

**MAILING ADDRESS:**  
City Hall  
150 City Park Way  
Brentwood, CA 94513  
Phone: 925.516.5400  
Fax: 925.516.5401  
www.brentwoodca.gov

**CITY MANAGER**  
150 City Park Way  
Phone: 925.516.5440  
Fax: 925.516.5441

**COMMUNITY DEVELOPMENT**  
150 City Park Way  
Phone: 925.516.5405  
Fax: 925.516.5407

**FINANCE AND  
INFORMATION SYSTEMS**  
150 City Park Way  
Phone: 925.516.5460  
Fax: 925.516.5401

**HUMAN RESOURCES**  
150 City Park Way  
Phone: 925.516.5191  
Fax: 925.516.5446

**PARKS AND RECREATION**  
150 City Park Way  
Phone: 925.516.5444  
Fax: 925.516.5445

**POLICE**  
9100 Brentwood Boulevard  
Phone: 925.634.6911  
24 Hr. Dispatch: 925.809.7911  
Fax: 925.809.7799

**PUBLIC WORKS  
Engineering Division**  
150 City Park Way  
Phone: 925.516.5420  
Fax: 925.516.5421

**Operations Division**  
2201 Elkins Way  
Phone: 925.516.6000  
Fax: 925.516.6001

June 26, 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 Brentwood 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.

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 Brentwood, 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.

Despite recent amendments, the City of Brentwood 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.

The Housing Element update process is time-consuming and costly. Navigating the State's complex certification process for the sixth cycle resulting in multiple reviews, pushing Brentwood's update past the statutory deadline. Creating new, vague, and possibly duplicative requirements will only further these delays and increase costs in the next cycle. Without amendments to clarify these concerns, cities like Brentwood will be set up to fail, leading to even more housing elements being deemed out of compliance.


AB 3093 was introduced on the heels of the Governor's May Revise, which proposed deep cuts to affordable housing and homelessness programs. While the Legislature and the Governor continue negotiating the final budget deal, AB 3093 has been fast-tracked through the legislative process without funding to realize these plans or spur much-needed development.

The City of Brentwood 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 Brentwood is opposed to AB 3093 unless amended.

Sincerely,



Joel R. Bryant  
Mayor

cc: Honorable Chris Ward via Legislative Position Letter Portal  
Honorable Timothy S. Grayson, Assembly Member: [assemblymember.grayson@assembly.ca.gov](mailto:assemblymember.grayson@assembly.ca.gov)  
Honorable Diane Burgis, CCC Supervisor: [supervisor\\_burgis@bos.cccounty.us](mailto:supervisor_burgis@bos.cccounty.us)  
Honorable City Council Members, City of Brentwood: [citycouncil@brentwoodca.gov](mailto:citycouncil@brentwoodca.gov)  
Sam Caygill, East Bay Division, Cal Cities: [scaygill@calcities.org](mailto:scaygill@calcities.org)  
League of California Cities: [cityletters@calcities.org](mailto:cityletters@calcities.org)