

4.11 Population and Housing

This section analyzes potentially significant impacts related to population and housing that could result from implementation of the project.

4.11.1 Existing Conditions

As the city of Irvine (City) continues to expand, there is a rising demand for housing to meet the needs of its growing population. The City's appeal as a residential destination stems from its prime location in Orange County, close proximity to employment opportunities, renowned school district, and exceptional safety record. The City's residential areas are organized into distinct villages, each with its unique density, character, and amenities. While initially focused on low-density, single-family homes, Irvine's housing landscape now includes a variety of property types.

4.11.1.1 Population, Housing, and Employment Trends

The Southern California Association of Governments (SCAG) is the metropolitan planning organization responsible for developing and adopting regional housing, population, and employment growth forecasts for local governments from Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is required to update these forecasts every four years. To facilitate regional planning efforts, SCAG's planning area is further organized into 14 subregions. The City is in the Orange County Council of Governments (OCCOG) subregion.

The regional and City population and housing trends outlined in SCAG's technical documents are discussed further below. However, it is important to note that the growth forecasts included in SCAG's technical documents are originally sourced from Orange County Projections (OCP), the official growth forecast for Orange County (all jurisdictions and the unincorporated County of Orange). OCP is developed by the Center for Demographic Research at California State University, Fullerton and is adopted by the OCCOG Board of Directors. Once OCP is adopted by the OCCOG, it is provided to subregional and regional agencies, including SCAG. OCP includes growth forecast data provided from and verified by the City.

a. Population

Per the 6th Cycle Housing Element Update effective 2021 to 2029 (2021-2029 Housing Element), the City's population has grown by 3 percent per year on an annual basis, while the SCAG region has experienced a growth rate of 0.7 percent per year. The City has experienced higher and more consistent growth rates compared to neighboring cities. Most of the City's population growth stems from the development of planning areas, which are primarily residential, including the Northern Sphere Planning Areas, the Great Park Neighborhoods, and the Irvine Business Complex.

Table 4.11-1 presents population growth forecast for the City in comparison to Orange County based on the 2020 Connect SoCal Demographic and Growth Forecast Technical Study (SCAG 2020). As shown in Table 4.11-1, the population of the City was projected to increase from 261,600 in 2016 to

327,700 in 2045, which would constitute a 25 percent increase during that 29-year time frame. The population within the County was projected to increase from 3,180,000 in 2016 to 3,535,000 in 2045, which would constitute an 11 percent increase during that 29-year time frame. In comparison, the City is projected to experience a higher amount of population growth compared to the County.

Year	City			Orange County		
	Total Population	Population Increase	Percent Change ¹	Total Population	Population Increase	Percent Change ¹
2016	261,600	--	--	3,180,000	--	--
2045	327,700	66,100	25%	3,535,000	355,000	11%

SOURCE: 2020 Connect SoCal Demographics and Growth Technical Study (SCAG 2020).
¹Change from 2016-2045.

In 2022, OCP was updated to reflect 2020 Census data. According to OCP 2022, the population of the City is projected to increase from 307,096 in 2020 to 334,107 in 2050.

b. Housing

According to the 2021-2029 Housing Element, approximately 39 percent of existing homes in the City are single-family detached homes, 44 percent are multi-family condominiums or apartments, 16 percent are single-family attached homes/townhomes, and 1 percent are mobile homes. Development trends indicate that significantly more multi-family units have been built in recent years as compared to single-family units. While single-family units have increased by 75 percent between 2000 and 2020, multi-family units have increased by 158 percent during this same period.

Table 4.11-2 presents housing growth forecast for the City in comparison to the County of Orange based on the SCAG 2020 Connect SoCal Demographics and Growth Technical Study. As shown in Table 4.11-2, the number of households within the City is projected to increase from 93,300 in 2016 to 121,700 in 2045, which would constitute a 30 percent increase during that 29-year time frame. The number of households within the County is projected to increase from 1,025,000 in 2016 to 1,154,000 in 2045, which would constitute a 13 percent increase during that 29-year time frame. In comparison, the City is projected to experience a greater amount of housing growth compared to the County.

Year	City			Orange County		
	Total Households	Household Increase	Percent Change ¹	Total Households	Household Increase	Percent Change ¹
2016	93,300	--	--	1,025,000	--	--
2045	121,700	28,400	30%	1,154,000	129,000	13%

SOURCE: 2020 Connect SoCal Demographics and Growth Technical Study (SCAG 2020).
¹Change from 2016-2045.

In 2022, OCP was updated to reflect 2020 Census data. OCP also utilizes housing unit in the growth forecast as compared to household in the SCAG Connect SoCal document. According to OCP 2022, the total number of housing units in the City is projected to increase from 117,544 in 2020 to 142,979 in 2050. This updated forecast reflects the more aggressive production of housing units that occurred between 2016 and 2020.

c. Employment

According to the 2021-2029 Housing Element, the City is a major job center in Orange County. Numerous corporations have national or international headquarters in the City, and companies of all types have a robust presence. In addition, the City is home to highly ranked and well-regarded educational institutions, including the University of California, Irvine; Concordia University; Irvine Valley College; University of Southern California (Orange County Center); and campuses of University of La Verne and Pepperdine University.

Table 4.11-3 presents employment growth forecast for the City in comparison to the County based on the 2020 Connect SoCal Demographic and Growth Forecast Technical Study (SCAG, 2020). As shown in Table 4.11-3, the number of jobs within the City is projected to increase from 265,300 in 2016 to 330,200 in 2045, which would constitute a 24 percent increase during that 29-year time frame. The number of jobs within the County is projected to increase from 1,710,000 in 2016 to 1,980,000 in 2045, which would constitute a 16 percent increase during that 29-year time frame. In comparison, the City is projected to experience a higher amount of job growth compared to the County.

Table 4.11-3 Regional and Local Employment						
Year	City			Orange County		
	Total Jobs	Jobs Increase	Percent Change ¹	Total Jobs	Jobs Increase	Percent Change ¹
2016	265,300	--	--	1,710,000	--	--
2045	330,200	64,900	24%	1,980,000	270,000	16%

SOURCE: 2020 Connect SoCal Demographics and Growth Technical Study (SCAG 2020).
¹Change from 2016-2045.

4.11.2 Applicable Regulatory Framework

4.11.2.1 Federal Regulations

a. Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 United States Code Section 4601)

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 United States Code [USC] 4601 et seq.) (Uniform Act), provides important protections and assistance for people affected by federally funded projects in accordance with the following objectives:

- (a) To ensure that owners of real property to be acquired for federal and federally-assisted projects are treated fairly and consistently, to encourage and expedite acquisition by agreements with such owners, to minimize litigation and relieve congestion in the courts, and to promote public confidence in federal and federally-assisted land acquisition programs;
- (b) To ensure that persons displaced as a direct result of federal or federally-assisted projects are treated fairly, consistently, and equitably so that such displaced persons will not suffer disproportionate injuries as a result of projects designed for the benefit of the public as a whole; and
- (c) To ensure that agencies implement these regulations in a manner that is efficient and cost effective.

4.11.2.2 State Regulations

a. Senate Bill 375

Senate Bill (SB) 375, the Sustainable Communities and Climate Protection Act, was approved in 2008. SB 375 provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing greenhouse gas emissions set by Assembly Bill (AB) 32 (see Section 4.6 above). As a part of this effort, SB 375 requires that regional housing needs be addressed in conjunction with regional transportation to integrate housing, land use, and transportation planning together. SB 375 also requires the Regional Housing Needs Allocation (RHNA) be completed every eight years and, if a jurisdiction does not meet this requirement, penalties may be incurred in accordance with SB 375 and AB 1233.

b. Senate Bill 35

SB 35, or the Affordable Housing Streamlined Approval Process, was passed in 2017. It creates an opt-in program for developers that allows a streamlined ministerial process (i.e., not subject to a discretionary review, and therefore California Environmental Quality Act [CEQA] exempt) for developments in localities that have not yet made sufficient progress toward meeting their RHNA. Eligible developments must include a specified level of affordability; be located on an infill site; and comply with existing residential and mixed-use general plan or zoning provisions.

c. Senate Bill 330

The "Housing Crisis Act" was passed in 2019 and was supplemented by AB 8 in 2021. It allows a housing developer to submit a "preliminary application" to a local agency for a housing development project. Submittal of a preliminary application allows a developer to provide a specific subset of information on the proposed housing development before providing the full amount of information required by the local government for a housing development application. Upon submittal of a preliminary application and payment of a permit processing fee, a housing developer is allowed to "freeze" the applicable fees and development standards that apply to a project while the rest of the

material necessary for a full application submittal is assembled. After an application is deemed complete, local agencies cannot “disapprove” an eligible housing development project or condition its approval at a “lower density,” as defined in Government Code Section 65589.5(g), if the project is consistent with objective standards. SB 330 also places additional limitations on an “affected” agency’s ability to limit development, and requires the California Department of Housing and Community Development (HCD) to develop a list of “affected cities” and census designated places within the unincorporated county (“affected counties”) that are prohibited from taking certain zoning-related actions, including, but not limited to the following:

- Downzoning or actions resulting in lesser intensification,
- Imposing a moratorium on development, and/or
- Imposing design standards that are not objective.

The law also requires jurisdiction-wide housing replacement when affordable housing to lower-income residents is demolished. The majority of these provisions sunset, or expire, on January 1, 2030, unless extended by the legislature and governor.

d. Senate Bill 6

The “Middle Crisis Housing Act” was passed in 2022. It allows residential development on property zoned for retail and office space without the need to rezone the site and allows project applicants to invoke the Housing Accountability Act (1982) to limit local discretion to deny or implement a conditional approval. SB 6 does not provide a ministerial approval pathway and requires applicants to commit to both prevailing wage and more costly “skilled and trained workforce” requirements for project labor. SB 6 does not contain any affordability requirements.

e. Assembly Bill 2011 (AB 2011)

The “Housing and High Roads Job Act” was passed in 2022 and sunsets in 2033. It creates a ministerial, CEQA-exempt, time-limited approval process for multi-family housing developments on commercially zoned property. Projects must pay prevailing wages to construction workers and meet specified Below Market Rate (BMR) affordable housing targets. The legislation provides two distinct options: one for 100 percent BMR projects and a second for mixed-income (typically 15 percent BMR) projects located specifically on “commercial corridors.” Eligibility is further limited by numerous site and project criteria requiring careful review. The streamlined review process relies on Objective Design Standards.

4.11.2.3 Local Regulations

a. Connect SoCal

On September 3, 2020, SCAG’s Regional Council unanimously voted to approve and adopt Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Connect SoCal is a regional planning document that SCAG is required to update every four years per federal and state law. Additionally, because most areas within the SCAG region have been designated as

nonattainment or maintenance areas for one or more transportation related criteria pollutants under the federal Clean Air Act, Connect SoCal must conform to the applicable State Implementation Plan.

It should be noted that SCAG is currently in the process of updating this document and recently released the draft Connect SoCal 2024 for review and comment. The final Connect SoCal 2024 document is expected to go to the Regional Council for adoption in April 2024.

b. Regional Housing Needs Assessment

To respond to state population and household growth, and to ensure the availability of decent affordable housing for all income groups, the state enacted a law that requires SCAG and other councils of governments to periodically distribute the state identified housing need for their regions. Local jurisdictions are required by state law (Government Code Section 65580 et seq.) to plan for their fair share of projected housing construction needs in their region over a specified planning period. Housing unit construction goals are set by the state HCD and allocated to cities through regional planning agencies. HCD is responsible for determining this regional need, initiating the process by which each region must then distribute their share of statewide need to all jurisdictions within its region. Future regional housing needs are calculated in terms of the following three factors:

1. The number of units needed to accommodate forecast population growth;
2. The number of units needed to replace demolition due to attrition in the housing stock (i.e., fire damage, obsolescence, redevelopment, and conversion to non-housing uses); and
3. Maintenance of an ideal vacancy rate for a well-functioning housing market (i.e., vacancy allowance).

After a RHNA determination has been made, a regional RHNA Plan must be developed. State Housing Element law (Government Code Section 65584 (d)) states that the RHNA Plan shall be consistent with four objectives:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low- and very low-income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the state Air Resources Board pursuant to Section 65080.
3. Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.
4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.

SCAG has developed a RHNA Plan to address the housing needs of the southern California region. Future housing need is assessed by each city or county jurisdiction. The RHNA Plan is based on the land use pattern in the 2020 Regional Transportation Plan and Sustainable Communities Strategy and the 2020 Regional Growth Forecast, in accordance with SB 375. This recent legislation, SB 375, as well as SB 575, affects the RHNA allocation process. The City's RHNA allocation for the 2021-2029 Housing Element is a total of 23,610 units, allocated by income level categories as follows:

- Extremely Low/Very Low Income: 6,396 units (27.1 percent of total)
- Low Income: 4,235 units (17.9 percent of total)
- Moderate Income: 4,308 units (18.2 percent of total)
- Above-Moderate Income: 8,671 units (36.7 percent of total)

c. 2021-2029 Housing Element

California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for the Housing Element of the General Plan. Specifically, Government Code Section 65588 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years. The City Council adopted the amended 2021-2029 Housing Element on May 10, 2022, and the HCD certified the 2021-2029 Housing Element on May 24, 2022.

The Housing Element, as part of the City's General Plan, establishes housing-related actionable programs intended to guide land-use planning and development activities for the 2021-2029 Housing Element planning period in accordance with the City's stated housing goals and state law. The 2021-2029 Housing Element includes strategies for maintenance of existing housing and action-oriented programs to increase the capacity for additional housing options within the local housing supply, as necessary, to meet the current and future needs of people living and working in the City.

The following eight major goals were identified by the City that are addressed by the Housing Plan in the 2021-2029 Housing Element:

- Provide for safe and decent housing for all economic segments of the community,
- Maximize land utilization for residential development,
- Preserve existing affordable housing,
- Encourage more affordable housing units,
- Maximize solutions for those experiencing or at risk of homelessness,
- Encourage and preserve homeownership,
- Improve quality of life and promote placemaking, and
- Affirmatively furthering fair housing.

d. Affordable Housing Strategy and Implementation Plan (2015)

The Affordable Housing Strategy Report and Implementation Plan reviews past accomplishments and presents new affordable housing opportunities and assists the City in identifying the process for implementing affordable housing.

e. Zoning Ordinance

Inclusionary Housing Ordinance

The City's Inclusionary Housing Ordinance program, adopted in 2003, requires that 15 percent of all new units be affordable. The affordable housing implementation procedure is a means for fulfilling the affordable housing requirements for certain developments or planning areas, as set forth in the General Plan 2021-2029 Housing Element. The implementation procedure describes the requirements for submitting the affordable housing plan to the City and to ensure that General Plan requirements are met.

f. Existing Plans, Programs, and Policies

There are no standard conditions applicable to population and housing. The following measures are existing plans, programs, or policies (PPP) that apply to the project and will help to reduce and avoid potential impacts related to population and housing. The City's Inclusionary Housing Ordinance (Affordable Housing Implementation Procedure), as contained in Chapter 2-3 of the Zoning Ordinance, should be considered in the analysis of a proposed project that consists of 50 residential units or more, as it requires a minimum of 15 percent of the total units that are constructed to be affordable units. The breakdown of income categories for the 15 percent, along with other requirements and guidelines, are outlined in detail in Chapter 2-3 of the Zoning Ordinance.

In addition, the adopted 2021-2029 Housing Element includes the following objective and policy related to the discussion of population and housing.

Goal 1: Provide for safe and decent housing for all economic segments of the community.

Objective A: Update the Land Use Element and Zoning Ordinance to achieve compliance with current State laws and to facilitate the development of diverse housing options.

- **Policy HE-A.3:** Ensure appropriate land use planning and developer mitigation/improvements are provided for adequate infrastructure, services, and facilities to serve existing and future residents.

Goal 5: Maximize solutions for those experiencing or at risk of homelessness.

Objective J: Increase tenant protections.

- **Policy HE-J.1:** Work with local nonprofit organizations to identify people experiencing or at risk of homelessness in vulnerable subpopulations in the City to navigate specialized services.
- **Policy HE-J.2:** Evaluate opportunities to leverage local, State, and Federal funding, as available, to maintain and continue rental assistance and financial assistance programs that were created to keep individuals housed and prevent homelessness during and following the COVID-19 pandemic

- **Proposed Program PP-J.2:** Displacement Prevention. Connect residents to resources to minimize the displacement of households with lower incomes and special needs whenever possible and where necessary to ensure that displacement is carried out in an equitable manner.

Proposed General Plan Strategies and Policies

There are no proposed goals, objectives, policies, and implementation actions that are applicable to the analysis of population and housing outside of what exists in the City's adopted General Plan, including the approved 2021-2029 Housing Element.

4.11.3 Significance Determination Thresholds

The City has adopted Appendix G of the State CEQA Guidelines as the significance thresholds. A significant impact related to population and housing would be significant if the project would:

- 1) Induce substantial unplanned 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); or
- 2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

4.11.4 Methodology

Potential impacts associated with population and housing were evaluated through a comparison of project buildout with data derived from the SCAG Connect SoCal 2020 Demographics and Growth Technical Study and the 2021-2029 Housing Element (City of Irvine 2022).

4.11.5 Topic 1: Population Growth

Would the project induce substantial unplanned 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)?

4.11.5.1 Impact Analysis

The proposed project would facilitate future development consisting of residential uses required to meet the City's RHNA requirement, nonresidential uses within the Great Park, nonresidential uses at the same intensities as permitted under the existing General Plan, and the extension of Ada roadway.

Approval of the project would serve as an important action towards implementing the City's 2021-2029 Housing Element and the associated RHNA allocation of 23,610 units. Because the housing assessment in the RHNA is determined by SCAG, future development under the project would accommodate increases in population based on SCAG's demographic projections. Therefore, the project would accommodate planned growth projected by SCAG. As described in Section 4.11.1.1

above, the City's population is projected to increase from 261,600 in 2016 to 327,700 in 2045, which would constitute a 25 percent increase in population during this 29-year time frame. Similarly, the City's housing is projected to increase from 93,300 in 2016 to 121,700 in 2045, which would constitute a 30 percent increase during that 29-year time frame. Therefore, future housing developed under the project would provide housing necessary to meet the City's RHNA allocation of 23,610 units, as well as accommodate future population growth and housing needs projected in SCAG's growth projections. Furthermore, the project would reduce the City's existing jobs/housing imbalance. The City currently has more jobs than can be sustained by the City's own population. Many of the jobs are in relatively high-paying professions, and employees are more likely and able to afford to make longer distance commutes from less dense residential areas within the City, as well as residential areas outside the City. Implementing the City's 2021-2029 Housing Element and the associated RHNA allocation would account for planned population growth, would increase housing within the City, and improve the City's jobs/housing balance.

Future development under the project would primarily be in developed areas that are already served by infrastructure. Given these conditions and the City's existing development and housing occupancy patterns, it is not anticipated that future housing development facilitated by the project would induce unplanned population growth directly or indirectly through extension of roads or other infrastructure or otherwise. Additionally, the 2021-2029 Housing Element includes Goal 1, Objective A and Policy HE-A.3, which aim to manage future growth within the City by updating the land use element and Zoning Ordinance to comply with State law and by ensuring appropriate land use planning to provide adequate infrastructure, services, and facilities to serve residents.

4.11.5.2 Significance of Impacts

The project would implement the vision of the 2021-2029 Housing Element, and future development under the project would not induce substantial unplanned population growth in an area, either directly or indirectly, and impacts would be less than significant.

4.11.5.3 Mitigation

Impacts would be less than significant. No mitigation is required.

4.11.6 Topic 2: Displacement of People or Housing

Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

4.11.6.1 Impact Analysis

The project would facilitate future development consisting of residential uses required to meet the City's RHNA requirement, nonresidential uses within the Great Park, nonresidential uses at the same intensities as permitted under the existing General Plan, and the extension of Ada roadway.

The purpose of the project is to provide orderly growth in the City through the distribution, location, balance, and mix of land uses. The project would not change existing land use designations within

each of the three focus areas (and on select sites located outside of the focus areas), but rather would adopt a residential and mixed use overlay that would allow for residential and mixed-use projects to be developed within these areas. In accordance with these overlays, buildout of the project would increase the amount of housing within the City. Although some people may be displaced by a future site-specific redevelopment project, buildout of the project would provide an overall expansion of housing opportunities, and would be required to comply with all laws and regulations related to the displacement of tenants including Government Code §§ 66300 et seq. Furthermore, the project would exceed the state RHNA allocations assigned to the City, providing a buffer in all income categories. This exceedance of the City's RHNA allocation would provide additional housing that would accommodate residents displaced by future redevelopment projects, ensuring no net loss of housing, and that displaced residents would be able to find replacement housing. Therefore, displacement of people associated with implementation of the project would be temporary. In addition, the City's Inclusionary Housing Ordinance, as contained in Chapter 2-3 of the Zoning Ordinance, would be considered in the analysis of a future site-specific development that consists of 50 residential units or more to ensure adequate and accessible affordable housing. The Inclusionary Housing Ordinance requires a minimum of 15 percent of the total units that are constructed to be affordable units, providing an expansion of housing opportunities.

The project would also implement the policies of the 2021-2029 Housing Element related to displacement, including Policies HE-J.1, HE-J.2 and Proposed Program PP-J.2, which connects residents to resources to minimize the displacement of households with lower incomes and special needs.

4.11.6.2 Significance of Impacts

Through the overall production of more housing and compliance with applicable laws related to the displacement of tenants, the project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and impacts would be less than significant.

4.11.6.3 Mitigation

Impacts would be less than significant. No mitigation is required.

4.11.7 Cumulative Analysis

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for population and housing. The study area considered for the population and housing cumulative impact analysis is defined as the SCAG region and is inclusive of a proportionate share of RHNA housing units from adjacent jurisdictions. Buildout of the project would respond to the City's allocation under RHNA and would accommodate the projected population growth in the region, consistent with adopted plans and regional growth principles. The purpose of this section is to evaluate any additional incremental impact that the proposed project is likely to cause over and above the combined impacts of recently already approved and proposed projects in the City and its sphere. At buildout, a total of 57,656 residential

units are projected for the City. The project implements the 2021-2029 Housing Element and provides jobs near existing and planned employment concentrations. For these reasons, the cumulative population and housing impact is beneficial and is not a significant cumulative impact. The proposed project increases the cumulative total of housing units and associated population approved in the City. In doing so, the project would provide benefits for the City by meeting existing and projected housing demand, regional housing goals that promote housing production in jobs-rich areas, regional growth policies that encourage housing production in the Focus Areas, City 2021-2029 Housing Element goals regarding workforce housing, and state-mandated fair share housing programs. Therefore, the project would not contribute to a cumulative significant impact related to population and housing.

Although some people may be displaced by a future site-specific redevelopment project, buildout of the Reduced Alternative would provide an overall expansion of housing opportunities, and would be required comply with all laws and regulations related to the displacement of tenants including Government Code §§ 66300 et seq. Furthermore, the Reduced Alternative would exceed the state RHNA allocations assigned to the City, providing a buffer in all income categories. This exceedance of the City's RHNA allocation would provide additional housing that would accommodate residents displaced by future redevelopment projects, ensuring no net loss of housing, and that displaced residents would be able to find replacement housing. Therefore, displacement of people associated with implementation of the Reduced Alternative would be temporary. Additionally, the City's Inclusionary Housing Ordinance, as contained in Chapter 2-3 of the Zoning Ordinance, would be considered in the analysis of a future site-specific development that consists of 50 residential units or more to ensure adequate and accessible affordable housing. The Inclusionary Housing Ordinance requires a minimum of 15 percent of the total units that are constructed to be affordable units, providing an expansion of housing opportunities. Therefore, impacts associated with population and housing would be less than significant, and less than the project.