

Date of Hearing: July 10, 2023

ASSEMBLY COMMITTEE ON NATURAL RESOURCES

Luz Rivas, Chair

SB 423 (Wiener) – As Amended June 30, 2023

SENATE VOTE: 29-5

SUBJECT: Land use: streamlined housing approvals: multifamily housing developments

SUMMARY: Extends and expands by right approval (i.e., not subject to the California Environmental Quality Act (CEQA) or other discretionary review by the relevant city or county) of both affordable and market-rate multifamily housing projects pursuant to SB 35 (Wiener), Chapter 366, Statutes of 2017, including extending the sunset from 2026 to 2036, relaxing specified construction labor requirements, expanding to parcels where parking is a permitted use, and removing the exclusion of the coastal zone.

EXISTING LAW:

- 1) Allows cities and counties to “make and enforce within its limits, all local, police, sanitary and other ordinances and regulations not in conflict with general laws.” (California Constitution, Article XI, Section 7)
- 2) Establishes Planning and Zoning Law, which requires every city and county to adopt a general plan that sets out planned uses for all of the area covered by the plan, and requires the general plan to include seven mandatory elements, including housing and land use elements, and requires major land use decisions by cities and counties, such as development permitting and subdivisions of land, to be consistent with their adopted general plans. (Government Code (GC) Sections 65000 – 66301)
- 3) CEQA requires lead agencies with the principal responsibility for carrying out or approving a proposed project to prepare a negative declaration, mitigated negative declaration, or environmental impact report (EIR) for this action, unless the project is exempt from CEQA. (Public Resources Code (PRC) 21000, et seq.)
- 4) Exempts from CEQA any residential development project, including any subdivision, or any zoning change that is undertaken to implement and is consistent with a specific plan for which an EIR has been certified after January 1, 1980, unless substantial changes or new information require the preparation of a supplemental EIR for the specific plan, in which case the exemption applies once the supplemental EIR is certified. (GC 65457)
- 5) Exempts from CEQA specified residential housing projects which meet detailed criteria established to ensure the project does not have a significant effect on the environment, including:
 - a) Affordable agricultural housing projects not more than 45 units within a city, or 20 units within an agricultural zone, on a site not more than five acres in size;

- b) Urban affordable housing projects not more than 100 units on a site not more than five acres in size; and,
- c) Urban infill housing projects not more than 100 units on a site not more than four acres in size which is within one-half mile of a major transit stop.

(PRC 21159.20-21159.24)

- 6) Requires metropolitan planning organizations (MPOs) to include a sustainable communities strategy (SCS), as defined, in their regional transportation plans, or an alternative planning strategy (APS), for the purpose of reducing greenhouse gas (GHG) emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies, including CEQA exemption or abbreviated review for residential or mixed-use residential "transit priority projects" if the project is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either an approved SCS or APS. (PRC 21155.1)
- 7) Exempts from CEQA residential, mixed-use, and "employment center" projects, as defined, located within "transit priority areas," as defined, if the project is consistent with an adopted specific plan and specified elements of an SCS or APS. (PRC 21155.4)
- 8) Exempts from CEQA multi-family residential and mixed-use housing projects on infill sites within cities and unincorporated areas that are within the boundaries of an urbanized area or urban cluster. (PRC 21159.25)
- 9) The CEQA Guidelines include a categorical exemption for infill development projects, as follows:
 - a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations;
 - b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses;
 - c) The project site has no value as habitat for endangered, rare, or threatened species;
 - d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and,
 - e) The site can be adequately served by all required utilities and public services.

(CEQA Guidelines 15332)

- 10) Establishes a ministerial approval process for certain multifamily housing projects that are proposed in local jurisdictions that have not met regional housing needs. Requires eligible projects to meet specified standards, including paying prevailing wage to construction workers and use of a skilled and trained workforce. Includes exclusions of several types of environmentally sensitive sites, including the entire coastal zone. (GC 65913.4, added by SB 35)

- 11) Establishes a ministerial approval process for affordable housing projects in commercial zones. Requires eligible projects to pay prevailing wage to construction workers and requires projects of 50 units or more to participate in an apprenticeship program and make specified healthcare contributions for construction workers. The coastal zone is not excluded, but specified height requirements apply and neither the Coastal Act nor the Coastal Commission's land use authority is preempted. (GC 65912.100 et seq., added by AB 2011 (Wicks), Chapter 647, Statutes of 2022)
- 12) Pursuant to the California Coastal Act of 1976 (Coastal Act):
- a) Regulates development in the coastal zone and requires a new development to comply with specified requirements. (PRC 30000)
 - b) Requires any person wishing to perform or undertake any development in the coastal zone, in addition to obtaining any other permit required by law from any local government or from any state, regional, or local agency, to obtain a coastal development permit (CDP). (PRC 30600)
 - c) Provides that the scenic and visual qualities of coastal areas must be considered and protected as a resource of public importance. Permitted development must be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. (PRC 30251)
 - d) Requires all new development to minimize risks to life and property in areas of high geologic, flood, and fire hazard; assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs; be consistent with requirements imposed by an air pollution control district or the Air Resources Board as to each particular development; minimize energy consumption and vehicle miles traveled; and, where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses. (PRC 30253 (f))
 - e) Provides that the Legislature finds and declares that it is important for the California Coastal Commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low- and moderate-income in the coastal zone. (PRC 30604 (g))

THIS BILL:

- 1) Extends the sunset for SB 35 from January 1, 2026 to January 1, 2036.
- 2) Amends SB 35's labor standards, as follows:

- a) Removes the requirement to meet the skilled and trained workforce provisions for any project that does not have floors *used for human occupancy* that are located more than 85 feet above the grade plane.
- b) For any project having floors used for human occupancy that are located more than 85 feet above the grade plane, amends the existing workforce provisions as follows:
 - i) Removes the requirement that the provisions only apply to projects of 50 units or more in highly populated coastal counties and 25 units or more in other counties, as specified;
 - ii) Requires the developer to enter into contracts with the prime contractor to utilize a skilled and trained workforce, as defined, for each scope of construction work, unless:
 - I) The prime contractor fails to receive at least three responsive bids that attest to satisfying the skilled and trained workforce requirements; or
 - II) All contractors, subcontractors and craft unions performing work on the development are subject to a multi-craft project labor agreement that requires the payment of prevailing wages to all construction workers employed in the execution of the development and provides for enforcement of that obligation through an arbitration procedure, as specified.
 - iii) Requires the prime contractor, except where they fail to receive three bids, to provide an affidavit under penalty of perjury that it will use a skilled and trained workforce, and that the prime contractor obtain from its subcontractors an enforceable commitment to use a skilled and trained workforce for each scope of work.
 - iv) Requires subcontractors, if the skilled and trained requirements apply, to provide the prime contractor with:
 - I) An affidavit signed under penalty of perjury that a skilled and trained workforce will be employed; and
 - II) A monthly compliance report.
 - v) Requires the developer, upon issuance of the invitation or bid solicitation for the project, and no less than seven days before the bid is due, to send a notice or solicitation that describes the project to the following entities within the jurisdiction of the proposed project site:
 - I) Any bona fide labor organization representing workers in the building and construction trades and the local building and construction trades council; and
 - II) Any organization representing contractors that may perform work necessary to complete the project, including any contractors' association or regional builder's exchange.

- c) Requires that, for a development of 50 or more housing units, the development proponent must require both of the following:
 - i) Contractors and subcontractors with construction craft employees must either participate in an apprenticeship program approved by the State of California Division of Apprenticeship Standards, as specified, or request the dispatch of apprentices from a state-approved apprenticeship program, as specified; and
 - ii) Contractors and subcontractors with construction craft employees must make health care expenditures for each employee, as specified. This requirement is severable from the rest of the bill.
- d) Adds the following enforcement requirements:
 - i) The obligation of the contractors and subcontractors to pay prevailing wages may be enforced by an underpaid worker through an administrative complaint or civil action, and by a joint labor-management committee through a civil action;
 - ii) The requirement to provide health care may be enforced by a joint labor-management cooperation committee, as specified; and
 - iii) A locality, and any labor standards enforcement agency the locality lawfully maintains, has standing to take administrative action or sue a construction contractor for failure to comply with this bill.
- 3) Strikes out SB 35's exclusion of the coastal zone.
- 4) Applies SB 35 to apply to local governments until they adopt a compliant housing element, as determined by the Department of Housing and Community Development (HCD).
- 5) Removes the applicability of SB 35 until July 1, 2025 on specified qualified sites located within an equestrian district designated by a general plan or specific or master plan. Specifies that this provision is intended to allow local governments to conduct general plan updates to align it with applicable zoning changes.
- 6) Provides the following regarding the approval of an SB 35 project:
 - a) Requires the governing body of a city or county to hold a public hearing within 45 days of receiving a notice of intent to submit an application pursuant to SB 35, if the proposed project is located in a census tract designated as a moderate or low resource area, or an area of high segregation and poverty, as specified;
 - b) The local determination about a project's compliance with the objective planning standards must be made by the local government's planning director or other equivalent position;
 - c) All departments of the local government that are required to issue an approval of the development prior to the granting of an entitlement must comply with the requirements of this section within the law's specified time periods;

- d) Removes the provision that public oversight of the development may be conducted by the local government's planning commission or any equivalent board or commission responsible for review and approval of development projects, or the city council or board of supervisors, as appropriate; and
 - e) Local governments cannot request studies, information or other materials that are not related to determining whether the development is consistent with the objective standards applicable to a development, nor can the local government require compliance with any standards necessary to receive a post-entitlement permit before the issuance of the project's entitlement.
- 7) Authorizes the Department of General Services (DGS), at its discretion, to act in the place of a locality or local government, for development on property owned by or leased to the state that is developed pursuant to SB 35.

FISCAL EFFECT: According to the Senate Appropriations Committee:

- HCD estimates minor and absorbable costs for staff to conduct any additional monitoring and enforcement efforts, update guidelines, and provide technical assistance to local agencies and developers. HCD notes that it may require additional resources for the cumulative workload associated with this bill in conjunction with several other measures, should they all be enacted. (General Fund)
- Unknown, potentially significant ongoing costs for the Department of Industrial Relations to conduct oversight and enforcement activities related to prevailing wage and apprenticeship standards on projects constructed pursuant to SB 35 streamlining provisions. There would also be unknown annual penalty revenue gains to partially offset these costs. Actual costs and penalty revenues would depend upon the number of qualifying projects constructed under SB 35 streamlining provisions and the number of complaints and referrals to the Division of Labor Standards and Enforcement that require enforcement actions, investigations, and appeals. (State Public Works Enforcement Fund)
- DGS does not anticipate any fiscal impacts related to provisions that authorize it to act in place of a local agency for development of property on property owned or leased to the state. (General Fund)
- Unknown local costs to update guidance and continue to conduct streamlined project reviews, make determinations, conduct expedited design reviews, and include SB 35 information in annual progress reports. These costs are not state-reimbursable because local agencies have general authority to charge and adjust planning and permitting fees to cover their administrative expenses associated with new planning mandates. (local funds)

COMMENTS:

- 1) **CEQA exemptions for housing.** CEQA includes various statutory exemptions, as well as categorical exemptions in the CEQA Guidelines, for a wide range of residential projects. Since 1978, CEQA has included statutory exemptions for housing. There are now at least 14 distinct CEQA exemptions for housing projects. The majority of residential projects are

approved via exemption or negative declaration under CEQA, or through ministerial permits where CEQA does not apply.

A few existing CEQA exemptions are specific to projects with an affordable housing fraction, the rest are available to affordable and market-rate projects alike. Each exemption includes a range of conditions, including requirements for prior planning-level review, as well as limitations on the location and characteristics of the site. These conditions are intended to guard against the approval of projects with significant environmental impacts that go undisclosed and unmitigated – endangering workers, residents and the greater environment. More recently, bills such as SB 35 and AB 2011 have established ministerial approval for multifamily housing projects, where local discretionary review, including CEQA, is replaced with construction labor requirements, exclusion of specified sensitive sites, and a checklist of “objective” criteria.

2) **Author’s statement:**

SB 423 extends the sunset on one of California’s most successful housing laws, SB 35, which expedites the approval of new homes. California has failed to create enough housing at all income levels. Currently, California ranks 49th out of 50 states in per capita housing units. The Legislative Analyst’s Office recommends the state produce 100,000 units annually beyond the expected 100,000 to 140,000 units per year. To help address this crisis, the Legislature passed SB 35 in 2017. The Turner Center reported that over 18,000 units have been proposed under SB 35, with 13,000 built. Of those proposed, 13,000 are affordable to very low- or low-income categories. The Mission Economic Development Agency utilized SB 35 for a 130-unit, 100% affordable project, and, decreased timelines between 6 months and 1 year. Although the bill has successfully increased affordable housing production, SB 35 under-performed producing market-rate housing, something SB 423 seeks to address.

Without an extension, SB 35 will expire on Jan. 1, 2026. SB 423 extends SB 35 to 2036, keeping a primary mechanism for streamlining housing production in place. This bill also helps California’s construction workforce thrive. Construction workers will be protected by the requirement to pay prevailing wages, and on projects over 50 units, contractors must offer apprentices employment and cover health care expenditures. This creates an economic base and opportunities for construction workers and provides our state with the highly skilled workforce it needs to build our future. SB 423 ensures California does not take a step back in addressing the housing crisis, but rather leans in to assist localities in streamlining much needed housing.

3) **Fire hazard severity zone exclusion includes outdated and subjective exemptions.** The site exclusion for high fire hazard severity zones (on page 12, lines 5-15) remains unchanged since SB 35 passed in 2017. However, since SB 35, the authority of local agencies to exempt state-designated fire zones was repealed by AB 2911 (Friedman), Chapter 641, Statutes of 2018. In addition, other housing streamlining bills (including AB 2011 in 2022 and AB 1449 (Alvarez) and AB 1633 (Ting) this year) have not included an exemption based on unspecified “mitigation measures” in this bill. *The author and the committee may wish to consider amending this provision as follows:*

(C) Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within a high or very high fire

hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code. ~~This subparagraph does not apply to sites excluded from the specified hazard zones by a local agency, pursuant to subdivision (b) of Section 51179, or sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development.~~

- 4) **To coast or not to coast?** The Coastal Commission regulates proposed development along the coast and in nearby areas. Generally, any development activity in the coastal zone requires a CDP from the Commission or local government with a certified local coastal program (LCP). Eighty-five percent of the coastal zone is currently governed by LCPs drafted by cities and counties, and certified by the Commission. In these certified jurisdictions, local governments issue the CDP with detailed planning and design standards. There are 14 jurisdictions without LCPs – also known as “uncertified” jurisdictions – where the Commission is still the direct permitting authority. The width of the coastal zone varies, but it can extend up to five miles inland from the shore, including private and public property.

The original Coastal Act of 1976 included PRC 30213, which stated:

Lower cost visitor and recreational facilities and housing opportunities for persons of low and moderate income shall be protected, encouraged, and, where feasible, provided.

The definition of low- and moderate-income households was anyone earning up to 120% of the median income, which included about 2/3 of California households at the time.

In the first five years of the Coastal Act, the Commission successfully required the construction of more than 5,000 affordable, deed-restricted, owner-occupancy and rental units in high-priced areas such as Laguna Niguel, San Clemente, and Dana Point. It also collected about \$2 million in in-lieu fees for additional housing opportunities throughout the state.

Over time, however, many local governments objected to the loss of local control and stated that the Coastal Act’s housing policies were preventing them from preparing LCPs. Subsequently, the Legislature passed SB 626 (Mello), Chapter 1007, Statutes of 1981, to remove the housing polices from the Coastal Act and instead provide that “*No local coastal program shall be required to include housing policies and programs.*” (PRC 30500.1) That legislation allowed any developer who had not yet completed a coastal housing project to require the Commission to remove the affordable requirements from the permit and prohibited the Commission from requiring local governments to include affordable housing in their LCPs. As a result, affordable housing development waned in the coastal zone.

Despite this, the Commission has maintained its mandate to protect the coast and, as of 2019, had approved more than 90% of all development applications. In fact, the Coastal Act continues to require the Commission to encourage housing opportunities for persons of low and moderate income. It further prohibits, in reviewing residential development applications for low- and moderate-income housing, the issuing local agency, or the Commission on appeal, from requiring measures that reduce residential densities below the density sought by an applicant if the density sought is within the permitted density or range of density established by local zoning plus the additional permitted density.

The Commission, in fact, has never denied a single affordable housing project in its history. Furthermore, permit review doesn't appear to be a roadblock to development. In terms of affordable housing project application turnaround times, permits are subject to the Permit Streamlining Act, thus the Commission must comply with those deadlines. Further, the Commission finds 'No Substantial Issue' on most of the appeals received, and turns permit applications around in 49 days.

SB 35 included a blanket exclusion of the coastal zone, and this bill repeals that exclusion. The Coastal Commission is a state agency, with land use authority emanating from the Coastal Act, as well as other authorities delegated by federal law. Review by the Commission (or even a city implementing a LCP) of a CDP application is different than a city reviewing a project under CEQA. GC 65913.4 does not explicitly preempt the Coastal Act, so it's not clear what application of this bill's by right process in the Coastal Zone means and how it would (or wouldn't) work.

Regardless, advocates on both sides are now fighting over whether this bill should exclude or include the coastal zone. If the bill passes in its current form, and developers attempt to build by right in the coastal zone, the fight is likely to extend to the Commission and/or the courts. Whether one thinks protecting public access or unchecked development better serves the coast, removing the coastal zone exclusions without addressing the unique complications of coastal land use is hardly a recipe for streamlining.

In the absence of a compromise, *the author and the committee may wish to consider* restoring the coastal zone exclusion, as follows:

65913.4(a)(6)(A) A coastal zone, as defined in Division 20 (commencing with Section 30000) of the Public Resources Code.

- 5) **Other loose ends.** This bill has also drawn concerns from a range of environmental justice, housing justice, and other community groups regarding gentrification, displacement, inadequate affordability requirements, locating housing in hazardous areas, inadequate/subjective cleanup standards for toxic sites, and lack of community input in the development process.

All of this is an expected consequence of the by right process, which eliminates not only CEQA review, but other forms of public consultation regarding individual development projects, and may also disregard prior community planning work. Many of these concerns could be addressed by limiting by right eligibility, particularly for market-rate projects, to sites covered by, and consistent with, an HCD-approved housing element (as many of the issues listed above would have been addressed at the community level in the housing element process).

An additional issue has been raised regarding June 19 author's amendments, which changed the 85 foot threshold for skilled and trained construction labor requirements as follows:

(F) For any project ~~over 85 feet in height above grade~~, *having floors used for human occupancy that are located more than 85 feet above the grade plane*, the following skilled and trained workforce provisions apply:

The effect of this change is that only the residential stories built above parking or retail levels, for example, will count toward the 85 foot limit. This represents a substantial change in the effect of this provision, added by May 23 Senate Appropriations Committee amendments.

- 6) **Double referral.** This bill was approved by the Assembly Housing and Community Development Committee on June 28, 2023 by a vote of 7-1.

REGISTERED SUPPORT / OPPOSITION:

Support

AARP
Abundant Housing LA
Active San Gabriel Valley
Associated General Contractors of California
Bay Area Council
Build Casa
California Apartment Association
California Catholic Conference
California Community Builders
California Community Economic Development Association
California Housing Consortium
California Housing Partnership Corporation
California State Council of Service Employees International Union
California YIMBY
Carpenter Local Union 1599
Carpenters Local 152
Carpenters Local 22
Carpenters Local 35
Carpenters Local 701
Carpenters Local Union #1109
Carpenters Local Union 1789
Carpenters Local Union 2236
Carpenters Union Local 180
Carpenters Union Local 217
Carpenters Union Local 405
Carpenters Union Local 46
Carpenters Union Local 505
Carpenters Union Local 605
Carpenters Union Local 713
Carpenters Union Local 751
Central City Association
Central Valley Urban Institute
Chico Councilmember Addison Winslow
City of Bakersfield
City of Berkeley Councilmember Rashi Kesarwani
City of Buena Park Council Member José Trinidad-Castañeda
City of Gilroy Council Member Zach Hilton

City of Mountain View Council Member Emily Ramos
City of Mountain View Council Member Lucas Ramirez
City of Santa Monica Council Member Jesse Zwick
City of Santa Monica Councilmember Gleam Davis
City of Sunnyvale Council Member Richard Mehlinger
City of Ventura Councilmember Mike Johnson
CivicWell
Community Coalition
Construction Employers' Association
Council of Infill Builders
Culver City for More Homes
Cupertino for All
Dignitymoves
District Council of Plasterers and Cement Masons of Northern California
Drywall Lathers Local 9109
Drywall Lathers Union Local 9068
Drywall Lathers Union Local 9083
Drywall Local Union 9144
East Bay for Everyone
East Bay Housing Organizations
East Bay YIMBY
Eastside Housing for All
Episcopal Communities Services
Episcopal Community Services of San Francisco
Fieldstead and Company
Fremont for Everyone
Greenbelt Alliance
Grow the Richmond
Habitat for Humanity California
Housing Action Coalition
How to ADU
Icon CDC
Inclusive Lafayette
Inner City Law Center
LeadingAge California
League of Women Voters of California
LISC San Diego
Livable Communities Initiative
Los Altos City Council Member Jonathan Weinberg
Los Angeles Area Chamber of Commerce
Mayor of City & County of San Francisco London Breed
Menlo Park Mayor Jen Wolosin
Mercy Housing California
Meta
MidPen Housing
Millwrights Local 102
Milpitas Councilmember Anthony Phan
Mothers Out Front California
Mountain View YIMBY

Napa-Solano for Everyone
Neighborhood Housing Services of Los Angeles County
New Way Homes
Nor Cal Carpenters Union
Northern Neighbors
Northern Neighbors SF
Passive House California
PATH (People Assisting the Homeless)
Peninsula for Everyone
Peninsula Interfaith Climate Action
People for Housing - Orange County
Pile Drivers Local 34
Place Initiative
Progress Noe Valley
Redwood Coalition for Climate and Environmental Responsibility
Resources for Community Development
San Francisco Bay Area Planning and Urban Research Association (SPUR)
San Francisco YIMBY
San Luis Obispo YIMBY
Santa Cruz YIMBY
Santa Rosa YIMBY
Silicon Valley Community Foundation
Silicon Valley Leadership Group
South Bay YIMBY
Southern California Association of Non-profit Housing
Southside Forward
Southwest Mountain States Regional Council of Carpenters
Streets for All
Streets for People
Sunnyvale City Council Member Alysa Cisneros
Supervisor Jaron Brandon, Tuolumne County
Supportive Housing Alliance
Sustainable Growth Yolo
The Pacific Companies
The Passive House Network
United Contractors
United Way of Greater Los Angeles
Urban Environmentalists
Urban League of San Diego County
Valley Industry and Commerce Association
Ventura County YIMBY
Wall and Ceiling Alliance
West Hollywood Mayor Pro Tempore John M Erickson
Western Wall and Ceiling Contractors Association
Westside for Everyone
YIMBY Action
YIMBY Democrats of San Diego County

Opposition

Association of California Cities – Orange County
California Cities for Local Control
California Contract Cities Association
Catalysts for Local Control
City of Beverly Hills
City of Camarillo
City of Carlsbad
City of Carson
City of Chino
City of Corona
City of Del Mar
City of Eastvale
City of Elk Grove
City of Fairfield
City of Indian Wells
City of Jurupa Valley
City of Laguna Niguel
City of Norwalk
City of Ontario
City of Palo Alto
City of Pleasanton
City of Rancho Cucamonga
City of Rancho Palos Verdes
City of Rosemead
City of San Marcos
City of Santa Clarita
City of Simi Valley
City of Stockton
City of Thousand Oaks
City of Torrance
City of Wildomar
League of California Cities
Livable California
Marin County Council of Mayors and Councilmembers
Midcoast Community Council
Pacific Palisades Community Council
San Francisco Latino Task Force
San Gabriel Valley Council of Governments
State Alliance for Firesafe Road Regulations
Sunnyvale United Neighbors
Sustainable Tamalmonite
Town of Truckee
West Torrance Homeowners Association
Western Regional Advocacy Project

Oppose Unless Amended

Azul
Ballona Wetlands Institute

California Coastal Commission
California Coastal Protection Network
California Coastkeeper Alliance
California Environmental Justice Alliance Action
Calle 24 Latino Cultural District
Center for Biological Diversity
Chinatown Community Development Center
Citizens Preserving Venice
City of Dublin
City of Half Moon Bay
City of Livermore
City of San Ramon
Coalition on Homelessness, San Francisco
Coastal Environmental Rights Foundation
Coastal Lands Action Network
Communities for a Better Environment
Crenshaw Subway Coalition
Defend Ballona Wetlands
Endangered Habitats League
Environmental Action Committee of West Marin
Environmental Center of San Diego
Environmental Justice Coalition for Water
Friends, Artists and Neighbors of Elkhorn Slough
Housing Rights Committee of San Francisco
Mission Economic Development Agency
Ocean Conservation Research
Orange County Coastkeeper
Poder
Public Trust Alliance
Resource Renewal Institute
San Francisco Community Land Trust
Save Capp Street
Sierra Club California
Smith River Alliance
SoCal 350 Climate Action
Soma Pilipinas Filipino Cultural Heritage District
Surfrider Foundation
The River Project
Town of Danville
Turtle Island Restoration Network
United to Save the Mission
Young Community Developers

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