

**From:** [Homeless United Huntington Beach](https://www.homelessunitedhb.org/)  
**To:** [housingelement@surfcity-hb.org](mailto:housingelement@surfcity-hb.org)  
**Cc:** [HousingElements@hcd.ca.gov](mailto:HousingElements@hcd.ca.gov)  
**Subject:** Draft Revisions to the 6th Cycle Housing Element – Public Comment Period May 14–21, 202  
**Date:** Wednesday, May 20, 2026 11:25:46 PM

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Homeless United HB is a community advocacy organization dedicated to finding and implementing solutions that reduce homelessness in Huntington Beach and the surrounding region. We submit the following comment during the public review period for the Draft Revisions to the 6th Cycle Housing Element Update, posted May 14, 2026.

**We offer responses to Sections 3 and 4 revisions.**

### **Section 3 — FAMILIES AND PERSONS IN NEED OF EMERGENCY SHELTER**

Our comments identify what we believe are factual inaccuracies in the Section 3 revision addressing AB 2339 compliance and the City's emergency shelter adequacy finding. We raise these not to obstruct certification, but because accurate data is the foundation of sound housing policy — and because the people these programs serve deserve a housing element that reflects reality.

#### **CONCERN 1: THE HOMEKEY SITE OFFICIALLY TRANSITIONED TO PERMANENT SUPPORTIVE HOUSING ON AUGUST 29, 2025**

The Section 3 revision asserts that the City meets the AB 2339 emergency shelter adequacy standard based on 236 combined beds: 174 at the Navigation Center and 62 units at Oasis Apartments (17251 Beach Blvd.). This inclusion is no longer accurate.

Oasis Apartments was always designed as a two-phase project. County of Orange agenda documents approving the original operating contract with American Family Housing described Phase 1 as "interim housing providing 62 units for a period of up to five years" that would "ultimately be converted into permanent supportive housing for low-income residents." That conversion is complete. On August 29, 2025, the Orange County Housing Authority issued its official public notice and began accepting applications for the 62 studio units as permanent, voucher-backed supportive housing — eight months before the City posted these revisions.

The 2024 OC PIT Count correctly counted the 62 units as sheltered transitional housing, which was accurate at the time. The revision does not acknowledge the subsequent transition and continues to count Oasis Apartments as shelter capacity under AB 2339, which it is no longer.

Under California housing law, emergency shelter, transitional housing, and permanent supportive housing are distinct program types with different regulatory definitions. Permanent supportive housing cannot be counted toward a city's emergency shelter bed capacity under Government Code Section 65583(a)(4)(F).

We respectfully request that the City and HCD update the shelter adequacy analysis to reflect Oasis Apartments' current PSH status and recalculate compliance using the Navigation Center as the sole qualifying shelter resource.

#### **CONCERN 2: THE NAVIGATION CENTER CAPACITY FIGURE IS**

## INCONSISTENT WITH THE CITY'S OWN WEBSITE

The Section 3 revision states the Navigation Center has a capacity of 174 beds. However, the City's Homeless Solutions webpage ([huntingtonbeachca.gov](http://huntingtonbeachca.gov), accessed May 2026) currently states capacity of 164 adults and couples — a 10-bed discrepancy that should be reconciled.

The accurate figure matters because the adequacy calculation is already extremely tight: the City's 2022 PIT baseline was 188 unsheltered persons, and the 2024 PIT count showed 173 unsheltered persons in Huntington Beach. At either capacity figure, the margin between the Navigation Center's standalone capacity and identified unsheltered need is razor thin — before accounting for PIT undercount limitations (people in vehicles, un-surveyed locations, and temporary situations) and normal operational fluctuations.

### CONCERN 3: THE NEED BASELINE IS ACTIVELY BEING SUPERSEDED

The housing element revision relies primarily on the 2022 PIT count (188 unsheltered). While the 2024 count showed modest improvement (173 unsheltered), HB's total homeless population grew from 330 to 433 over that same period, reflecting sustained and increasing overall need.

The 2026 Orange County PIT Count was conducted January 27–29, 2026, results were released on Monday, May 18th, — during this very comment period. We respectfully request that the revised Housing Element incorporate the 2026 city-specific figures before finalizing its adequacy determination.

We recognize the genuine progress the City's investment in the Navigation Center represents, and the Oasis Apartments' transition to permanent supportive housing is itself a positive outcome — exactly what the Homekey program was designed to achieve. We raise these concerns in that same spirit: to ensure the housing element accurately reflects current conditions.

**Presentation Suggestion:** A timeline or chart explaining the development of the Navigation Center (why bed count declined and the plan for a permanent NC and Supportive Housing on the current site), alongside a chronology of the Project Homekey/Oasis transition from interim shelter to permanent housing, would help the community understand these resources and their impact on meeting housing needs.

**Review Suggestion:** We recommend that the Homeless and Behavioral Health Manager review this document.

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## Section 4 Revisions — Program Updates

- **Page 1:** First paragraph states 9 units; should be 10 units.
- **Page 7 — 2I:** GWC is deleted — why, and how have those units been accounted for in the Site Plan?
- **Page 8 — 3C:** Residential Development on City-Owned Property should be expanded to include properties belonging to other agencies, school districts, and faith communities, which represent potential sources of low-income and permanent supportive housing.
- **Page 12 — 7G:** Update "Proactively Seek Funding for Hotel/Motel" to reflect Project

Homekey's transition to Oasis.

Small projects of fewer than 75 units have had significant impact on stable affordable housing in Huntington Beach and are worth actively pursuing by city leaders. We acknowledge the work of the faith communities and non-profits to support families that struggle to meet food and housing needs. Their collaboration with the city have a significant impact to prevent homelessness in Huntington Beach.

Respectfully submitted,

Pat Goodman,  
**Homeless United HB**

Need Help - Give Help: **211 OC** 24/7 Hotline or [www.211oc.org](http://www.211oc.org)  
City of Huntington Beach, Homeless Task Force: [www.huntingtonbeachca.gov/homelessness/](http://www.huntingtonbeachca.gov/homelessness/)  
HTF Case Managers Message: 714-536-5576  
HBPD Non-emergency: 714-960-8825  
Use App: MyHB



[HomelessUnitedHB@gmail.com](mailto:HomelessUnitedHB@gmail.com)

[www.facebook.com/pg/HomelessUnitedHB/posts/](https://www.facebook.com/pg/HomelessUnitedHB/posts/)

*HUHB is a network of representatives from the faith communities, nonprofits and advocates for those in need of clean, safe, affordable housing in our city. HUHB usually meets on the 3rd Thursday of every month, 7:00 pm, via Zoom. You may mail inquiries c/o CUMC, 6652 Heil Ave., Huntington Beach 92647*

**From:** [Terry Park CommUNITY](#)  
**To:** [housingelement@surfcity-hb.org](mailto:housingelement@surfcity-hb.org)  
**Subject:** Senior Housing  
**Date:** Sunday, May 17, 2026 3:28:09 PM

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You don't often get email from [save@terryparkcommunity.com](mailto:save@terryparkcommunity.com). [Learn why this is important](#)

Pretty disturbing that you all talk about senior housing and quality of life in HB then try to put in a 24/7 warehouse operation next to a senior housing complex and park. Ever heard of sensitive receptors?

Just STOP shoving high density low income senior narrative down our throats when you dont really care about the people in HB

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A message from the  
Terry Park CommUNITY  
[save@terryparkcommunity.com](mailto:save@terryparkcommunity.com)  
[www.terryparkcommunity.com](http://www.terryparkcommunity.com)  
UCC 1-308 All Rights Reserved  
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**From:** [Ketrin Adam](#)  
**To:** [housingelement@surfcity-hb.org](mailto:housingelement@surfcity-hb.org)  
**Subject:** Public Comments for Housing Plan  
**Date:** Wednesday, May 20, 2026 11:53:46 AM

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You don't often get email from oketrin@gmail.com. [Learn why this is important](#)

Dear Huntington Beach City Council Members,

I am writing as a resident of Huntington Beach who strongly supports the immediate implementation of the state-required housing plan in order to avoid the unnecessary \$50,000 penalties and continued waste of taxpayer resources on litigation.

I live at 20241 Everglades Lane, near Hawes Elementary School, and I have watched with disappointment as the City continues to spend significant amounts of money fighting housing requirements rather than addressing the real quality-of-life concerns impacting families in our community.

For example, the playground equipment at the park serving Hawes Elementary has noticeably deteriorated over the years. The slide was removed several years ago and was never replaced. Today, the condition of the playground and equipment is frankly unacceptable for one of the major elementary school areas in our city. These are the types of issues residents and families see every day.

Instead of continuing costly and ultimately unproductive legal battles, I urge the City to implement the housing plan immediately and move forward. Additional housing will bring new residents, families, and tax revenue that can help support our schools, parks, infrastructure, students, and local businesses.

Huntington Beach should focus on improving the community and investing in the needs of current and future residents, not wasting public funds on frivolous lawsuits that do not improve daily life for families who live here.

Please implement the plan and move on so the City can focus its energy and resources on serving the community.

Respectfully,

Ketrin Adam  
20241 Everglades Lane  
Huntington Beach, CA



May 21, 2026

www.kennedycommission.org  
17701 Cowan Ave., Suite 200  
Irvine, CA 92614  
949 250 0909

Ms. Jennifer Villasenor  
Director of Community Development  
City of Huntington Beach  
Planning Administration  
2000 Main Street  
Huntington Beach, CA 92648  
Submitted via email ([housingelement@surfcity-hb.org](mailto:housingelement@surfcity-hb.org))

**RE: Initial Comments to the Proposed May 14, 2026 Revisions to the City of Huntington Beach's Draft Housing Element**

City of Huntington Beach Planning Division:

The Kennedy Commission (the Commission) submits this letter to provide public comments regarding the proposed revisions to the City of Huntington Beach's 2021-2029 draft Housing Element, which were posted on the City's website on May 14, 2026. As detailed below, the City has failed to provide proper notice of these proposed revisions and the City has failed to post all of its proposed revisions and a completed draft Housing Element. Further, because the City's limited revisions to the Draft Housing Element are not sufficient to address the deficiencies in the prior Draft dated March 10, 2023, the Commission requests that the City further revise the Draft Housing Element so that it substantially complies with Housing Element Law.

The Commission is a broad-based coalition of residents and community organizations that advocates for the production of homes affordable for families earning less than \$27,000 annually in Orange County. Formed in 2001, the Commission has been successful in partnering and working with Orange County jurisdictions to create effective housing and land-use policies that have led to the construction of homes affordable to lower-income working families.

The Commission has intervened in the litigation *The People of California ex rel. Rob Bonta v. The City of Huntington Beach*, Case No. 30-2023-01312235-CU-WM-CJC. In this case, the San Diego Superior Court, Department 63, issued an Order on December 19, 2025, directing the City of Huntington Beach to adopt a revised Housing Element that substantially complies with Housing Element Law within 120 days of the Order. Consistent with Government Code section 65754, the Order specifies that the 120-day period shall include the 45-day review period by the Department. On April 24, 2026, the Court revised the City's deadline to adopt a substantially compliant Housing Element to May 28, 2026.

The City's proposed revisions do not fully address the deficiencies of the Draft Housing Element identified by the Commission in its February 6, 2026 letter to Melinda Coy, which the City was copied on, and by HCD in its March 6, 2026 letter to the City, attached hereto. For example:

- [The notice of the revisions provided by the City does not meet the requirements of

Government Code section 65585(b)(1), which requires that prior to submitting the Draft, the City must 1) provide seven days' public notice, 2) post the draft revision to its internet website, and 3) send an email notification to interested individuals. While the City posted the Housing Element revisions to its website with seven days' public notice, it does not appear that the City sent an email notification to interested individuals. The Kennedy Commission, which has submitted public comments on the City's prior Sixth Cycle Housing Element drafts, was not notified via email of the revisions.]

- The City's notice is also deficient because it has failed to post all proposed changes to the Draft 6<sup>th</sup> Cycle Housing Element and a complete version of its proposed updated Draft Housing Element. (Government Code section 65585(b).) The 7-day public notice and comment period cannot begin to run until the City publicly posts all proposed changes.
- The City's inventory of sites remains deficient. The sites inventory must be updated to reflect any changes in circumstances since 2023, such as the status of pipeline projects, site availability for development within the planning period, and suitability of nonvacant sites. (See March 6 HCD Letter, p. 2.) To illustrate, the City is proposing to remove Program 2I on Golden West College. The City included four sites that are a part of Golden West College in its sites inventory; the City identified these sites to have the capacity of 272 lower income units and 328 above moderate income – a total of 600 dwelling units. (March 2023 Draft, pp. B-33, B-46.) It is unclear, following the removal of Program 2I, whether these sites remain available; if they are unavailable, the site inventory must be updated accordingly. The sites inventory must also be updated to comply with Housing Element Law, including Government Code sections 65583, 65583.2, and the Court of Appeal decisions in *New Commune DTLA LLC v. City of Redondo Beach*, issued on October 10, 2025, (see February 6 Commission Letter, p. 2), and *Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193.
- Instead of an Affordable Housing Overlay, the City now proposes an Affordable Housing Focus Area (AHFA) zone to accommodate a majority of its RHNA. (See proposed Programs 2A & 2B.) The minimal revisions to Programs 2A and 2B suggest that this is merely a repackaged version of the Overlay, and is not sufficient to satisfy *New Commune* and *Martinez*.
- The City's revisions to Programs 8A-9E do not address HCD recommendations to include significant and meaningful place-based strategies that will increase affordable housing opportunities in lower-economic areas of the City. (See March 6 HCD Letter, pp. 6-7.) From the Analysis of Impediments conducted, the neighborhood identified the following key issues as needs in their communities:
  - o Developable Space
  - o Development Standards
  - o Affordability

Jennifer Villasenor

May 21, 2026

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- o Housing fees
- o Access to housing
- o Access to funding
- o Information availability and lack of resources.

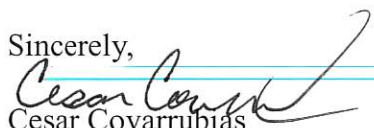
(See March 2023 Draft Housing Element, p. 3-55.)

- Revisions to Program 8A-9E only address the last issue - information availability and lack of resources. The revisions to the programs do not identify any place-based strategies to increase access to housing or lower the cost of housing fees, and do not address affordability, development standards, or access to funding. (See AFFH HCD Guidance Memo (rev'd. April 2021, pp. 15 (discussing place-based strategy examples to transform R/ECAPs to areas of opportunities), 54, 56 (discussing conserving and improving existing affordable housing stock as place-based strategies). The City needs to revise the Draft and include specific place-based strategies that address the housing needs of the communities, including efforts employed or to be employed by the City on how it will improve the existing affordable housing stock and make it available to those in need of it.
- The City did not update its constraints analysis to address Measure U or include a program to mitigate its effect. As explained in the Commission's February 6, 2026 letter, the City's constraints analysis, as required by Government Code section 65583(a)(5), is incomplete because it does not account for Measure U, placed on the ballot by the City Council and passed by the voters in November 2024, that amended the City's Charter to require an affirmative vote of the people before any City initiated general plan amendment may be approved. The Draft should include program measures to mitigate the effect of Measure U on the City's ability to comply with Housing Element Law.

The above is not meant to be an exhaustive list of deficiencies, and the Commission reserves the right to identify additional deficiencies in subsequent comments. Because of these deficiencies, the draft Housing Element with the revisions proposed by the City fails to substantially comply with Housing Element Law. The Commission, therefore, requests the City make the revisions necessary to bring its draft Housing Element into compliance with the law.

The Commission looks forward to partnering with the City of Huntington Beach to create opportunities to increase affordable homes for lower income households in the city. If you have any questions, please feel free to contact me at (949) 250-0909 or [cesarc@kennedycommission.org](mailto:cesarc@kennedycommission.org).

Sincerely,

  
Cesar Covarrubias

Executive Director

Jennifer Villasenor  
May 21, 2026  
Page 4 of 4

cc: Melinda Coy, Housing Accountability Chief, Land Use and Local Government Relations  
(melinda.coy@hcd.ca.gov)

February 6, 2026



www.kennedycommission.org  
17701 Cowan Ave., Suite 200  
Irvine, CA 92614  
949 250 0909

Melinda Coy, Housing Accountability Chief, Land Use and Local Government Relations  
(melinda.coy@hcd.ca.gov)  
California Department of Housing and Community Development  
2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833

**Sent via E-mail**

**RE: City of Huntington Beach Draft Housing Element, Submitted to the Department  
for Review on January 21, 2026**

The Kennedy Commission provides this initial comment on the Draft Housing Element submitted to the Department of Housing and Community Development on January 21, 2026 by the City of Huntington Beach. Because the Draft Housing Element has not been updated since March 2023 and is deficient for the reasons detailed below, we ask that the Department determine now that the Draft does not substantially comply with Housing Element Law.

The Commission has intervened in the litigation *The People of California ex rel. Rob Bonta v. The City of Huntington Beach*, Case No. 30-2023-01312235-CU-WM-CJC. In this case, the San Diego Superior Court, Department 63, issued an Order on December 19, 2025, directing the City of Huntington Beach to adopt a revised Housing Element that substantially complies with Housing Element Law within 120 days of the Order. Consistent with Government Code section 65754, the Order specifies that the 120-day period shall include the 45-day review period by the Department.

In an apparent effort to comply with the Order, on January 21, 2026 the City resubmitted its March 2023 Draft Housing Element to the Department without making any changes to that document. The City did not provide notice to the Commission or to the public prior to submitting the draft to the Department for review, as required by law. The Commission is concerned that the City is continuing its practice of delaying compliance with the law by waiting over a month in the 120-day period before providing a three-year-old Draft that was already submitted to the Department.

There are substantial deficiencies in the Draft, outlined below, that should cause the Department to now determine that it does not substantially comply with Housing Element Law.

- The City did not provide the notice required by law prior to submitting the Draft to the Department. Government Code section 65585(b)(1) requires that prior to submitting the Draft, the City must 1) provide seven days' public notice, 2) post the draft revision to its

internet website, and 3) send an email notification to interested individuals. The City's claim that it met these requirements in 2023 could only apply to the seven days' notice requirement, and even there the time would relate to the submission in 2023 not in 2026. The City has not provided any e-mail update, nor any indication on the City's website that it has resubmitted the 2023 draft to HCD.

- The City has not updated its inventory of sites to analyze changed circumstances in fact and law since 2023. For example:
  - There is no accounting for changes to the status of sites in the inventory since the 2023 draft was prepared. For example, the Magnolia Tank Farm is listed as a pipeline project in the Draft, with all 250 units identified as above-moderate units. See Draft, p. B-9. However, the Magnolia Tank Farm Specific Plan was amended in December 2024 to include a 20 percent inclusionary requirement that is not reflected in the Draft.
  - The Court of Appeal issued *New Commune DTLA LLC v. City of Redondo Beach* on October 10, 2025, which overturned the Department's prior guidance that allowed meeting RHNA on overlay sites in non-residential areas without minimum residential densities. The Draft includes such overlay sites with underlying non-residential zoning, not allowed by *New Commune*, and does not account for the resulting substantial change in the inventory of sites now required.
  - After applying the *New Commune* decision, the City may reassess its entire inventory of sites if it decides to not impose minimum residential densities on those sites. When justifying its overlay strategy, the City claims it "is a built-out community with little vacant land available" so it uses the overlay for most RHNA sites that have existing uses. See Draft, p. 3-148. In this context, for example, the City may reassess the amount of housing permitted on the 29 acres of vacant land at the Magnolia Tank Farm, to potentially increase from 250 dwelling units, or less than ten units per acre.
- The City has also not updated its programs, despite the need to do so to account for changed circumstances, including the fact that the City is now five years into the current planning period. For example, Program 2B, which is a program to establish a city-wide affordable housing overlay zone, and Program 2I, which is a program to apply an affordable housing overlay to the Golden West College, will need to be revisited in light of *New Commune*. See Draft, pp. 4-14, 4-17. Moreover, some of the deadlines for targeted actions to implement the programs have already passed, underscoring the need for revision and updating. For example, the overlay in Program 2I was supposed to be applied to the site by December 2022 and the City was supposed to meet with college administration in 2023 about assisting with the college's Request for Proposal. See Draft, p. 4-17. No information is provided about whether these deadlines were met.

Melinda Coy  
February 6, 2026  
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- The City's constraints analysis, as required by Government Code section 65583(a)(5), is incomplete because it does not account for Measure U, placed on the ballot by the City Council and passed by the voters in November 2024, that amended the City's Charter to require an affirmative vote of the people before any City initiated general plan amendment may be approved. The Draft should include program measures to mitigate the effect of Measure U on the City's ability to comply with Housing Element Law.

Rather than the Department completing a comprehensive substantive review of a Draft Housing Element that clearly does not reflect current facts or law, the Commission asks that the Department find the Draft does not substantially comply with Housing Element Law based on the deficiencies identified above, and return the Draft to the City now. The Department's review should not contribute to the delay inherent in the City's incomplete Draft submission, which does not comply with its obligation to comply with Housing Element Law within 120 days of the Court's Order.

The concerns raised in this letter focus on the need for updates to the outdated Draft; they are not exhaustive. In the event that the Department does not return the Draft to the City now, but proceeds to a full review, the Commission intends to provide further substantive comments.

If you have any questions, please feel free to contact me at (949) 250-0909 or [cesarc@kennedycommission.org](mailto:cesarc@kennedycommission.org).

Sincerely,



Cesar Covarrubias  
Executive Director

cc:

Jennifer Villasenor  
Director of Community Development  
([jvillasenor@surfcity-hb.org](mailto:jvillasenor@surfcity-hb.org))