

July 11, 2024

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

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

Dear Senator Skinner,

The City of Escondido opposes **AB 3093 (Ward)** unless amended to address cities' concerns. Currently, AB 3093 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. This will place an undue financial burden on the City of Escondido.

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 Escondido is concerned that this will only lead to duplicating planning efforts since existing housing element law already requires cities to analyze the special housing needs of homeless 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 sites and encourage the development of a variety of housing, 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.

AB 3093 has been fast-tracked through the legislative process without funding to realize these plans or spur much-needed development. Despite recent amendments, the City of Escondido 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 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 to fail, leading to even more housing elements being deemed out of compliance.

The City of Escondido 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 millions of new homes at all income levels despite new bills introduced every year that have changed the rules mid-stream, 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 Escondido **is opposed to AB 3093 unless amended.**

Sincerely,

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Dane White  
Mayor

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Christian Garcia  
Deputy Mayor

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Consuelo Martinez  
Councilmember District 1

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Joe Garcia  
Councilmember District 2

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Mike Morasco  
Councilmember District 4

cc: The Honorable Chris Ward  
Senator Bill Jones, Assembly member Brian Maienschein  
League of California Cities