



July 24th, 2020

**Assembly Member Cecilia M. Aguiar-Curry,
Chair, California Assembly Local Government Committee
1020 N street, Room 157
Sacramento, CA 95814**

Re: SB1120 (Atkins et al) Oppose Unless Amended

Dear Chair Aguiar-Curry,

SB1120 would provide ministerial approval of 2 unit projects within single-family zoning, as well ministerial approval of (one time) parcel splits for single-family zoning, as specified. We, the undersigned organizations, strongly support the intent of this legislation to increase residential densities, and we thank the authors for their attention to this important issue amid California's escalating affordable housing crisis.

However, we have multiple concerns. Primarily, a distinction needs to be made between location efficient areas where we need greater densification and very low density areas where densification is problematic. Small rural town centers certainly have housing and densification needs, however, splitting parcels in very low-density outside of those centers raises a host of practical infrastructure challenges for those jurisdictions, and doubling density in areas remote from jobs and services undercut's the ability of California to meet its Vehicle Miles Travelled (VMT) and greenhouse gas reduction mandates.

Our recommendation is to constrain the bill's provisions to location-efficient Low-VMT zones, wholly within Urban areas and Urban Clusters as defined by the Census Bureau, for both cities and unincorporated areas. "Low-VMT zones" (per the OPR Technical Advisory on SB 743 (2013) CEQA Guidelines) are areas exhibiting per capita VMT performance of -15% of city or regional average. Which can provide coverage of location-efficient areas in both major urban centers and smaller rural towns alike.

Secondly we would prefer that the list of sensitive areas that are excluded from applicability, as reference by 65913.4 (a) (6) (B - K), should be replaced by the slightly modified version of PRC 21159.21 currently proposed by AB 2323 (Friedman, 2020), which better accounts for hazardous sites among other considerations.

We also believe that a cumulative municipal services review should be required of jurisdictions to assess infrastructure readiness, before these ministerial provisions are enacted. Infrastructure needs should be assessed in anticipation of increased densities rather than on a project by project basis.

And finally, we feel the prohibition of demolition of properties inhabited by tenants within the previous 3 years should be increased to a period of 10 years, to better protect against the displacement of existing low-income families.

Again, we thank the authors for their attention to this important issue, and we hope these recommendations are found to be constructive. Thank you for your consideration.

Sincerely,



Matthew Baker
Policy Director, **Planning and Conservation League**



Brandon Dawson
Policy Advocate, **Sierra Club California**



Melissa Romero
Legislative Affairs Manager, **California League of Conservation Voters**

Brian Nowicki
California Climate Policy Director, **Center for Biological Diversity**