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June 4, 2025

The Honorable Diane Papan  
California State Senate  
1021 O Street, Suite 4220  
Sacramento, CA 95814

**RE: AB 650 (Papan): Planning and Zoning: Housing Element: Regional Housing Needs Allocation – SUPPORT**

Dear Assemblymember Papan:

Larry Klein  
Mayor

Linda Sell  
Vice Mayor

Alysa Cisneros  
Councilmember

Richard Mehlinger  
Councilmember

Murali Srinivasan  
Councilmember

Charlsie Chang  
Councilmember

Eileen Le  
Councilmember

On behalf of the City of Sunnyvale, we want to express our support of AB 650, which would allow local governments to begin the housing element update process six months earlier. Between initial planning, community engagement, and HCD review, the housing element update process can take an extensive amount of time. AB 650 would address these issues by requiring the California Department of Housing and Community Development (HCD) by moving up the timeline for the Regional Housing Needs Allocation (RHNA) process, which will allow local governments to begin updating their Housing Element six months earlier. The bill would also require HCD to provide specific text and analysis that must be included in the Housing Element to remedy deficiencies, ensuring that local governments are not penalized when HCD identifies additional deficiencies not previously identified in prior review letters.

Since 1969, California's local governments have planned and selected sites for housing at all income levels through the housing element portion of a local government's general plan. But cities and counties do not exist in a vacuum. Proper community engagement takes time and involves meeting with the public, including residents, developers, housing advocates, and other community groups, to hear feedback about housing needs, site selection, and policies and programs. Incorporating public feedback as well as comments from HCD takes even more time and makes each subsequent revision a serious undertaking that can easily consume multiple months.

The City of Sunnyvale's 2023-2031 Housing Element update process began in August 2021. Our extensive process included four public drafts, over twenty public meetings, four HCD findings letters, numerous meetings with HCD staff, and hundreds of hours of

City staff and consultant time. Even with the assistance of experienced housing element consultants, the certification process is opaque, subjective, and inconsistent. HCD's findings letters are often ambiguous and incomplete. For example, HCD included new findings about the City's fees in their second findings letter that could have been addressed earlier if the City had been informed in the first letter. This practice is inefficient and delays housing element certification at no fault of the jurisdiction. After over two and a half years of work, the City's Housing Element was finally certified by HCD in March 2024.

As identified in City Council Policy 5.6(3) and General Plan Policy H-1.1, the City supports encouraging the State to create a fair and reasonable RHNA process and for the City to provide adequate housing sites. This bill would allow the City more time to plan for adequate housing sites to ensure that the City can accommodate its RHNA and incorporate community and HCD feedback in the housing element update process. Additionally, this bill increases clarity in HCD's review process, which will reduce the number of revisions and help jurisdictions attain housing element certification by the deadline.

For these reasons, we support AB 650. Thank you for consideration of our position. Please do not hesitate to contact me or Trudi Ryan, Director of Community Development, at [tryan@sunnyvale.ca.gov](mailto:tryan@sunnyvale.ca.gov), if you have any questions.

Sincerely,



Larry Klein  
Mayor

cc: Senator Dr. Aisha Wahab  
Assembly Member Patrick Ahrens  
City Council  
Tim Kirby, City Manager  
Sarah Johnson-Rios, Assistant City Manager  
Trudi Ryan, Director of Community Development