



July 3, 2019

The Honorable Mike McGuire
Chair, Senate Governance and Finance Committee
State Capitol, Room 408
Sacramento, CA 95814

**Re: AB 1483 (Grayson): Housing data: collection and reporting.
As amended June 24, 2019 – Oppose Unless Amended
Set for hearing in Senate Governance and Finance Committee – July 10, 2019**

Dear Senator McGuire,

The California State Association of Counties (CSAC), the Urban Counties of California (UCC), the League of California Cities (LCC), the American Planning Association California Chapter (APA), and the Rural County Representatives of California (RCRC) have taken an oppose unless amended position on AB 1483, which would significantly increase reporting burdens under the Annual Progress Report (APR) cities and counties are required to submit to the Department of Housing and Community Development (HCD) each year. Specifically, AB 1483 would require local agencies to compile and submit 13 additional fields of project-level information within the APR, which represents a new level of detail and reporting complexity not currently required in state law. The bill would also create new annual reporting and online posting requirements for a broad variety of other land use-related information. Finally, AB 1483 would also create a new, unnecessary role for HCD in the relationship between cities and counties and their Metropolitan Planning Organizations (MPOs).

We recognize that California is facing a housing affordability crisis that and that additional data and reporting can help inform policy changes to promote development at all levels. However, statutory changes must be based on a compelling need and balanced against costs at the state and local levels—especially since new local costs will not be reimbursed by the state, but instead passed on to housing development applicants through fees. Legislation from 2017 significantly expanded reporting requirements for the APR due in April 2019. At the very least, an evaluation of the results from those changes should occur before completely redesigning the report a second time in only two years.

Imposes New Reporting Requirements Prior to Analysis of Data Needs and Costs

We support the provisions of the bill that require HCD to work with stakeholders, including local governments, to develop a long-term strategy to improve the availability and standardization of housing-related data in order to help inform state and local policy decisions. This language explicitly requires an evaluation of costs and benefits, including consideration of local needs for technical assistance, technology, and staffing to implement any subsequent changes. Unfortunately, AB 1483 would significantly expand both the breadth and detail required in APR reporting prior to the formation

of this stakeholder group and any consideration of the costs and benefits of additional data collection and reporting.

Expansion of APR Project-Level Reporting

The current APR largely requires reporting on data at a jurisdictional level (e.g. the total number of units included in all development applications; the total number of units constructed by income category). AB 1483 would depart from this approach and instead require thirteen fields of detailed information for *each* individual housing development project in the state. We question the need for this level of detail and specificity. While some of the requested data would only require “yes” or “no” answers, other fields are descriptive in nature, making the data significantly less useful for analysis under the statewide online reporting required by the bill.

Online Posting Requirements

We do not object to online posting requirements for fees imposed pursuant to the mitigation fee act and current development standards. We are opposed to the expansive and prescriptive nature of the additional posting requirements, including the ability of HCD to impose uniform standards for the format in which the information must be posted. While many of the elements included in paragraph (1) of subdivision (a) of Section 65940.1 may not change on an annual basis, it would still be required to be included in the annual progress report. Finally, requiring an online database of historical local zoning standards will create costs as well as the potential for confusion for project applicants and members of the public.

Allows Additional Reporting Requirements without Legislative Review

The bill would give HCD the authority to request “any other information the Department of Housing and Community Development deems necessary or convenient for purposes of assessing progress towards the state’s housing goals.” The Legislature already substantially expanded the reporting requirements in the 2018 APR (due in April 2019) and any further expansion deserves additional legislative scrutiny, especially since increased costs related to expanding reporting will ultimately be passed onto development applicants.

HCD/MPO/Local Agency Relationship

AB 1483 would change the relationship between regional governments and cities and counties by inserting HCD as a middleman. Specifically, the measure would allow an MPO to request that HCD require jurisdictions to report additional housing-related data within the MPOs jurisdictional boundary. Given that MPOs are comprised of city and county elected officials, we are confounded as to why HCD needs a new role in this uniquely local relationship.

Includes County Assessor Data in Housing Element Reporting

The June 24 amendments require counties to submit parcel data from county assessors as part of the APR. We object to expanding annual reporting on the implementation of local housing elements to encompass general government functions outside of land use. The bill further allows HCD to specify the format in which this parcel-level data would be submitted, thereby creating a significant and potentially reimbursable mandate to the extent that data systems currently in use by county assessors differ.

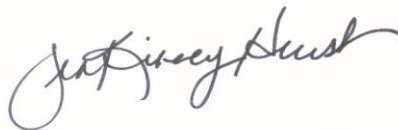
We are committed to partnering with the Legislature and Administration to find policy and fiscal solutions that result in the development of housing affordable to Californians at all income levels. At the same time, state mandates may create new costs at the local level that will be passed onto the very housing developments that we are actively trying to expedite and make more affordable. Finally, any new statewide data collection efforts must be supported by a compelling need and demonstrate the explicit benefits the data will support.

For these reasons, we are opposed, unless amended, to AB 1483. Should you have any questions about our position on this measure, please do not hesitate to contact Christopher Lee (CSAC) at clee@counties.org, Jean Hurst (UCC) at jkh@hbeadvocacy.com, Jason Rhine (LCC) at jrhine@cacities.org, Sande George (APA) at sgeorge@stefangeorge.com, or Tracy Rhine (RCRC) at trhine@rcrcnet.org.

Sincerely,



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Jean Hurst
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Jason Rhine
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cc: The Honorable Tim Grayson, California State Assembly
Members, Senate Governance and Finance Committee
Anton Favorini-Csorba, Consultant, Senate Governance and Finance Committee
Doug Yoakam, Consultant, Senate Republican Caucus