



® April 4, 2019

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The Honorable Tim Grayson
California State Assembly
State Capitol, Room 4164
Sacramento, CA 95814

**RE: AB 1484 (Grayson): Mitigation Fee Act: housing developments
As amended on March 26, 2019 – CONCERNS
Set for hearing in Assembly Local Government – April 10, 2019**

Dear Assembly Member Grayson:

The California State Association of Counties (CSAC) has concerns with your Assembly Bill 1484, which would require cities and counties to provide a “good faith” statement of certain development impact fees when an application for a housing development is deemed complete. The bill would also, with exceptions, preclude increases in the specified fees applicable to the housing development for up to two years after the application is deemed complete.

CSAC is still working with counties to review the March 26 amendments to the bill. While AB 1484 provides several exceptions to the prohibition on fee increases during the two-year period, CSAC is concerned that there may be other warranted exceptions; especially in the context of a housing development this is subject to an approval that is legislative in nature. Other concerns include whether the “good faith” statement of all fees applicable to the project includes other agencies’ impacts fees, or only those fees imposed by the county itself, and whether two years is an appropriate timeframe for providing certainty to developers while also encouraging expeditious development to provide much-needed housing supply.

Impact fees are vital to providing the public facilities and infrastructure necessary to support new development, especially in unincorporated areas, which may be less developed. We look forward to working with you and resolving the above-stated potential concerns based feedback from counties. If you need additional information about our position, please contact me at 916.650.8180 or clee@counties.org.

Sincerely,

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

Christopher Lee
Legislative Representative

Cc: The Honorable Cecilia Aguiar-Curry, Chair, Assembly Local Government Committee
Honorable Members, Assembly Local Government Committee
Debbie Michel, Chief Consultant, Assembly Local Government Committee
William Weber, Consultant, Assembly Republican Caucus