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*[Exempt from Filing Fee (Gov. Code § 6103)]*

Attorneys for Plaintiff  
THE TOWN OF LOS GATOS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

THE TOWN OF LOS GATOS, a California  
municipal corporation

Case No.:

Plaintiff,

**PLAINTIFF THE TOWN OF LOS  
GATOS'S COMPLAINT FOR  
DECLARATORY RELIEF**

v.

ARYA PROPERTIES, LLC, LOS GATOS  
BOULEVARD PROPERTIES, LLC, and  
DOES 1-100, inclusive,

Defendant.

Plaintiff The Town of Los Gatos (the Town), a California municipal corporation, alleges:

### **General Background**

1. This declaratory relief action involves the interpretation of a statute enacted as part of California's Senate Bill 330 (SB 330), also known as the "Housing Crisis Act of 2019" (Government Code Sections 65941.1, 65943 and 66300<sup>1</sup>). The Town seeks a declaration of its rights and duties with respect to the processing of applications for housing development projects. With this action, the Town is requesting judicial guidance on the correct interpretation of Section

<sup>1</sup> All unlabeled statutory references are to the Government Code.

65941.1, so that it may process applications for development projects in full accordance with its legal rights and obligations, and so affected developers may have similar clarity as to their, and the Town's, rights and duties. While the Town believes that, to retain extraordinary vesting rights granted by the Housing Crisis Act, developers should complete their applications within the reasonable period of time granted by the Legislature, Defendants claim that they may retain these vesting rights indefinitely while continuing to submit incomplete applications, and building no housing.

2. Crucially, the Town has a strong record of housing accomplishments. For the Town's 2015 through 2023 Housing Element, the Town was assigned a Regional Housing Needs Allocation (RHNA)—its fair share of the regional housing need—of 619 units. As of December 2022, the Town had added 683 new units to its housing stock, approximately 110 percent of its fair share. In 2023 and 2024, the Town approved entitlements for 181 units and issued building permits for 100 units. Thus far in 2025, the Town has approved two large projects totaling 340 units. These are significant developments for a community of just 33,000 people.

3. The Town has also gone beyond state requirements to encourage the development of affordable housing. It amended its Accessory Dwelling Unit (ADU) Ordinance to incentivize the development of ADUs (smaller, secondary units on a parcel, sometimes called "granny flats") affordable to lower-income households. The Town's ADU Ordinance includes a 10-percent increase in the allowable floor area for a new ADU. Likewise, to encourage development of smaller, more affordable housing units, the Town has adopted an ordinance allowing an additional 10-percent floor area ratio (i.e., the ratio of interior floor space to the area of a lot) for use by dwelling units developed under SB 9 (Sections 65852.21 and 66411.17), another recent housing law intended to lower housing costs by allowing four homes on single-family lots.

4. While the Town exceeded its fair share of housing units assigned from 2015 to 2023, it recognized the need to develop more units affordable to lower- and moderate-income households. Even before the Town adopted its current 2023 – 2031 Housing Element, the Town adopted a Racial, Social, and Environmental Justice Element, which established goals and policies intended to make healthy, affordable housing more readily available to all the Town's



believes that Los Gatos Boulevard Properties, like Arya, maintains its principal place of business at 16400 Lark Avenue, Suite 400, Los Gatos, California.

10. The Town is informed and believes that the principal owner, chief executive officer, and agent for service of process for Arya and for Los Gatos Boulevard Properties is one and the same person.

11. The Town is ignorant of the true names and capacities of those sued herein as DOES 1 through 100 and therefore sues those Defendants by such fictitious names. The Town will amend this Complaint to allege their true names and capacities if and when they are ascertained. The Town designates all other unknown persons or entities claiming any interest in the subject of this litigation as DOE defendants. The Town is informed and believes that each of the Defendants named as DOES 1 through 100 should be bound by the declarations sought herein.

### **Facts**

12. With this action the Town seeks a judicial declaration of its obligations under state law on how long “preliminary applications” for housing development projects are effective. A “preliminary application” under the Housing Crisis Act of 2019 allows a housing developer to submit certain specified information about a proposed housing project to a local agency in an abbreviated application, before applying for project approval. (Section 65941.1.) The primary effect of the preliminary application is that the proposed project becomes “vested” as to the local agency’s development standards, fees, and zoning rules that apply to the project when a complete preliminary application is submitted, with limited exceptions. (Section 65589.5(o).) Changes in those rules that might make the project more expensive or difficult are not permitted while the preliminary application is effective.

13. The preliminary application allows developers to “vest” housing projects very early in the planning process, when only conceptual plans have been prepared. The local agency’s rules in effect when a complete preliminary application is submitted remain applicable throughout the development review, even if local ordinances change later. Once a preliminary application is submitted with all required components, the developer gains “vested rights” to

1 develop the project according to the standards and fees that were in place at the time of  
2 submission. This is an extraordinary benefit for minimal effort, eliminating a substantial portion  
3 of the risk and uncertainty inherent in land use entitlement.

4 14. The Housing Crisis Act also requires that a project proponent must complete an  
5 application and move a project forward, or else lose vesting. To maintain the vesting conferred  
6 by the preliminary application, the development proponent must submit an application for  
7 approval of the housing development project under the Permit Streamlining Act (PSA) (Sections  
8 65940 *et seq.*, 65941, and 65943). The deadline for submitting the project application is 180  
9 calendar days after submitting a preliminary application that contains all of the statutorily-  
10 required information. (Section 65941.1(e)(1).) That section states:

11 (e)(1) Within 180 calendar days after submitting a preliminary application  
12 with all of the information required by subdivision (a) to a city, county, or  
13 city and county, the development proponent shall submit an application for  
14 a development project that includes all of the information required to  
process the development application consistent with Sections 65940, 65941,  
and 65941.5.

15 15. At issue in this declaratory relief action is the correct interpretation of Section  
16 65941.1(e)(2),<sup>2</sup> which states:

17 (e)(2) If the public agency determines that the application for the  
18 development project is not complete pursuant to Section 65943 [the Permit  
19 Streamlining Act], the development proponent shall submit the specific  
20 information needed to complete the application **within 90 days** of receiving  
the agency's written identification of the necessary information. **If the**  
**development proponent does not submit this information within the 90-**  
**day period, then the preliminary application shall expire and have no**  
**further force or effect.** (Emphases added.)

21 16. The Town, along with many other local agencies throughout the State, contend  
22 that, after the 180-day period to submit a complete application expires, this provision refers  
23 plainly to a single 90-day review period (**the** 90-day period) within which a project applicant  
24 must complete a preliminary application to maintain vesting. This provides an applicant with at  
25

26  
27  
28 <sup>2</sup> Formerly numbered Section 65941.1(d)(2); the pertinent section was renumbered effective  
January 1, 2025 when subdivision (b), related to fee estimates, was added to Section 65941.1.

1 least 270 days total to merely submit plans that include all items required by the local agency's  
2 application form before a preliminary application expires.

3 17. The Town is informed and believes, however, that the defendants contend that a  
4 preliminary application remains in effect so long as applicants re-submit an application found  
5 incomplete within 90 days after receiving a list of incomplete items—no matter how long the  
6 overall process takes, how little change is made in the plans, or how many notices of  
7 incompleteness the Town provides—allowing successive and unending 90-day periods after each  
8 incompleteness determination. Defendants have filed administrative appeals asserting this view.

9 18. The Town contends that allowing successive 90-day periods is not supported by  
10 the plain language of the statute, the context of the statute within the Housing Crisis Act and in  
11 relation to the PSA and HAA, nor by the legislative history, nor by the policy purposes of the  
12 Housing Crisis Act. Defendants' interpretation would allow an applicant to receive the benefits  
13 of vesting forever, without producing the housing that is the goal of these statutes, by filing a  
14 preliminary application and then submitting a development application within 180 days that  
15 omits required information. The applicant could then resubmit within 90 days after each  
16 successive incompleteness determination—all the while maintaining vesting indefinitely,  
17 burdening the community with developments to be considered based on outdated rules and fees  
18 that no longer recover the Town's costs to serve the development.

19 19. Defendants' interpretation finds no support in the statute or in the public policy  
20 behind the Housing Crisis Act, which was primarily intended to create certainty in the  
21 application process and allow project applicants to receive local agency approval with clarity  
22 about the rules to be followed, so that housing could be built more quickly, while also preserving  
23 local land use authority. Defendant's interpretation would allow the housing application process  
24 to drag on indefinitely, and reward applicants who merely want to maintain vested rights, with  
25 no intent to construct sorely needed housing. This encourages dilatory conduct by real estate  
26 speculators, not prompt housing construction.

27 20. Not only would Defendants' interpretation thwart the State's frequently  
28 articulated goal and policy of producing housing quickly, but it also would conflict with SB

330's legislative history. This legislative history supports the Town's position that, once the 180-day submittal period expires, Section 65941.1(e)(2) establishes a single 90-day period within which to supply any missing information. For example, the Author's Statement for the bill states:

The bill then requires the city to give project proponents a single list of all incomplete elements of the full application, and sets a new requirement that the project proponent respond with the additional information **within 90 days**. (Assembly Committee on Local Government, Committee Background Request at AP2-51; emphasis added.)

A true and correct copy of the Author's Statement is attached as Exhibit A to this Complaint.

21. Notably, SB 330's vesting provisions conferred an extraordinary benefit upon project proponents, by providing for vested rights with a minimum amount of effort. Before the enactment of SB 330, vested rights required much more: either a development agreement, which requires approval of an ordinance subject to referendum (Sections 65864 *et seq.*); completion of a vesting tentative map (Section 66498.5); or substantial construction in reliance on an approved building permit. (*Avco Community Developers Inc. v. South Coastal Reg'l. Comm'n.* (1976) 17 Cal.3d 785.) All of these required detailed plans and significant effort. SB 330 gave the same vested rights by requiring submission of only a conceptual application and minimal information about a proposed project—which could differ significantly from the eventual project application. Defendants' interpretation is unreasonable because it allows developers to maintain vesting indefinitely simply by resubmitting minor changes, with a constant resetting of the deadline, with no time limit whatsoever as to when vesting expires.

22. In arguing for an unlimited number of 90-day periods under Section 65941.1(e)(2), Defendants rely on that section's reference to Section 65943 of the Permit Streamlining Act. That section states:

Not later than 30 calendar days after any public agency has received an application for a development project, the agency shall determine in writing whether the application is complete and shall immediately transmit the determination to the applicant for the development project. If the application is determined to be incomplete, the lead agency shall provide the applicant with an exhaustive list of items that were not complete. That list shall be limited to those items actually required on the lead agency's submittal requirement checklist. In any subsequent review of the application determined to be incomplete, the local agency shall not request the applicant to provide any new information that was not stated in the initial list of items

1 that were not complete. If the written determination is not made within 30  
2 days after receipt of the application, and the application includes a statement  
3 that it is an application for a development permit, the application shall be  
4 deemed complete for purposes of this chapter. **Upon receipt of any**  
5 **resubmittal of the application, a new 30-day period shall begin, during**  
6 **which the public agency shall determine the completeness of the**  
7 **application.** (Emphasis added.)

8 23. Section 65943, unlike Section 65941.1, expressly states that resubmittals begin a  
9 new 30-day review period under the Permit Streamlining Act—not the Housing Crisis Act. If the  
10 Legislature had intended the 90-day period in Section 65941.1(e)(2) to reset on each  
11 resubmission in the latter statute, it could have easily included similar language. Yet it chose not  
12 to do so. Further, Section 65941.1 (e)(2)’s reference to Section 65943 is only with regard to an  
13 agency’s incompleteness determination, not with regard to resubmittals.

14 24. The Town is aware that HCD has taken the position that the 90-day period  
15 referred to in Section 65941.1(e)(2) restarts with each subsequent resubmittal by an applicant.  
16 The Town respectfully disagrees. Further, and crucially, this question of statutory interpretation  
17 is a matter for the courts to resolve, not HCD. HCD’s interpretation of the housing statutes is not  
18 binding on a court. (*Fonseca v. City of Gilroy* (2007) 148 Cal.App.4th 1174, 1192-1193;  
19 *Martinez v. City of Clovis* (2023) 90 Cal.App.5th 193, 243.)

20 25. In response to arguments by the Arya and Luxe developers that Section 65941.1’s  
21 90-day period resets following each resubmittal indefinitely, the Town sought the analysis of  
22 outside counsel. After a thorough analysis of the statute’s text, the statute’s context, legislative  
23 history, and relevant public policy, outside counsel’s conclusion was that the 90-day period in  
24 Section 65941.1(e)(2) does not reset after each resubmission indefinitely.

### 25 **The Arya Builder’s Remedy Project**

26 26. Arya submitted a preliminary application on November 14, 2023, for a project to  
27 be located at 15300 and 15330 Los Gatos Boulevard, Los Gatos. Arya contends that when it  
28 submitted the preliminary application, the Town had not yet adopted a Housing Element that  
substantially complied with state law. Arya argues that it is therefore entitled to take advantage



of the “Builder’s Remedy,” i.e., proceed with a project that does not comply with the Town’s General Plan and zoning ordinances.

27. The Builder’s Remedy may be available to a developer to excuse compliance with local plans and zoning if, when a “preliminary application” is filed, a city has not adopted a Housing Element in substantial compliance with state law. (Section 65589.5(d)(5).)

28. The Arya Builder’s Remedy application is for a project that greatly exceeds existing height limits, density, and other zoning standards for the property. Arya has proposed a project containing 175 units on 1.9 acres. The density of the proposed project exceeds 91 units per acre, on a site that is zoned at a density of 20 units per acre. The proposed height of the project exceeds 116 feet, on a site with a 35-foot height limit. The proposed project is nine stores high and is surrounded by one-story buildings and a single two-story building.

29. Arya did not submit its application for project approval until May 10, 2024, 178 days after submitting the preliminary application, or just under Section 65941.1(e)(1)’s 180-day deadline.<sup>3</sup> The Town responded with a letter dated June 5, 2024, determining the application to be incomplete under Section 65943. Arya submitted new plans to the Town on September 2, 2024—89 days later. The Town then issued a later incompleteness letter on September 25, 2024. The Arya resubmitted the application on November 27, 2024—63 days later. On December 23, 2024, the Town provided Arya with a determination of incompleteness, followed by a letter dated January 30, 2025, from the Town’s Community Development Director, notifying the applicant of the right to appeal the incompleteness determination. Arya has elected not to appeal the January 30, 2025 incompleteness letter. On February 7, 2025, the applicant submitted an appeal of the Town’s communication of its position that the preliminary application had expired because Arya’s application remained incomplete after a second resubmittal.

30. The Town contends that under Section 65941.1(e), the preliminary application has expired because more than 180 days have elapsed since Arya’s submittal of the formal

<sup>3</sup> The 180 days elapsed on a Sunday: May 12, 2024; Arya submitted the formal application the Thursday before the expiration date.

development application on May 10, 2024, and the application submitted on November 27, 2024 was not complete. The Town is informed and believes that Arya contends otherwise and contends that it is still entitled to the vesting conferred by the November 14, 2023 submittal of the preliminary application 16 months ago.

31. Because the parties have a good faith dispute over the interpretation of Section 65941.1(e)(2), and whether Arya’s preliminary application has expired and has no force and effect, the Town has suggested to Arya that the parties submit the issue to the court for resolution via this action for declaratory relief. The Town has offered to continue processing Arya’s application, while reserving its rights to take the position that Arya’s preliminary application has expired, depending upon the outcome of this action.

### **The Luxe Builder’s Remedy Project**

32. Los Gatos Boulevard Properties submitted a preliminary application on September 13, 2023, for a Builder’s Remedy project to be located at 14849 Los Gatos Boulevard, Los Gatos, known as “the Luxe Builder’s Remedy Project.” Los Gatos Boulevard Properties contends that, when it submitted the preliminary application, the Town had not yet adopted a Housing Element that substantially complied with state law. Los Gatos Boulevard Properties contends that it is therefore entitled to take advantage of the “Builder’s Remedy,” i.e., proceed with a project that does not comply with the Town’s General Plan and/or zoning ordinances.

33. The Luxe Builder’s Remedy application is for a project that greatly exceeds existing height limits, density, and other zoning standards for the property. The applicant has proposed 120 units on less than an acre. The proposed density is 133 units per acre, on a site that is zoned at a density of 20 units per acre. The proposed height of the project is 148 feet, six inches, including rooftop mechanical equipment shielding. Surrounding buildings range in height from 12 to 16 feet. The proposed project also includes approximately 21,000 square feet of commercial area.

34. Los Gatos Boulevard Properties did not submit its application for project approval until March 8, 2024 — 177 days later, barely within Section 65941.1(e)(1)’s 180-day deadline.

1 The Town responded with a letter dated April 3, 2024, determining the application to be  
2 incomplete under Section 65943. Los Gatos Boulevard Properties responded to the Town's April  
3 3, 2024, incompleteness letter on July 2, 2024—90 days later. The Town then issued a later  
4 incompleteness letter dated July 24, 2024. Los Gatos Boulevard Properties resubmitted the  
5 application on October 21, 2024—89 days later. On November 20, 2024, the Town provided the  
6 Los Gatos Boulevard Properties with a third incompleteness determination. On January 30, 2025,  
7 the Town's Community Development Director issued a letter notifying the applicant of the right  
8 to appeal the incompleteness determination. Luxe has elected not to appeal the January 30, 2025  
9 incompleteness letter. On February 7, 2025, the applicant submitted an appeal of the Town's  
10 communication of its position that the preliminary application had expired because Arya's  
11 application remained incomplete after a second resubmittal.

12 35. The Town contends that the preliminary application has expired under Section  
13 65941.1(e) because more than 180 days have elapsed since Los Gatos Boulevard Properties'  
14 submittal of the formal development application on March 8, 2024 and the application submitted  
15 on October 21, 2024 was not found to be complete. Los Gatos Boulevard Properties still has not  
16 provided the Town with all information about its project required under Section 65941.1. The  
17 Town is informed and believes that Los Gatos Boulevard Properties contends otherwise and  
18 contends that it is still entitled to the vesting conferred by the September 12, 2023 submittal of  
19 the preliminary application over 18 months ago.

20 36. Because the parties have a good faith dispute over the interpretation of Section  
21 65941.1(e)(2), and whether Los Gatos Boulevard Properties' preliminary application has expired  
22 and has no force and effect, the Town has suggested to Los Gatos Boulevard Properties that the  
23 parties submit the issue to the court for resolution via this action for declaratory relief. The Town  
24 has offered to continue processing the Luxe Builder's Remedy application, while reserving its  
25 rights to take the position that the Luxe preliminary application has expired, depending on the  
26 outcome of this action.

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28 ///

**Cause of Action for Declaratory Relief**

**(By the Town against all Defendants)**

37. The Town realleges and incorporates by reference the allegations contained in paragraphs 1 through 36, above.

38. An actual controversy has arisen between the Town on the one hand and Defendants on the other, in which the Town contends that Government Code Section 65941.1(e)'s reference to a 90-day period to submit a complete preliminary application refers to a single 90-day period, following expiration of the 180-day period to submit a complete application, to maintain vesting. The Town is informed and believes that Defendants contend that the preliminary application remains in effect so long as the applicants re-submit an application within 90 days after receiving a list of incomplete items—no matter how long this repeated process takes, how little change is made in the plans, or how many times the Town concludes the preliminary applications are incomplete—allowing successive and unending 90-day periods to submit revised preliminary applications, all the while maintaining the vesting effect of the original submission of the preliminary application.

39. The Town is entitled to a judicial declaration to establish the respective rights and duties of the parties with respect to the preliminary applications for the Arya and Luxe Builder's Remedy project applications, and whether those preliminary applications have expired. The Town contends that the preliminary applications for the Arya and Luxe Builder's Remedy applications have expired and that the applicants are no longer vested as to the Town's ordinances, policies, and standards in effect at the time the preliminary applications for the projects were submitted. The Town is informed and believes that Defendants contend otherwise. A judicial resolution of this controversy is necessary and appropriate because the Town has no adequate remedy at law to resolve the controversy described herein.

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**Prayer for Relief**

Wherefore, the Town prays for judgment as follows:

1. For a judicial declaration that Government Code Section 65941.1(e)'s reference to "the 90-day period" within which to submit specific information needed to complete a preliminary application refers to a single 90-day period;
2. For a judicial declaration that the preliminary applications for the Arya and Luxe Builder's Remedy applications have expired and that the applicants are no longer vested as to the Town's ordinances, policies, and standards in effect when they first submitted preliminary applications for their projects;
3. For costs of suit; and
4. For such other and further relief as the Court deems just and proper.

DATED: March 28, 2025

GOLDFARB & LIPMAN LLP

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# **EXHIBIT A**



## ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT

Cecilia M. Aguiar-Curry, Chair

### COMMITTEE BACKGROUND REQUEST

MEASURE: SB 330

AUTHOR: Senator Nancy Skinner

CONTACT: Katerina Robinson

PHONE: (916) 651-4009

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#### PLEASE ANSWER THE FOLLOWING QUESTIONS:

- Who is the **sponsor** of this bill? We need a letter on letterhead from the sponsor, identifying them as such.

Author bill

- What does existing law say?

Existing law allows local governments to approve or deny housing developments brought before them, and to set design standards for housing construction, but requires local governments to approve projects that satisfy their underlying general plan and zoning as long as those projects do not conflict with health and safety (Housing Accountability Act). The individuals in a city may also vote to constrain the property rights of other members of the city by restricting the power of the local government to make land use decisions – this is generally achieved through voter-imposed “slow growth” or “no growth” measures like housing moratoriums, population caps, limits on permits the city is allowed to issue, or requirements that upzoning or development outside urban growth boundaries be approved by a vote of the people.

Existing law further requires local governments to accept applications for housing projects from developers, deem those applications complete or incomplete, and once deemed complete, approve or deny the project within 180 days for regular projects and 90 days for affordable projects (Permit Streamlining Act). In cases where CEQA applies, the Permit Streamlining Act timelines for approval or denial of a project do not go into effect until after the conclusion of CEQA (*Eller Media v. Community Redevelopment Agency*, 2003 and *Schellinger Brothers v. City of Sebastopol*, 2009).



- What does the bill do?

SB 330 amends the Permit Streamlining Act to further streamline the permitting of new housing in California, and ensure fair and transparent project fees, zoning, and historic site designation. First, SB 330 creates an “initial application” which, when completed and submitted to the local government, would ensure that the rules in place at the time of the initial application’s submittal are applied to the development project. This is crucial to speeding up housing production because it ensures that the rules under which the project was designed are not changed mid-stream to invalidate the project or render the project unfinancable. SB 330 then requires a developer to submit a full application (required under existing law) within 180 days after submitting an initial application. The bill then requires the city to give project proponents a single list of all incomplete elements of the full application, and sets a new requirement that the project proponent respond with the additional information within 90 days. The city then deems the application complete and triggers the Permit Streamlining Act timeline to approve or deny projects. SB 330 shortens these timelines from 180 days down to 90 days for regular projects and from 90 to 60 days for affordable housing projects. A developer must then break ground within 2.5 years of pulling permits, or the locking of the rules at the time of initial application is void. (Chart attached to this backgrounder shows this permit process visually)

SB 330 additionally seeks to address anti-growth measures implemented in cities with the worst housing shortages by suspending them for a period of five years. This includes lifting housing moratoriums, population caps, and caps on the number of housing permits a city will put out annually, and preventing downzoning unless a local government simultaneously upzones to achieve “no net loss” in zoning. The bill also lifts, for five years, any voter-imposed requirement that a local government obtain a vote of the people or a supermajority vote of a government body to exercise its land use authority. SB 330 also reduces mandatory parking minimums for housing projects in these same cities, which can add significant cost to a project. Adding one above-ground parking spot costs \$27,000, just for construction, while an underground space runs around \$35,000, according to 2014 estimates by UCLA planning professor Donald Shoup, author of “The High Cost of Free Parking.”

Lastly, SB 330 includes anti-displacement measures to insure that low-income housing is not lost to new development and that tenants are rehoused at the developer’s expense while their units are being rebuilt.





- **Author's Statement** on need for the bill. [The analysis may quote the author's statement directly].

California is experiencing an extreme housing shortage. We now rank 49th in the number of housing units per capita and are home to 33 of the 50 US cities with the highest rents. SB 330 is designed to address our housing crisis by asking local governments to hold off on actions that would decrease or delay housing and to process permits for housing that is already allowed under their existing rules, but to do it faster and not change the rules once the housing application is submitted. By requiring timely processing of permits and relaxing a limited set of rules, SB 330 employs the same approach that cities have used to help recover from fires or other disasters. Lastly, to help keep tenants and low-income families in their homes, SB 330 also includes anti-displacement measures.

- Are you planning any amendments? If so, please briefly explain the substance of the amendments and provide a copy of what is being taken to Legislative Counsel to the Committee office. **PLEASE NOTE THE DEADLINES FOR AMENDMENTS LISTED BELOW.**
- Which stakeholders groups have you talked to about this bill?

American Planning Association  
 Association of CA Water Agencies (ACWA)  
 Bay Area Council  
 BRIDGE Housing  
 State Building and Construction Trades Council of CA  
 CA Association of Local Building Officials (CALBO)  
 CA Association of Sanitation Agencies (CASA)  
 CA Chamber of Commerce (CalChamber)  
 CA Housing Consortium  
 CA Rural Legal Assistance Foundation (CARLAF)  
 CA State Association of Counties (CSAC)  
 City of San Jose  
 City of San Francisco  
 City of Healdsburg  
 City of Encinitas



City of Los Angeles  
CBIA  
CA Association of Realtors  
CA Apartment Association  
Facebook  
Greenbelt Alliance  
The League of Cities  
Non-Profit Housing Association of Northern CA  
PICO  
Planning and Conservation League  
Rural County Representatives of CA  
Turner Center for Housing Innovation, UC Berkeley  
TMG Partners (Denise Pinkston)  
Western Center on Law and Poverty

(probably more – but these groups have given the most substantive feedback)

- Who is in support? Who is in opposition? Do you expect other supporters or opponents to weigh in that have not submitted a letter yet? **PLEASE NOTE DEADLINES FOR SUPPORT AND OPPOSITION LETTERS BELOW.**

Full list of support and opposition I've received at this time attached.

- How much time do you think will be necessary to consider this bill in the committee?

30 minutes

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**COMMITTEE DEADLINES.** Please be aware of the following deadlines:

**COMMITTEE BACKGROUND REQUEST.** The Committee background should be returned **no later than five (5) legislative days after delivery to the author's office** (*Committee Rule 1*). Please submit an electronic copy of the background sheet, along with any additional materials, to Debbie Michel, the consultant assigned to the bill, as well as Dixie Petty, the Committee Secretary; and, William Weber, Republican Caucus consultant. **The committee must be in receipt of this information before we can set the bill.**



**AMENDMENTS.** Author's amendments are due 12 calendar days prior to the hearing by 5:00 p.m. (signed original plus 4 copies), **along with a copy of the "In-Context Amendments."** Once the bill has been set, please confirm with staff what the exact deadlines are for that particular hearing date.

**LETTERS.** All support and opposition letters are due to the Committee **no later than 5:00 pm of the Thursday preceding the week of the hearing in order to be listed in the committee analysis.** To improve accuracy and reduce paper waste, we are requesting that all position letters be submitted electronically through the California Legislature Advocates Portal (<https://calegislation.lc.ca.gov/Advocates/>). It is your responsibility to ensure that the Committee has all letters by the Thursday deadline.

RETURN TO: ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT  
ROOM 157, 1020 N STREET (LOB) PHONE: 319-3958  
ATTENTION: DIXIE PETTY FAX: 319-3959

