



American Planning Association
California Chapter

Creating Great Communities for All

April 16, 2025

The Honorable Matt Haney
California State Assembly
Chair, Assembly Housing and Community Development Committee
1021 O Street, Room, 5740
Sacramento, CA 95814

RE: AB 1294 (Haney) Planning and Zoning: Housing Development: Standardized Application Form – CONCERNS

Dear Assemblymember Haney:

The American Planning Association, California Chapter (APA California) must respectfully raise concerns on your AB 1294, which requires the Department of Housing and Community Development (HCD) to create a standardized housing entitlement application that all local governments throughout the state must accept as part of a housing application process.

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 that minimize constraints to housing production.

While we understand the intent behind the bill is to simplify the first step in the permitting process to make housing approvals process in a faster and more predictable way, there are some issues that we believe need to be addressed to ensure the bill would be implemented and have outcomes that are intended. As California continues to grapple with a severe housing crisis, planners are working hard at the local level to address these realities in their communities, while attempting to keep pace with several new laws enacted year over year. That said, planners also appreciate and benefit from predictability in the application process. As written, AB 1294 aims to shorten the front-end timeline for a jurisdiction to provide completeness review of an application (the intake process) but does not necessarily facilitate review of the project for consistency with the applicable standards and codes (processing the application and CEQA compliance). Such consistency review would likely require additional information and studies to be provided for after the application has already been deemed complete under this bill, which could void the time saved.

While we have several specific concerns that we've shared with your staff and ideas on how to resolve them, the key theme revolves around planners having enough information about the project and supporting documentation to determine the scope of the project, while also respecting that no one project is the same across jurisdictions and environmental conditions in a state as diverse as California. While some aspects of the bill as currently written, such as the prohibition on pre-application referrals, may help expedite the applicant's submittal, other prohibitions, such as for technical studies to be provided at intake, could serve to work against the applicant down the road because such information is needed to confirm the types of approvals or entitlements needed, as well as the required environmental clearance. We have shared with your staff ideas on information that we believe is necessary will make the entire application process work more efficiently from start to finish.

The other issue we would like to raise is the process by which HCD would develop a standardized application, which would be exempt from the Administrative Procedures Act rulemaking process. We believe planners and other impacted stakeholders, developers included, should be part of the process by which they will then need to work within. We would suggest that this provision be removed from the bill to allow for a transparent process to create a well-informed statewide standardized application.



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We would like to thank your staff from the Assembly Housing and Community Development Committee for their time in discussing these issues with our organization and our ongoing conversations. For all the reasons listed above, APA California remains concerned but hopeful that we can work to remove together and create a process that will be implemented as intended. If you have any questions, please contact our lobbyist, Lauren De Valencia, with Stefan/George Associates at lauren@stefangeorge.com.

A handwritten signature in blue ink, appearing to read 'Reuben Duarte'.

Reuben Duarte
Vice President Policy and Legislation
APA California

cc: The Assembly Local Government Committee
 The Governor's Office
 The Office of Land Use and Climate Innovation
 The California Department of Housing and Community Development