistent with the General Plan. This Zoning Code is adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City. More specifically, the purposes of this Zoning Code are to: provide standards and guidelines to ensure the City's continuing orderly growth and development and to assist in protecting its character and community identity; promote conservation of energy and water resources and protection of air quality; create a comprehensive and stable pattern of land uses upon which to plan energy, sewage, transportation, water supply, and other public facilities and utilities; encourage development patterns that allow less reliance on motor vehicles for mobility and result in reduction in vehicle miles traveled and corresponding greenhouse gas emissions; and Ensure compatibility between different types of development and land uses.

## 2 ADDENDUM FINDING

As detailed herein, on the basis of substantial evidence in the light of the whole record, a Subsequent or Supplemental EIR is not appropriate for the proposed Project because none of the criteria permitting such a document under State CEQA Guidelines section 15162 are met.

The 2021-2029 Housing Element Update and Community Health and Safety Element Update would result in no new significant impacts that were not analyzed in the General Plan FEIR, nor would the proposed Project cause a substantial increase in the severity of any previously identified environmental impacts. The potential impacts associated with the proposed Project would either be the same or less than those described in the General Plan FEIR. In addition, there are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the General Plan FEIR, nor has any new information regarding the potential for new or more severe significant environmental impacts been identified. Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this Addendum to the previously certified General Plan FEIR is the appropriate environmental documentation for the proposed Project. In taking action on any of the approvals, the decision-making body must consider the whole of the data presented in the Final EIR.

## 3 DESCRIPTION OF THE PROPOSED PROJECT

## 3.1 BACKGROUND

## 3.1.1 Housing Elements and Regional Housing Needs Allocation

The Housing Element is a State-mandated element of the General Plan. The City of Stanton must update its Housing Element every eight years. Updates to the Housing Element must meet the requirements of California Government Code Sections 65580-65589. The purposes of the Housing Element are to identify the community's housing needs; to state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs; and to define the policies and programs that the community will implement to achieve the stated goals and objectives.

State law requires that the City accommodate its "fair share" of regional housing needs, which are assigned by the Southern California Association of Governments (SCAG) for all jurisdictions in the SCAG region. SCAG established the 2021-2029 Regional Housing Needs Plan (RHNP) to assign each city and the unincorporated county in the region its fair share of the regional housing need based on a number of factors established by State law (Government Code Section 65584) and regional housing burdens and needs. The objectives of the Regional Housing Needs Allocation (RHNA) are:

- Increase housing supply and the mix of housing types;
- Promote infill, equity, and environment;
- · Ensure jobs housing balance and fit;
- Promote regional income equity; and
- Affirmatively further fair housing.

Beyond the income-based housing needs established by the RHNA, the Housing Element must also address special needs groups such as seniors, persons with disabilities including developmental disabilities, single female parents, large families, farmworkers, and homeless persons.

## 3.1.2 SAFETY ELEMENTS

The Community Health and Safety Element is a State-mandated element of the General Plan. Updates to the Safety Element will meet the requirements of California Government Code Section 65302(g) (Section 65302) as updated by Senate Bills 1241, 379, 99, and 1035. The Safety Element addresses potential and existing hazards in the City, which are outlined in the following categories: Geologic Hazards and Seismicity; Landslides; Drainage/Flood Hazards; Noise; Fire Protection; Police Protection; Hazardous Materials; Climate Adaptation and Resiliency Planning; Aircraft Operations; and Emergency Response and Operations. Updates to the Safety Element are largely focused on the topics of fire hazards, evacuation routes, and climate adaption.

## 3.2 PROJECT LOCATION AND SETTING

The City of Stanton is located in northwestern Orange County. Stanton is bordered by the cities of Anaheim, Garden Grove, and Cypress and is within six miles of the Pacific Ocean (northeast). California State Route 22 and State Route 39 (Beach Boulevard) provide regional access. Stanton

Description of the Proposed Project

has a population of 39,077 (Department of Finance, 2020) and is approximately 3.1 square miles in size. Stanton is an urban suburb that is experiencing a redevelopment renaissance. Recent development activity, particularly along the main corridor Beach Boulevard, is widening the range of housing, employment, and lifestyle opportunities within the City.

The General Plan identifies the most prevalent land uses in Stanton as residential, consisting of approximately 47 percent of the Planning Area; Mixed-Use District, consisting of approximately 13 percent of the Planning Area; Public/Institutional and Open Space/Recreation, consisting of approximately 11 percent of the Planning Area, combined; Industrial, consisting of approximately 8 percent of the Planning Area; and General Commercial, consisting of approximately 3 percent of the Planning Area.

The Community Development Element identifies the distribution, location, and intensity of all land use types throughout the City. To fully reflect the range of physical attributes that are important for Stanton's success, the Element also contains goals and policies to guide community form and design, and the provision of community facilities and urban services. The Community Development Element is primarily implemented by the City's Zoning Code, which specifies districts and performance standards for various types of land uses described in the General Plan. Each General Plan land use designation has a corresponding zone or zones that implement and regulate the intent of the land use. The zone districts specify the permitted uses for each category and applicable development standards.

The General Plan identifies the expected development capacity associated with the distribution of planned land uses specified in the Land Use Map (Exhibit 2-1 of the Community Development Element). Table 1, Stanton General Plan Expected Residential Development Capacity, summarizes the expected development capacity for residential uses within Stanton based on reasonable density assumptions for the City and SOI.

Table 1: Stanton General Plan Expected Residential Development Capacity

Residential Land Use Designation	Density Range	Existing Acreage	Expected Development Capacity (Dwelling Units)
Low Density Residential	1 – 6 du/ac	436.4	2,618
Medium Density Residential	6.1 – 11 du/ac	166.4	1,830
High Density Residential	11.1 – 18 du/ac	321.8	5,780
General Mixed-Use <sup>1</sup>	25 – 45 du/ac	112.5	3,038
North Gateway Mixed-Use District <sup>1</sup>	25 – 45 du/ac	22.4	605
South Gateway Mixed-Use District <sup>1</sup>	60 – 90 du/ac	92.7	3,337
Town Center Mixed-Use District <sup>1</sup>	Up to 60.0 du/ac	37.9	1,364
Total			18,572

## 3.3 CHARACTERISTICS OF PROPOSED PROJECT REVISIONS/ADDITIONS

The project analyzed in this Addendum involves the City of Stanton 2021-2029 Housing Element Update and Community Health and Safety Element Update Project ("Project"). The Project includes revisions to policy documents and would not modify the City of Stanton General Plan Land Use Map, land use designations, or intensities/densities identified within the General Plan Community Development Element. No changes to the maximum development potential approved for the General Plan and analyzed in the General Plan FEIR would occur with the Project.

## 3.3.1 Housing Element

In compliance with State Housing Element Law requirements, the City of Stanton has prepared the 2021-2029 Housing Element to:

- Provide goals, policies, quantified objectives, and scheduled programs to preserve, improve, and develop housing
- Identify and analyze existing and projected housing needs for all economic segments of the community
- Identify adequate sites that are zoned and available within the 8-year housing cycle to meet the City's fair share of regional housing needs at all income levels
- Affirmatively further fair housing
- Be certified (approved) by the State Department of Housing and Community Development (HCD) as complying with State law
- Be internally consistent with other parts of the General Plan

## **Housing Element Organization**

The proposed Housing Element Update covers the October 15, 2021 through October 15, 2029 planning period and is comprised of the following components:

## Part 1: Housing Plan

Part 1 of the 2021-2029 Housing Element is the City's "Housing Plan," which includes the goals, policies, and programs the City will implement to address housing needs and constraints. The City's overall strategy for addressing its housing needs has been defined according to the five goals:

- 1. Provide a broad range of housing opportunities to meet the existing and future needs of all Stanton residents.
- 2. Protect, encourage, and provide housing opportunities for persons of lower and moderate incomes.
- 3. Preserve and maintain the existing housing stock so that all residents live in neighborhoods free from blight and deterioration.
- 4. Reduce or remove governmental and nongovernmental constraints to the development, improvement, and maintenance of housing where feasible and legally permissible.
- 5. Affirmatively further fair housing practices, promoting equal opportunity for all residents to reside in housing of their choice.

The Housing Plan includes only minor modifications to the City's current Housing Element goals and policies. The Housing Plan includes a number of new programs to address State Housing law including future required updates to the Stanton Municipal Code, new programs to support affirmatively furthering fair housing, and tracking and reporting requirements for housing sites.

### Part 2: Background Report

Part 2 of the 2021-2029 Housing Element is the "Background Report," which identifies the nature and extent of Stanton's housing needs, including those of special populations, potential constraints to housing production, potential housing resources (land and funds), and an assessment of fair housing. In addition to identifying housing needs, the Background Report also presents information regarding the setting in which these needs occur. The Background Report comprehensively updates the background context and conditions identified in the City's current Housing Element.

## Appendix A: Housing Sites Inventory

The Housing Element must include an inventory of land suitable and available for residential development to meet the City's regional housing need by income level. The California Department of Housing and Community Development (HCD) requires that the Housing Sites Inventory be prepared using a State-approved format, included as Appendix A. No land use changes are proposed to accommodate the City's Regional Housing Needs Allocation (RHNA); future residential development is expected to occur in those areas already identified for residential uses including land within the City's mixed-use districts. All sites identified in the City's Housing Sites Inventory are currently identified for new development consistent with the potential development capacities identified in Appendix A.

## Appendix B: Public Engagement Summary

As part of the Housing Element Update process, the City hosted numerous opportunities for the community and key stakeholders to provide feedback on existing housing conditions, housing priorities, priority areas for new residential growth, and topics related to fair housing. Public engagement was facilitated in both English and Spanish to further engage the Stanton community. Public participation played an important role in the refinement of the City's housing goals and policies and in the development of new housing programs, as included in Part 1: Housing Plan. The public's input also helped to validate and expand upon the contextual information included in Part 2: Background Report. The City's efforts to engage the community in a meaningful and comprehensive way are summarized in Appendix B.

## **Capacity to Meet Regional Housing Needs**

As determined by SCAG, the City of Stanton's fair share allocation (RHNA) is 1,231 new housing units during this planning cycle. This includes: 165 units affordable to extremely/very low-income households; 145 units affordable to low-income households; 231 units affordable to moderate-income households; and 690 units affordable to above moderate-income households. State Income Limits which are used to determine affordability levels are set annually by the California Department of Housing and Community Development.

## Progress Towards the RHNA

RHNA uses June 30, 2021 as the baseline for growth projections for the 2021-2029 planning period. Jurisdictions may count toward the RHNA housing units that have been developed, are under construction, and/or have received their building permits after June 30, 2021. Since this time, 540 housing units have been developed, are under construction, or have received their building permits in Stanton. Jurisdictions may also count projects that are approved/entitled but not yet built or under construction; 413 units across all income categories have been approved/entitled and are expected to be developed within the planning period. Based on this progress, the City has already achieved approximately 77% of its overall RHNA with housing units constructed, under construction, or approved/entitled (953 units). With these units taken into account, the City has a remaining RHNA of 282 units (26 extremely low/very low-income units, 133 low-income units, zero moderate-income units, and 123 above moderate-income units) as shown in Table 2, Progress Towards the RHNA, below.

Table 2: Progress Towards the RHNA

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	165	145	231	690	1,231
Constructed, Under Construction/ Permits Issued (Since 6/30/2021)	79	12	114	335	540
Units Approved/Entitled	60	0	121	232	413
Remaining Allocation	26	133	0 (-4)	123	282

Sources: City of Stanton, 2021; Southern California Association of Governments, 2021

## Residential Sites Inventory to Accommodate Remaining RHNA

The City has sufficient land appropriately zoned for residential uses throughout the community to accommodate its remaining RHNA (282 units) for the 2021-2029 planning period. The City of Stanton's 6<sup>th</sup> Cycle residential sites fall into four categories:

- 1) Proposed development sites. Three projects in various stages of planning review are included as sites. The densities and unit counts proposed by these projects are realistic and consistent with similar projects that have been approved and successfully developed (or are under construction) in Stanton. The three sites are expected to yield 120 units, seven of which will be affordable to low-income households and 113 units affordable to above moderate-income households. The projects are summarized and quantified in Table 5-4 of the Background Report.
- 2) Accessory dwelling units. In response to new ADU laws, Stanton has continually updated its Zoning Code to align with State law and better facilitate the production of ADUs and Junior ADUs. ADUs are allowed on any lot that is zoned for single-family or multifamily dwelling residential use, including lots that are zoned for such use within a specific plan area. The City has been successful in its efforts, having issued building permits for 13 ADUs in 2018, 12 ADUs in 2019, and 19 ADUs in 2020. The City has taken an average of the annual number of ADUs constructed over the past three years (14.7 units) and multiplied that by 8 years to arrive at a reasonable expectation of how many new ADUs will likely be constructed during the planning period, at a minimum. Development of ADUs is expected to yield 117 units.
- 3) Vacant residential sites. As part of this Housing Element update, the City conducted a parcel-by-parcel analysis of vacant residential sites based on data obtained from the City's geographic information system (GIS) and county data. There are minimal areas of vacant land remaining in the City currently zoned for residential development (exclusive of the mixed-use overlays). There are a total of 6 vacant parcels with the capacity for 37 residential units. It is assumed that the potential of 10 dwelling units on five of the parcels would be comprised of market-rate residential units. Parcels with RH (High Density Residential) zoning provide the capacity for 27 units to be counted toward meeting the City's lower income needs.
- 4) Mixed-Use Sites. Stanton is an entirely built out city with very limited vacant land available to accommodate new development of any sort. The City has established three mixed-use districts to accommodate additional residential development in areas along major corridors. Current development trends in mixed-use areas show that high residential density is feasible and realistic, and appropriate to accommodate housing for all income levels, including the lower income RHNA. Site selection in the mixed-use overlay zones includes both vacant sites and underutilized sites, which were chosen given their size and location. Mixed-use sites are along major streets in the City, particularly along Beach Boulevard. The City's three mixed-use land use designations allow for high-density residential capacities up to 60 du/ac. Government Code Section 65583.2(c)(3)(B)(iv) allows jurisdictions in metropolitan counties, such as Stanton, to include sites with a minimum density of 30 units per acre as appropriate sites to

accommodate lower income households, allowing sites in the mixed-use zones to be counted toward meeting housing needs for all income groups in the City (including lower income). Based on other successful projects in the area, it is assumed that the market can continue to create affordable units at this density. The City has evaluated the development capacity of the mixed-use areas to determine realistic potential development yield based upon evaluation of existing land uses, infrastructure capacity, land use controls, and site improvements.

Key sites with existing uses that are suitable for redevelopment typically contain older structures and are underutilized given the development potential afforded by the mixed-use development standards. Examples of existing uses include small-scale commercial uses, used car dealerships and auto repair shops, motels, restaurants, and structures with large surface parking lots. Some sites with existing residential uses provide the opportunity for significant capacity increases. The following criteria was used to identify underutilized parcels in mixed-use zones:

- Improvement value is less than half of the land value (ratio is less than 1.00)
- Structure was built prior to 1990 (and therefore over 30 years of age)
- General characteristics such as unit vacancy, declining uses, low existing floorarea ratio (FAR), etc.
- Location near recent mixed-use or residential development activities on properties exhibiting similar characteristics
- Known redevelopment interest

The mixed-use sites identified to meet the RHNA can facilitate 1,288 units. These sites contain existing commercial and/or residential uses that are of marginal economic viability, are at or near the end of their useful life, and/or the existing intensity of development is substantially lower than allowed by existing zoning. Sites that are smaller than 0.5 acres have multiple parcels that are adjacent to each other and are appropriate for consolidation into larger development projects, achieving a lot size of at least 0.5 acres. These sites have common ownership, function as a part of a larger site currently, such as a commercial building with an adjacent parking lot, and/or are significantly underutilized and have been identified by developers for potential projects.

Table 3: Comparison of RHNA Candidate Sites Realistic Capacity and RHNA

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
Remaining 6th Cycle RHNA	26	133	0	123	282
Proposed Developments	0	7	0	113	120
ADUs	30	50	35	2	117
Vacant Residential Sites	0	27	0	10	37
Mixed-Use Sites	138	128	256	766	1,288

Description of the Proposed Project

Total Capacity	168	212	291	891	1,562
Surplus/Shortfall	142	79	291	768	1,280

Note: The realistic capacity analysis of vacant and underutilized sites assumes that (i) all RM and RH sites will develop at 75% of maximum capacity, and (ii) mixed-use sites that are less than 1.0 acre in size will develop at 50% of maximum capacity, while sites ≥1.0 acre in size will develop at 80% of maximum capacity. If the sites develop closer to their full capacity, which has been realized as part of past projects, the City's surplus of units would be higher.

## **Summary of Housing Element Modifications**

As previously noted, State law requires that the Housing Element be reviewed and updated not less than every eight years, in order to remain relevant and useful, and to reflect the community's changing housing needs. The proposed Housing Element Update involves minor changes/additions to the Housing Element and environmental conditions under which it would be implemented. The following summarizes the modifications to the Housing Element, as compared to the 2013-2021 Housing Element:

### Goals, Policies, and Programs (Part 1: Housing Plan)

The City made minor modifications to the goals and policies included in the Housing Element to reflect the City's current housing needs and State mandates. The following programs are included in this 2021-2029 Housing Element:

- Proposed HE Program 1: Residential Sites Inventory
- Proposed HE Program 2: Monitor Residential Capacity (No Net Loss)
- Proposed HE Program 3: Public Property Conversion to Housing
- Proposed HE Program 4: Replacement of Affordable Units
- Proposed HE Program 5: Facilitate Affordable and Special Needs Housing Construction
- Proposed HE Program 6: Mixed-Use Development
- Proposed HE Program 7: Accessory Dwelling Units
- Proposed HE Program 8: Density Bonus Implementation
- Proposed HE Program 9: Redevelop the Tina/Pacific Neighborhood
- Proposed HE Program 10: California Accessibility Standards Compliance Program
- Proposed HE Program 11: Rental Assistance
- Proposed HE Program 12: Preservation of Existing Affordable Units
- Proposed HE Program 13: Homeowner Rehabilitation Program
- Proposed HE Program 14: Proactive Code Enforcement
- Proposed HE Program 15: Energy Conservation and Energy Efficiency Opportunities
- Proposed HE Program 16: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws
- Proposed HE Program 17: Zoning Code Amendments Housing Constraints
- Proposed HE Program 18: Fair Housing Services
- Proposed HE Program 19: Affirmatively Furthering Fair Housing Outreach and Coordination
- Proposed HE Program 20: Economic Displacement Risk Analysis

#### Background Information (Part 2: Background Report)

The Background Report of the Housing Element has been comprehensively updated to include current information. This section of the Housing Element includes: Introduction, Accomplishments Under 5<sup>th</sup> Cycle Housing Element, Housing Needs Assessment, Constraints, Housing Resources, Affirmatively Furthering Fair Housing Analysis, Other Requirements, and References.

## Appendix A: Housings Sites Inventory

The City has updated its Housing Sites Inventory to demonstrate capacity to accommodate its 2021-2029 RHNA. The Housing Sites Inventory includes a list of sites appropriate to accommodate the RHNA at the appropriate densities and income levels and includes sites identified in the current Housing Element and other sites designated for residential development consistent with the City's General Plan, Zoning Code, and Specific Plans. No land use changes are proposed as part of the 2021-2029 Housing Element.

### Appendix B: Public Engagement Summary

The public engagement program conducted as part of the Housing Element Update project is summarized in Appendix B.

## 3.3.2 COMMUNITY HEALTH AND SAFETY ELEMENT

In compliance with State law, the City of Stanton has prepared an update to its Community Health and Safety Element to further address fire hazards, emergency preparedness, and climate adaptation. Natural and human-caused events have the ability to impact productivity by causing substantial damage to life, property, and economic prosperity. The Community Health and Safety Element addresses these potential issues with goals, policies, and actions to continue to serve and protect Stanton and its residents.

## **Community Health and Safety Element Organization**

The Community Health and Safety Element includes an Introduction to the Element, Background, and Key Issues which outline the goals and policies, and implementation/action programs.

## **Summary of Community Health and Safety Element Modifications**

Within the Background section of the Community Health and Safety Element, the Fire Hazards discussion was updated to include current information regarding the CAL FIRE Fire Hazard Severity Zones, of which there are none in the City of Stanton. The City has updated the discussion on Emergency Response and Operations. Specifically in accordance with SB 99, the City conducted an evaluation of evacuation routes serving residential developments in hazard areas. This analysis is presented in a White Paper attached as an appendix and the results of the analysis found that there are no residential developments within Stanton that do not have at least two emergency evacuation routes. Lastly, the City prepared a Climate Vulnerability Assessment (CVA) to promote effective and integrated actions to safeguard against anticipated impacts from climate change.

No goals, policies, or programs from the current Community Health and Safety Element were eliminated as part of this update. The following modifications or additions were made:

## Flooding

- Proposed Strategy CHS-2.1.2: Expand the amount of pervious surfaces
- Proposed Action CHS-2.1.1(c): Encourage permeable paving

### Fire and Police Protection

- Proposed Action CHS-4.2.1(c): Minimize the risk of structural loss from fires
- Proposed Action CHS-4.2.1(d): Visible addressing and signage
- Proposed Action CHS-4.2.1(e): Consider fire safe design

Description of the Proposed Project

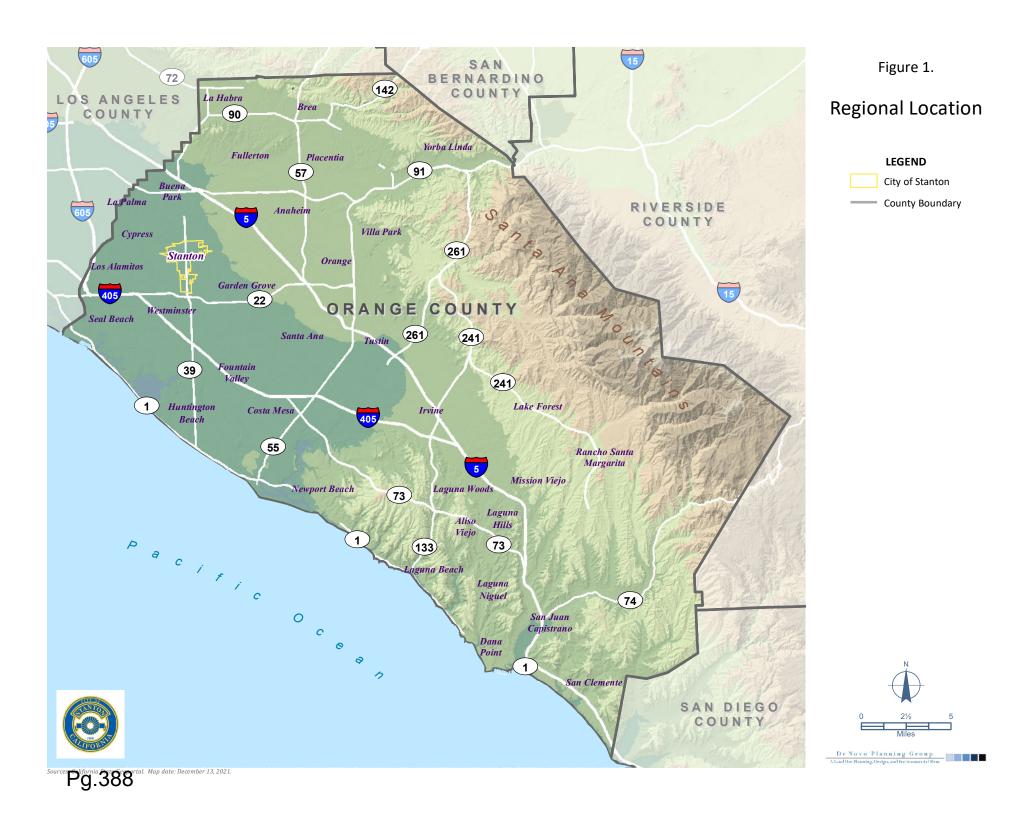
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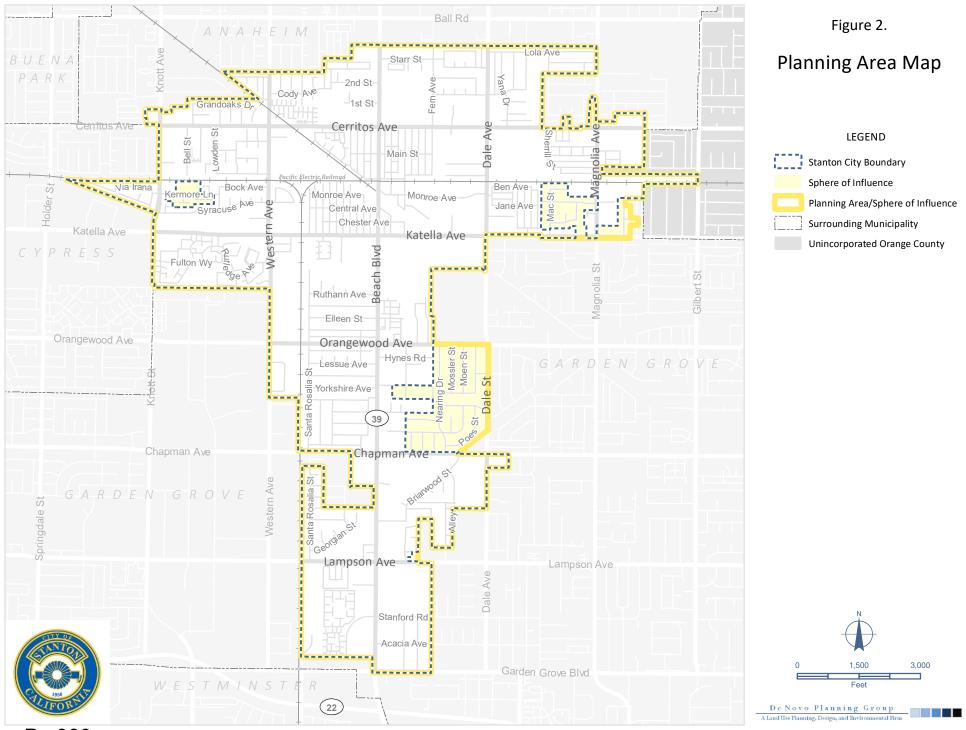
## **Emergency Response**

- Proposed Action CHS-5.1.1(e): Regulate the location of critical facilities
- Proposed Action CHS-5.1.1(e): Minimum standards for evacuation of residential areas

#### Hazardous Materials

• Proposed Action CHS-6.1.1(d): Cleanup of any active hazardous waste sites





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## 4 ENVIRONMENTAL ANALYSIS

The scope of the City's review of the proposed Project is limited by provisions set forth in CEQA and the State CEQA Guidelines. This review is limited to evaluating the environmental effects associated with the proposed Project to the General Plan Project as set forth in the General Plan FEIR. This Addendum also reviews new information, if any, of substantial importance that was not known and could not have been known with the exercise of reasonable due diligence at the time the General Plan FEIR was certified. This evaluation includes a determination as to whether the changes proposed by the Project would result in any new significant impacts or a substantial increase in a previously identified significant impact.

The section is patterned after the CEQA Guidelines Appendix G Checklist and provides a summary of impacts associated with the proposed actions, as described in the General Plan FEIR, and includes an analysis of the potential impacts associated with the proposed 2021-2029 Housing Element Update and Community Health and Safety Element Update. This comparative analysis provides the City with the factual basis for determining whether any changes in the Project, any changes in circumstances, or any new information since the General Plan FEIR was certified would require additional environmental review or preparation of a Subsequent EIR or Supplemental EIR.

## 4.1 AESTHETICS

	esholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
	ept as provided in Public Resources Code	Section 21099,	would the project:				
	Have a substantial adverse effect on a scenic vista?					Χ	
	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?					Х	
C.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?					Х	
	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?					X	

## **General Plan FEIR Conclusions**

- Over the life of the General Plan, new development and redevelopment are expected to result in a general intensification of the planning area and has the potential to disrupt scenic vista resources such as hillsides, ridgelines, and open space. Infill development of vacant parcels and general intensification of development may limit some viewsheds of hills or reduce the feeling of open space. There are no State scenic highways within or adjacent to the planning area. Further, the General Plan Update does not identify any scenic vistas or resources within the boundaries of the City of Stanton; the General Plan FEIR concluded that no impacts would occur in this regard.
- The City is primarily built out and is an urbanized city. Future development under the General Plan Update is not anticipated to degrade the existing quality of development within the City of Stanton. The proposed land use designations would establish consistent and compatible development intensities within the mixed-use land use designations, improving the overall visual character/quality of these areas. Compliance with the goals, strategies and actions of the General Plan Update would enhance the visual quality and character of the City. The Community Development Element would ensure that future development would be compatible with existing development in the surrounding area. Additionally, the

Environmental Analysis

General Plan Update includes a Community Design Element. Goals, strategies and actions in the Community Design Element are anticipated to enhance the quality of the visual environment and character of Stanton. Goals, strategies and actions in the General Plan Update provide supplemental support to maintain and enhance the aesthetic quality of the City. The General Plan FEIR concluded that compliance with the goals and actions provided in the General Plan Update would reduce potential impacts related to visual quality to less than significant levels.

• The majority of light and glare generating land uses presently exists in the City as it is highly built out and urbanized. The General Plan Update introduces four new mixed-use land use designations that would encourage mixed-use development within the northern and southern portions of the City and adjacent to Beach Boulevard and Katella Avenue at greater intensities than currently exists. The placement of sensitive receptors (i.e. residential uses) adjacent to commercial areas could result in light and glare impacts. Future development projects would be reviewed on a project-by-project basis. Subsequent development projects would be reviewed by the City to evaluate lighting and glare and ensure that the City's Municipal Code, Zoning Code, and local ordinances are met. Therefore, the General Plan FEIR concluded that implementation of the General Plan Update would not result in adverse light and glare impacts.

## **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the City. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Further, the Community Health and Safety Element would not result in any modifications to existing land use designations or modify any General Plan actions or programs–specific to visual resources. The Housing Element and Community Health and Safety Element strategies and actions would not have an impact on existing General Plan strategies and actions protecting aesthetic and visual resources.

The revisions to the Housing and Community Health and Safety Elements would not result in new aesthetic impacts beyond those identified in the General Plan FEIR, as there are no officially designated visual resources within the City. Following compliance with the recommended General Plan strategies and actions, there would be no new significant or significantly different impacts to aesthetics as a result of the proposed Project.

## 4.2 AGRICULTURE AND FORESTRY RESOURCES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:  a. Convert Prime Farmland, Unique						
Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?						Х
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?						Х
c. Result in the loss of forest land or conversion of forest land to non-forest use?						Х
d. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?						Х

## **General Plan FEIR Conclusions**

- Future development within the Planning Area pursuant to the land use policies of the General Plan Update will not result in the conversion of Prime or Unique Farmland, or Farmland of State and Local Importance to non-agricultural use as no land within the City is designated Farmland under the General Plan or by the Department of Conservation.
- Implementation of the General Plan Update would not result in significant impacts related to conflict with agricultural zoning or forest land, as there no agriculturally zoned or forest lands with the Planning Area. There are also no Williamson Act contracts in the Planning Area; the General Plan FEIR found effects not to be significant.

## **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses. The Planning Area does not contain any agricultural land, therefore, any future development under the proposed Project would not result in the loss or conversion of agricultural land. Further, the Community

Environmental Analysis

Health and Safety Element would not result in any modifications to existing land use designations specific to agricultural resources.

Subsequent to adoption of the General Plan FEIR, amendments to the CEQA Guidelines resulted in the addition of forestry resources as a topical area to be addressed within CEQA Guidelines Appendix G. There are no forest lands located within the General Plan Update study area. Additionally, the General Plan area is not designated or zoned as forest land. No impacts related to this environmental topic were anticipated as a result of implementation of the General Plan Update, and no mitigation measures were required.

The revisions to the Housing Element and Community Health and Safety Element would not result in any agricultural or forestry resource impacts, consistent with the findings in the General Plan FEIR.

## 4.3 AIR QUALITY

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:	_					
a. Conflict with or obstruct implementation of the applicable air quality plan?	1				Χ	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non attainment under an applicable federal of state ambient air quality standard?	r -			X		
c. Expose sensitive receptors to substantial pollutant concentrations?	0				Х	
d. Result in other emissions (such as those leading to odors) adversely affecting substantial number of people?					Х	

## **General Plan FEIR Conclusions**

• The General Plan FEIR explains that the City is located within the South Coast Air Basin and adheres to the regional 2007 Air Quality Management Plan (AQMP). Projects that are considered consistent with the 2007 AQMP would not interfere with attainment, because this growth is included in the projections utilized in the formulation of the 2007 AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the 2007 AQMP would not jeopardize attainment of the air quality levels identified in the 2007 AQMP, even if they exceed the South Coast Air Quality Management District's recommended daily emissions thresholds.

Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled, both within the project area and the surrounding area in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is considered consistent with the 2007 AQMP. Goals, strategies and actions contained in the General Plan Update serve to promote infill and mixed use development of vacant and underutilized parcels. Thus, the General Plan Update would be consistent with the AQMP in the reduction of vehicle miles traveled. The General Plan FEIR determined no conflict with the regional air quality plan will result, and no adverse impact will occur.

 Implementation of the General Plan Update would result in new emissions being generated from construction activities. Many of the individual projects would be small and generate construction emissions that would not exceed the South Coast Air Quality Management District's recommended thresholds of significance. Although the City would not consider

**Environmental Analysis** 

these projects to cause a potentially significant air quality impact, each project would be required to implement the General Plan Update strategies and actions that address air quality in order to minimize emissions. Other projects could be large enough to generate construction emissions that exceed thresholds (i.e., development within the City's Mixed Use Areas). The General Plan FEIR found that through the environmental review process for individual projects, additional mitigation may also be required to further reduce emissions and potential impacts; however, even with mitigation it may not be possible to mitigate impacts to a less than significant level. The General Plan FEIR established Mitigation Measure Air Quality (AQ)-1 to help mitigate daily construction emissions that exceed thresholds. However, it would be speculative and difficult, to quantify the emissions related to construction activities under the General Plan Update, as the scale and timing of each construction event is currently unknown. Because the thresholds are established for individual development projects, and it is assumed that some of the projects that would be implemented under the General Plan Update could individually exceed the South Coast Air Quality Management District thresholds, the total amount of construction within the Planning Area under the General Plan Update could also exceed the South Coast Air Quality Management District's recommended thresholds of significance, and the General Plan FEIR considers this impact to be significant. Implementation of General Plan Update goals, strategies and actions, and Mitigation Measure AQ-1 would lessen construction-related impacts by reducing air pollutant emissions from construction activities. However, even with implementation of the strategies and actions and recommended mitigation, construction-related emissions would not be reduced to a less than significant level; thus, the General Plan FEIR concluded that significant and unavoidable impacts would occur in this regard.

Implementation of the General Plan Update would result in new emissions being generated due to buildout of the City. The thresholds of significance that have been recommended by the South Coast Air Quality Management District (SCAQMD) for these new emissions were developed for individual development projects. Under the General Plan Update, varying amounts of development would likely occur over time until buildout of the General Plan Update is achieved. Many of the individual projects would be small and generate mobile and stationary emissions that do not exceed the SCAQMD's recommended thresholds of significance. Although the City would not consider these projects to cause a potentially significant air quality impact, each project would be required to implement the General Plan Update strategies and actions that address air quality in order to minimize emissions. Through the environmental review process for individual projects, additional mitigation may also be required to further reduce emissions and potential impacts; however, even with mitigation it may not be possible to mitigate impacts to a less than significant level.

The destination of motor vehicles, which are the primary contributors to air pollution, vary widely and cross many jurisdictional boundaries. Future site-specific development proposals would be evaluated for potential air emissions once development details have been determined and are available. Individual projects may not result in significant air quality emissions. Strategies and actions in the proposed General Plan Update would reduce the significance of such impacts. However, because the thresholds are established for

individual development projects, and it is assumed that some of the projects that would be implemented under the General Plan Update could individually exceed the South Coast Air Quality Management District thresholds, the impacts would remain significant and unavoidable.

With regard to daily operational emissions and the cumulative net increase of any criteria pollutant for which the region is in nonattainment, this is considered to be a potentially significant cumulative impact, due to nonattainment of  $O_3$  and  $PM_{10}$  standards in the South Coast Air Basin. The contribution of daily construction and operational emissions from the buildout associated with the General Plan Update could be cumulatively considerable. The General Plan FEIR considered this cumulative impact is considered to be significant and unavoidable.

• A detailed carbon monoxide analysis was conducted in the federal Attainment Plan for Carbon Monoxide (CO Plan). The locations selected for microscale modeling in the CO Plan are worst-case intersections in the South Coast Air Basin, and would likely experience the highest CO concentrations. Of these locations, the Wilshire Boulevard/Veteran Avenue intersection (located outside of the City) experiences the highest CO concentration (4.6 ppm), which is well below the 35-ppm 1-hr CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Los Angeles County with an average daily traffic (ADT) volume to about 100,000 vehicles/day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonable inferred that CO hotpots would not be experienced at any locations within the City of Stanton due to the volume of traffic experienced under buildout conditions, and the relatively low ambient concentration. Therefore, impacts would be less than significant in this regard.

Goals, strategies and actions have been specified in the General Plan Update Regional Coordination Element to encourage the use of alternative energy sources, reduce vehicle miles traveled, add additional trees/vegetation, and develop a public education program emphasizing air quality conditions, and promoting innovative approaches to reduce harmful impacts to the atmosphere. The intent of these new strategies and actions is to reduce overall cumulatively considerable air quality impacts throughout the City. Mitigation Measures AQ-3 and AQ-4 would provide additional energy conservation measures.

- Cumulative development is not expected to expose sensitive receptors to substantial
  pollutant concentrations. Thus, exposure of substantial pollutant concentrations to
  sensitive receptors is considered to be a less than significant cumulative impact. Future
  ambient CO concentrations resulting from the General Plan Update would be substantially
  below National and State standards. Therefore, the General Plan Update FEIR found the
  Project's contribution to the impact to be less than cumulatively considerable, and the
  cumulative impact would be less than significant.
- The General Plan FEIR states that cumulative development would not have a potentially significant impact in terms of the creation of objectionable odors affecting a substantial

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number of people. Odors resulting from the construction of projects that would occur with implementation of the General Plan Update are not likely to affect a substantial number of people, since construction activities occur in a limited area and do not usually emit odors that are considered offensive. Other odor impacts resulting from these projects are also not expected to affect a substantial amount of people, as solid waste from these projects would be stored in areas and in containers as required by City regulations, and restaurants are typically required to have ventilation systems that avoid substantial adverse odor impacts. Therefore, the General Plan FEIR concluded that cumulative odor impacts would thus be less than significant.

# **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development would be reviewed for consistency with policies and programs aimed to reduce impacts to air quality as a result of new development and would be required to implement General Plan FEIR Mitigation Measures to reduce potential impacts to air quality due to construction-related emissions (General Plan FEIR Mitigation Measure AQ-1) and operational activities by reviewing future development proposals for potential regional and local air quality impacts per CEQA and, if identified, require mitigation to reduce the impact to a level less than significant.

The proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR.

The revisions to the Housing Element and Community Health and Safety Element would not result in new air quality impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan strategies and actions, there would be no new significant or significantly different impacts to air quality as a result of the proposed Project.

#### **General Plan FEIR Mitigation Measures:**

- AQ-1 For projects that may exceed daily construction emissions established by the South Coast Air Quality Management District, Best Available Control Measures shall be incorporated to reduce construction emissions to below daily emission standards established by the South Coast Air Quality Management District. Project proponents shall prepare and implement a Construction Management Plan, which shall include, Best Available Control Measures among others. Appropriate control measures shall be determined on a project by project basis, and would be specific to the pollutant for which the daily threshold is exceeded. Such control measures shall include the following, among others:
  - Minimizing simultaneous operation of multiple construction equipment units;

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- Implementation of South Coast Air Quality Management District Rule 403, *Fugitive Dust Control Measures*;
- Watering the construction area to minimize fugitive dust;
- Require that off-road diesel powered vehicles used for construction shall be new low emission vehicles, or use retrofit emission control devices, such as diesel oxidation catalysts and diesel particulate filters verified by the California Air Resources Board; and
- Minimizing idling time by construction vehicles.

# 4.4 BIOLOGICAL RESOURCES

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?						Х
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?						х
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?						Х
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?						х
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?						Х
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?						Х

# **General Plan FEIR Conclusions**

 The General Plan FEIR concluded that significant biological resources do not occur within the City and that implementation of the General Plan would not have a substantial adverse effect on biological resources.

# **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses. The Planning Area does not contain significant biological resources, therefore, future development under the proposed Project would not result in a substantial adverse impact to biological resources. Further, the revisions to the Community Health and Safety Element would not result in in a substantial adverse impact to biological resources.

The revisions to the Housing Element and Community Health and Safety Element would not result in new biological resources impacts beyond those identified in the General Plan FEIR. There would be no new significant or significantly different impacts to biological resources as a result of the proposed Project.

## 4.5 CULTURAL RESOURCES

Thresholds:  Would the project:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?						Х
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?						Х
c. Disturb any human remains, including those interred outside of formal cemeteries?						Х

#### **General Plan FEIR Conclusions**

 The General Plan FEIR concluded that significant cultural resources do not occur within the City and that implementation of the General Plan would not have a substantial adverse effect on cultural resources.

# **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses. The Planning Area does not contain significant cultural resources, therefore, future development under the proposed Project would not result in a substantial adverse impact to cultural resources. Further, the revisions to the Community Health and Safety Element would not result in in a substantial adverse impact to cultural resources.

The revisions to the Housing Element and Community Health and Safety Element would not result in new cultural resources impacts beyond those identified in the General Plan FEIR. There would be no new significant or significantly different impacts to cultural resources as a result of the proposed Project.

## 4.6 ENERGY

	Substantial	Substantial	Information	No	Less Than	No Impact
	Change in	Change in	Showing	Additional	Significant	
	Project	Circumstance	Greater	Significant	Impact/No	
	Requiring	Requiring	Significant	Impact/	Changes or	
	Major EIR	Major EIR	effects than	Less Than	Information	
T	Revisions	Revisions	Previous EIR	Significant	Requiring	
Thresholds:				Impact	Preparation	
				With	of an MND	
				Application	or EIR	
				of		
				Mitigation		
				from FEIR		
Would the project:						
a. Result in potentially significant						
environmental impact due to wasteful,					.,	
inefficient, or unnecessary consumption					X	
of energy resources, during project construction or operation?						
b. Conflict with or obstruct a state or local						
plan for renewable energy or energy					Χ	
efficiency?						

#### **General Plan FEIR Conclusions**

The General Plan FEIR does not include a stand-alone Energy analysis section. Since certification of the General Plan FEIR, the CEQA Guidelines Appendix G Checklist has been revised to include a discreet category for Energy impacts. The topic of energy is addressed in the General Plan FEIR's Electricity and Natural Gas and Air Quality sections.

 Implementation of the General Plan Update would result in an increase in demand for electrical power and service. The City has an existing electricity infrastructure located throughout the City, which would serve future development projects associated with the implementation of the General Plan Update. The anticipated service demands created by implementation of the General Plan Update are within the service parameters of Southern California Edison (SCE) current transmission and service infrastructure.

All new developments that require new electricity lines to be installed would be required to pay applicable fees assessed by SCE to extend electricity lines to serve the specific project site. All new construction in the State of California is subject to the energy conservation standards set forth in Title 24 of the California Administrative Code. These are prescriptive standards that establish maximum energy consumption levels for the heating and cooling of new buildings. Therefore, the General Plan FEIR determined impacts would be less than significant in this regard.

• New development associated with implementation of the General Plan Update would generate an increased need for natural gas over existing conditions. The City of Stanton has existing gas mains, located throughout the City, which would serve new developments. At this time, the Southern California Gas Company (SCGC) natural gas supplies are adequate to serve the City; however, a natural gas survey is required to assess project-

specific impacts to natural gas supplies and services. Future developments that require new infrastructure/gas main extensions would be required to pay any applicable fees assessed by SCGC necessary to accommodate the specific project. The General Plan Update includes goals, strategies and actions to address the future impacts of new development on public infrastructure and services. Individual development projects would be analyzed to identify project-specific impacts to utility infrastructure on a project-by-project basis. Therefore, impacts to natural gas supply and services would be less than significant.

Proposed General Plan Update goals, strategies, and implementation actions address the impact of new development to energy services. The General Plan emphasizes the efficient development and use of modern technologies that can minimize energy demand and consumption. To ensure that future energy supplies are available to support additional development pursuant to the General Plan, the General Plan FEIR includes Mitigation Measures AQ-3 and AQ-4, requiring the use of renewable energy and energy-efficient appliances. The General Plan FEIR concluded energy impacts will be less than significant.

## **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The Stanton General Plan includes strategies and actions to reduce potential impacts to energy resources, which are also referenced in the Housing Element Update. Additionally, Stanton has adopted the 2019 California Green Building Standards Code (CALGREEN) in its entirety, which establishes mandatory statewide green building standards to enhance resource efficiency and sustainability. Future housing development, consistent with the Stanton General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to energy resources. The Community Health and Safety Element strategies and actions would not have an impact on General Plan strategies addressing energy resources.

The revisions to the Housing Element and Community Health and Safety Element would not result in new energy resource impacts beyond those identified in the General Plan FEIR. Following compliance with General Plan strategies and actions, there would be no new significant or significantly different impacts to energy resources as a result of the proposed Project.

# 4.7 GEOLOGY AND SOILS

Thresholds:  Would the project:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:						
<ul> <li>Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</li> <li>Strong seismic ground shaking?</li> <li>Seismic-related ground failure, including liquefaction?</li> <li>Landslides?</li> </ul>				X		
b. Result in substantial soil erosion or the loss of topsoil?				Х		
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				Х		
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				Х		
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?						Х
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?						

## **General Plan FEIR Conclusions**

 The General Plan FEIR concluded that the General Plan Update would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent

Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.

- Strong seismic ground shaking could result in substantial damage to some buildings within the City. After the 1971 San Fernando earthquake, modern building codes and design standards were implemented for structures and infrastructure within the City. The effects of ground shaking would be sufficiently mitigated for buildings designed and constructed in conformance with current building codes and engineering standards. However, there is the possibility of partial to total collapse of buildings built prior to 1933 and some tilt-up concrete block buildings built prior to 1972. There are no unreinforced masonry buildings located within the City, therefore, it is not anticipated that any existing buildings would need to be retrofitted. The City's Building Department would continue to inspect buildings that may deteriorate over time and unsafe structures would be condemned if necessary. The City has identified protective measures within the goals, strategies and actions incorporated into the General Plan Update. These measures acknowledge safety concerns pertaining to seismic ground shaking and would minimize potential hazards to a less than significant level.
- The General Plan FEIR concluded that the General Plan Update would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.
- According to the California Department of Conservation, the City of Stanton is located in a liquefaction hazard zone. In addition to the goals, strategies and actions identified in the General Plan Update to reduce seismic hazard impacts, mitigation requiring site-specific geologic investigation of liquefaction potential for subsequent new development projects within the City has been identified. If a site-specific geologic report concludes liquefaction impacts cannot be reduced to less than significant, with mitigation as necessary, development would not be permitted. Therefore, with compliance to Mitigation Measure GEO-1, impacts would be less than significant in this regard.
- The majority of the slopes in Stanton are less than ten percent. Much of the area available for new development would be on infill sites covered by primarily disturbed vegetation or impermeable surfaces. This would result in minimal soil erosion or loss of topsoil. Grading plans for proposed development projects would include an approved drainage and erosion control plan to minimize the impacts from erosion and sedimentation during grading. Plans would be required to conform to all standards adopted by the City and meet the requirements set by Storm Water Pollution Prevention Plans (SWPPP) mandated by California State Water Resources Control Board. Impacts related to soil erosion or the loss of topsoil would be less than significant in this regard.
- There are no known ongoing or planned large-scale extractions of groundwater, gas, oil, or geothermal energy that would cause subsidence within Stanton. Therefore, impacts would be less than significant in this regard. Due to the City's flat topography and lack of significant slopes, the City is not subject to lateral spreading conditions. Therefore, impacts

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would be less than significant in this regard. Alluvial sediments, deposited by an ancestral Santa Ana River, underlie the City of Stanton. With implementation of mitigation measure GEO-1, which requires a geologic study for future development, including the identification of expansive soils and recommendations to minimize impacts related to expansive soils, if such soils are identified, impacts would be reduced to a less than significant level.

- The General Plan FEIR concluded that the General Plan Update would not have soils
  incapable of adequately supporting the use of septic tanks or alternative waste water
  disposal systems where sewers are not available for the disposal of waste water.
- The General Plan FEIR concluded that the General Plan Update would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

## **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The Stanton General Plan includes strategies and actions to reduce potential impacts associated with geology and soils. Future housing development, consistent with the Stanton General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with geology and soils, including preparation of site-specific geotechnical analysis and required compliance with the Stanton Municipal Code. The Community Health and Safety Element Update would not modify the existing land use plan or allow for development in areas not previously considered or at a greater intensity/density than identified in the General Plan FEIR. The proposed Community Health and Safety Element would continue to provide actions specific to reducing potential risks associated with geologic hazards within the City. Further, General Plan FEIR Mitigation Measure GEO-1 ensures that the City would continue to require geological reports for new developments prior to any issuance of grading permits.

The proposed amendment to the Community Health and Safety Element includes current information regarding fire hazard planning and emergency preparedness, as well as an evaluation of evacuation routes in hazard areas. Proposed policies would continue to promote development consistent with the adopted land use policy that considers natural and human-induced hazards and the overall safety of Stanton's residents.

The revisions to the Housing Element and Community Health and Safety Element would not result in new impacts to geology and soils beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan strategies and actions, there would be no new significant or significantly different impacts to geology and soils as a result of the proposed Project.

#### General Plan FEIR Mitigation Measures:

GEO-1 Prior to the issuance of a grading permit, new development within the City shall have a site-specific geologic report prepared by a registered geologist or soils engineer and submitted to the City Building and Safety Division for approval. The geologic report shall address geological hazards, including ground shaking, liquefaction and subsidence. The geologic report shall provide construction recommendations to minimize impacts related to ground shaking, liquefaction and subsidence. The geologic report shall also indicate whether the soil types within the project area are considered expansive soils. The geologic report shall provide construction recommendations to minimize impacts related to expansive soils, if such soils are identified within the project site. All recommendations in the geologic report shall be implemented during site preparation, grading, and construction. New construction shall be prohibited were structural solutions to identified hazards cannot be mitigated to a less than significant level.

## 4.8 GREENHOUSE GAS EMISSIONS

Th	resholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
W	ould the project:						
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?					X	
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?					Х	

In March 2010, the Natural Resources Agency revised Appendix G of the State CEQA Guidelines to include a checklist item relating to a project's impacts relating to Greenhouse Gas (GHG) Emissions. In particular, Appendix G of the State CEQA Guidelines now includes a checklist item that provides:

#### VIII. Greenhouse Gas Emissions. Would the project:

- (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- (b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The City certified the General Plan Final EIR in 2008, several years before the above checklist item was added to the State CEQA Guidelines. California courts have held that where a new guideline or threshold is adopted after the certification of an EIR, an Addendum to the EIR need not include additional environmental analysis relating to that guideline or threshold where the potential environmental impact at issue in the new guideline or threshold was known or could have been known at the time the EIR was certified. (See Citizens Against Airport Pollution v. City of San Jose (2014) 227 Cal.App.4th 788, 806 [even though State CEQA Guidelines were amended on March 18, 2010 to address greenhouse gas emissions, lead agency's 2010 Addendum to a 1997 EIR did not require analysis of greenhouse gas emissions because "information about the potential environmental impact of greenhouse gas emissions was known or could have been know at the time the 1997 EIR and the 2003 SEIR for the [project] were certified"]; Concerned Dublin Citizens v. City of Dublin (2013) 214 Cal.App.4th 1301, 1319-1320 ["the adoption of guidelines for analyzing and evaluating the significance of data does not constitute new information if the

underlying information was otherwise known or should have been known at the time the EIR was certified"]; see also Citizens for Responsible Equitable Environmental Development v. City of San Diego (2011) 196 Cal.App.4<sup>th</sup> 515, 532.). Because potential impacts relating to Greenhouse Gas Emissions were not known or could not have been known when the General Plan FEIR was certified in 2008, California law does not require these impacts to be analyzed in this Addendum.

The Final EIR does not include a stand-alone Greenhouse Gas Emissions analysis section. GHG Emissions are generally discussed in the Air Quality section.

#### **General Plan FEIR Conclusions**

• Population growth anticipated to occur under the General Plan Update is expected to result in increased emissions of greenhouse gases, largely due to increased vehicle miles traveled, as well as increased energy consumption and waste generation. Increased concentrations of greenhouse gas emissions could also potentially conflict with the requirement of Assembly Bill 32 to reduce statewide greenhouse gas emissions. The General Plan FEIR provides the total amount of greenhouse gas emissions from area, indirect, and mobile sources for existing and General Plan Update buildout conditions. Emission reduction measures targeting sources of greenhouse gas emissions called for in Assembly Bill 32 will likely be adopted in the near future, although no measures have yet been adopted, and it is unknown at this time if these measures will apply to local governments.

Since future (i.e., 2020) greenhouse gas emissions are projected to exceed existing levels by a sizeable margin, the incremental greenhouse gas emissions associated with development under the General Plan Update would cause a cumulatively considerable incremental contribution to the cumulative (worldwide) impacts when viewed in connection with worldwide greenhouse gas emissions. Goals, strategies and actions have been specified in the Regional Coordination Element to encourage the use of alternative energy sources, reduce vehicle miles traveled, add additional trees/vegetation, and develop a public education program emphasizing air quality conditions, and promoting innovative approaches to reduce harmful impacts to the atmosphere. Furthermore, Mitigation Measure AQ-2, from the Air Quality section, would require the City to create and implement a Climate Protection Action Plan to set up an enforceable framework for the City to achieve the objectives outlined in AB 32 and Executive Order S-3-05.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, strategies, and recommendations of the General Plan Update. In general, implementation of the goals, strategies and actions in the General Plan Update, as well as compliance with federal, state, and local regulations would avoid or reduce their incremental contribution to the significant worldwide increase in GHG emissions. However, for some projects it is possible that adherence to the strategies and actions in the General Plan Update may not adequately avoid or reduce incremental impacts, and such projects would require additional measures. These additional measures would be considered mitigation. For each future discretionary project requiring mitigation, project specific measures would be identified with the goal of reducing incremental project level impacts

to less than significant or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined necessary and feasible, these measures would be included in a Mitigation Monitoring and Reporting Program for the project. Mitigation measures would include the comprehensive General Plan Update strategies and actions designed to reduce the GHG emissions of future development. The measures may be updated, expanded, and refined when applied to specific future projects based on project specific design and changes in existing conditions, and local, state, and federal laws.

The degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately determined for each specific future project at this programmatic level of analysis. Therefore, the cumulatively considerable incremental contribution to the worldwide increase in GHG emissions represented by development that is anticipated to occur with implementation of the General Plan Update is considered significant and unavoidable.

## **Analysis of Modified Project**

It is noted that the Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the Stanton General Plan, would be reviewed for consistency with policies and programs aimed to reduce GHG emission impacts as a result of new development and construction-related emissions and operational activities. More specifically, proposed projects would be reviewed for consistency with the General Plan Regional Coordination Element, Goal RC-3, which advocates for clean and safe air quality and contains numerous strategies and actions addressing energy efficiency. General Plan Goal CD-4.1, supports a well-connected, multi-modal urban environmental to reduce vehicle trips and encourage alternative transportation options. Additionally, the General Plan and Zoning Code maximize the potential for mixed-use and other creative residential development types, which would help the City achieve greenhouse gas reductions through reduced vehicle trips. Compliance with the AQMP and General Plan strategies and actions would contribute to the reduction of GHG emissions. Further the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR.

The proposed Project would not result in new impacts to GHG emissions beyond those identified in the General Plan FEIR. Following compliance with the General Plan strategies and actions, there would be no new significant or significantly different impacts to greenhouse gas emissions as a result of the proposed Project.

## 4.9 HAZARDS AND HAZARDOUS MATERIALS

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Create a significant hazard to the publi	ic					
or the environment through the routin transport, use, or disposal of hazardou materials?				Χ		
b. Create a significant hazard to the publi or the environment through reasonabl foreseeable upset and accider conditions involving the release of hazardous materials into the environment?	ly nt of e			Х		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	s n			X		
d. Be located on a site which is included o a list of hazardous materials site compiled pursuant to Government Cod Section 65962.5 and, as a result, would create a significant hazard to the publi or the environment?	s e it				Х	
e. For a project located within an airpo land use plan or, where such a plan ha not been adopted, within two miles of public airport or public use airpor would the project result in a safet hazard or excessive noise for peopl residing or working in the project area?	s a t, y e				Х	
f. Impair implementation of or physicall interfere with an adopted emergenc response plan or emergency evacuatio plan?	y sy n					Х
g. Expose people or structures, eithe directly or indirectly, to a significant ris of loss, injury or death involvin wildland fires?	k					Х

#### **General Plan FEIR Conclusions**

• There are a variety of existing business operations in the City of Stanton that use, store, or transport hazardous substances, as well as generate hazardous waste. Therefore, any non-residential development that occurs within the City may result in an increase in hazardous materials use, transport, or generation of hazardous waste. Since the General Plan Update does not include any specific development projects, no specific type of hazard

associated with the use of these materials can be identified and the likelihood of a hazard presenting a serious health or safety to the public cannot be determined at this time. However, it can be generally concluded that any additional non-residential development in the City would result in an increase in the use and transport of hazardous materials and an increase in the generation of hazardous waste. The consequence of this increased presence of hazardous materials in the City would be an increase in the potential for human exposure to these substances, with possible public health and safety consequences.

While the risk of exposure to hazardous materials cannot be eliminated, measures can be implemented to maintain risk to acceptable levels. Compliance with measures established by Federal, State and local regulatory agencies is considered adequate to offset the negative effects related to the use, storage and transport of hazardous materials in the City. In addition, General Plan Update goals, strategies, and actions, as well as the recommended mitigation measures (Public Health and Safety (PHS)-1, PHS-2, PHS-3, and PHS-4), would further reduce hazardous materials impacts to a less than significant level.

• Implementation of the General Plan Update would result in an overall decrease in non-residential development. However, the General Plan Update proposes four mixed-use land use designations, which would include commercial uses. Implementation of the General Plan Update has the potential to result in an increase in the use and transport of hazardous materials in the City of Stanton. The increased use and transport of hazardous materials in the City increases the potential for accidental releases of hazardous materials, which poses a threat to the health and safety of residents. Depending on the nature and extent of the contamination, groundwater supplies could become unsuitable for use as a domestic water source. Accidental releases would most likely occur in the commercial and industrial areas and along transport routes leading to and from these areas. Currently, the primary concentration of commercial uses is located along State Route 39 (Beach Boulevard) and industrial uses are located to the east of Beach Boulevard and to the north of the Southern Pacific Railroad.

The Orange County Fire Authority oversees the submittal of Business Emergency Plans, which are intended to mitigate potential release of hazardous substances and minimize potential harm or damage. Oversight by the appropriate agencies and compliance with applicable regulations are considered adequate to offset the negative effects related to the accidental release of hazardous materials in the City.

Compliance with measures established by Federal, State and local regulatory agencies is considered adequate to offset the negative effects related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials in the City. In addition, General Plan Update goals, strategies, and actions, and PHS mitigation measures would further reduce accidental release of hazardous materials impacts to a less than significant level.

• Several elementary and high schools are located within the City. New businesses that locate near residential areas or within 1/4-mile from a school may expose these sensitive land

uses to greater risk of exposure to hazardous materials, wastes, or emissions. Methods such as a buffer in the form of a major street, channel, or intervening land use can be used to separate residential areas from industrial areas. The General Plan FEIR concludes that General Plan Update goals, strategies, and actions, as well as the recommended mitigation measures (PHS-1, PHS-2, PHS-3, and PHS-4), would reduce hazardous materials impacts to a school to less than significant level.

- The General Plan FEIR did not identify any sites in Stanton included on the Department of Toxic Substances Control Hazardous Waste and Substance List (Cortese List) and impacts were determined to be less than significant.
- The City of Stanton is not located within the accident potential zone of the Joint Forces Training Base; the closest aircraft base to the City. However, the northwest portion of the City is located within the AELUP height restriction zone for JFTB. This portion of the City is composed of low-density residential land uses. This land use designation would not change upon the General Plan Update. Upon implementation of the height restrictions that are currently being imposed by the AELUP and the additional recommended mitigation measures (PHS-5 through PHS-9), potential impacts to people residing or working in the AELUP would be reduced to less than significant levels.
- The Community Health and Safety Element of the General Plan includes the goal to: "Maintain a level of preparedness to respond to emergency situations in order to reduce the loss of life, injury and property damage to the community." (Goal 5.1, Community Health and Safety Element). However, the General Plan FEIR does not contain a discussion on possible impairment of implementation an adopted emergency response plan or emergency evacuation plan; effects found not to be significant.
- The General Plan FEIR concluded that the General Plan Update would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

# **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized site to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. The Stanton General Plan includes strategies and actions to reduce potential impacts due to hazards or hazardous materials.

The proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR. Updates to the Community Health and Safety Element are largely focused on the topics of fire hazards, emergency preparedness, evacuation routes, and

climate adaption. The Fire Hazards discussion was updated to include current information regarding the CAL FIRE Fire Hazard Severity Zones, of which there are none in the City of Stanton. In accordance with SB 99, the City conducted an evaluation of evacuation routes serving residential developments in hazard areas. This analysis found that there are no residential developments within Stanton that do not have at least two emergency evacuation routes. Lastly, the City prepared a Climate Vulnerability Assessment (CVA) to promote effective and integrated actions to safeguard against anticipated impacts from climate change.

No goals, strategies, or actions from the current Community Health and Safety Element were eliminated as part of this update. Proposed modifications or additions related to natural hazards were made to Flooding, Fire and Police Protection, Emergency Response, and Hazardous Materials strategies and actions. Strategy 2.1.2 promotes the expansion of pervious surfaces, while Action 2.1.1 (c) encourages permeable paving. Action 4.2.1(c) minimizes the risk of structural loos from fires; Action 4.2.1(d) supports creating visible addressing and signage; and Action 4.2.1 (e) considers fire safe design. Action 5.1.1 (e) regulates the location of critical facilities and advocates for minimum standards for evacuation of residential areas. Proposed Action 6.1.1 (d) promotes cleanup of any active hazardous waste sites.

The revisions to the Housing Element and Community Health and Safety Element would not result in new hazards and hazardous materials impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan strategies and actions, there would be no new significant or significantly different impacts related to hazards and hazardous materials as a result of the proposed Project.

#### **General Plan FEIR Mitigation Measures:**

- PHS-1 Provide information to businesses on viable alternatives to hazardous materials. Create an informational pamphlet with existing hazardous material substitutions and retailers that sell the materials. Offer the information to applicable business owners who are required to file as a hazardous waste handler in the City.
- PHS-2 Provide information on viable alternatives to household hazardous materials on the City's website so households may use alternatives. Information will also educate the public to the health, safety, and environmental benefits of using non-hazardous substitutions.
- PHS-3 Ensure that all new land uses within the City of Stanton comply with applicable laws regarding hazardous substances transport, storage, use, and handling; and incorporate precautions that protect adjoining uses from unacceptable health and safety risks.
- PHS-4 Establish and adopt development standards which ensure that new mixed use districts that include residential uses near industrial development does not create an unacceptable risk of human exposure to hazardous materials.
- PHS-5 Limit development height within the flight approach to the Joint Forces Training Base (JFTB) Los Alamitos to minimize safety hazards to aircraft and protect the airfield.
- PHS-6 Monitor legislation and regulations established by the Joint Forces Training Base (JFTB) Los Alamitos.

- PHS-7 Applicants of future development projects shall comply with all requirements of the FAA should any portion of the development encroach within 100 to 1 imaginary surface surrounding the Joint Forces Training Base, Los Alamitos. Encroachment within the 50 to 1 approach will require approval by the FAA. A Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the FAA in accordance with Federal Aviation Administration Regulations Part 77.
- PHS-8 Applicants of future development projects seeking a Conditional Use Permit or similar approval for the construction or operation of a heliport or helistop, shall comply with the State permit procedure provided by law and with conditions of approval imposed by the Federal Aviation Administration (FAA), by the Airport Land Use Commission for Orange County (ALUC), and by Caltrans Division of Aeronautics. This requirement shall be in addition to other City development requirements.
- PHS-9 Future development or redevelopment projects with residential uses located within the Los Alamitos Impact Zones, Joint Forces Training Base shall disclose that the units are within the vicinity of the Joint Forces Training Base, Los Alamitos. The disclosure shall be provided in sales literature and/or sales/rental/lease agreements.

# 4.10 HYDROLOGY AND WATER QUALITY

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Violate any water quality standards or	<del></del>				<del></del>	
waste discharge requirements or otherwise substantially degrade surface or groundwater quality?				X		
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X		
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:						
<ul> <li>result in substantial erosion or siltation on- or off-site;</li> <li>substantially increase the rate or amount of surface runoff in a</li> </ul>				X		
manner which would result in flooding on- or offsite;  create or contribute runoff water						
which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or						
impede or redirect flood flows?  d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?						Х
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?					X	

#### **General Plan FEIR Conclusions**

• All future development would be subject to compliance with Chapter 6.20, Stormwater Discharge and Water Quality Ordinance of the City's Municipal Code, and NPDES requirements. Construction sites with 1.0 acre or greater of soil disturbance or less than 1.0 acre, but part of a greater common plan of development, would be required to apply for coverage for discharges under the General Construction Permit. As part of its

compliance, a NOI would need to be prepared and submitted to the Santa Ana Regional Water Quality Control Board (RWQCB), providing notification and intent to comply with the General Permit. Prior to grading or construction, a SWPPP would be required for the construction activities onsite. Implementation of recommended mitigation (i.e., compliance with the NPDES requirements) would reduce construction-related impacts to water quality to a less than significant level.

A Water Quality Management Plan (WQMP) would be required for all future development. The WQMP would be specific to the expected pollutants that would be present in the stormwater flow from the project site after completion of construction. The specified mitigation requires preparation of a comprehensive WQMP for each future development. The WQMP would be required to include both Structural and Non-Structural BMPs, and comply with the requirements of the DAMP, as required by the Santa Ana RWQCB and NPDES permits. With mitigation, potential impacts in this regard would be reduced to a less than significant level.

- Wells have historically supplied 85 percent of water in the West Orange County System. The General Plan Update proposes 5,751 additional dwelling units and a reduction of 1,433,635 square feet of non-residential development. Projected development and increased population would result in an ultimate increase in the demand for water supplies and strain existing water facilities. The projected increase in demand is not anticipated to substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The Orange County Water District would continue to regulate the amount of groundwater pumped from the Basin and establish the Basin Production Percentage (BPP) for all pumpers to ensure groundwater resources are adequate. Additionally, the City has identified water conservation measures within the General Plan Update strategies, actions and implementation measures. Specifically, strategies include decreasing demand on the City's potable water supply, using recycled water and water conservation. With Federal and State requirements along with the following strategies, actions and implementation measures included in the General Plan Update, impacts to groundwater resources would be less than significant in this regard.
- Some effects were found not to be significant by the General Plan FEIR; implementation of
  the General Plan Update would not result in substantial erosion or siltation on- or off-site;
  nor would it substantially increase the rate or amount of surface runoff in a manner which
  would result in flooding on- or offsite. However, the General Plan FEIR did find some
  impacts to be significant with regard to stormwater capacity.

The City of Stanton is primarily built out and has an existing stormwater infrastructure. Development associated with implementation of the General Plan Update may contribute to the runoff, which may exceed the capacity of the existing drainage system. New development projects associated with implementation of the General Plan Update would be required to ensure project-specific and citywide drainage systems have adequate capacity to accommodate new development. Strategies and actions in the General Plan Update serve to ensure all new developments pay a fair share of the cost for storm drain infrastructure improvements. Furthermore, implementation of the required mitigation measure (HYD-1)

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would ensure new development projects are designed to result in less than significant impacts related to the drainage system capacity. Compliance with strategies and actions included in the General Plan Update and the required mitigation measure would ensure drainage system capacity impacts are reduced to a less than significant level.

• The General Plan FEIR concluded that the General Plan Update would not in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

# **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of proposed development, ADU, vacant and mixed-use sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the Stanton General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with hydrology and drainage, including preparation of site-specific analysis and required compliance with the Stanton Municipal Code. Further, the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR. The Stanton General Plan includes strategies and actions to reduce potential impacts to hydrology and water quality. Additionally, General Plan FEIR Mitigation Measures HYD-1 through HYD-3 outline strategies to mitigate drainage impacts, decrease runoff pollutants, and prepare WQMPs.

The revisions to the Housing Element and Community Health and Safety Element would not result in new hydrology and water quality impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan strategies and actions, there would be no new significant or significantly different impacts related to hydrology and water as a result of the proposed Project.

#### **General Plan FEIR Mitigation Measures:**

- HYD-1 Prior to approval of project tract maps, the project owner/developer(s) shall be required to coordinate with the City of Stanton Director of Public Works to determine requirements necessary to mitigate impacts to drainage improvements required to accommodate storage volumes and flood protection for existing and future runoff. Proposed projects shall implement mitigation measures, if required, to the satisfaction of the Director of Public Works.
- HYD-2 Prior to issuance of any Grading or Building Permit, and as part of the future development's compliance with the NPDES requirements, a Notice of Intent shall be prepared and submitted to the Santa Ana RWQCB providing notification and intent to comply with the State of California General Construction Permit. Also, a Stormwater Pollution Prevention Plan (SWPPP) shall be reviewed and approved by the Director of Public Works and the City

Engineer for water quality construction activities onsite. A copy of the SWPPP shall be available and implemented at the construction site at all times. The SWPPP shall outline the source control and/or treatment control BMPs to avoid or mitigate runoff pollutants at the construction site to the "maximum extent practicable."

HYD-3 Prior to issuance of any Grading Permit, all future development shall prepare, to the satisfaction of the Stanton Director of Public Works and the City Engineer, a Water Quality Management Plan, which includes both Structural and Non-Structural BMPs in order to comply with the requirements of the current DAMP and NPDES.

## 4.11 LAND USE AND PLANNING

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Physically divide an established community?					Χ	
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X		

#### **General Plan FEIR Conclusions**

- The City of Stanton is primarily developed. Only a very limited amount of vacant land (57.8 acres) located throughout the City remains. The General Plan Update anticipates 5,751 additional residential units and 1,433,635 fewer square feet of non-residential uses over existing conditions. No physical division would result from development pursuant to the General Plan Update; the General Plan FEIR found effects not to be significant.
- The General Plan Update contains strategies and implementing actions that continue to support current procedures followed by the City when development applications are reviewed, including the referral of plans to appropriate Federal and State agencies to ensure consistency between City and other agency regulations and requirements. Strategies and actions in the General Plan Update continue to provide for implementation of and participation in area-wide planning efforts. The consistency of the General Plan Update with specific Federal and State plans is presented in Table 5.1-2 of the General Plan FEIR.

The General Plan Update includes relevant strategies and actions that reflect and respond to SCAG's regional goals. The Community Development Element is intended to establish the overall policy direction for land use planning decisions in the City of Stanton. In addition, strategies and actions in the Community Development and Housing Elements address regional jobs/housing balance objectives, in regards to providing affordable housing while providing a range of housing and employment opportunities. The General Plan FEIR assesses the General Plan Update's relationship and consistency to pertinent policies contained in various chapters of the Regional Comprehensive Plan and Guide, as identified by SCAG; the General Plan Update is consistent with all SCAG policies.

The SCAG Growth Vision Report (GVR) contains principles and numerous strategies to guide regional development and transportation improvements throughout Southern California. The General Plan FEIR provides a detailed analysis of the project's consistency with the principles and strategies of the GVR. The General Plan Update would be consistent with all applicable strategies of the SCAG Southern California Compass Growth Visioning Program. As such, the General Plan FEIR determined that the project would not conflict with the SCAG Growth Visioning Program and no adverse impacts are anticipated in this regard.

The General Plan FEIR concludes that the General Plan Update would be consistent with the City's Zoning Ordinance and Redevelopment Plan.

# **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Further, the Community Health and Safety Element would not result in any modifications to existing land use designations or modify any General Plan strategies or actions specific to land use and planning. Future housing development, consistent with the Stanton General Plan, would be reviewed for consistency with land use policies and programs. The Stanton General Plan includes strategies and actions to reduce potential impacts resulting from new development and intensification of land uses.

The revisions to the Housing Element and Community Health and Safety Element would not result in new land use and planning impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan strategies and actions, there would be no new significant or significantly different impacts to land use and planning as a result of the proposed Project.

## 4.12 MINERAL RESOURCES

	resholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
	ould the project:						
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?						X
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?						Х

#### **General Plan FEIR Conclusions**

 Future development within the Planning Area pursuant to the land use policies of the General Plan Update will not result in the loss of a known mineral resource as no mineral resources within the City have been determined by the California Geological Survey; the General Plan FEIR found effects not to be significant.

## **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Further, the Community Health and Safety Element would not result in any modifications to existing and use designations or modify any General Plan actions or strategies specific to mineral resources.

The revisions to the Housing Element and Community Health and Safety Element would not result in new mineral resources impacts beyond those identified in the General Plan FEIR. There would be no new significant or significantly different impacts to mineral resources as a result of the proposed Project.

## **4.13 NOISE**

Th	resholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
W	ould the project result in:						
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				Х		
b.	Generation of excessive groundborne vibration or groundborne noise levels?				Х		
C.	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?					Х	

#### **General Plan FEIR Conclusions**

Construction-related activities will be short-term temporary sources of groundborne noise that could affect occupants of neighboring uses. It is unlikely the City would experience intensive construction activity with implementation of the General Plan Update. Section 9.28.070 of the Municipal Code, Special Provisions, exempts "noise sources associated with construction, repair, remodeling, or grading of any real property," provided said activities occur between the hours of 7:00 AM and 8:00 PM Monday through Saturday. The City would require each project to implement the General Plan Update strategies and actions and mitigation measures (NOI-1) that address construction-related noise in order to minimize impacts to surrounding sensitive receptors. Through the environmental review process for individual projects, additional mitigation may also be required to further reduce construction-related noise impacts to a less than significant level. Development under the General Plan Update would primarily involve commercial and residential uses, thus significant impacts are not anticipated for groundborne vibration. Compliance and/or adherence to the City's Noise Ordinance, strategies and actions in the General Plan Update, and adherence to the recommended mitigation measures (NOI-1), would reduce shortterm construction noise impacts to less than significant levels.

With implementation of the General Plan Update, some residential uses would experience noise levels that would exceed the City's Noise and Land Use Criteria Compatibility Criteria

due to the increase in roadway noise. It is noted that the computer noise model used to project the potential ambient noise levels with implementation of the General Plan Update does not consider the existing noise attenuating features such as sound walls, buildings, landscaping, or topography. As such, the roadway noise contours may not reflect true noise conditions. Intervening structures or other noise-attenuating obstacles between the roadway and sensitive receptors may reduce roadway noise levels at the receiving receptor. However, there would almost certainly be receptors that would experience roadway noise levels very similar to those indicated by the noise contours. Existing railroad operations would not create a significant noise-related impact as the existing noise levels are less than significant. However, any future plans to increase the use of the railroads or operate the railroad during nighttime hours would potentially create a significant impact. If operations of the railroads change, acoustical barriers and measures would be necessary to mitigate potential impacts to less than significant levels. Thus, a less than significant impact would occur with implementation of mitigation measures. Adherence to the City's Noise Ordinance, strategies and actions in the General Plan Update, and the recommended mitigation measures would mitigate ambient noise impacts. However, even with implementation of feasible mitigation measures (NOI-2 through NOI-4) and applicable strategy and action measures, ambient noise impacts would not be reduced to a less than significant level. A significant and unavoidable impact would occur.

In the City of Stanton, there are four mixed-use areas: the General Mixed-Use, the North Gateway Mixed-Use District, the South Gateway Mixed-Use District, and the Town Center Mixed-Use District. Future noise from the mixed-use areas would be consistent with existing mixed-use areas, as they would be similar. Commercial uses would generally be placed below residential uses, however noise strategies and actions require the reduction of noise transmission between commercial and residential uses. Implementation of NOI-5 would ensure reduction of noise transmission between these two uses to less than significant levels.

Compliance and/or adherence to the City's Noise Ordinance, and strategies and actions in the General Plan Update would reduce stationary noise impacts for the City to less than significant.

The City is within the Joint Forces Training Base – Los Alamitos Airport 60 CNEL noise
contour. Single-family residential uses are within the 60 CNEL noise contour, however
impacts due to operations of the airport would be less than significant to residents as these
sensitive receptors do not exceed the "normally acceptable" threshold presented in the
General Plan FEIR. Therefore, it was concluded that a less than significant impact would
occur in this regard.

## **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's

RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Future housing development, consistent with the Stanton General Plan, would be reviewed for consistency with actions and strategies aimed to reduce potential impacts associated with noise, including preparation of site-specific analysis and required compliance with the Stanton Municipal Code. The proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or modify General Plan strategies and actions specific to noise. The Stanton General Plan includes strategies and actions to reduce potential impacts to ambient noise levels as a result of groundborne vibration or exposure to excessive noise levels. Further, General Plan FEIR Mitigation Measures NOI-1 through NOI-5 ensure review and enforcement of noise standards on new and existing development, development of noise reducing design measures, and require construction activities to reduce potential impacts related to noise.

The revisions to the Housing Element and Public Safety Element would not result in noise impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan strategies and actions, there would be no new significant or significantly different impacts related to noise as a result of the proposed Project.

## **General Plan FEIR Mitigation Measures:**

- NOI-1 At the discretion of the City of Stanton's Community Development Director, construction activities that may occur under the proposed General Plan Update shall include, but not be limited to the following:
  - During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receptors.
  - All construction equipment shall use available noise suppression devices and properly
    maintained mufflers. All internal combustion engines used in the project area shall
    be equipped with the type of muffler recommended by the vehicle manufacturer. In
    addition, all equipment shall be maintained in good mechanical condition to minimize
    noise created by faulty or poorly maintained engine, drive-train, and other
    components.
  - Construction noise reduction methods (i.e., shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied sensitive receptor areas, and use of electric air compressors and similar power tools, rather than diesel equipment) shall be employed where feasible. Staging of construction equipment and unnecessary idling of equipment shall be avoided whenever feasible. "Feasible," as used here, means that the implementation of this measure would not have a notable effect on construction operations or schedule.
- NOI-2 At the discretion of the City of Stanton's Community Development Director, all new development that may occur under the proposed General Plan Update shall include noise reduction design measures (i.e., attenuation barriers, double pane windows, sound attenuating building walls, incorporate architecturally attenuating features, landscaping, etc.) where conditions exceed the Noise and Land Use Compatibility Criteria "Normally Acceptable" noise exposure levels.
- NOI-3 At the discretion of the City of Stanton's Community Development Director, all new stationary sources shall include noise reduction practices (i.e., mufflers, well maintained

mechanical equipment, etc.) where conditions exceed the regulations within the Municipal Code. In addition, areas adjacent to sensitive receptors that are in excess of the City's Noise Ordinance (i.e., parking lots, public trash receptacles, truck delivery areas, etc.), shall implement applicable noise attenuation features (i.e., attenuation wall, mufflers, etc.).

- NOI-4 At the discretion of the City of Stanton's Community Development Director, any increase or change in railroad operations shall warrant an Acoustical Assessment to ascertain the potential noise impacts to surrounding sensitive receptors. Mitigation measures (i.e., attenuation barriers, double pane windows, sound attenuating building walls, incorporate architecturally attenuating features, landscaping, etc.) shall be implemented where conditions exceed the Noise and Land Use Compatibility Criteria of "Normally Acceptable" noise exposure levels.
- NOI-5 At the discretion of the City of Stanton's Community Development Director, all new mixed use areas shall include noise reduction practices (i.e., well maintained mechanical equipment, increased building insulation, upgraded party wall-to-floor ceiling assembly acoustical treatments, etc.) where conditions exceed the regulations for residential uses within the Municipal Code. In addition, where outdoor activities exceed the City's Noise Ordinance (i.e., parking lots, public trash receptacles, truck delivery areas, etc.), applicable noise attenuation features (i.e., attenuation wall, mufflers, etc.) shall be implemented.

## 4.14 POPULATION AND HOUSING

	resholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
a.	ould the project: Induce substantial unplanned						
a.	population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?					X	
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?						X

#### **General Plan FEIR Conclusions**

The General Plan Update would allow for the construction of approximately 5,751 additional dwelling units within the City of Stanton, resulting in a total of approximately 18,537 dwelling units at buildout. Additionally, buildout of the General Plan Update would result in a net reduction of 1,433,635 square feet of non-residential development within Stanton, resulting in a maximum of 6,144,748 square feet of non-residential development at buildout. Implementation of the General Plan Update is anticipated to increase the City's population by 20,416 persons, resulting in a total population of approximately 59,397 persons. As the City is predominately built out, future development would occur on existing vacant parcels, through infill development of underutilized parcels, or redevelopment of currently developed parcels, which is consistent with SCAG's policies that call for jurisdictions to maximize the use of existing urbanized areas that are accessible to transit through infill and redevelopment and utilize existing infrastructure. With the General Plan Update, the City of Stanton would establish policy direction towards the intensification of the City in key areas with four new mixed-use land use designations. Implementation of the General Plan Update would adequately meet the housing needs of the anticipated population growth within the City; therefore, the impacts are considered less than significant. Strategies and actions in the General Plan Update would further reduce any housing related impacts associated with buildout of the General Plan Update.

The City's General Plan Update accounts for the increased growth and proposes strategies and actions to reduce potential population related impacts associated with buildout of the General Plan Update. Additionally, the increase in population would occur over a 15-year

period, allowing for development of necessary services and infrastructure to accommodate this growth. Therefore, impacts are considered to be less than significant.

The General Plan FEIR projects the City's labor market under General Plan Update conditions and indicates approximately 11,430 jobs would be provided in the City at buildout. Buildout of the General Plan Update would decrease the City's employment opportunities by approximately 24 percent (3,631 jobs) less than existing conditions. In 2007, the City of Stanton had a jobs/housing ratio of approximately 1.18. Buildout of the proposed General Plan Update would result in 11,430 jobs and 18,513 housing units, which represents a jobs/housing ratio of approximately 0.62. Therefore, implementation of the General Plan Update would result in a reduction in the City's jobs/housing balance. Additionally, SCAG anticipates that in 2020 the County will have a jobs/housing balance of 1.74. Therefore, the Orange County subregion would have an adequate jobs/housing balance, and since jobs/housing balance is considered at a subregional/regional level, impacts would be considered less than significant in this regard. Additionally, the General Plan Update would include several strategies and actions within the Community Development and Economic Development Elements that promote employment opportunities for Stanton residents, further reducing impacts to a less than significant level.

The General Plan will allow the development of a variety of uses. However, this new
development under the General Plan Update will not displace substantial numbers of
housing units or people; the General Plan FEIR found effects not to be significant and no
impacts will result.

# **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Additionally, the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR. Future housing development, consistent with the Stanton General Plan, would be reviewed for consistency with strategies and actions aimed to reduce potential impacts associated with substantial unplanned population growth and displacement.

The revisions to the Housing Element and Community Health and Safety Element would not result in housing and population impacts beyond those identified in the General Plan FEIR. Following compliance with General Plan strategies and actions, there would be no new significant or significantly different impacts related to population and housing as a result of the proposed Project.

## 4.15 PUBLIC SERVICES

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:  • Fire protection?	Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
<ul><li>Police protection?</li><li>Schools?</li></ul>	adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:  • Fire protection?  • Police protection?				X		

## **General Plan FEIR Conclusions**

Development projects anticipated to occur pursuant to General Plan policy will result in increased demand for fire and police protection, and emergency services and facilities. Subsequent development would be reviewed by overseeing agencies, such as the Orange County Fire Authority (OCFA) and the Orange County Sheriff's Department (OCSCD), in order to assess fire and police protection services on a project-by-project basis. Additionally, new developments associated with the buildout of the General Plan Update would be required to comply with all applicable fire and safety codes and ordinance requirements for construction, access, water mains, fire flows, and hydrants. Action CHS-4.1.1(c) of the General Plan Update requires new developments be reviewed to assess the impact of new development on fire protection services and to ensure that increased demand for emergency services will be adequately served. Project-specific recommendations to mitigate impacts to police protection services would be assessed on a project-by-project basis. Prior to project-specific approvals, the OCFA requires Project Developers to enter into a Secured Fire Protection Agreement with the OCFA and/or City of Stanton, in order to mitigate impacts to fire protection facilities, equipment and/or personnel. The General Plan FEIR determines that implementation of the goals, strategies and actions in the General Plan Update, recommended mitigation measures (PS-1, PS-2, and PS-3) and approval of subsequent project-specific Secured Fire Protection Agreements would reduce impacts to fire and police protection services to less than significant.

- Residential development projects anticipated to occur pursuant to General Plan Update will result in demand for new or expanded education facilities to adequately accommodate new students. The Garden Grove Unified School District (GGUSD), Anaheim Unified High School District (AUHSD), Magnolia School District (MSD) and Savanna School District (SSD) are responsible for the provision of public school facilities (kindergarten though high school) in the City of Stanton. Currently, nine of the 16 schools serving the City are at or above capacity levels. Implementation of the General Plan Update would result in the addition of 5,751 dwelling units citywide. Buildout of the proposed General Plan Update would result in the addition of approximately 3,811 students dispersed throughout all grade levels and school facilities. According to GGUSD, impacts associated with implementation of the General Plan Update could result in the need for additional or relocation of portable classrooms, noise abatement measures, school recreational facilities, parking impacts, potential designation for school bus loading issues, and city safe routes to school/cross guards. The SSD anticipates the school district would not be impacted by implementation of the General Plan Update. Applicable developer and redevelopment fees to mitigate impacts to the SSD and AUHSD are shared between the two districts. Pursuant to SB 50, payment of fees to the applicable school district is considered full mitigation for project impacts, including impacts related to the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for schools. Therefore, individual project applicants would be required to pay the statutory fees, so that space can be constructed, if necessary, at the nearest sites to accommodate the impact of projectgenerated students, reducing impacts to a less than significant level. Mitigation Measure SCH-1 is required to ensure applicable developer fees are paid prior to the issuance of certificate of occupancy.
- The City of Stanton is built out with little available vacant land for parkland dedication and conversion. Additional recreational facilities within and adjacent to the City are available to serve residents. The population increase resulting from the General Plan Update would create new demand on current recreational infrastructure including parks, facilities and programs. In order to offset the existing parkland deficiency, the City has taken several measures to provide alternative facilities and options for recreational opportunities including, creation of mini, community and neighborhood parks; utilizing local school acreage to augment available parkland (joint-use facilities); and seeking open space opportunities for passive recreation amenities such as multi-use fields, play areas, and green space which serve to benefit several local neighborhoods. Individual development projects would be reviewed to determine their potential impact on park and recreation facilities. The City's Municipal Code Chapter 19.42 and Section 20.10.070 require dedication of land and/or payment of in lieu fees as a condition of approval for residential subdivisions. The City has proposed several goals, strategies and actions in the General Plan Update to assist in providing parkland and recreational facilities for residents of Stanton, including acquisition of land and updating the Parks and Recreation Master Plan to identify where additional parks and the types of facilities are needed. However, with the

Community Health and Safety Element Update 2021-01 Addendum to the General Plan FEIR

City's existing deficiency and the future growth associated with buildout of the General Plan Update, along with the limited land available to develop additional parks, impacts to parks and recreational facilities would be considered significant and unavoidable. According to the General Plan FEIR, no mitigation measures beyond the goals, strategies and actions identified in the General Plan Update are available; leaving Parks impacts significant and unavoidable.

Residential development projects anticipated to occur pursuant to General Plan Update will
result in demand for library resources. The current General Plan Update contains actions
that promote the expansion of library services.

## **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses. Further, the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR. The Stanton General Plan includes strategies and actions to reduce potential impacts to public services as a result of new development and intensification of land uses. Further, General Plan FEIR Mitigation Measures PS-1, PS-2, PS-3, and SCH-1 ensure acceptable service ratios and response times of police, fire, emergency medical, and educational services.

The Community Health and Safety Element update includes updated information regarding fire hazard planning and emergency preparedness, as well as an evaluation of evacuation routes for residents. Proposed policies would continue to promote development consistent with the adopted land use policy that considers natural and human-induced hazards and the overall safety of Stanton's residents, including the provision of adequate services and facilities.

The revisions to the Housing Element and Community Health and Safety Element would not result in public services impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan strategies and actions, there would be no new significant or significantly different impacts related to public services as a result of the proposed Project.

#### General Plan FEIR Mitigation Measures:

- PS-1 Prior to project approval, all development projects shall be required to enter into a Secured Fire Protection Agreement with the Orange County Fire Authority (OCFA) and /or City of Stanton.
- PS-2 All traffic signals on public access ways shall include the installation of optical pre-emption devices.
- PS-3 All electrically operated gates within a project, or addition to an existing facility or residence, shall install an emergency access key over-ride switch approved by the OCFA.

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SCH-1 Prior to the issuance of certificate of occupancy, individual project applicants shall submit evidence to the City of Stanton that legally required school impact mitigation fees have been paid per the mitigation established by the applicable school district.

## 4.16 RECREATION

	Substantial	Substantial	Information	No	Less Than	No Impact
	Change in	Change in	Showing	Additional	Significant	
	Project	Circumstance	Greater	Significant	Impact/No	
	Requiring	Requiring	Significant	Impact/	Changes or	
	Major EIR	Major EIR	effects than	Less Than	Information	
	Revisions	Revisions	Previous EIR	Significant	Requiring	
Thresholds:				Impact	Preparation	
				With	of an MND	
				Application	or EIR	
				of		
				Mitigation		
				from FEIR		
a. Would the project increase the use of						
existing neighborhood and regional						
parks or other recreational facilities such				X		
that substantial physical deterioration of the facility would occur or be						
accelerated?						
b. Does the project include recreational						
facilities or require the construction or						
expansion of recreational facilities which				X		
might have an adverse physical effect on						
the environment?						

#### **General Plan FEIR Conclusions**

This topical area is addressed in the General Plan FEIR's Parks and Recreational Facilities section; refer to Section 4.15, Public Services.

### **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Further, the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR. The Stanton General Plan Update includes strategies and actions to reduce potential impacts to parks and recreation facilities as a result of new development and intensification of land uses. Further, the Stanton Municipal Code sets parkland dedication requirements in accordance with the Quimby Act.

The revisions to the Housing Element and Community Health and Safety Element would not result in additional parks and recreation facilities impacts beyond those identified in the General Plan FEIR. Following compliance with General Plan strategies and actions, there would be no new significant or significantly different impacts related to recreation as a result of the proposed Project.

## 4.17 TRANSPORTATION

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:  a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?					Х	
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				X		
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?					X	
d. Result in inadequate emergency access?					Х	

#### **General Plan FEIR Conclusions**

• The City of Stanton is required to demonstrate compliance with the Orange County Congestion Management Program (CMP). Beach Boulevard and Katella Avenue are designated as Orange County CMP facilities. The target operation for CMP facilities is Level of Service (LOS) E or better; Beach Boulevard and Katella Avenue roadway segments would operate at LOS D or better under forecast General Plan Buildout conditions. Therefore, impacts to CMP facilities would be less than significant in this regard. Additionally, goals, strategies and implementation measures in the General Plan Update would further CMP objectives.

Public transportation is available to Stanton's residents through the Orange County Transportation Authority (OCTA) bus service. The General Plan Update would increase population in the City, thus, increasing the demand for transit service. Additionally, the General Plan Update would establish four new mixed-use land use designations, which would encourage the use of transit and alternative modes of transportation. Potential impacts in this regard would be reduced to less than significant levels following compliance with General Plan Update strategies and actions which call for a citywide framework plan for improving transit and transit supportive development within the City and working with OCTA to study alternative uses of the Pacific Electric and Union Pacific Corridors and promotion of mass transit systems, which would ensure that public transportation needs

Environmental Analysis

are accounted for as development occurs. Implementation of the General Plan Update would not conflict with adopted policies, plans, or programs supporting alternative transportation (i.e., bus routes) and a less than significant impact would occur in this regard.

- The traffic conditions at build-out of the City were projected to determine whether the City's circulation system was capable of accommodating the future traffic demands of the City's land use plan. The General Plan is forecast to reduce citywide trips by approximately 3,127 daily trips. While the overall change in traffic generation with implementation of the General Plan Update is a reduction in trips, the change occurs in 19 focus areas, so some roadways may have an increase in trips while some show a reduction in trips. With the addition of project generated trips, all of the study roadway segments are forecast to operate at an acceptable LOS according to City of Stanton performance criteria for forecast General Plan buildout conditions. No mitigation measures beyond the goals, strategies and actions identified in the General Plan Update are required; the General Plan FEIR concludes impacts to be less than significant.
- Buildout of the General Plan Update is not anticipated to result in inadequate design features or incompatible uses. Through the City's development review process, future developments would be evaluated to determine the appropriate land use permit for authorizing their use and the conditions for their establishment and operation. At a minimum, compliance with relevant Code standards would be required. Therefore, the General Plan Update would not substantially increase hazards due to design feature or incompatible uses. A less than significant impact would occur in this regard. Future development projects would be evaluated on a case-by-case basis to ensure that adequate access and circulation to and within the development would be provided. Access to development sites would be required to comply with all City design standards and would be reviewed by the City and the Orange County Fire Authority to ensure that inadequate design features or incompatible uses do not occur. The City and the Orange County Fire Authority would review future development in order to ensure that they are designed to meet adopted standards and provide adequate emergency access. Therefore, the General Plan FIER concluded that implementation of the General Plan Update would not result in significant impacts involving inadequate design features or incompatible uses.
- Proposed development projects would be required to comply with the City's development review process including review for compliance with the City's Zoning Code. New developments associated with the buildout of the General Plan Update would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. Individual projects would be reviewed by the Orange County Fire Authority to determine the specific fire requirements applicable to the specific development and to ensure compliance with these requirements. This would ensure that new developments would provide adequate emergency access to and from the site. Further, the City and the Orange County Fire Authority would review any modifications to existing roadways to ensure that adequate emergency access or emergency response would be maintained. Additionally, emergency response and evacuation procedures would be

coordinated through the City in coordination with the police and fire departments, resulting in less than significant impacts, as determined by the General Plan FEIR.

# **Analysis of Modified Project**

The General Plan FEIR did not address potential impacts to Vehicle Miles Traveled (VMT) because at the time of preparation of the General Plan FEIR, VMT was not the primary metric used as the basis for determining the significance of transportation impacts under CEQA. However, the proposed Project does not include site-specific development or result in any changes to existing land uses or allow for greater development than what was considered in the General Plan FEIR. Thus, the proposed Project would result in similar VMT as would occur under the existing General Plan and would not result in new impacts or substantially more significant impacts related to VMT.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Further, the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR. The Stanton General Plan includes strategies and actions to reduce potential impacts to the circulation system, including increased hazards and emergency access, as a result of new development and intensification of land uses.

The Community Health and Safety Element update includes current information regarding fire hazard planning and emergency preparedness, as well as an evaluation of evacuation routes in hazard areas. Proposed policies would continue to promote development consistent with the adopted land use policy that considers natural and human-induced hazards and the overall safety of Stanton's residents.

The revisions to the Housing Element and Community Health and Safety Element would not result in transportation impacts beyond those identified in the General Plan FEIR. Following compliance with the General Plan strategies and actions, there would be no new significant or significantly different impacts related to transportation as a result of the proposed Project.

# 4.18 TRIBAL CULTURAL RESOURCES

Thresholds:  Would the project cause a substa Resources Code section 21074 as	either a site, feature, place,	cultural landscap	e that is geograp	hically defined	in terms of	No Impact
the size and scope of the landsca is:  a. Listed or eligible for listin California Register of Resources, or in a local r historical resources as define Resources Code section 5020	ng in the Historical register of d in Public	ith cultural value	to a California Na	ative American	tribe, and that	
b. A resource determined by agency, in its discretion and by substantial evidence, to be pursuant to criteria set subdivision (c) of Public Code Section 5024.1. In ap	supported significant forth in Resources					

## **General Plan FEIR Conclusions**

Since certification of the General Plan FEIR, the CEQA Guidelines Appendix G Checklist has been revised to include a new category for Tribal Cultural Resources impacts. This topical area is addressed in the General Plan FEIR's Cultural Resources section; refer to Section 4.5.

# 4.19 UTILITIES AND SERVICE SYSTEMS

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
Would the project:						
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				Х		
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X		
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				Х		
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				Х		
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				Х		

### **General Plan FEIR Conclusions**

 The increase in population from the General Plan Update would occur over a 25-year period, allowing for development of necessary services and infrastructure to accommodate the proposed growth. However, the Orange County Sanitation District (OCSD) treatment facilities are limited to levels associated with the approved growth identified by SCAG.

Implementation of the General Plan Update would result in an increase in demand for electrical power and natural gas service. The anticipated service demands created by implementation of the General Plan Update are within the service parameters of SCE current transmission and service infrastructure. SCE would update existing facilities or add new facilities in the City based upon specific requests for service from end users. The City of Stanton is primarily built out and contains Southern California Gas Company (SCGC) natural gas supplies that are adequate to serve the City. Future developments that require

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new infrastructure/gas main extensions would be required to pay any applicable fees assessed by SCGC necessary to accommodate the specific project. In addition, the General Plan Update includes goals, strategies and actions to address the future impacts of new development on public infrastructure and services. Individual development projects would be analyzed to identify project-specific impacts to utility infrastructure on a project-by-project basis. Therefore, impacts to natural gas supply and services would be less than significant. A more detailed discussion on electricity and natural gas impacts can be found in Section 4.6, Energy.

- Buildout of the General Plan Update is projected to increase population within the City of Stanton and Golden State Water Company (GSWC) service area, and therefore increase demand for water. According to the GSWC, no new facilities are planned for the West Orange County System. GSWC will construct new wells, pipelines and treatment systems as needed, as part of its normal maintenance and Capital Investment Program, in order to maintain its supply and meet distribution system requirements. The existing water supply for the City is sufficient to meet projected water demands associated with the General Plan Update build out, assuming source and supply capacities remain consistent with current conditions. GSWC facilities currently serving the West Orange County System, including the City of Stanton, are adequate to meet anticipated service demands associated with buildout of the General Plan Update. In addition, the City has outlined a series of goals, strategies and actions in the General Plan Update to ensure the continued protection of its water resources. A fair-share cost-sharing program is designed to hold individual projects responsible for water supply and service impacts. The General Plan FEIR found that these measures, along with the conservation and management efforts by Municipal Water District of Orange County and GSWC to protect future water supplies, should reduce impacts from the General Plan Update build out to less than significant.
- Buildout of the General Plan Update would increase the amount of wastewater flow to the OCSD treatment facilities. The increase of approximate 1.5 mgd of wastewater associated with implementation of the General Plan Update would represents less than one percent of the current capacity (229 mgd) at these treatment facilities. The City of Stanton Public Works Department and the OCSD indicate that presently no deficiencies exist within their facilities serving the City. According to the City of Stanton Public Works Department, the local sanitary sewer system has adequate capacity to accommodate development associated with implementation of the General Plan Update. Individual developments would be reviewed by the City's Public Works Department and the OCSD to determine if sufficient sewer capacity exists to serve the future development. Both districts charge fees for the privilege of connecting to its sewerage system or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. The fees are required to construct new sewer infrastructure and/or incremental expansions to the existing sewerage system to accommodate individual development, which would mitigate the impact of the development on the sewerage system. The City's Public Works Department and the OCSD would only allow new developments to connect to its sewer systems if there is sufficient capacity or planned expansions of its facilities to accommodate new developments proposed. Therefore, new development would not be permitted to

exceed the capacity of wastewater conveyance systems or treatment facilities, since adequate capacity must be demonstrated in order to contribute flows to the system. All expansions of local and regional sewer facilities must be sized and service phased to be consistent with the SCAG regional growth forecasts for the southern California counties. The available capacities of the OCSD facilities are limited to levels associated with the approved growth identified by SCAG.

The General Plan Update proposed strategies and actions include: assuring adequate linear infrastructure through a fair share cost sharing program; implementation of a six-year capitol improvement program for city sewer projects; and continuous assessment of the wastewater infrastructure on a project by project basis. The proposed Action ICS-2.1.1 of the General Plan Update would require all projects to pay its fair share of the cost of all essential linear infrastructure improvements, including improvements to the sewer, stormwater, and potable water city systems. With implementation of mitigation requiring individual development projects to verify with the City's Public Works Department and the OCSD that sufficient wastewater transmission and treatment plant capacity is available to serve the subsequent development (WW-1, WW-2, and WW-3), the General Plan FEIR found that impacts would be reduced to a less than significant level.

- Solid waste projections for buildout of the General Plan Update indicates solid waste generated within the City would decrease. CR&R anticipates no impacts to solid waste services would result from buildout of the General Plan Update. Compliance with City and County waste reduction programs and policies would reduce the volume of solid waste entering landfills. Individual development projects within the City would be required to comply with applicable State and local regulations, thus reducing the amount of landfill waste by at least 50 percent. Buildout of the General Plan Update would generate less than one percent of the landfills daily permitted capacity. Additionally, these landfills all have adequate remaining capacity to serve the buildout of the General Plan Update. The various landfills have anticipated closure dates ranging from 2013 to 2067, which assures the ongoing availability of solid waste disposal capacity through the General Plan buildout in 2020. The General Plan FEIR concluded that impacts would be less than significant in this regard.
- All development projects would be required to comply with State and local regulations related to solid waste. Pursuant to the AB 939, every city and county in the State is required to divert 50 percent of solid waste generated in its jurisdiction away from landfills. Implementation of source reduction measures, such as recycling and converting waste to energy, on a project-by-project basis would serve to divert solid waste away from landfills. Since buildout of the General Plan Update would generate less solid waste than existing conditions and adequate landfill capacity is available to serve the City through 2037, the General Plan Update would be less than significant. Therefore, the General Plan FEIR decided that impacts related to solid waste would be less than significant.

## **Analysis of Modified Project**

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Further, the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development in areas not previously considered or at a greater intensity/density than identified in the General Plan FEIR. The Stanton General Plan includes strategies and actions to reduce potential impacts to utilities and service systems as a result of new development and intensification of land uses. Additionally, General Plan FEIR Mitigation Measure WW-1 requires projects to pay user fees to offset impacts; and WW-2 and WW-3 requires projects to prepare studies to determine system adequacy and provide evidence that there is sufficient capacity within the system. The Housing Element policies and programs would not have an impact on existing General Plan strategies and actions addressing utilities and service systems.

The revisions to the Housing Element and Community Health and Safety Element would not result in new utilities and service systems impacts beyond those identified in the General Plan FEIR. Following compliance with the recommended General Plan FEIR mitigation measures and General Plan strategies and actions, there would be no new significant or significantly different impacts related to utilities and service systems as a result of the proposed Project.

### General Plan FEIR Mitigation Measures:

- WW-1 Prior to issuance of a wastewater permit for any future development project, the Project Applicant shall pay applicable connection and/or user fees to City of Stanton Public Works Department.
- WW-2 Prior to issuance of a building permit for any future development project, the Project Applicant shall prepare an engineering study to determine the adequacy of the sewer systems and submit the engineering study to the City for review and approval.
- WW-3 Prior to issuance of a building permit for any future development project, the Project Applicant shall provide evidence that the Orange County Sanitation District has sufficient wastewater transmission and treatment plant capacity to accept sewage flows from buildings for which building permits are being requested.

## 4.20 WILDFIRE

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
If located in or near state responsibility are		ed as very high fir	e hazard severit	y zones, would	the project:	
Substantially impair an adopted emergency response plan or emergen evacuation plan?					Х	
b. Due to slope, prevailing winds, and oth factors, exacerbate wildfire risks, a thereby expose project occupants t pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire	nd :o, re				Х	
c. Require the installation or maintenan of associated infrastructure (such roads, fuel breaks, emergency wat sources, power lines or other utilitie that may exacerbate fire risk or that m result in temporary or ongoing impact to the environment?	as er s) ay				Х	
d. Expose people or structures significant risks, including downslope downstream flooding or landslides, as result of runoff, post-fire slojinstability, or drainage changes?	a				Х	

#### **General Plan FEIR Conclusions**

Since certification of the General Plan FEIR, the CEQA Guidelines Appendix G Checklist has been revised to include a new category for Wildfire impacts. The City of Stanton is not located within or adjacent to state responsibility areas or lands classified as very high fire hazard severity zones. The General Plan FEIR determined that there were no impacts regarding exposure to wildland fires. This topical area is addressed in the General Plan FEIR's Traffic and Circulation, Public Health, and Hazards and Hazardous Materials sections.

### **Analysis of Modified Project**

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the General Plan FEIR. Further, the proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than

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previously considered in the General Plan FEIR. The Stanton General Plan does not include specific strategies or actions to reduce potential impacts due to wildfires, as the City is not located within or adjacent to lands classified as very high fire hazard severity zones.

The proposed amendment to the Community Health and Safety Element would not modify the existing land use plan or allow for development at a greater intensity/density than previously considered in the General Plan FEIR. The Safety Element addresses potential and existing hazards in the City including Fire Protection and Emergency Response and Operations. In compliance with State law, the City of Stanton has prepared an update to its Community Health and Safety Element to further address fire hazards, emergency preparedness, and climate adaptation. Within the Background section of the Safety Element, the Fire Hazards discussion was updated to include current information regarding the CAL FIRE Fire Hazard Severity Zones, of which there are none in the City of Stanton. The City has updated the discussion on Emergency Response and Operations. Specifically in accordance with SB 99, the City conducted an evaluation of evacuation routes serving residential developments in hazard areas. This analysis found that there are no residential developments within Stanton that do not have at least two emergency evacuation routes.

No goals, strategies, or actions from the current Community Health and Safety Element were eliminated as part of this update. Modifications or additions related to fire hazards were proposed to Action 4.2.1 (c,d,e) to further support the goal to minimize injury, loss of life, and damage to property resulting from urban fire. More specifically, Action 4.2.1 (c) minimizes the risk of structural loss from fires, Action 4.2.1 (d) focuses on enhancing visible addressing and signage and Action 4.2.1(e) considers fire safe design.

The revisions to the Housing Element and Community Health and Safety Element would not result in wildfire impacts, consistent with the findings in the General Plan FEIR.

## 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Thresholds:	Substantial Change in Project Requiring Major EIR Revisions	Substantial Change in Circumstance Requiring Major EIR Revisions	Information Showing Greater Significant effects than Previous EIR	No Additional Significant Impact/ Less Than Significant Impact With Application of Mitigation from FEIR	Less Than Significant Impact/No Changes or Information Requiring Preparation of an MND or EIR	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?						Х
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				Х		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				Х		

## **General Plan FEIR Conclusions**

As described above, the General Plan FEIR concluded that full implementation of the General Plan Update would result in less than significant impacts or less than significant impacts with the implementation of mitigation measures for all issue areas analyzed except for Section 5.5, Air Quality (Short-Term Construction Emissions; Long-Term Mobile and Stationary Source Emissions; Short-Term Cumulative Construction Impacts; and General Plan Buildout Cumulative Impacts), Section 5.6, Noise (Long-Term Operational Impacts and Long-Term Cumulative Operational Impacts) and Section 5.15, Parks and Recreation Facilities (Parks and Recreational Facilities, and Cumulative Park and Recreational Facilities Impacts) which were determined to be significant and unavoidable. The General Plan FEIR's background and policy information and environmental impact conclusions are cited throughout this Addendum.

## **Analysis of Modified Project**

Future housing would not significantly impact, directly or through habitat modifications, sensitive vegetation communities and/or sensitive plant and wildlife species or eliminate important examples of the major periods of California history or prehistory, as significant biological resources and cultural resources do not occur within the City; refer to Section 4.4 and Section 4.5, above. Following compliance with the established regulatory framework no new significant impact to biological or cultural resources or substantial increase in the severity of previously identified significant impacts would occur with implementation of the Project.

The General Plan FEIR determined that cumulative impacts would result in the following areas: Short-Term Cumulative Construction Impacts and General Plan Buildout Cumulative Impacts; cumulative impacts associated with mobile source noise impacts and Long-Term Cumulative Operational Impacts; and Cumulative Park and Recreational Facilities Impacts. All other cumulative impacts were determined to be less than significant.

The anticipated housing development and Community Health and Safety Element update would not result in environmental effects that would cause substantial adverse effects on human beings.

### **RESOLUTION NO. 2547**

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF STANTON RECOMMENDING ADOPTION OF GENERAL PLAN AMENDMENT NO. GPA 22-01 UPDATE TO THE HOUSING ELEMENT FOR THE 2021-2029 PLANNING PERIOD AND UPDATE TO THE COMMUNITY HEALTH AND SAFETY ELEMENT AND MAKING FINDINGS IN SUPPORT THEREOF

**WHEREAS**, State law requires cities and counties to prepare and adopt a General Plan to guide the future development of a city or county; and

**WHEREAS**, a General Plan must contain certain elements, including a Housing Element which sets forth goals, policies and programs to encourage the development of housing for all income groups and persons with special needs; and the Community Health and Safety Element which sets forth goals, policies and programs to reduce impacts of potential hazards on the community.

WHEREAS, the Housing Element is required to be updated periodically to, among other things, evaluate the appropriateness and effectiveness of a local jurisdiction's housing goals, objectives and policies with respect to that local jurisdiction providing for their fair share of the regional housing need, as required by California Government Code §65588; and the Community Health and Safety Element is required to be updated to address climate adaptation and resiliency strategies, as required by California Government Code §65302; and

WHEREAS, adoption of the Proposed Housing Element and Community Health and Safety Element by resolution will satisfy the requirements of California Government Code §65585; and

**WHEREAS**, upon adoption, the City will submit the Housing Element and Community Health and Safety Element for certification review, pursuant to California Government Code §65585; and

**WHEREAS**, on January19, 2022, the Planning Commission of the City of Stanton conducted a duly noticed public hearing concerning the update to the Housing Element, Community Health and Safety Element and the request to approve the General Plan Addendum prepared for said updates; and

**WHEREAS**, all legal prerequisites have occurred prior to the adoption of this Resolution.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF STANTON DOES HEREBY FIND:

**SECTION 1.** That the above recitations are true and correct and, accordingly, are incorporated as a material part of this Resolution.

<u>SECTION 2</u>. That the General Plan Amendment GPA 22-01 is consistent with the goals of the General Plan. General Plan Amendment GPA22-01 promotes the orderly development of the

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City and addresses the City's housing needs for the 2021-2029 planning period. General Plan Amendment GPA22-01 comprehensively considers the health and safety of Stanton's residents from potential hazards including earthquakes, flooding, fire, emergency response, and climate resiliency.

**SECTION 3.** That the General Plan Amendment GPA 22-01 will not be detrimental to the public interest, health, safety, convenience or welfare of the City. General Plan Amendment GPA22-01 provides for and will not diminish land available for housing, and promotes maintenance and improved viability of the City housing stock. General Plan Amendment GPA 22-01 provide goals, policies and strategies to protect the community health and safety from potential hazards and impact from climate change, and a set of feasible implementation measures to address climate adaptation and resiliency.

**SECTION 4.** That the environmental effects of the project are within the scope described in the Final Environmental Impact Report (FEIR) for the Revised City of Stanton General Plan which was certified in 2008. The Planning Commission further finds that no subsequent EIR is necessary on the basis that no substantial evidence exists, in the light of the whole record, regarding any substantial changes in the project, or the circumstances under which the project is undertaken, which would require major revisions of the previous certified Final EIR; and, further, the Planning Commission hereby certified that the Final Environmental Impact Report for the Revised City of Stanton General Plan was completed in compliance with the California Environmental Quality Act of 1972, as amended, and the Guidelines promulgated thereunder, and further that the Planning Commission has reviewed and considered information contained in said Final Environmental Impact Report.

**SECTION 5**. The Planning Commission further finds, as follows:

- A. State law provides for the adoption of a Housing Element as part of the General Plan of each municipality and said element shall be updated every seven years. The current Housing Element for the City of Stanton was adopted by City Council on October 3, 2013, for the 2014-2021 planning period and was certified by the State. This update will
- B. As required by state law, during the preparation of an amendment to the General Plan, the planning agency has provided opportunities for the involvement of citizens, public agencies, civic, educational, and other community groups, through the public hearing and other means the City deems appropriate. Such public involvement has been summarized and included in the Exhibit B of the Housing Element. In addition, study sessions with the Council and Planning Commission occurred to consider the final housing needs and goals and confirm overall policy direction in the updated Housing Element.
- C. The update to the Housing Element was prepared in accordance with State Law and reviewed by the State Office of Housing and Community Development as required by

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the California Government Code. The City submitted a copy of the draft Housing Element to the California Department of Housing and Community Development (HCD) and received written correspondence from HCD on December 17, 2021 indicating that the draft Housing Element was in substantial conformance with State Law. Any comments received from HCD has been addressed and incorporated in the final document, as necessary; and

**SECTION 6.** Based on the findings and conclusions set forth above, the Planning Commission hereby recommends the City Council approves and adopts the Housing Element Update and Community Health and Safety Element Update of the Stanton General Plan (General Plan Amendments GPA 22-01)

**SECTION 7.** The Planning Commission Secretary shall certify to the adoption of this Resolution and cause a copy to be transmitted to the City Clerk.

**ADOPTED, SIGNED AND APPROVED** by the Planning Commission of the City of Stanton at a regular meeting held on January 19, 2022 by the following vote, to wit:

AYES:	COMMISSIONERS:	
NOES:	COMMISSIONERS:	
ABSENT:	COMMISSIONERS:	
ABSTAIN:	COMMISSIONERS:	
		Thomas Frazier, Chairperson Stanton Planning Commission
		Jennifer A. Lilley, AICP Community and Economic Development
		Director