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July 15, 2025

The Honorable Diane Papan
California State Capitol
1021 O Street
Sacramento, CA 95814

Re: AB 650 Notice of Support

Dear Assembly Member Papan:

This Letter serves to notice the support of the Cities Association of Santa Clara County JPA for your measure, Assembly Bill 650.

The Cities Association of Santa Clara County is an interjurisdictional body whose members comprise all 15 municipal corporations in Santa Clara County: Campbell, Cupertino, Gilroy, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Morgan Hill, Mountain View, Palo Alto, San Jose, Santa Clara, Saratoga, and Sunnyvale. A key element of our mission is to act as a collective voice for our cities toward our representatives in Sacramento with respect to our legislative needs. AB 650 answers specific needs our member cities broadly share.

All of our cities underwent significant challenges throughout the development of the 6th RHNA Cycle Housing Element update. AB 650 would assist local governments, such as our members', in updating their Housing Element a year earlier than present law facilitates, provide significantly greater certainty in the Housing Element review process, and ensure that local governments have adequate time to respond to the California Department of Housing and Community Development's (HCD) review letters, and improve the opportunity for jurisdictions to enter into RHNA subregions.

As you are aware, since 1969, California's local governments have planned and selected sites for housing at all income levels through the Housing Element of said local government's General Plan. Currently, every five to eight years, local governments are required to adopt an updated Housing Element laying out where and how project applicants are encouraged to build residential developments within their respective communities based on a regionally assigned fair-share allocation and obtain certification from HCD. The process is complex. Recent legislation has increased this complexity as the Legislature strives to help cities plan for some 2.5 million new homes statewide.

During the 6th RHNA cycle, our member cities experienced various challenges in obtaining certification from HCD. Some of the challenges include a short timeline for completing these complex documents and responding to HCD's feedback, a lack of clarity regarding what the state expects from local governments when reviewing additional housing element drafts, and the introduction of new requirements late in the review process. These challenges created a bottleneck in the availability of

qualified consultants to help cities with this planning process. That bottleneck exacerbated all points in the update process. Numerous cities, as a result, adopted their revised Housing Elements late, resulting in uncertainty for the development community, and exposure to the “builder’s remedy” of the Housing Accountability Act for many.

AB 650 would address these issues by *allowing* our member cities to begin updating their Housing Element six months earlier. The bill would also require HCD to provide specific text and analysis that must be included to resolve deficiencies HCD identifies, reducing the potential for cities to be penalized, while simultaneously serving the goal of achieving timely adoption of a certified Housing Element.

Sincerely,



Larry Klein
President, Cities Association of Santa Clara
Mayor, City of Sunnyvale



J.R. Fruen
Chair, CASC Legislative Action Committee
Councilmember, City of Cupertino

Cc:

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