



July 15, 2024

The Honorable Nancy Skinner
Chair, Senate Housing Committee
1021 O Street, Room 3330
Sacramento, CA 95814

ANNETTE C. DELGADILLO
Mayor

PEGGY LEMONS
Vice Mayor

ISABEL AGUAYO
Councilmember

BRENDA OLMOS
Councilmember

VILMA CUELLAR STALLINGS
Councilmember

RE: AB 3093 (Ward) Land use: housing element: streamlined multifamily housing. - Notice of OPPOSE UNLESS AMENDED

Dear Senator Skinner,

The City of Paramount opposes AB 3093 (Ward) unless amended to address cities' concerns. AB 3093 in its current form 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.

The City of Paramount is concerned that this will only lead to duplicative planning efforts. Housing element law already requires cities to analyze the special housing needs of unhoused 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 housing sites and encourage the development of a variety of housing types, 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.

Despite recent amendments, the City of Paramount continues to be concerned that the new income categories added by AB 3093 go beyond the suggested intent of the measure. As drafted, AB 3093 requires a site inventory for ALI and ELI households and

lacks critical information about how these sites should differ from the housing cities are planning for already through the very low-income category. Without amendments to clarify these concerns, cities will be set up for failure, leading to even more housing elements being deemed out of compliance.

The City of Paramount is a partner in the effort to end the housing affordability and availability crisis. From the City Council to City staff, including Planning Department staff and a dedicated homeless outreach liaison, each and all take responsibility for the planning and development of housing for all. The requirements of AB 3093 only pose an administrative and financial burden without directly achieving the change (or funding to make the change) needed to meet the State and this region's housing goals.

AB 3093 was introduced on the heels of the Governor's May Revise, which proposed deep cuts to affordable housing and homelessness programs. While the Legislature and the Governor continue negotiating the final budget deal, AB 3093 has been fast-tracked through the legislative process without funding to realize these plans or spur much-needed development.

The City of Paramount shares the goal of preventing and reducing homelessness and increasing the supply of affordable housing in our communities. However, 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. In the absence of ongoing funding to address homelessness, the complicated requirements included in AB 3093 fail to expand or develop local governments' capacity to address immediate homelessness challenges across California.

Cities across California are planning and approving new homes at all income levels despite new bills introduced every year that have changed the rules midstream, 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, the City of Paramount is opposed to AB 3093 unless amended. Please feel free to contact City Manager John Moreno at (562) 220-2225, if you have any questions. We thank you for your time and consideration.

CITY OF PARAMOUNT



Annette C. Delgadillo
Mayor

Cc: Honorable State Senator Lena Gonzalez, 33rd District
Honorable Assembly Speaker Anthony Rendon, 62nd District
Kristine Guerrero, Public Affairs Director, League of California Cities
Jorge Morales, Legislative and Governmental Affairs Consultant, California Contract Cities Association