



BUILDING INDUSTRY OF SOUTHERN CALIFORNIA, INC.

ORANGE COUNTY CHAPTER

Chair Donne Brownsey
CA Coastal Commission
455 Market Street, Ste 300
San Francisco, CA 94105

Re: California Housing Crisis: Magnolia Tank Farm Approval

Chair and Commissioners,

The Building Industry Association of Orange County strongly supports the proposed housing project known as the Magnolia Tank Farm. Considering the existing housing crisis, Regional Housing Needs Allocation (RHNA) enforcement and Orange County Flood Control District planning/infrastructure, Magnolia Tank Farm is a project that needs to be supported by all levels of California government.

Critical Need for New Housing in Orange County: California is facing a growing housing and homelessness crisis that impacts families, communities, and the well-being of the state. Lack of housing inventory is causing home and apartment costs to skyrocket, forcing relocation of some Californians to high-polluting states. Housing and Community Development (HCD) acknowledges this crisis though the RHNA process and requires Orange County to plan for 180,000 new homes over an eight-year period. More specifically, it calls for Huntington Beach to plan for over 13,000 homes during this time. Failure to plan for and facilitate construction of such homes now invokes state law penalties that will be aggressively enforced by the Attorney General's Housing Strikeforce and HCD's Housing Accountability Unit.

Failure of a project like Magnolia Tank Farm would also contribute to a worsening of issues raised by the California Coastal Commission's (CCC) Environmental Justice Policies. Elimination of affordable residential neighborhoods in the coastal zone is identified as a contributing factor to homelessness and an unjust impact for lower income communities of color. Increasing housing opportunity within coastal communities is a matter of statewide interest that must be given serious consideration.

Factors Inhibiting Coastal Home building: The Legislative Analyst's Office (LAO) issued a report identifying multiple constraints that limit coastal development opportunity. This daunting list should not be compounded by mitigatable Sea Level Rise (SLR) barriers when existing infrastructure and planning exist. If coastal cities are unilaterally prevented from such development, achieving state housing goals becomes untenable. Local government flood control efforts need to be given full consideration, in coordination with the CCC, to achieve RHNA requirements.

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As an example, the Orange County Flood Control District (OCFCD) maintains 380 miles of flood control infrastructure protecting critical regional infrastructure, roads, schools, libraries, and residences. Through their mitigation strategies, communities like Huntington Beach can safely meet their RHNA demands while also protecting against SLR. Partnerships between the CCC and OCFCD are the path to an environmentally stronger, safer and equitable future for our coastal communities. Unilateral removal of all parcels with future flood potential, without consideration of mitigation efforts, unduly restricts the California dream for countless families.

As such, we respectfully request that the CCC adopt a smart and reasonable approach to environmental policies that will also address the housing crisis. We look forward to your consideration of this request and proactive efforts to assist the building industry with projects currently under consideration by the CCC.

Sincerely,

A handwritten signature in black ink, appearing to read 'AW', with a long horizontal stroke extending to the right.

Adam Wood
Vice President
BIA/SC, OC Chapter