



**Community, Equity, Action**

2940 16th Street, Suite 200-1

San Francisco, CA 94103

[www.LivableCalifornia.org](http://www.LivableCalifornia.org)

415-870-1511

April 7, 2021

Hon. David Chiu, Chair  
Assembly Housing and Community Development Committee  
State Capitol  
Sacramento, CA 95814

**Subject: OPPOSE AB 215 (Chiu) as amended 4/5/2021**

Dear Honorable Chairman Chiu,

On behalf of Livable California, a 501(c)(4) nonprofit organization representing over 10,000 followers in defending the self-determination of local government and advocating for truly affordable housing, we strongly oppose AB 215 as a state intrusion into local government, that government which is closest to the people.

AB 215 would weaponize the California Department of Housing and Community Development (HCD) by increasing the reporting burdens on local government and empowering HCD to police California's 482 cities and 58 counties.

This is an unwelcome intrusion into the self-determination of local government. — the vast majority of our municipalities are doing their best with their severely reduced state funding for affordable housing.

In this sixth cycle of the statewide housing elements, the Regional Housing Needs Assessment numbers (RHNA) used by HCD are out of touch with the state's impeccable Department of Finance numbers and with the deeply respected housing needs numbers from Freddie Mac. The HCD's doubling of the housing needs assessment numbers, in this post-COVID-19 world, represents little more than mythology. Having HCD enforce its own inaccurate projections will create a bloated and expensive bureaucracy pursuing cities and counties for failing to approve hyper-inflated housing numbers.

AB 215 would micromanage local governments through each municipalities' housing element, allowing the state to (1), fine cities up to \$100,000 per month for failure to achieve

HCD's inflated figures and (2), bring the state Attorney General into the picture, an extremely poor use of our clogged courts and of the AG.

AB 215 is the wrong solution to the wrong problem. We don't have a high-end, market-rate housing crisis. We have a housing affordability crisis. Yet most pending housing laws, and the 67 laws adopted in the last four years, maximize market-rate housing. Very few of these bills build affordable or low-income units. The affordability crisis cries out for significant state funding, not more policing of cities who are desperate for those dollars.

**We strongly oppose AB 215.**

Sincerely,

The Board of Directors of Livable California

A handwritten signature in black ink, appearing to read "Rick Hall", written over a horizontal line.

Rick Hall, President  
T Keith Gurnee, Member  
Carey White, Member  
Isaiah Madison, Member