



May 26, 2020

The Honorable Toni Atkins
California Senate President pro Tempore
State Capitol, Room 205
Sacramento, CA 95814

Re: Senate Housing Package

Dear Senate President pro Tempore Atkins:

The California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC) write to share our initial thoughts on the Senate housing package released last week. The key elements of your package align with goals shared by counties, including promoting redevelopment of commercial corridors with existing infrastructure that can accommodate higher-density housing, providing options for gentle increases in density within built-out residential neighborhoods, streamlining the environmental review processes for large housing projects, and encouraging developers to incorporate affordable units within their housing projects.

Our organizations are committed to partnering with the Legislature and the Administration to find policy and fiscal solutions that result in the development of housing affordable to Californians at all income levels. Longstanding policies of our organizations recognize the legitimacy of state goals promoting adequate housing for households at all income levels, which in turn are implemented through locally-adopted plans. That said, we recognize that the severity of California's housing affordability crisis requires creative thinking, including policy options that are procedurally difficult or legally impossible for local governments to quickly implement under existing law.

Recent legislation has added significant analytical requirements when local governments seek to accommodate regional housing needs allocations (RHNA) in already-developed areas. At the same time, the State continues to encourage local governments to promote infill housing and densification rather than additional greenfield growth in order to help achieve greenhouse gas emissions reductions goals and other important sustainability policies. Counties agree that redevelopment of underutilized commercial properties and densification of existing residential neighborhoods may present excellent opportunities for additional housing supply in some areas, provided that infrastructure is already available to accommodate this growth. We encourage the Senate to focus these proposals carefully on areas with both the greatest need and capacity for housing growth. We further encourage the Senate to accompany these opportunities for densification with streamlined processes for local housing element compliance—especially as counties attempt to take advantage of these proposed policies in the context of significantly higher sixth cycle housing needs allocations.

Counties are broadly supportive of efforts to streamline the environmental review process for housing development projects that meet important state and local goals, including reducing greenhouse gas emissions, preserving agricultural and natural resources, encouraging affordability, and protecting future residents from natural disasters, including floods and wildfires. Many environmental streamlining proposals for housing development have focused narrowly on cities, although counties must also plan for their share of regional housing needs within the unincorporated areas. Our organizations encourage you to ensure that any new environmental streamlining tools are available in the unincorporated areas. Infill in more rural unincorporated areas may not look like development in the state's most dense urban cores, but appropriate environmental streamlining should create a strong incentive for counties and developers alike to steer the unincorporated area's share of housing growth toward existing communities.

In addition to their responsibilities as the providers of countywide health services, human services, and public safety services, counties are responsible for planning for adequate housing at all income levels in the unincorporated area. While the vast majority of Californians live within cities, counties have a vested interest in ensuring that there is adequate supply of housing throughout the state, particularly for clients of county programs. Counties around the state have already adopted local ordinances providing enhanced density bonuses when projects provide a significant number of affordable units. We recognize that the density bonus program could be adapted to better promote mixed-income housing developments, but encourage the Senate to appropriately balance incentives and concessions with affordability, especially for lower-income residents who are often the clients of county services.

We look forward to continuing our work with you and the members of the Senate housing production workgroup to refine these proposals by ensuring they are implementable and that they direct additional unincorporated housing development to areas best suited for accommodating infill growth. Should you have any questions about our position, please do not hesitate to contact Christopher Lee (CSAC) at clee@counties.org, Jean Kinney Hurst (UCC) at kh@hbeadvocacy.com, or Tracy Rhine (RCRC) at trhine@rcrcnet.org.

Sincerely,



Christopher Lee
California State Association of Counties



Jean Kinney Hurst
Urban Counties of California



Tracy Rhine
Rural County Representatives of California

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cc: The Honorable Scott Wiener, Chair, Senate Housing Committee
The Honorable Mike McGuire, Chair, Senate Governance and Finance Committee
Kimberly Rodriguez, Policy Director, Office of the Senate President pro Tempore
Stephanie Park, Consultant, Office of the Senate President pro Tempore
Erin Riches, Chief Consultant, Senate Housing Committee
Anton Favorini-Csorba, Consultant, Senate Governance and Finance Committee
Ryan Eisberg, Consultant, Senate Republican Caucus
Ted Morley, Consultant, Senate Republican Caucus