



February 23, 2026

The Honorable Laurie Davies  
California State Assembly  
1021 O Street, Suite 4720  
Sacramento, CA 95814

**RE: AB 1623 (Davies) Planning and Zoning: Regional Housing Needs  
Assessment and Annual Report: Student Housing Quarters  
Notice of Support – City of Irvine**

Dear Assemblymember Davies,

I am writing to you today on behalf of the City of Irvine to express my strong support for AB 1623 (Davies), which would allow specific types of student housing quarters within a jurisdiction to count toward the local government's regional lower-income housing needs, regardless of entitlement or permitting status. This change will align the Regional Housing Needs Assessment (RHNA) planning more closely with the unique housing needs of jurisdictions that are home to institutions of higher education, ensuring an accurate reflection of all housing types that satisfy demand. I point to the 2024 Department of Housing and Community Development "California's Housing Future 2040" Report, which explicitly states that different forms of student housing should be included in housing elements utilized by cities, and believe it is time to act on this recommendation.

The City of Irvine is home to the University of California, Irvine (UCI), one of the top ten largest public universities in the State. The student population at UCI has grown rapidly over the past decade, with almost 10,000 more students enrolled now compared to 2016. In addition to UCI, Concordia University Irvine and Irvine Valley College also call our City home. Student populations have been historically undercounted or not integrated into traditional RHNA projections; however, with AB 1623's provisions, eligible student housing quarters would be recognized in RHNA reporting, helping local governments like the City of Irvine plan more effectively for the full spectrum of housing associated with rapidly expanding university campuses. Including student housing in the RHNA reporting reflects the reality that many students participate in the broader housing market and require long-term housing solutions for which cities must plan.

In previous RHNA cycles, the City has exceeded its overall housing allocation at the above moderate- and moderate-income categories, but faced challenges meeting targets for lower-income categories, a dynamic common in high-cost communities. While actual construction is driven by market conditions, accurate accounting of all types of housing capacity, including student-oriented units that meet the Census definition of a housing unit, is critical for aligning local planning with state-mandated goals. By permitting appropriate student housing quarters

to count within the RHNA and annual housing report, AB 1623 will strengthen local housing element planning and support sustainable community growth in cities with educational institutions.

For these reasons, the City of Irvine is pleased to support AB 1623.

Sincerely,

A handwritten signature in black ink that reads "Larry Agran". The signature is fluid and cursive, with a prominent loop at the end of the last name.

Larry Agran  
Mayor  
City of Irvine

cc: Irvine City Council  
Sean Crumby, City Manager