



CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE ▪ BEVERLY HILLS, CALIFORNIA 90210

Julian A. Gold, M.D., Mayor

July 12, 2023

The Honorable Cecilia Aguiar-Curry
Chair, Assembly Committee on Local Government
State Capitol, Room 126
Sacramento, CA 95814

Re: SB 684 (Caballero) Land use: streamlined approval processes: development projects of 10 or fewer single-family residential units on urban lots under 5 acres
City of Beverly Hills – OPPOSE

Dear Chair Aguiar-Curry:

On behalf of the City of Beverly Hills, I write to you in respectful OPPOSITION to SB 684. We fully appreciate the bill's intent to streamline the housing development process and increase homeownership opportunities, particularly for moderate-income and families of color. However, we firmly believe that such efforts should not undermine local control and the unique needs of communities.

SB 684 requires local governments to ministerially approve the subdivision of parcels for housing development projects of 10 or fewer units, without discretionary review or a hearing. While this bill may facilitate some subdivisions, we are concerned that it poses significant challenges to local zoning control and the ability of cities to appropriately plan and manage development.

It is crucial to recognize that each city and community in California is unique. Decisions about housing development should be made at the local level, taking into consideration the needs of the community, the existing infrastructure, and the potential impacts on the local environment and quality of life. Removing local control and discretionary review for such projects undermines the ability of cities to ensure that development aligns with the community's character and needs.

Furthermore, we worry that the bill's emphasis on density as a main criterion for project approval could lead to ill-considered development. The requirement that the proposed project must match the maximum density allowed by the local zoning on the current parcel can result in no additional units. Thus, this bill, as currently written, may not significantly increase the overall housing stock, contrary to its intended purpose.

Finally, with the multitude of changes in state law mandating increased density in housing over the last several years, cities, counties, and the state have had little opportunity to see if the changes mandated by state law are having the desired effect. Three such bills include:

- SB 9 (Atkins) 2021 which facilitated the process for homeowners to subdivide their current residential lot or build a duplex by mandating local governments ministerially approve these projects. This bill essentially ended single-family zoning in California;
- SB 330 (Skinner) 2019, declared a statewide housing crisis and for a five-year period (later extended to 2030 by SB 8 (Skinner) 2021). The bill aimed to increase residential unit development, protect existing housing inventory, and expedite permit processing. This measure made a number of modifications to existing law, such as the Permit Streamlining Act and the Housing Accountability Act; and
- SB 35 (Wiener) 2017, which mandates cities or counties who do not meet the state-mandated Regional Housing Need Allocation target to provide a streamlined, ministerial review process for qualifying multifamily residential projects.

Beverly Hills believes the state should pause enacting laws that make further changes to increase density until the state and local governments have a chance to see the full impacts of the many density laws passed by the state, including those mentioned above. Additionally, with recent surveys showing people are either (a) leaving California or (b) looking at moving out of state, it may be beneficial for the state legislature to pause enacting more laws that increase density until it can evaluate the effect of recent changes of these laws have had in creating affordable housing, especially as there are many other factors that have slowed development including supply chain issues and labor shortages.

We urge your reconsideration of the provisions that limit local control and discretionary review. By doing so, we believe that we can create a more balanced approach to housing development that both expands homeownership opportunities and respects the needs and character of local communities.

For these reasons, the City of Beverly Hills must respectfully OPPOSE SB 684. Thank you for your consideration.

Sincerely,



Julian A. Gold, M.D.
Mayor, City of Beverly Hills

Cc: The Honorable Anna Caballero, Senator, 14th District
The Honorable Ben Allen, Senator, 24th District
The Honorable Rick Zbur, Assemblymember, 51st District
Andrew K. Antwih, Shaw Yoder Antwih Schmelzer & Lange