

## 4.10 POPULATION AND HOUSING

This EIR section analyzes the potential for adverse impacts on population and housing resulting from implementation of the proposed project. The EIR analysis is limited to those socioeconomic issues that could result in a direct change on the physical environment (CEQA Guidelines Section 15131). The Initial Study (Appendix A) identified the potential for impacts associated with the inducement of substantial population growth in the City of Huntington Beach. Issues scoped out from detailed analysis in the EIR include the displacement of any existing housing or people, as the majority of the project site is vacant. Data used to prepare this section were taken from the United States Bureau of the Census, the California Department of Finance (DOF), the Southern California Association of Governments (SCAG), and the City of Huntington Beach General Plan 2000–2005 Housing Element (Housing Element). Full bibliographic entries for all reference materials are provided in Section 4.10.5 (References) of this section.

### 4.10.1 Existing Conditions

The majority of the 23.1 acre project site is vacant. The northeast corner of the site (approximately 4.5 acres) contains a recreational vehicle and boat storage facility, consisting of a large paved surface parking area and a temporary trailer serving as an administration office. There is no existing housing on the project site.

Population, housing, and employment data are available on a city, county, regional, and state level. This EIR uses data collected and provided at the city and county level, in an effort to focus the analysis specifically on the City of Huntington Beach. The recent population and household forecasts provided in Table 4.10-1 for the City of Huntington Beach, Orange County (OCCOG SubRegion), and SCAG region were prepared by SCAG in 2004.

<b>Table 4.10-1 SCAG Population and Households Forecast</b>						
	<b>2005</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>
<b>Huntington Beach</b>						
Population	204,297	212,893	216,565	219,601	222,457	223,992
Households	75,332	77,825	78,268	78,842	79,385	79,647
<b>Orange County (OCCOG Region)</b>						
Population	3,103,377	3,291,628	3,369,745	3,433,609	3,494,394	3,552,742
Households	978,423	1,034,027	1,046,473	1,063,976	1,081,421	1,098,474
<b>SCAG Region</b>						
Population	18,117,604	19,208,661	20,191,117	21,137,519	22,035,416	22,890,797
Households	5,673,585	6,072,578	6,463,402	6,865,355	7,263,519	7,660,107
SOURCE: SCAG 2004, Growth Forecast						

## ■ Population

According to the DOF, the 2005 population for the City of Huntington Beach is approximately 200,763. Due to the more recent computation of this number compared to the SCAG RTP Update, the DOF data will be used in the analysis where it is available. The 2005 population represents a 0.9 percent increase over the 2004 population of approximately 199,025. Table 4.10-2 shows the population growth in the City over the past three decades. This table also includes 2005 DOF data. Based on DOF data, the population in the City has increased by a total of approximately 11 percent since 1980, which recorded a population of 170,486. In 2000 the City’s population of 189,594 represented approximately 6.7 percent of Orange County’s total population (2,846,289). Similarly, in 2005, the City’s population of 200,763 currently represents approximately 6.6 percent of Orange County’s total population (3,056,865). Huntington Beach ranks as the third most populated city in Orange County, following Anaheim and Santa Ana. However, the population increase of 4.44 percent in Huntington Beach between 1990 and 2000 is among the lowest increases in the County, and is lower than the countywide increase of 12 percent over the same period. As shown in Table 4.10-2 the growth rate has increased substantially during the period between 2000 and 2005, when compared to recent decades.

<i>Year</i>	<i>Population</i>	<i>Decade Increase (%)</i>	<i>Average Annual Growth (persons/year)</i>	<i>Average Growth Rate</i>
1980	170,486	—	—	—
1990	181,519	6.47	1,104	0.06%
2000	189,594	4.45	808	0.04%
2005	200,763	5.89	2,234	0.23%

SOURCE: California Department of Finance, 1980-2005; EIP Associates 2005.

## ■ Households

A household is defined by the DOF and the Census as a group of people who occupy a housing unit. A household differs from a dwelling unit because the number of dwelling units includes both occupied and vacant dwelling units. It is important to note that not all of the population lives in households. A portion lives in group quarters, such as board and care facilities; others are homeless.

### **Household Size**

Small households (1 to 2 persons per household [pph]) traditionally reside in units with 0 to 2 bedrooms; family households (3 to 4 pph) normally reside in units with 3 to 4 bedrooms. Large households (5 or more pph) reside in units with 4 or more bedrooms. However, the number of units in relation to the household size may also reflect preference and economics: many small households obtain larger units, and some large families live in small units for economic reasons.

Table 4.10-3 compares the number of households in the City of Huntington Beach and Orange County for the period 2000-2005. The average household size in the City of Huntington Beach increased slightly

from 2.56 pph in 2000 to 2.65 pph in 2005. The average household size of 2.65 persons in 2005 is used for projections in this EIR.

<i>Area</i>	<i>2000</i>	<i>2005</i>
<b>Total Households</b>		
Huntington Beach	73,674	75,560
Orange County	935,287	976,540
<b>Average Household Size (persons per household)</b>		
Huntington Beach	2.56	2.65
Orange County	3.00	3.09

SOURCE: California State Department of Finance 2000, 2005  
Household figures represent occupied house units.

## ■ Housing

The total housing stock during 2000 and 2005 is shown in Table 4.10-4. There was an increase of 1,937 units between 2000 and 2005. Of the 77,616 housing units in 2005, 2,056 units (2.7 percent) are vacant.

<i>Year</i>	<i>Housing Type</i>				<i>Total Number of Units</i>	<i>Occupied Units</i>
	<i>Single-Family</i>	<i>Multifamily</i>		<i>Mobile Homes/Other</i>		
		<i>2 to 4 units</i>	<i>5+ units</i>			
2000	46,409	9,666	16,463	3,141	75,679	73,674
2005	47,809	9,782	16,884	3,141	77,616	75,560

SOURCE: State Department of Finance 2000, 2005

The 2005 percentage breakdown for housing by type as derived from Table 4.10-4 is as follows:

- 61.5 percent single-family
- 12.6 percent multifamily (2 to 4 units)
- 21.8 percent multifamily (5+ units)
- 4.05 percent mobile homes/other

## **Vacancy Rates**

The vacancy rates and affordability of the housing stock are also key elements in the balance between supply and demand in the City’s housing market. High vacancy rates usually indicate low demand and/or high prices in the housing market or significant mismatches between the desired and available types of housing. Conversely, low vacancy rates usually indicate high demand and/or low prices in the housing market. However, vacancy rates are not the sole indicator of market conditions. They must be viewed in the context of all the characteristics of the local and regional market and economy. Vacancy rates, which indicate a “market balance” (i.e., a reasonable level of vacancy to avoid local housing shortages, and

appropriate price competition and consumer choice), generally range from 1 percent to 3 percent for single-family units, and from 3 to 5 percent for multifamily units. The City’s overall vacancy rate remained the same between 2000 and 2005, at 2.65 percent.

**Growth Trends**

A city’s housing market is driven by supply and demand and can be influenced by population growth, income, housing cost, and housing locations. However, age distribution is a key market characteristic because housing demand within the market is influenced by the housing preference of certain age groups. For example, due to limited income, the majority of the young adult population (20 to 34 years old) tends to occupy apartments, low- to moderate-cost condominiums, and smaller single-family units. In addition, the 35- to 65-year-old group provides the market for moderate to high-cost apartments and condominiums and larger single-family units because, on average, people of this age group have higher incomes and larger household sizes. Housing demand for the elderly population (65 years of age and up) is similar to young adults but can also include group quarters as housing options. Table 4.10-5 provides age distribution in Huntington Beach in 2000. The data presented in this table is derived from the Census.

<b>Table 4.10-5 City of Huntington Beach Age Distribution in 2005</b>		
<i>Age Group/Year</i>	<i>Population</i>	<i>% of Total</i>
Preschool (0 to 4)	11,728	6.2%
School (5 to 19)	34,650	18.3%
Young Adults (20 to 24)	11,735	6.2%
Prime Working (25 to 54)	93,196	49.2%
Retirement (55 to 64)	18,629	9.8%
Seniors (65+)	19,656	10.4%
<i>Total</i>	<i>189,594</i>	<i>100.10%</i>

SOURCE: U.S. Census Bureau 2000  
 Percent of Total figure exceeds 100 percent due to rounding.

**■ Housing Needs Assessment**

California’s Housing Element Law requires that each city and county, when preparing its state-mandated Housing Element of a General Plan, must develop local housing programs designed to meet its “fair share” of existing and future housing needs for all income groups, as determined by the jurisdiction’s Council of Governments. This “fair share” allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for those households who might reasonably be expected to reside within the jurisdiction, particularly lower-income households, in order to provide a variety and choice of housing accommodations appropriate to their needs.

In the six-county Southern California region, the agency responsible for assigning these fair share targets to each jurisdiction is SCAG. As part of the Regional Housing Needs Assessment (RHNA), SCAG

determines the five-year housing growth needs for municipalities within its jurisdiction, which includes the City of Huntington Beach. In Orange County, the Orange County Council of Governments (OCCOG) was delegated responsibility for developing the RHNA in coordination with the cities and the County. The Regional Housing Needs Assessment provides recommendations and guidelines to identify housing needs within cities. It does not impose requirements as to housing development in cities.

The RHNA adopted by OCCOG and SCAG has identified a 1998–2005 future housing need for Huntington Beach of 2,015 units. Table 4.10-6 shows the 2000 RHNA allocation for the City of Huntington Beach. Huntington Beach’s RHNA allocation is based, in part, on SCAG’s regional growth forecast to 2030, which was prepared for the 2004 Regional Transportation Plan Update. Proposed project housing would be available for occupancy in 2009, at which time a new set of RHNA numbers will be applicable to the City.

**Table 4.10-6 RHNA Needs by Income Category for Huntington Beach  
(June 1, 1998, through June 30, 2005)**

<i>Income Category</i>	<i>RHNA-Identified Need</i>
Very Low	388
Low	255
Moderate	400
Upper	972
<i>Total</i>	<i>2,015</i>

SOURCE: SCAG 2000, RHNA

Total “construction need” for RHNA numbers is comprised of three components: (1) the number of housing units needed to accommodate future household growth; (2) an additional allowance for vacant units to ensure a healthy housing market; and (3) a further additional allowance to account for units that will be demolished, converted to non-housing uses or otherwise removed from the housing stock. The calculation of each component is based on a combination of the method used to calculate statewide housing need and past SCAG practice in preparing the RHNA.

The construction need totals cover the period of 1998 to 2005, though the Housing Element planning period is from 2000 to 2005. Thus, the RHNA construction need numbers that are used as a planning target in the City’s Housing Element Update may be reduced by new units produced since January 1, 1998. According to the 2000–2005 Housing Element, the City has already constructed a total of 1,118 units between January 1, 1998, and July 1, 2000. Thus, for the planning period covered in the Housing Element, the City was left with a remaining RHNA of 897 units out of the original projected 2,015 units.

### **Potential Future Housing Development**

An analysis of short-term (5-year) residential development potential was completed as part of the City Housing Element, and this analysis identified total potential development of approximately 3,753 units (refer to Table 4.10-7). A vacant land analysis was completed, based on a vacant residential land survey conducted by the City in 1998 and updated by comparing vacant sites to building permits granted since

1998. Site visits were conducted to verify the data. The vacant land inventory excludes sites that could not be developed within the five-year planning horizon due to special circumstances (i.e., contaminated sites). Based on the site analysis, relatively little vacant land suitable for residential development remains in Huntington Beach. Approximately 117 acres (less than 1 percent of the City) of the City’s residential land are vacant and have no project entitlements or pending development projects. Under the existing zoning and General Plan land use designations, this acreage could accommodate an additional 2,212 dwelling units.

<i>Land Use Category</i>	<i>Acres</i>	<i>Total Units</i>
Vacant Land with No Entitlements		
Low (3 to 7 du/ac)	41.74	292
Medium (0 to 15 du/ac)	6.14	92
Medium High (0 to 25 du/ac)	48.53	1,213
High (30+ du/ac)	20.50	615
<i>Subtotal</i>	<i>116.91</i>	<i>2,212</i>
Vacant Land Projects with Entitlements	N/A	372
Vacant Land Projects Pending Approval	N/A	889
Residential Development Capacity, Downtown Specific Plan	11.54	280
<i>Total</i>		<i>3,753</i>

SOURCE: City of Huntington Beach 2000

At the time the Housing Element was prepared, vacant residentially designated properties with entitlements provided for an additional 372 residential units, including 260 market rate and 112 very low-to moderate-income households. These projects with approved entitlements represent units that are likely to be built within the near term planning horizon. A total of 889 additional units were pending approval—275 units for lower income households and 614 market rate units.

Table 4.10-8 compares the City’s RHNA numbers with the number of residential units constructed through October 2005. The total number of units constructed includes 1,342 units constructed between July 2000 and October 2005 on sites that are part of the inventory presented in Table 4.10-7. Although the City has exceeded the total RHNA numbers through 2005, the assessment for individual income groups (i.e., very low, low, and moderate) are still below the identified RHNA thresholds. It is expected that the additional RHNA numbers could be accommodated on sites included in the residential inventory that have not yet been developed.

**Affordable Housing**

A key issue facing the City is the affordability of housing to its citizens. The 2000 Census documented a median housing unit value of \$311,800. Data from the California Association of Realtors (CAR) indicate that the median sales price of a home in Huntington Beach for August 2005 was \$686,000 and \$610,000 in Orange County. The median monthly rent for the City was \$808 in 1990 and \$985 in 2000.

**Table 4.10-8 Housing Growth Need and Development Potential by Income Group**

<i>Income Group</i>	<i>Total RHNA</i>	<i>Units Constructed (through October 2005)</i>	<i>Remaining RHNA</i>	<i>Minimum Density Guidelines</i>
Very Low	388	154	234	≥25 units/acre
Low	255	85	170	
Moderate	400	276	124	≥8 units/acre
Above Moderate	972	1,945	-973	<8 units/acre
<i>Total</i>	<i>2,015</i>	<i>2,460</i>	<i>-445</i>	

SOURCE: City of Huntington Beach 2000

The median housing unit value in Orange County is one of the highest in the state of California. By targeting programs and monetary assistance towards households with the greatest need, the City can achieve the goal of assuring the availability of adequate housing for all social and economic segments of Huntington Beach's present and future population. The City has access to a variety of local, state, federal, and private resources that can be used for affordable housing activities. The three most significant funding sources used in Huntington Beach are (1) Community Development Block Grants (CDBG); (2) the HOME Investment Partnership Program (HOME); and (3) Redevelopment Set Asides. As for the CDBG funds, the City receives an annual CDBG entitlement of approximately \$1.8 million from the federal Department of Housing and Urban Development (HUD) for a variety of community development and housing activities primarily benefiting lower income households. The HOME Program is a federal program intended to expand and preserve the affordable housing supply for very low- and low-income households. Under this program, the City receives an annual entitlement of approximately \$600,000 from HUD, which can be used towards housing rehabilitation, acquisition, new construction, rental assistance, and assistance for first-time homebuyers.

## 4.10.2 Regulatory Framework

### ■ Federal and State

There are no federal or state regulations related to population and housing that apply to the proposed project.

### ■ Regional

#### ***Southern California Association of Governments***

The Southern California Association of Governments determines regional housing need and the share of the regional need to be addressed by Orange County. SCAG is a Joint Powers Agency and is designated as Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO) for the six-county region of Orange, Los Angeles, Ventura, San Bernardino, Riverside, and Imperial counties.

SCAG's Regional Comprehensive Plan and Guide (RCPG) and RHNA are tools for coordinating regional planning and housing development strategies in southern California. State Housing Law mandates that local governments, through Councils of Governments, identify existing and future housing needs in a RHNA. The Regional Housing Needs Assessment provides recommendations and guidelines to identify housing needs within cities. It does not impose requirements as to housing development in cities. In Orange County, the OCCOG was delegated by SCAG responsibility for developing the RHNA in coordination with the cities and the County. All 34 cities in Orange County are currently members of the OCCOG.

## ■ Local

### **General Plan Housing Element**

The 2000-2005 Housing Element provides an examination of the City's housing problems and needs, the opportunities and constraints related to addressing these needs, and formulates policies to address these needs. The Housing Element further addresses housing construction needs to accommodate the City's share of regional growth for the period 1998–2005, including the improvement and provision of affordable housing. Goals and objectives presented in the Housing Element of the General Plan related to population and housing are presented below that are potentially relevant to the proposed project.

**Goal HE 2** Provide adequate housing sites.

**Objective HE 2.1** Provide appropriate zoning and regulatory incentives to facilitate the production of 388 very low, 255 low, 400 moderate, and 972 upper income units through this planning period.

**Policy HE 2.1.4** Plan for residential land uses which accommodate anticipated growth from new employment opportunities.

**Policy HE 2.1.5** Promote the rezoning of vacant or recyclable parcels of land to higher densities where compatible with surrounding land uses and available services in order to lower the cost of housing.

**Goal HE 3** Assist in development of affordable housing.

**Objective HE 3.1** Facilitate the development of housing for low and moderate income households which is compatible with and complements adjacent uses and is located in close proximity to public and commercial services.

**Policy HE 3.1.1** Encourage the provision and continued availability of a range of housing types throughout the community, with variety in the number of rooms and level of amenities.

**Goal HE 5** Provide equal housing opportunity.

**Objective HE 5.1** Promote equal housing opportunity for all residents to reside in the housing of their choice.

**Policy HE 5.1.3** Encourage the provision of adequate numbers of housing units to meet the needs of families of all sizes.

### **Consistency Analysis**

The proposed project consists of 204 attached multi-family residential units. The project would be required to provide a minimum of 10 percent, or 21 units, of the total development as affordable housing, either on- or off-site. With the affordable housing component, the project would contribute to the City meeting its RHNA allocation. Implementation of the proposed project would also rezone the site from industrial to medium-density residential in an area primarily surrounded by existing residential uses. The proposed project would provide varying residential options for residents with both duplex and triplex units proposed for the site and would provide housing opportunities for families of various sizes. Consequently, the proposed project would not conflict with any of the applicable General Plan policies.

### ***City of Huntington Beach Zoning Code***

#### **Affordable Housing**

The City's Affordable Housing regulations (Title 23, Chapter 230, Section 230.26) implement the goals, objectives, and policies of the City's Housing Element. They are intended to encourage very low-, low-, and median-income housing that is integrated, compatible with and complements adjacent uses, and is located in close proximity to public and commercial uses. These regulations are used by the City to meet its commitment to provide housing that is affordable to all economic sectors, and to meet its regional fair-share requirements for construction of affordable housing.

New residential projects containing three or more units are required to provide a minimum of 10 percent of total units as affordable housing, either on- or off-site. Rental units included in a project shall be made available to very low- or low-income households and for-sale units included in the project shall be made available to very low-, low-, or median-income level households. The eligibility of households for the affordable units is based on the Orange County Median Income, adjusted for appropriate family size, as published by the HUD or established by California, pursuant to Health and Safety Code Section 50093, or a successor statute.

## **4.10.3 Project Impacts and Mitigation**

### **■ Analytic Method**

This analysis considers population and household growth that would occur with implementation of the proposed project and whether this growth is within local or regional forecasts, and whether it can be considered substantial with respect to remaining growth potential in the City as articulated in the General Plan Housing Element. In addition, this analysis of potential population and housing impacts considers

whether population growth and residential development were previously assumed to occur in a particular area. Specifically, population and housing impacts were analyzed by comparing the proposed project with growth projections for the City from SCAG as well as the City's General Plan Housing Element.

### ■ Thresholds of Significance

The following thresholds of significance are based on Appendix G of the 2005 CEQA Guidelines. For purposes of this EIR, implementation of the proposed project may have a significant adverse impact on population and housing if it would result in the following:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)

### ■ Impacts and Mitigation Measures

Threshold	Would the project induce substantial population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?
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For the purposes of this analysis, impacts would be considered significant if the inducement of population growth results in increases in population at a level that largely exceeds projected/planned levels for the year of project occupancy/buildout.

**Impact 4.10-1      Implementation of the proposed project would directly increase population growth; however, the population growth would not cause exceedance of current growth projections established by the City.**

As described in Chapter 3 (Project Description), the proposed project would provide a master-planned, gated residential community of 204 attached homes (medium-density residential units), with 123 triplex units and 81 duplex units. New residential uses would increase the City population. Using an existing average household size of 2.65 pph, the proposed project would be expected to accommodate approximately 541 (204 x 2.65) residents.

The relative proportion of the population growth in comparison to projected population levels is shown in Table 4.10-9. SCAG 2010 population projections are used for this comparison since it is anticipated that construction would be fully completed, with the project operational by early to mid 2009. Assuming that all occupants of the proposed housing are new to the City, this potential population growth would represent 0.27 percent of the 2005 baseline City population, and approximately 0.25 percent of the projected 2010 population. Assuming that all occupants of the proposed housing are new to the County, the project-related population increase would represent approximately 0.017 percent of the 2005 baseline population and approximately 0.016 percent of the projected population for 2010.

**Table 4.10-9 Project Contribution to Population Increases**

<i>Location</i>	<i>Population</i>	<i>Project Contribution</i>
Project Site	541	100%
City of Huntington Beach, 2005 baseline population	200,263	0.27%
City of Huntington Beach, projected 2010 population	212,893	0.25%
Orange County, 2005 baseline population	3,056,865	0.018%
Orange County, projected 2010 population	3,291,628	0.016%

SOURCE: DOF and SCAG, 2004 RTP update, Growth Forecast

As the proposed project site is currently designated for industrial uses, increased population on the site has not been anticipated in the General Plan. However, the project would provide needed housing to the City and the region, contributing to the City's progress towards meeting its RHNA numbers. Further, with a projected population increase of 541 persons, the project would represent only a 0.27 percent increase in population compared to current conditions. As shown in Table 4.10-1, SCAG predicts that the population and households would continue to increase from 2005 to 2030, and the project is consistent with this pattern. Because the potential population increase that could result from the proposed project would not result in growth as identified by the City's Housing Element that could not be accommodated, impacts would be *less than significant*.

**Impact 4.10-2      The proposed project would provide the required number of affordable housing units either on- or off-site.**

The proposed housing units would be provided at market rate and would be priced in the "Above Moderate" income group. All housing construction would be completed by 2009. The existing RHNA numbers would not be applicable to the project upon completion of construction, since the existing RHNA numbers apply to the 1998–2005 planning period, although it is possible this planning period may be extended to 2007. Nonetheless, the project would contribute 204 units to the housing needs in the City. The provision of "Above Moderate" housing on site would not impede the ability of the City to meet the RHNA allocation for very low-, low-, and moderate-income housing. The proposed project site was not included in the calculations of available land for housing potential in these income categories.

The proposed project would include the affordable housing units consistent with City requirements. Presently, the applicant's Affordable Housing Program is not complete, and therefore, it is uncertain whether the required affordable housing units would be provided on- or off-site. However, regardless of where the affordable units would be located, the applicant would be required to designate 21 units (10 percent of the total number of units) as median-, low-, or very low-income units, as identified in the following City Requirement:

*CR 4.10-2      The project shall comply with Title 23, Chapter 230, Section 230.26(B)(1) of the City Zoning Code and provide a minimum of ten percent of all new residential construction as affordable housing units.*

This would ensure compliance with City requirements for affordable housing and ensure that impacts would be *less than significant*.

#### 4.10.4 Cumulative Impacts

The proposed project would develop residential and visitor-serving commercial uses that would—in combination with cumulative development—increase population and housing opportunities in the City and could directly or indirectly induce growth in the City and County. As described above in Section 4.10.3, the anticipated growth associated with the project would, even under the most conservative assumptions, be less than or on par with the development of housing anticipated for the City in the General Plan Housing Element. Specifically, according to Table 3-5, the new population that would result from the residential projects included in the cumulative projects list would total approximately 3,279 (1,237 units x 2.65) residents. This increase in population contributes approximately 1.54 percent to the City's 2010 total population projection and approximately 0.10 percent of the County's total population. Cumulative development projects have also been included in City projections, as these projects represent implementation of the City General Plan. Thus, they are consistent with the population projections for the City. The proposed project would, in combination with cumulative development, provide additional housing opportunities. This growth would serve the existing population and help to meet anticipated housing demand in the City and County. Other cumulative projects within the proposed project area would also be required to provide affordable housing. Each of these projects would be required to satisfy City requirements with respect to affordable housing, such that cumulative effects would not be significant. Because cumulative development would be within levels projected by the City, it would not represent a significant impact with respect to population and housing. The proposed project would not, therefore, result in cumulatively considerable impacts with respect to population and housing. Cumulative impacts would be *less than significant*.

#### 4.10.5 References

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