

January 20, 2012

Honorable Sukhee Kang
Mayor
City of Irvine
1 Civic Center
Irvine, CA 92606

Re: City of Irvine Housing Element

Mayor Kang,

I am writing on behalf of the members of the Building Industry Association of Southern California, Orange County Chapter (BIA/OC) to address the proposed update to the City's housing element. Specifically, our members have serious concerns about the Planning Commission's recommendation to include a provision requiring the City to review, and consider, within one year of adoption of the Housing Element, an amendment to the Inclusionary Housing Ordinance requiring that three percent of rental units be affordable to extremely low-income households.

The provision in question was not vetted by staff and was added into the Housing Element at the last minute by the Planning Commission with no opportunity for public comment on the matter. Our concern is that the onerous mandate that has been proposed will limit project viability of potential housing providers. **For that reason BIA/OC is opposed to the provision and asks that it be deleted entirely from the proposed Housing Element.**

Irvine has an extensive housing plan that was thoughtfully developed and included input from a variety of stakeholders. Hastily amending the City's housing goals and implementation policies with little or no input from the community is a departure from Irvine's policy development best practices. If the City is interested in exploring amendments to its existing housing policies, we ask that a separate stakeholder process be initiated so that all policy considerations can be fully vetted.

Thank you for your thoughtful consideration.

Sincerely,



Bryan M. Starr
Chief Executive Officer

Cc: City Council
Eric Tolles, Community Development Director
Mark Asturias, Housing Manager



**Orange County
Chapter**

Building Industry Association
of Southern California

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