



® May 8, 2019

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The Honorable Lorena Gonzalez  
Chair, Assembly Appropriations  
State Capitol, Room 2114  
Sacramento, CA 95814

**RE: AB 671 (Friedman): Accessory dwelling units: incentives  
As amended on March 26, 2019 – CONCERNS  
Assembly Appropriations Suspense File**

Dear Assembly Member Gonzalez:

The California State Association of Counties (CSAC) has concerns with Assembly Bill 671, which would require local agencies to adopt via their housing elements a plan that incentivizes and promotes the creation of accessory dwelling units (ADUs) that can be offered at rents affordable to lower-income households. While we recognize that ADUs present an important to quickly expand housing supply within existing neighborhoods, we are concerned about the prescriptive nature of the bill and its unfunded implementation costs.

There is no ongoing funding for local jurisdictions to update housing elements, instead local agencies use general purpose revenues and may attempt to recoup their costs through fees imposed on housing development projects. Amending AB 671 to make it an opt-in program in the housing element will mitigate these costs, as well as reducing costs for the Department of Housing and Community Development to review the resulting plans. Under this framework, local agencies prioritizing ADUs as a source of lower-income housing, including identifying any necessary subsidies and developing monitoring programs to ensure that units continue to be offered at affordable rents, could enjoy a streamlined process for counting these units toward their below-moderate income regional housing needs allocation.

While some communities have elected to use local funding to subsidize the creation of affordable ADUs, other communities may wish to prioritize other types of affordable housing to meet local needs, including housing for agricultural workers or denser multifamily affordable developments. Mandating a local program to incentivize lower-income ADUs will put pressure on limited state, federal and local funding available to support other types of affordable homes. Thank you for your consideration of our concerns. If you need additional information about our position, please contact me at 916.650.8180 or [clee@counties.org](mailto:clee@counties.org).

Sincerely,

A handwritten signature in black ink that reads 'Chris Lee'.

Christopher Lee  
Legislative Representative

Cc: The Honorable Laura Friedman, California State Assembly  
Honorable Members, Assembly Appropriations Committee  
Jennifer Swenson Principal Consultant, Assembly Appropriations Committee  
William Weber, Assembly Republican Caucus