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August 15, 2024

The Honorable Christopher Ward  
California State Capitol  
1021 O Street  
Sacramento, CA 95814

**Re: AB 3093 (Ward): Land use: housing element: streamlined multifamily housing**

**Notice of Opposition unless amended**

Dear Assembly Member Ward:

We write today on behalf of the Cities Association of Santa Clara County (CASCC), a Joint Powers Authority, an association of fourteen cities of the county and the elected representatives of more than 1.8 million Bay-Area residents. Since 1990, the city representatives have been gathering to discuss and find consensus and solutions for regional issues. The cities of our association are diverse and include cities of a few thousand people and a city of a million people.

The CASCC must respectfully **Oppose AB 3093 Unless Amended** as currently drafted. AB 3093 would require local governments to account for the housing needs of people experiencing homelessness in their housing elements without funding to develop the plan, implement strategies, or support the construction of affordable housing.

Specifically, AB 3093 adds two new income categories to the Regional Housing Needs Assessment (RHNA) framework: acutely low-income (ALI) and extremely low-income (ELI). While these new categories are intended to help assess the needs of homeless residents, they fall within the existing very low-income category, which already accounts for the needs of individuals in our cities earning between 0% and 50% of the area median income.

Cities are concerned that this will only lead to duplicating planning efforts since existing housing element law already requires cities to analyze the special housing needs of homeless residents and assist in developing adequate housing to meet the needs of extremely low-income households. Housing element law also currently requires cities to identify sites and encourage the development of a variety of housing, including supportive housing and transitional housing. Through these processes, cities are doing more than ever to plan for the needs of unhoused residents in their communities.

Without amendments to clarify these concerns, cities will be set up to fail, leading to even more housing elements being deemed out of compliance. Real progress will require ongoing funding that allows for the development of long-term, ambitious plans that support unhoused residents and prevent more individuals from losing their homes.

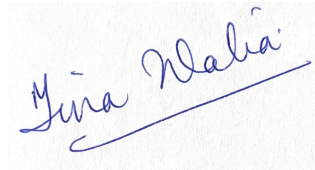
Cities across California are planning and approving millions of new homes at all income levels despite new bills introduced every year that have changed the rules mid-stream, significantly altering cities' housing element certification process. These complex, multiyear housing plans are laborious, time-consuming, and costly. With many cities still navigating the state's certification process for the sixth cycle, now is not the time to create new vague requirements that will only further these delays in certification.

For these reasons, CASCC respectfully **opposes AB 3093 unless amended**. The CASCC finds both AB 1886 (Alvarez) and AB 3093 to be counterproductive. We believe more time and attention should be focused on how the state can partner with the cities to bolster local government efforts.

Sincerely,



Neysa Fligor  
President, Cities Association of Santa Clara  
Councilmember, City of Los Altos



Tina Walia  
Chair, CASCC Legislative Action Committee  
Councilmember, City of Saratoga

Cc:

Asm. Marc Berman  
Asm. Alex Lee  
Asm. Evan Low  
Asm. Ash Kalra  
Asm. Gail Pellerin  
Asm. Robert Rivas  
Sen. Josh Becker  
Sen. Dave Cortese  
Sen. Aisha Wahab