



April 19, 2023

The Honorable Senator Janet Nguyen
1021 O Street, Room 7130
Sacramento, California 95814

RE: SB 576 (Nguyen) Local planning. General plans: land use element: military sites – OPPOSE

Dear Senator Nguyen:

The American Planning Association, California Chapter (APA California) write in regrettable opposition to your **SB 576**, which would require the legislative body of a city or county, upon any substantive revision of its land use element, to modify that element to prohibit high-density housing, as defined, from being built within a 5-mile radius of a military installation or other site deemed sensitive to national security by the United States Department of Defense.

APA California is a non-profit organization made up of practicing planners, citizens and public officials committed to advancing the practice of local, regional, and statewide planning throughout urban, suburban, and rural California. As adopted in APA California's Legislative Platform, *Plan California*, our organization is supportive of efforts to minimize constraints to housing production, including state policy constraints. Unfortunately, SB 576 runs counter to our policy and in turn creates more constraints to housing production.

While we understand from your office that the bill was introduced in response to concerns surrounding the security of local military bases and installations, SB 576 would require all jurisdictions throughout the state to update their General Plan to effectively ban "high-density housing", which is arbitrarily defined as three stories, from being developed within 5 miles of "a military installation or other site deemed sensitive to national security by the United States Department of Defense". We have the following concerns with this proposal:

- The proposed one-size-fits-all threshold of within 5 miles appears to be overly broad and excessive. We are unaware of any evidence suggesting that a distance threshold of this magnitude is necessary for security reasons.
- It's also unclear why only "high-density housing" would be banned, but not other types of housing. We are unaware of any evidence that suggests three-story buildings might pose greater security threats than single- or two-story housing types.
- The proposed ban in this bill would likely prevent communities that either contain or are within 5 miles of nearby military sites across the state from building affordable housing at modest densities that would otherwise be available to military service personnel and their families. Banning all new modestly dense housing in this way could force our military service personnel to have to find affordable housing in distant communities, requiring longer commutes from distant communities. Longer commutes are not only hard on family life but could also increase vehicle miles traveled and associated tailpipe emissions that are contrary to the State's air quality and climate goals.

Furthermore, we urge your consideration of existing guidance in the "California Advisory Handbook for Community and Military Compatibility Planning" (2016), which speaks to both the important consideration of providing adequate housing near military installations, as well as the need for flexible compatibility planning processes more broadly that are carried out already by local agencies and military agencies.



- On the topic of “Local Housing Availability” near military bases, the Guide states:

“Given personal choice to live off-base and DoD budget constraints, the military only provides on-base housing to a portion of the military personnel assigned to an installation. The remaining housing demand relies on adjacent communities to meet the needs of military personnel. Given the high cost of housing in California, and limited housing supplies in some areas, it may be difficult for military personnel to find affordable housing in neighboring communities.”

- On the topic of “Strategies and Tools for Improving Land Use Compatibility”, the Guide states:

“There is no guaranteed, “one size fits all” planning solution, strategy, or textbook example for how best to address land use compatibility issues between local jurisdictions and the military. Each of California’s cities and counties has unique perspectives and policies related to community development and growth objectives, and each military branch, installation, and asset has a unique mission, operational profile, and perspective on which land uses would or would not be compatible in specific locations and circumstances. Because of these varying and dynamic parameters and their role in defining the challenges at hand, compatibility planning typically requires a combination of approaches and each of them requires collaboration, creative implementation, and ongoing monitoring and maintenance to achieve success.”

As the State and local planning agencies combine efforts to face a severe housing crisis, we remain concerned that this proposal unnecessarily limits critically needed housing developments near military sites and absent more information that substantiates the need for these changes, APA California must respectfully oppose SB 576. If you have any questions, please contact Lauren De Valencia, Stefan/George Associates, APA California’s lobbyist, at 916 443-5301, lauren@stefangeorge.com.

Sincerely,

Erik de Kok, AICP
Vice President Policy and Legislation
APA California

cc: Senate Governance and Finance Committee
Senate Republican Caucus
The Governor
The Office of Planning and Research
The Department of Housing and Community Development