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California State Senate

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TRANSPORTATION

JOINT LEGISLATIVE COMMITTEE
ON EMERGENCY MANAGEMENT

May 1, 2023

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

Dear Chair Brownsey,

We, the undersigned representatives of Orange County's legislative delegation, write to express our support for the Magnolia Tank Farm (MTF), a 250 unit housing project, including twenty-five low-income housing units, some of which will be set aside for hotel workers, and a 215-room visitor serving lodge with dedicated low-cost lodging in Huntington Beach. The MTF is on a Brownfields site formerly occupied by oil storage tanks. The project site is part of the City's recently adopted Housing Element, and the site has been included in the City's Housing Inventory. MTF has been approved by the City of Huntington Beach and is awaiting Coastal Commission approval of its amended Local Coastal Program.

As you are aware, California is facing an ongoing housing crisis. In accordance with the Regional Housing Needs Assessment (RHNA), Orange County must zone for over 180,000 additional housing units by October 2029. Of these, 13,368 new units are required in Huntington Beach alone. Since MTF is in the approved housing element, if the Coastal Commission denies the LCP amendment for MTF, the city of Huntington Beach would have to find an additional 250 units of housing somewhere else, a near impossibility in such a highly developed coastal community. To comply with RHNA in Orange County and to achieve our state's housing goals, new housing will necessarily be required within the coastal zone.

One of the issues that local governments in Orange County are wrestling with is the impact of sea level rise (SLR) on housing needs. Acknowledging this new reality, we urge the CCC to recognize that the MTF site is an appropriate site for housing. First, the MTF project is surrounded by existing developments that the CCC considers “critical infrastructure”: schools, roads, health care facilities, public buildings, etc. The CCC’s own policy recognizes the need and appropriateness of protecting critical infrastructure from flood risk caused by SLR.

The MTF project site is already protected by the Huntington Beach Channel and the Talbert Channel operated by the Orange County Flood Control Management District (OCFCD). OCFCD has provided flood control protection for Orange County since 1927. Today, OCFCD maintains the integrity of 380 miles of flood control infrastructure throughout the county. The Orange County Board of Supervisors has passed a Resolution confirming that they will continue to protect critical infrastructure from additional flooding threats, including SLR, in the future. Because MTF is co-located with critical infrastructure, it will benefit from ongoing flood control protection, and from our perspective, it is an ideal location for new housing.

We understand that the CCC may evaluate whether the site is located at a location that is a “hazard” when considering approval, without regard to the existing flood protection. The CCC seems to be concerned about tidal inundation of the site. But we understand that under the relevant SLR scenario for residential development over the 75-year project lifespan, the developed project site does not flood.

Finally, in the recent *Del Mar* decision, a housing project located in a hazardous flood plain was approved by the CCC. In contrast, the MTF housing project **is not located** in a hazardous area as defined by FEMA. In other words, the flood risk was far greater for the Del Mar project than the MTF site. Moreover, the CCC’s suggested project modifications that were incorporated into the Del Mar project to minimize SLR risks have also been added to the MTF project. The MTF will provide additional affordable housing opportunities, as did the Del Mar project, which was identified by the CCC as being a significant factor in the approval of the Del Mar project.

Given Orange County’s housing needs and the many coastal friendly design features of this project, MTF’s consistency with the adopted Housing Element, the lack of SLR flood risk to the

site, the existing and continued flood control protection in this area, and the *Del Mar* precedent, we implore the CCC to approve the Huntington Beach LCP amendment for the MTF project.

Sincerely,



Assembly Member Blanca Pacheco
(District - 64)



Assembly Member Diane Dixon
(District - 72)



Assembly Member Sharon Quirk-Silva
(District - 67)



Senator Josh Newman
(District - 29)



Assembly Member Avelino Valencia
(District - 68)



Senator Bob Archuleta
(District - 30)



Assembly Member Tri Ta
(District - 70)



Senator Kelly Seyarto
(District - 32)



Senator Thomas Umberg
(District - 34)



Senator Dave Min
(District - 37)

CC: California Coastal Commissioners
Dr. Kate Huckelbridge, Executive Director
Governor Gavin Newsom
Dana Williamson, Chief of Staff, Governor Newsom
Ann Patterson, Cabinet Secretary, Governor Newsom