

November 29, 2022

Building Industry Association of Southern California
17192 Murphy Avenue #14445
Irvine, CA 92623

Chairwoman Donne Brownsey
California Coastal Commission
Sent via e-mail at: Donne.Brownsey@coastal.ca.gov

RE: SUPPORT for City of Huntington Beach Magnolia Tank Farm Housing Development

Dear Chairwoman Brownsey and Commissioners,

The Building Industry Association of Southern California strongly supports the Magnolia Tank Farm housing project. 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.

California is facing a growing housing and homelessness crisis that impacts families, communities, and the well-being of the state. The situation in Orange County is no different. Lack of housing inventory is causing home and apartment costs to skyrocket, forcing relocation of some Californians to high-polluting states. The CA Department of Housing and Community Development (HCD) acknowledges this crisis through the RHNA process and requires cities to plan for thousands of new homes over an eight-year period. The current plan 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.

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 prevented from such development, achieving state housing goals becomes an impossibility.

Local government flood control efforts need to be given full consideration, in coordination with the CCC, to achieve RHNA requirements.

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.

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 "Jeff Montejano", with a long horizontal stroke extending to the right.

Jeff Montejano, CEO
BIASC