

Date of Hearing: August 11, 2020

ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT

Cecilia Aguiar-Curry, Chair

SB 1120 (Atkins) – As Amended July 27, 2020

**SENATE VOTE:** 39-0

**SUBJECT:** Subdivisions: tentative maps.

**SUMMARY:** Requires ministerial approval of housing developments with two units (duplexes) and subdivision maps that meet certain conditions, and increases the length of time that cities and counties can extend the validity of existing subdivision maps. Specifically, **this bill:**

1) **Duplex Provisions.**

- a) Requires cities and counties to ministerially approve a proposed housing development project containing two residential units on parcels zoned for single-family residential development if all of the following conditions are met:
  - i) The parcel where the housing development will take place is either:
    - (1) Wholly within the boundaries of an urbanized area or urbanized cluster as designated by the United States (US) Census Bureau; or,
    - (2) Located within a city which includes some portion of an urbanized area or urban cluster as designated by the US Census Bureau within its boundaries.
  - ii) The parcel where the housing development will take place is not located on or within any of the following:
    - (1) Prime farmland, or farmland of statewide importance;
    - (2) Wetlands, as defined in 1993 by the US Fish and Wildlife Service;
    - (3) A very high fire hazard severity zone, as defined by the Department of Forestry and Fire Protection (CALFire), unless the site has adopted fire hazard mitigation measures required by existing building standards;
    - (4) A hazardous waste site, as defined, unless specified agencies clear the land for residential use;
    - (5) An earthquake fault zone as determined by the State Geologist, unless the development complies with existing applicable building code standards;
    - (6) A special flood hazard area as defined, unless certain conditions are met;
    - (7) A regulatory floodway as defined by the Federal Emergency Management Agency (FEMA), unless certain conditions are met;
    - (8) Land identified for conservation pursuant to the Federal Endangered Species Act;

- (9) Habitat for protected species, as defined;
  - (10) Land under a conservation easement;
  - (11) A national, state, or local historical district or property; or,
  - (12) A parcel where the owner of residential property has withdrawn accommodations for rent or lease within the last 15 years.
- iii) The housing development will not require demolition or alteration of any of the following types of housing:
- (1) Housing that restricts rents to levels affordable to persons and families of moderate, low, or very low income;
  - (2) Housing that is subject to rent or price control; or,
  - (3) Housing occupied by tenants within the last three years.
- iv) The housing development will not require the demolition of more than 25% of the exterior walls of an existing structure, unless demolition of more than one existing exterior wall is allowed by ordinance, or the development has not been occupied by a tenant in the last three years.
- b) Allows cities and counties to impose objective design, subdivision, and zoning standards that are not in conflict with the bill, provided that the standards do not:
- i) Physically preclude the development from including up to two units;
  - ii) Require setbacks for an existing structure, or structure built in the same location and to the same dimensions of an existing structure, if the required setbacks would physically preclude the development from including up to two units; or,
  - iii) Require setbacks of more than four feet from the side and rear lot lines, if those setbacks would preclude the development from including up to two units.
- c) Allows cities and counties to require a development eligible for ministerial approval under the bill to provide one off street parking space per unit, unless:
- i) The parcel is located within one-half mile walking distance of public transit; or,
  - ii) A car share vehicle is located within one block of the parcel.
- d) Allows cities and counties to require residential units connected to an onsite wastewater treatment system that are eligible for ministerial approval under the bill to have a percolation test completed within the last five years or recertified within the last ten years.
- e) Requires cities and counties to restrict the rental term of any unit created under the bill to a term of more than 30 days.

- f) Provides that an application for a housing development shall not be rejected solely because it includes adjacent or connected structures provided that those structures meet existing building code and safety standards that are sufficient to allow separate conveyance.

## 2) Urban Lot Split Provisions.

- a) Requires cities and counties to ministerially approve a parcel map, or a tentative and final map for an “urban lot split,” that complies with the following:
  - i) The urban lot split is a parcel map that performs all of the following:
    - (1) Subdivides a parcel that is zoned for residential use;
    - (2) Subdivides a parcel that is located:
      - (a) Wholly within the boundaries of an urbanized area or urbanized cluster as designated by the US Census Bureau; or,
      - (b) Located within a city which includes some portion of an urbanized area or urban cluster as designated by the US Census Bureau.
    - (3) Subdivides an existing parcel to create two new parcels of equal size; and,
    - (4) Creates two parcels that are no smaller than 1,200 square feet, unless a smaller minimum lot size is allowed by an ordinance adopted by a local agency.
  - b) The parcel subdivided by an urban lot split meets all of the following requirements:
    - i) The parcel is not located on or within:
      - (1) Prime farmland, as defined;
      - (2) Wetlands, as defined in 1993 by the US Fish and Wildlife Service;
      - (3) A very high fire hazard severity zone, as defined by the Department of Forestry and Fire Protection (CALFire), unless the site has adopted fire hazard mitigation measures required by existing building standards;
      - (4) A hazardous waste site, as defined, unless specified agencies clear the land for residential use;
      - (5) An earthquake fault zone as determined by the State Geologist, unless the development complies with applicable building code standards;
      - (6) A special flood hazard area as defined, unless certain conditions are met;
      - (7) A regulatory floodway as defined by FEMA, unless certain conditions are met;
      - (8) Land identified for conservation pursuant to the federal Endangered Species Act;

- (9) Habitat for protected species, as defined;
  - (10) Land under a conservation easement;
  - (11) A national, state or local historical district or property; or,
  - (12) A parcel where the owner of residential property has withdrawn accommodations for rent or lease within the last 15 years.
- ii) The urban lot split would not require demolition or alteration of any of the following types of housing:
    - (1) Housing that restricts rents to levels affordable to persons and families of moderate, low, or very low income;
    - (2) Housing that is subject to rent or price control; or,
    - (3) Housing occupied by tenants within the last three years.
  - iii) The urban lot split does not subdivide either of the following types of parcels:
    - (1) A parcel previously established through an urban lot split; or,
    - (2) A parcel where the owner or a person acting in concert with the owner previously subdivided an adjacent parcel through an urban lot split.
- c) Requires cities and counties to approve urban lot splits that conform to the objective requirements of the Subdivision Map Act in accordance with the following:
    - i) Ministerially and without discretionary review; and,
    - ii) Without the imposition of regulations that require dedications of rights-of-way, or the construction of offsite improvements as a condition of approval.
  - d) Allows cities and counties to impose objective design and subdivision standards to parcels created by an urban lot split provided that the standards do not conflict with the standards established in the bill and do not:
    - i) Physically preclude the construction of two units on either of the resulting parcels;
    - ii) Require setbacks for an existing structure, or structure built in the same location and to the same dimensions of an existing structure if the required setbacks would physically preclude the development from including up to two units; or,
    - iii) Require setbacks of more than four feet from the side and rear lot lines, if those setbacks would preclude the development from including up to two units.
  - e) Provides that cities and counties may impose or require any of the following conditions on an urban lot split:
    - i) Easements required for the provisions of public services and facilities;

- ii) Requirements that parcels have access to or adjoin the public right-of-way;
  - iii) Off street parking of up to one space per unit, unless the parcel is located within one-half mile walking distance of public transit or a car share vehicle located within one block of the parcel.
  - f) Requires cities and counties to limit parcels created through urban lot splits to residential uses, and to restrict the rental term of any unit created through an urban lot split to a term of more than 30 days.
  - g) Prohibits a local agency from requiring the correction of nonconforming zoning conditions as a condition of approval of an urban lot split.
  - h) Provides that an urban lot split shall not be rejected solely because it includes adjacent or connected structures provided that those structures meet existing building codes and safety standards that are sufficient to allow separate conveyance.
- 3) **Other Provisions.**
- a) Allows cities and counties to adopt an ordinance to implement the provisions of this bill allowing for ministerial approval of two unit residential housing developments and urban lot splits, and specifies that the action to adopt the ordinance is not subject to the California Environmental Quality Act (CEQA).
  - b) Specifies that a local agency is not required to permit accessory dwelling units (ADUs) on parcels that are subdivided through an urban lot split and have two residential units constructed on the parcel.
  - c) Requires cities and counties to include information on the number of applicants for urban lot splits and the number of units constructed under the provisions of this bill in the annual housing element report submitted to the Department of Housing and Community Development (HCD).
  - d) Allows cities and counties to extend the life of subdivision maps by an additional 12 months.
  - e) States that the provisions of the bill address a matter of statewide concern rather than a municipal affair and therefore its provisions are applicable to all cities, including charter cities.

**EXISTING LAW:**

- 1) Requires, pursuant to Planning and Zoning Law, 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 a land use element.
- 2) 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.
- 3) Requires, under CEQA, lead agencies with the principal responsibility for carrying out or approving a proposed project to prepare a negative declaration, mitigated negative

declaration, or an environmental impact report (EIR), unless the project is exempt from CEQA.

- 4) Provides, pursuant to the Subdivision Map Act, the following related to the subdivision of land:
  - a) Requires a city or county to require a tentative and a final map for all subdivisions of land creating five or more parcels, except for subdivisions which meet specified conditions;
  - b) Requires a city or county to require a parcel map for subdivisions meeting specified conditions;
  - c) Limits the improvements a city or county may require for a subdivision of land that is less than five parcels; and,
  - d) Requires a legislative body of a city or county to deny approval of a tentative map or a parcel map if it makes any of the following findings:
    - i) That the proposed map is not consistent with applicable general and specific plans;
    - ii) That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans;
    - iii) That the site is not physically suitable for the type of development;
    - iv) That the site is not physically suitable for the proposed density of development;
    - v) That the design of the subdivision or the proposed improvements are likely to cause environmental damage, injure wildlife, or are likely to cause serious public health problems; or,
    - vi) That the design of the subdivision or the type of improvements will conflict with certain easements providing access through or use of property within the proposed subdivision.
- 5) Requires cities and counties to ministerially permit the creation of certain types of ADUs within the space of a single family home or in a new or converted structure in the rear of the property, regardless of what local zoning provides and places numerous limitations on the ability of cities and counties to impose requirements on ADUs.

#### **FISCAL EFFECT:**

According to the Senate Appropriations Committee:

The Department of Housing and Community Development (HCD) estimates it would incur costs of \$105,000 in the first year and \$99,000 annually thereafter for 0.5 PY of staff time to provide technical assistance and outreach education to local agencies and affordable housing developers. (General Fund).

Unknown local costs to establish streamlined project review processes for proposed duplex housing developments and tentative maps for urban lot splits, and to conduct expedited design

reviews of these proposals. 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) **Author's Statement.** According to the author, "SB 1120 promotes small-scale neighborhood residential development by streamlining the process for a homeowner to create a duplex or subdivide an existing lot in all residential areas. This policy builds upon existing prior successful housing policies such as the state's Accessory Dwelling Unit (ADU) law, which led to a 63% increase in ADU permit requests statewide in the first two years alone. Additionally, the policy leverages valuable but previously untapped resources, such as developed but underutilized land, while building valuable equity for homeowners. The bill also respects the priorities of local governments in local land use decisions: such applications must meet a specific list of qualifications that ensure protection of local zoning and design standards, historic districts, environmental quality, and existing tenants vulnerable to displacement.

"COVID-19 has dramatically exacerbated California's already-severe housing crisis. Essential workers are more likely to live in overcrowded housing, which is linked to an increased risk of contracting (and dying from) the disease. Among households facing COVID-related loss of income, half were already struggling to afford rent pre-COVID and now face eviction, housing instability, and homelessness. Finally, estimates show that homeless individuals are two to three times more likely to die from COVID than their housed counterparts. The best way to address these issues is to provide more housing that is affordable to low- and moderate-income families by creating the environment and opportunity for small-scale neighborhood development."

- 2) **Bill Summary.** This bill requires cities and counties to ministerially approve subdivisions of specific types of parcels called urban lot splits, and specific types of housing developments of up to two units (duplexes). Under this bill, a property owner could independently seek ministerial approval for an urban lot split, a duplex, or the owner could seek approval for both an urban lot split and a duplex. Urban lot splits and duplexes are only eligible for ministerial approval if the project meets the applicable objective standards specified in the bill.

The bill allows a local agency to adopt an ordinance to implement the provisions of the bill and provides that such an ordinance is not a project under CEQA. Finally, the bill also increases the length of time a local government can extend the life of a subdivision map.

- 3) **California's Housing Crisis.** California faces a severe housing shortage. In its most recent statewide housing assessment, HCD estimated that California needs to build an additional 100,000 units per year over recent averages of 80,000 units per year to meet the projected need for housing in the state. A variety of causes have contributed to the lack of housing production. Recent reports by the Legislative Analyst's Office (LAO) and others point to local approval processes as a major factor. They argue that local governments control most of the decisions about where, when, and how to build new housing, and those governments are quick to respond to vocal community members that may not want new neighbors. The

building industry also points to CEQA review as an impediment, and housing advocates note a lack of a dedicated source of funds for affordable housing.

- 4) **Objective Standards and CEQA.** CEQA requires the state and local governments to study and mitigate, to the extent feasible, the environmental impacts of proposed projects, providing a key protection for the environment and residents of California. This bill exempts any ordinance a local agency adopts to administer the ministerial approval of these projects from CEQA. Additionally, under the bill, duplexes and urban lot splits that meet specified conditions must be approved ministerially by the relevant local agency. Ministerial approvals remove a project from all discretionary decisions of a local government, including an environmental review under CEQA. Thus, establishing processes to approve certain types of projects ministerially also creates exemptions from CEQA.

A CEQA exemption provides a tremendous benefit to property owners, developers, local governments and other parties involved in the approval of a project as it allows for the project to be completed in an expedited fashion. In light of the state's ongoing housing crisis, the Legislature has created several exemptions to CEQA that are designed to increase the production of housing. The protection of resources afforded by CEQA is not exempted lightly. The Legislature balances the risk of allowing projects to proceed without a full environmental review by limiting exemptions to projects that comply with scores of objective standards and criteria. These standards and criteria are an expression of the state's values and ensure that exempt projects do not result in harm to public health and safety and the environment.

- 5) **Ministerial Approval Under This Bill.** This bill continues the practice of limiting CEQA exemptions to projects that meet specific objective criteria. In order to qualify for ministerial approval both types of projects, whether they are executed in tandem or independently, may only occur on parcels located in urbanized areas or clusters or within cities that include urbanized areas or clusters within their boundaries. Additionally, the bill excludes projects on parcels that are located on or within any of the following:
  - a) Prime farmland or farmland of statewide importance;
  - b) Wetlands;
  - c) Land within the very high fire hazard severity zone, unless the development complies with state mitigation requirements;
  - d) A hazardous waste site;
  - e) An earthquake fault zone, unless the development complies with state mitigation requirements;
  - f) Land within the 100-year floodplain or a floodway;
  - g) Land identified for conservation under a natural community conservation plan, or lands under conservation easement;
  - h) Habitat for protected species;



- i) A national, state, or local historical district or property; or,
- j) A parcel where the owner of residential property has withdrawn accommodations for rent or lease within the last 15 years.

The bill additionally prohibits projects from qualifying for ministerial approval if the project would require the evacuation or eviction of an existing housing unit of any of the following types of housing:

- a) Rent-restricted housing, including deed-restricted affordable housing and housing subject to rent or price control by a public entity's police power; or,
  - b) Housing that has been occupied by a tenant in the last three years.
- 6) **Project Specific Criteria.** In addition to the qualifying and disqualifying criteria that apply to both types of projects, urban lot splits and duplex developments are subject to an additional layer of objective criteria that are unique to each type of project, as follows:
- a) **Duplexes.** This bill requires cities and counties to ministerially approve housing developments that contain two units (duplexes) located on parcels that meet the criteria noted above; however, the housing development may not require the demolition of more than 25% of the existing exterior walls of a residential structure, unless a local ordinance specifically allows a greater rate of demolition, or the site has not been occupied by a tenant in the last three years.
  - b) **Urban Lot Splits.** This bill amends the Subdivision Map Act to define "urban lot splits," and requires cities and counties to ministerially approve subdivision maps that qualify as an urban lot split. In addition to the parcel-specific criteria noted above, a proposed subdivision must conform to the following criteria to qualify as an urban lot split:
    - i) The subdivision divides a parcel that is zoned for residential use;
    - ii) The subdivision divides the existing parcel into two parcels of equal size;
    - iii) The subdivision creates parcels no smaller than 1,200 square feet, unless a smaller size is specifically allowed by local ordinance; and,
    - iv) The subdivision must not divide a parcel that was previously created by or is adjoined to a parcel previously created by an urban lot split.
- 7) **Other Conditions and Requirements.** The bill additionally restricts the types of requirements and conditions that may be applied to projects that meet all of the objective criteria for ministerial approval applicable to that project. In addition to requiring ministerial approval, the bill prohibits cities and counties from imposing regulations that require dedications of rights-of-way or the construction of offsite improvements. However, a local agency may require easements and that the parcel have access to, provide access to, or adjoin the public right-of-way. A local agency can impose objective zoning and design standards that do not conflict with the bill, so long as those standards do not physically preclude the development from including up to two units.

- 8) **Accessory Dwelling Units.** As noted by the author, this bill seeks to build on the success of the ADU laws that were codified over the last five years. This bill mirrors several provisions of existing ADU law that are designed to ensure the projects move forward and create permanent housing. First, the bill mirrors the parking standards in ADU law and limits the parking that cities and counties may require for duplexes. Second, ADU law allows cities and counties to require that ADUs must be rented for a period of at least 30 days. This bill mirrors this provision but is more restrictive in that it requires cities and counties to prohibit rentals of less than 30 days for any units created as a result of the bill.

Finally, this bill states that cities and counties are not required to permit ADUs on parcels that were ministerially created by an urban lot split and had a duplex constructed on the property under the provisions allowed for in this bill, thereby limiting the total number of units that can be developed on a single existing parcel. However, this restriction only flows in one direction. Nothing in the bill provides cities and counties the ability to deny an urban lot split or duplex development on a parcel that already had an ADU permitted ministerially on the lot. An enterprising property owner or developer could employ the ministerial provisions under ADU law and this bill on a single existing parcel, provided they do so in the proper order.

- 9) **Subdivision Map Extensions.** This bill allows cities and counties to extend the life of subdivision maps by one year, up to a total of four years depending on the type of map. The expanded authority to extend maps granted under this bill is discretionary.

#### 10) **Policy Considerations**

- a) **Historic Districts.** In order for a project to be eligible for ministerial approval under this bill, the project cannot occur within an historic district or property included on the state historic resources inventory, or within a site that is designated or listed as a city or county landmark or historic property or district pursuant to a city or county ordinance.

Under existing law, cities and counties can designate historic districts within their jurisdiction, and doing so may trigger additional levels of CEQA review for projects that occur in those districts. In this respect, excluding ministerial approval in historic districts parallels existing precedent as it disqualifies projects that could otherwise trigger additional review and mitigation under CEQA. However, compared to the other objective standards identified in the bill and existing CEQA exemptions for housing developments, this criteria is unique in that these locations may be identified at the discretion of a local agency, whereas other standards are either identified by a state or federal agency, or are defined temporally (e.g. tenancy of no less than three years). Inclusion of this standard may encourage NIMBY groups that are opposed to increased density to pressure cities and counties to expand historic districts. Ultimately, the reporting provisions in the bill should provide insight on whether this standard presents a barrier to implementation of the bill.

- b) **Demolition Restrictions.** The duplex provisions of the bill prohibit the demolition of more than 25% of the existing exterior structural walls of an existing residential property, unless:
- i) A greater percentage of demolition is allowed by local ordinance; or

ii) The property has not been occupied by tenants for a period of more than three years.

Property that has been occupied by a tenant in the last three years is already excluded from both the duplex and urban lot split provisions of the bill. Therefore, it appears the 25% demolition restriction would never apply to a property eligible for the streamlining provisions in this bill. If the bill intends to prohibit the demolition of more than 25% of an existing structure, the author may wish to clarify this provision.

11) **Technical Amendments.** The Committee may wish to consider a number of technical amendments to the bill:

a) Sections 65852.21(a)(3)(C) and 66411.7(a)(3)(D)(iii) contain an erroneous reference to submitting an application pursuant to Section 65913.4. The Committee may wish to consider striking these references.

b) Sections 65852.21(f) and 66411.7(i) state the following, “an application shall not be rejected solely because it proposes adjacent or connected structures that meet building code safety standards and are sufficient to allow separate conveyance.” In order to provide clarity, the Committee may wish to consider amending the language in both sections to read:

“An application shall not be rejected solely because it proposes adjacent or connected structures *provided* that *the structures* meet building code safety standards and are sufficient to allow separate conveyance.”

c) Section 66411.7 (a) requires ministerial approval of a parcel map or a tentative and final map that meets specified conditions. However 66411.7 (a)(1) only refers to parcel maps. The Committee may wish to clarify that (a)(1) also applies to a tentative and final map.

d) As drafted 65852.21(a)(3) is written to prevent the demolition or alteration of certain types of housing that would result in an eviction of tenants. However (a)(3)(C) refers to a type of housing where tenants have already been evicted. In order to clarify that these parcels are not eligible for development under the bill, the Committee may wish to amend Section 65852.21 to make the language in this section parallel to the corresponding requirement in Section 66411.7. Specifically, the Committee may wish to renumber and subdivisions (a)(3)(C) as paragraph (a)(4) and that reads:

*(4)The parcel subject to the proposed housing development is not a parcel on which an owner of residential real property has exercised the owner’s rights under Chapter 12.75 (commencing with Section 7060) of Division 7 of Title 1 to withdraw accommodations from rent or lease within 15 years before the date that the development proponent submits an application pursuant to Section 65913.4.*

12) **Arguments in Support.** The Turner Center for Housing Innovation writes in support, “The majority of Californians cannot afford a median priced home, and single family-only zoning also prevents the creation of affordable housing in oftentimes high opportunity communities. It should also be noted that our structure of single family zoning has historically been used to reinforce segregation by effectively keeping People of Color out of affluent, White neighborhoods.

“SB 1120 takes a measured approach to addressing this issue by building off of the success of recent Accessory Dwelling Unit (ADU) reforms, which have resulted in tens of thousands of new units in recent years. Despite this progress, ADUs are limited in impact given the few financing options available to construct them, largely limiting ADU construction to affluent homeowners who can access cash savings or home equity. SB 1120 intends to significantly increase similarly smaller-scale development by allowing parcels to be split for the purpose of creating two independent structures, thereby opening up new forms of financing opportunities.”

- 13) **Arguments in Opposition.** Citizens Preserving Venice writes in opposition, “We have serious concerns about the elimination of single-family zoning that this bill will cause statewide. The bill would allow four market-rate homes to replace one single-family home. Those four units could become eight units in areas that allow “accessory dwelling units” (ADUs).

“There is no affordable housing requirement despite this egregious increase in density. Clearly the people of California who are facing dire economic times are in need of affordable housing. But without requirements to include affordable housing, this bill would be a gift to speculators and developers up and down the state who will build high-end units to maximize their profits.”

## **REGISTERED SUPPORT / OPPOSITION:**

### **Support**

Abundant Housing LA  
 All Home  
 American Planning Association, California Chapter  
 Associated Builders and Contractors Northern California Chapter  
 Bay Area Council  
 Bay Area Housing Advocacy Coalition  
 Bridge Housing Corporation  
 California Apartment Association  
 California Association of Realtors  
 California Chamber of Commerce  
 California YIMBY  
 Council of Infill Builders  
 Facebook  
 Granville Homes  
 Habitat for Humanity California  
 San Francisco Housing Action Coalition  
 Schneider Electric  
 South California Rental Housing Association  
 South Pasadena Residents for Responsible Growth  
 Sv@home Action Fund  
 Terner Center for Housing Innovation At the University of California, Berkeley  
 The Casita Coalition  
 The Greenlining Institute  
 The Two Hundred

**Support (continued)**

TMG Partners  
Up for Growth  
Zillow Group

**Support If Amended**

California State Association of Counties  
League of California Cities  
Los Angeles County Division, League of California Cities  
Rural County Representatives of California  
Urban Counties of California  
Valley Industry & Commerce Association

**Oppose**

Aircraft Owners and Pilots Association  
Brentwood Beautiful  
Brynhurst Avenue Bock Club  
By the Beach Tamarack Group  
Citizens Preserving Venice  
Citizens Protecting San Pedro  
Cities of Agoura Hills, Beverly Hills, Campbell, Cerritos, Cupertino, El Segundo, Hidden Hills,  
Rancho Palos Verdes, Redondo Beach, Santa Clarita, and Saratoga  
Coastal San Pedro Neighborhood Council  
Communities United CD7  
Comstock Hills Homeowners Association  
Families of Park Mesa Heights  
Federation of Hillside and Canyon Associations  
Franklin Corridor Coalition  
Friends of Sunset Park  
Grayburn Avenue Block Club  
Graylawn Neighbors for Quality of Life  
Hyde Park Organizational Partnership for Empowerment  
Leimert Park - Edgehill Drive Residents Association  
Liberty Community Land Trust  
Livable Riverside & Moreno Valley  
Mission Street Neighbors  
New Livable California DbA Livable California  
North Santa Ana Preservation Alliance  
Northeast San Fernando Valley Activists  
Protecting Our Foothill Community  
Riviera Homeowners Association  
Shadow Hills Property Owners Association  
Sherman Oaks Homeowners Association  
Southeast Torrance Homeowners' Association, INC. (SETHA)  
Sunnyvale Neighbors

**Oppose (continued)**

Sunset-Parkside Education and Action Committee (SPEAK)  
Sustainable Tamalmonite  
Tamalpais Design Review Board  
Tarzana Property Owners Association  
United Neighborhoods for Los Angeles (UN4LA)  
Victoria/54th Ave Block Club  
View Heights Block Club  
WCH Association  
West Wood Highlands Neighborhood Association  
Westwood Hills Property Owners Association  
Wilshire Montana Neighborhood Coalition  
Woodland Hills Homeowners Organization  
Woodland Hills Homeowners Organization (WHHO)  
Individual Letters (33)

**Oppose Unless Amended**

AIDS Healthcare Foundation  
Bay Area Transportation Working Group  
Las Virgenes-Malibu Council of Governments  
Pacific Palisades Community Council  
Planning and Conservation League  
Sierra Club California  
Transportation Solutions Defense and Education Fund

**Analysis Prepared by:** Hank Brady / L. GOV. / (916) 319-3958