



May 25, 2021

## ASSEMBLY FLOOR ALERT

### **AB 215 (Chiu): Housing element: regional housing need: relative progress determination**

#### **As amended on April 5, 2021 – OPPOSE ASSEMBLY THIRD READING FILE**

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The California State Association of Counties (CSAC), League of California Cities (Cal Cities), Urban Counties of California (UCC), and Rural County Representatives of California (RCRC) are opposed to AB 215, which would create a new, mid-cycle regional housing needs progress determination process and mandates cities and counties with “low progress” in meeting those housing targets to consult with the California Department of Housing and Community Development (HCD) and adopt policies consistent with yet-to-be-released HCD regulations.

Our primary concerns include:

- **Mandating local governments to achieve HCD’s designation as a prohousing jurisdiction:** HCD has yet to issue emergency regulations for this program, so it is impossible to know what would be required of local jurisdictions or whether these policies and strategies are appropriate for the type of community (e.g. small/large, urban/rural). Moreover, AB 215 turns an incentive-based program approved only in 2019 and not yet implemented into a mandatory requirement for a subset of jurisdictions.
- **An additional mid-cycle housing element review process that will be targeted mostly at jurisdictions with weaker economies:** California’s regions are incredibly diverse, with significant variation in local economies. In most cases, a lower rate of “relative progress” toward RHNA goals will simply be a reflection of a weaker housing market. AB 215 will create additional administrative costs for the jurisdictions that can least afford it, with unclear impacts on actual housing production.

For these reasons, we must respectfully oppose AB 215. Should you have any questions, please do not hesitate to contact Christopher Lee (CSAC) at [clee@counties.org](mailto:clee@counties.org), Jason Rhine (Cal Cities) at [jrhine@counties.org](mailto:jrhine@counties.org), Jean Kinney Hurst (UCC) at [jkh@hbeadvocacy.com](mailto:jkh@hbeadvocacy.com), or Tracy Rhine (RCRC) at [trhine@rcrcnet.org](mailto:trhine@rcrcnet.org).

cc: The Honorable David Chiu, California State Assembly