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April 15, 2025

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

RE: AB 650 (Papan) Planning and Zoning: Housing Element: Regional Housing Needs Allocation.  
Notice of SUPPORT (As of 3/28/25)

Dear Assembly Member Papan,

The City of Lodi is pleased to support your measure AB 650 (Papan), which would allow local governments to begin the housing element update process six months early, provide greater certainty and reduce ambiguity in the housing element review process, and ensure that local governments have adequate time to respond to the California Department of Housing and Community Development's (HCD) 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. Every five to eight years, local governments are required to adopt a blueprint outlining where developers can or cannot build residential developments within their respective communities and obtain certification from HCD. Local governments plan for their fair share of housing development as determined through the Regional Housing Needs Allocation (RHNA) process. As part of this complex process, local governments submit in their housing elements a variety of essential data, actions, and programs to promote fair, equitable, and affordable housing in their community. Currently, local jurisdictions are planning and zoning for nearly 2.5 million additional homes statewide.

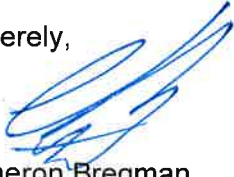
During the 6th RHNA cycle, local governments experienced various challenges in obtaining certification from HCD. Some of the challenges include a short timeline for completing these complex documents and responding to HCD's feedback, a lack of clarity regarding what the state expects from local governments when reviewing additional housing element drafts, and the introduction of new requirements late in the housing element review process.

AB 650 would address these issues by allowing local governments to begin updating their housing element six months early. 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.

The proposed changes would provide the City of Lodi additional time to prepare our Housing Element, allowing for a more thoughtful and comprehensive planning process. The extended timeline would ease the burden on staff and consultants, enabling more robust public engagement and additional analysis needed to interpret and incorporate numerous recent changes in state housing law.

For these reasons, the City of Lodi is pleased to support your measure AB 650 (Papan).

Sincerely,



Cameron Bregman  
Mayor  
City of Lodi

cc. Jerry McNerney, State Senator  
Heath Flora, State Assembly Member  
Marla Livengood, Regional Public Affairs Manager, Central Valley Division, [mlivengood@calcities.org](mailto:mlivengood@calcities.org)  
League of California Cities, [cityletters@cacities.org](mailto:cityletters@cacities.org)