

August 11, 2026

Honorable Sheila Hanson
Presiding Judge of the Superior
County of Orange
700 Civic Center Drive West
Santa Ana, CA 92701

Stephanie Klopfenstein
Mayor
George S. Brietigam
Mayor Pro Tem - District 1
Phillip Nguyen
Council Member - District 2
Cindy Ngoc Tran
Council Member - District 3
Joe DoVinh
Council Member - District 4
Yesenia Muñeton
Council Member - District 5
Ariana Arestegui
Council Member - District 6

RE: Response to the 2025-2026 Orange County Grand Jury Report,
*California Housing Mandates The Unintended Reshaping of Orange
County Neighborhoods*

Dear Judge Sheila Hanson,

The City of Garden Grove has reviewed the Orange County Grand Jury Report, *California Housing Mandates The Unintended Reshaping of Orange County Neighborhoods*. In compliance with the California Penal Code section 933.05(a) and (b), the City has responded to each of the findings and recommendations directed to the City in this report. Each finding and recommendation is listed below, followed by the City's response.

Findings

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.

Response: The City of Garden Grove agrees with the above 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.

Response: The City of Garden Grove agrees with the above 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.

Response: The City of Garden Grove agrees with the above 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 in cities with major population and employment centers.

Response: The City of Garden Grove partially agrees with the above finding as SCAG's methodology, in part, incorporated higher allocations to cities with employment centers, transit accessibility (High Quality Transit Areas), and cities considered high resource areas (non-Disadvantaged Communities - DAC).

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.

Response: The City of Garden Grove agrees with the above 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.

Response: The City of Garden Grove agrees with the above finding.

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

Response: The City of Garden Grove partially agrees with the above finding. While city permit fees cover cost of service to developers, California regulatory requirements have added to the construction cost, such as the California Environmental Quality Act (CEQA), building material and energy efficiency requirements, among other state requirements.

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.

Response: The City of Garden Grove agrees with the above 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.

Response: The City of Garden Grove agrees with the above 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.

Response: The City of Garden Grove partially agrees with the above finding as private develop incentives may result in an exceedance of the RHNA allocation for a specific site, but the city has not experienced an exceedance of its overall RHNA allocation through private developer incentives.

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.

Response: The City of Garden Grove agrees with the above finding.

Recommendations

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)

Response: The recommendation has not been implemented, and will required further analysis.

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)

Response: The recommendation has not been implemented, and will required further analysis.

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

Response: The recommendation has not been implemented, and will required further analysis.

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)

Response: The recommendation has been implemented. The City has assigned a dedicated staff member to regularly attend the OCCOG TAC meetings and participate in the SCAG RHNA Subcommittee meetings, ensuring consistent participation.

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)

Response: The recommendation has been implemented. The City has assigned a dedicated staff member as the single technical representative, 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.

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)

Response: The recommendation has been partially implemented with information available on the city's webpage.

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 the role residents can play in shaping outcomes. Public education efforts should also include guidance on

how community members can effectively engage with the California Legislature and advocate for more realistic, data-driven housing policies. (F1, F7)

Response: The recommendation has been partially implemented with information available on the city's webpage.

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)

Response: The recommendation has been implemented as the city continues to maintain strong partnerships with not-for-profit housing developers and actively engages and collaborates on housing projects to increase production of affordable housing.

Thank you for the opportunity to respond to the Grand Jury's report. Should you have any questions or need additional information, please contact Shawn Park, Assistant to the City Manager, at (714) 741-5371 or by email at shawnp@ggcity.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephanie Klopfenstein", with a stylized flourish at the end.

Stephanie Klopfenstein
Mayor