



City of Villa Park

17855 Santiago Boulevard, Villa Park, California 92861-4187
(714) 998-1500 • Fax: (714) 998-1508

www.villapark.org

July 28, 2026

Orange County Grand Jury
700 Civic Center Drive West
Santa Ana, CA 92701

RE: CITY OF VILLA PARK RESPONSE TO THE 2025-2026 ORANGE COUNTY GRAND JURY REPORT, "CALIFORNIA HOUSING MANDATES"

On behalf of the City of Villa Park, I am pleased to respond to the Grand Jury's report regarding California Housing Mandates. The City of Villa Park provides the following responses:

GRAND JURY FINDINGS

Finding F1: *In recent years, the California Legislature has enacted an unusually large and burdensome volume of housing-related laws intended to strengthen compliance with State Housing Mandates.*

City Response: The respondent agrees with the finding.

Finding F2: *Housing Mandates are implemented through a RHNA process that often lacks transparency and relies on complex methodologies that are difficult for local officials and the public to understand or meaningfully challenge.*

City Response: The respondent agrees with the finding.

Finding F4: *Meaningful participation by Orange County cities in both OCCOG and SCAG meetings is critical to ensuring that local perspectives are represented during the development and implementation of Housing Mandates policies.*

City Response: The respondent agrees with the finding.

Finding F5: *SCAG's 6th Cycle RHNA assigned Orange County a questionable total of 183,861 housing units for the 2021-2029 planning period, with higher allocations concentrated with major population and employment centers.*

City Response: The respondent agrees with the finding. The City of Villa Park was hit with a disproportionate allocation relative to the population and current residential parcels.

Finding F6: *RHNA allocations are unrealistic and not attainable within the current planning cycle due to limited available land, built-out urban conditions, infrastructure constraints, environmental factors, and public health and safety requirements.*

JORDAN WU, Mayor • ROBERT FRACKELTON, Mayor Pro Tem
NICOL JONES, Councilmember • KELLY MCBRIDE, Councilmember • CRYSTAL MILES, Councilmember

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City Response: The respondent partially disagrees with the finding. The City of Villa Park has a Certified Housing Element for the current planning cycle and is taking actions to fully implement as set forth. The City does not have the staff resources to sufficiently research and address the attainability of other jurisdictions relative to their respective allocations.

Finding F7: *Residents in Orange County consistently express a desire for local planning decisions to reflect community priorities, including but not limited to neighborhood character, safety considerations, the environment and open-space preservation.*

City Response: The respondent agrees with the finding.

Finding F8: *California's regulatory construction costs (i.e., permitting fees) present substantial challenges for private housing developers – particularly those delivering affordable housing units.*

City Response: The respondent partially disagrees with the finding. The permitting fees for the City of Villa Park reflect true cost recovery and are consistent regardless of products delivered. The City does not have the staff resources in the City to research or address the approval process, construction costs, and fees for other jurisdictions.

Finding F9: *The cost of constructing a single affordable housing unit in California typically ranges from approximately \$500,000 to \$800,000 per unit when fully complying with current state regulations. New low-income housing is generally not financially feasible without public subsidy.*

City Response: The respondent agrees with the finding. Land acquisition costs and construction costs are financially difficult for development unless addressed in a market rate pricing structure.

Finding F10: *Prior to their dissolution in 2012, redevelopment agencies served as a primary mechanism for cities and counties to finance affordable housing and related infrastructure. The loss of redevelopment has reduced cities' ability to support construction of affordable units.*

City Response: The respondent agrees with the finding. However, the City of Villa Park never had a redevelopment agency and is unable to research the activities of other jurisdictions given limited City staff resources.

Finding F11: *Because public subsidy is limited and highly competitive, cities seeking to produce meaningful quantities of low-income housing must rely in part on private development incentives, often resulting in higher overall development densities and unit counts than the RHNA allocation.*

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City Response: The respondent agrees with the finding, but is unable to validate the research done by the Grand Jury due to the limited City staff resources.

Finding F12: *The 6th Cycle RHNA methodology included numerous technical inputs published by SCAG and HCD; however, these inputs were highly complex and difficult for cities to interpret or independently verify.*

City Response: The respondent agrees with the finding, but does not have the staff resources to research the validity of the finding relative to other jurisdictions.

GRAND JURY RECOMMENDATIONS

Recommendation R7: *OCCOG, all Orange County cities and the County of Orange should reassess the current dues structure, by September 30, 2026, to ensure that OCCOG has the resources necessary to effectively represent Orange County jurisdictions in SCAG processes, including RHNA methodology development and appeals. [F3, F15]*

City Response: The recommendation has not yet been implemented, but it is our expectation that it will be implemented by September 30, 2026. The City will have to defer to OCCOG to complete the reassessment given the limited staff resources in the City. Actual implementation of the dues structure will be dependent upon the outcome of the analysis.

Recommendation R8: *By December 31, 2026, the Orange County Board of Supervisors should partner with cities to evaluate countywide infrastructure capacity – including water, wastewater, flood control, transportation, and public-safety systems – and develop a coordinated regional plan capable of supporting the level of housing growth required under state law. [F6]*

City Response: This recommendation has not yet been implemented, but will be implemented in the future. Given the limited staff resources available within the City of Villa Park, the City will be dependent upon the County of Orange to take the leadership role and set the completion timeframe for a County-wide infrastructure evaluation. The City will actively participate relative to the infrastructure capacity within Villa Park City boundaries to the extent requested.

Recommendation R9: *By September 30, 2026, the Orange County Board of Supervisors should strengthen its engagement with OCCOG and increase staff support to develop a share, countywide database of potential housing sites and key development-feasibility factors. [F15]*

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City Response: This recommendation has not yet been implemented, but will be implemented in the future. Given the limited staff resources available within the City of Villa Park, the City will be dependent upon the County of Orange to take the leadership role and set the completion timeframe. The City will actively support the strengthened engagement effort by the County of Orange.

Recommendation R11: *The County of Orange and each city should ensure consistent participation in SCAG and OCCOG committees by September 30, 2026, including the Technical Advisory Committee (TAC), to strengthen regional representation during RHNA-methodology development. [F3, F4, F15]*

City Response: The recommendation has been implemented. The City Council officially designated a specific City Councilmember in January 2026 as the primary and alternate contact with SCAG and OCCOG for 2026. Technical support of the Council designee and the TAC at the staff level is provided by the City Manager, City Planner and City Engineer as needed.

Recommendation R12: *The County of Orange and each city should designate a single technical representative, by September 30, 2026, along with an alternate, for all RHNA-related SCAG and OCCOG committees to ensure continuity of participation and eliminate gaps in representation across multiple decision-making bodies. [F4]*

City Response: The recommendation has been implemented. The City Council officially designated a specific City Councilmember in January 2026 as the primary and alternate contact with SCAG and OCCOG for 2026. Technical support of the Council designee at the staff level is provided by the City Manager, City Planner and City Engineer as needed.

Recommendation R14: *By April 30, 2027, the County of Orange and each city should publish annual monitoring dashboards showing (a) entitlement pipeline conditions, (b) realistic site yield, (c) assembled funding sources for affordable units, and (d) conversion rates from planned capacity to issued permits and completed units, ensuring that County and city-determined capacity assumptions remain aligned with actual production. [F13]*

City Response: The recommendation requires further analysis. While the City regularly inventories and assesses infrastructure resources, assembling funding sources and related conversion rates have not been determined due to limited City staff resources. Further, development and publishing of a dashboard would require additional financial resources that have not been researched at the City level. The City will begin conducting related research in FY 2026-27, with a completion timeframe to be determined.

Recommendation R15: *By September 30, 2026, and ongoing, the County Board of Supervisors and all city councils should make a coordinated and sustained effort to educate their constituents about the RHNA process – its requirements, its impact on local planning and community character, and role residents can play in shaping outcomes. Public education efforts should also*

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include guidance on how community members can effectively engage with the California Legislature and advocate for more realistic, data-driven housing policies. [F1, F7]

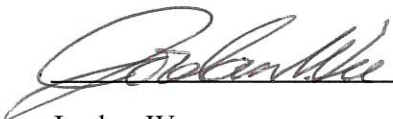
City Response: The recommendation has been implemented. During the development of the 6th Cycle Housing Element, the City conducted multiple public hearings specific to the RHNA process and impacts. The City also distributed a hard-copy informational package by mail to all residents during the process. City Councilmembers have been actively engaged on an on-going basis with California Legislature members regarding housing policies, both on an individual basis and in cooperation with League of Cities – Orange County Division and ACCOC activities. The City plans to continue this effort.

Recommendation R16: *By December 31, 2026, all cities should look to enhance their relationships with not-for-profit affordable housing developers to increase the opportunity to develop more affordable housing. [F8, F10, F12]*

City Response: The recommendation requires further analysis. Additional effort will be required to determine not-for-profit affordable housing developers who would be interested in developing affordable housing in the unique Villa Park City environment. Land values are extraordinarily high within the City, which would increase development costs and potentially inhibit the feasibility and/or interest in some developers relative to affordable housing. The City will make efforts to reach out to not-for-profit developers by December 31, 2026, but is not confident there will be interest generated.

Sincerely,

THE CITY OF VILLA PARK



Jordan Wu
Mayor

