
SENATE COMMITTEE ON HOUSING
Senator Nancy Skinner, Chair
2023 - 2024 Regular

Bill No: AB 2560 **Hearing Date:** 6/18/2024
Author: Alvarez
Version: 4/24/2024
Urgency: No **Fiscal:** No
Consultant: Alison Hughes

SUBJECT: Density Bonus Law: California Coastal Act of 1976

DIGEST: This bill provides that any density bonus, concessions, incentives, or waivers of development standards, and parking ratios to which an applicant is entitled under density bonus law (DBL) are permitted, notwithstanding the Coastal Act, as long as the development is not located on specified environmentally sensitive sites in the coastal zone.

ANALYSIS:

Existing law:

- 1) Establishes the California Coastal Commission (CCC) in the California Natural Resources Agency.
- 2) Provides for the planning and regulation of development within the coastal zone.
 - a) A person planning to perform or undertake any development in the coastal zone is required to obtain a coastal development permit from the CCC or local government enforcing a local coastal program (LCP) certified by the CCC.
 - b) A LCP cannot be required to include housing programs and policies.
 - c) The coastal zone means the coastal land and waters of California, and includes the lands that extend inland generally 1,000 yards from the mean high tide line, as specified, with various exceptions including the San Francisco Bay.
 - d) Development means, among other things, the placement or erection of any solid material or structure on land or in water.

- 3) Provides that after certification of a local coastal program, an action taken by a local government on a coastal development permit application may be appealed to the CCC only for the following types of developments:
 - a) Developments approved by the local government within a specified distance of the sea.
 - b) Developments approved by the local government in specified tidelands submerged lands, public trust lands, and within 100 feet of a wetland, estuary, or stream, or within 300 feet of the top of the seaward face of a coastal bluff.
 - c) Developments approved by the local government located in a sensitive coastal resource area.
 - d) Any development approved by a coastal county not designated as the principal permitted use under the zoning ordinance or zoning district map.
 - e) A development which constitutes a major public works project or a major energy facility.
- 4) Defines “sensitive coastal resource area” as means those identifiable and geographically bounded land and water areas within the coastal zone of vital interest and sensitivity. “Sensitive coastal resource areas” include the following:
 - a) Special marine and land habitat areas, wetlands, lagoons, and estuaries as mapped and designated in Part 4 of the coastal plan.
 - b) Areas possessing significant recreational value.
 - c) Highly scenic areas.
 - d) Archaeological sites referenced in the California Coastline and Recreation Plan or as designated by the State Historic Preservation Officer.
 - e) Special communities or neighborhoods, which are significant visitor destination areas.
 - f) Areas that provide existing coastal housing or recreational opportunities for low- and moderate-income persons.
 - g) Areas where divisions of land could substantially impair or restrict coastal access.
- 5) Requires each city and county to adopt an ordinance that specifies how it will implement state DBL. Requires cities and counties to grant a density bonus when an applicant for a housing development --- defined as “five or more units” --- seeks and agrees to construct a project that will contain at least one of the following:
 - a) 10% of the total units of a housing development for lower-income households;

- b) 5% of the total units of a housing development for very low-income households;
 - c) A senior citizen housing development or mobile home park;
 - d) 10% of the units in a common interest development (CID) for moderate-income households;
 - e) 10% of the total units for transitional foster youth, veterans, or persons experiencing homelessness;
 - f) 20% of the total units for lower-income students in a student housing development; or
 - g) 100% of the units of a housing development for lower-income households, except that 20% of units may be for moderate-income households.
- 6) Requires a city or county to allow an increase in density on a sliding scale from 20% to 80%, depending on the percentage of units affordable to low- and very low-income households, over the otherwise maximum allowable residential density under the applicable zoning ordinance and land use element of the general plan. Requires the increase in density on a sliding scale for moderate-income for-sale developments from 5% to 50% over the otherwise allowable residential density.
- 7) Provides that the DBL does not supersede or in any way alter or lessen the effect or application of the Coastal Act, and requires that any density bonus, concessions, incentives, waivers or reductions of development standards, and parking ratios to which an applicant is entitled under the DBL be permitted in a manner consistent with the Coastal Act.
- 8) Pursuant to SB 35 (Wiener, Chapter 366, Statutes of 2017), allows for specified infill projects with specified percentages of units affordable to lower-income households to be developed in the Coastal Zone under the specified conditions.

This bill:

- 1) Deletes the provision that states that nothing in DBL supersedes or in any way alters or lessens the application of the Coastal Act of 1976 (the Coastal Act) and instead applies DBL in the coastal zone.
- 2) Provides that any density bonus, concessions, incentives, or waivers of development standards, and parking ratios to which an applicant is entitled under DBL are permitted, notwithstanding the Coastal Act, as long as the development is not located on a site in the Coastal Zone that is:

- a) Between the sea and the first public road paralleling the sea, or within 300 feet of the inland extent of any beach or of the mean high tideline of the sea where there is no beach, whichever is the greater distance;
- b) On tidelands, submerged lands, public trust lands, within 100 feet of any wetland, estuary, or stream, or within 300 feet of the top of the seaward face of any coastal bluff;
- c) In a sensitive coastal resource area;
- d) Not subject to a certified local coastal program;
- e) Vulnerable to five feet of sea level rise;
- f) Not zoned for multifamily housing;
- g) On or within a 100-foot radius of a wetland; or
- h) On prime agricultural land.

COMMENTS:

- 1) *Author's statement.* "The Coastal Zone is one of the most expensive housing markets in the country, rendering it unaffordable for the vast majority of Californians, including service workers who make the coastal economy possible. The ballooning housing costs is a direct result of not building enough housing to meet the demand. As a state program that has proven successful in creating more market rate and affordable housing across the state, Density Bonus Law serves as an important tool to resolve the severe housing shortage in our coastal areas. Density Bonus Law only applies in areas already zoned residential and allows developers to build additional units above the zoned amount in exchange for a certain percentage of income-restricted units. This ensures areas already zoned for housing are building more units than they would have otherwise while also dedicating a portion of them for moderate, low, and very-low income earners. AB 2560 utilizes this important housing tool with additional exemptions for areas with sensitive natural or environmental resources to guarantee we balance the need to build more housing with protecting our coast as a valuable resource."
- 2) *California's housing and homelessness crisis.* California has the largest concentration of severely unaffordable housing markets in the nation; the typical home value in California reached \$747,400 in September 2023, a one percent decrease from the same month last year, but still far exceeding the national typical home value of \$349,500. The lack of supply is the primary factor underlying California's housing crunch. The state Department of Housing and Community Development (HCD) estimates that California needs to build 220,000 new homes a year to keep up with current population growth.

To keep up with demand, HCD estimates that California must plan for the development of more than 2.5 million homes over the next eight years, and no less than one million of those homes must meet the needs of lower-income households (more than 640,000 very low-income and 385,000 low-income units are needed). Additionally, the lack of affordable housing is the single biggest contributor to homelessness. This is because as housing costs continue to rise, rent becomes less affordable for lower-income households, who are forced to live beyond their means (paying more than 30% of income on housing costs) or are pushed out of their homes, leading to rapid increases in homelessness.

- 3) *Housing permitting generally.* Cities and counties enact zoning ordinances to implement their general plans. Zoning determines the type of housing that can be built throughout a jurisdiction. Before building new housing, housing developers must obtain one or more permits from local planning departments and must also obtain approval from local planning commissions, city councils, and/or county board of supervisors. Most housing projects that require discretionary review and approval are subject to review under CEQA, while projects permitted ministerially generally are not. Development opponents can appeal many individual decisions related to the CEQA review to the planning commission and to the city council or board of supervisors. Finally, litigation over approvals is also common. The building industry points to environmental reviews and other permitting hurdles as a hindrance to housing development. They argue that the high cost of building and delays in the approval process reduce builders' incentives to develop housing.
- 4) *Developing in the coastal zone.* The Coastal Act outlines standards for development in the coastal zone including specific policies addressing shoreline public access, recreation, protection of habitats, development design, among other things. Local governments within the coastal zone can adopt a local coastal plan (LCP). LCPs generally contain the rules for development and protection of coastal resources and basic planning tools used by the local government. Each LCP contains a land use plan and implementing measures (such as zoning and maps), some of which are subjective standards (such as requirements around design or community character), some of which are objective standards.

In order for the local government to have primary jurisdiction over development permitting in the coastal zone, however, the LCP must be approved by the California Coastal Commission (CCC). Once the LCP is approved by the CCC, the local government assumes permitting authority over local developments, including housing, and the LCP is considered to be an extension of the Coastal Act. About 73% of local jurisdictions in the coastal zone have approved LCPs.

In the remaining jurisdictions (*i.e.*, those that do not have an approved LCP), coastal development permits (CDPs) are issued by the CCC directly. Additionally, permitting decisions made by a local government with an approved LCP can be appealed directly to the CCC under specified circumstances. In reviewing the permit, CCC generally must defer to those standards outlined in the LCP.

- 5) *DBL: An affordable housing creator without subsidies.* Given California's high land and construction costs for housing, it is extremely difficult for the private market to provide housing units that are affordable to low- and even moderate-income households. Public subsidy is often required to fill the financial gap on affordable units. DBL allows public entities to reduce or even eliminate subsidies for a particular project by allowing a developer to include more total units in a project than would otherwise be allowed by the local zoning ordinance, in exchange for affordable units. Allowing more total units permits the developer to spread the cost of the affordable units more broadly over the market-rate units. The idea of DBL is to cover at least some of the financing gap of affordable housing with regulatory incentives, rather than additional subsidy.

Under existing law, if a developer proposes to construct a housing development with a specified percentage of affordable units, the city or county must provide all of the following benefits: a density bonus; incentives or concessions (hereafter referred to as incentives); waiver of any development standards that prevent the developer from utilizing the density bonus or incentives; and reduced parking standards. To qualify for benefits under DBL, a proposed housing development must contain a minimum percentage of affordable housing. If one of these options is met, a developer is entitled to a base increase in density for the project as a whole (referred to as a density bonus) and one regulatory incentive. Under DBL, a developer is entitled to a sliding scale of density bonuses, up to a maximum of 50% of the maximum zoning density and up to four incentives, as specified, depending on the percentage of affordable housing included in the project. At the low end, a developer receives 20% additional density for 5% very low-income units or 20% density for 10% low-income units. The maximum additional density permitted is 50%, in exchange for 15% very low-income units or 24% low-income units. Additionally, specified 100% affordable housing projects may receive up to an 80% density bonus. The developer also negotiates additional incentives, reduced parking, and design standard waivers, with the local government. This helps developers reduce costs while enabling a local government to determine what changes make the most sense for that site and community.

According to supporters of this bill, DBL policies in jurisdictions who have embraced its provisions have found substantial use by housing developers, and lead to the production of many deed-restricted affordable homes. DBL also tends to be used in high opportunity areas and near public transit, which helps reverse racist land use practices and further the states climate goals.

- 6) *History of DBL in the Coastal Zone.* Two key pieces of legislation passed in the early 2000s informed more recent interactions between DBL and the Coastal Act.
- a) *AB 1866 (Wright, Chapter 1062, Statutes of 2002)*, made numerous changes to state DBL and state law relating to second units. One of the provisions of DBL added by AB 1866 is that the granting of a concession or incentive shall not require or be interpreted, in and of itself, to require an LCP amendment. It also added the section of law this bill seeks to amend—Government Code Section 65915(m)—providing that DBL does not supersede or in any way alter or lessen the effect or application of the Act.

AB 1866 was opposed by the Commission until August 6, 2002, shortly after amendments taken in the Senate added, among other provisions, what is now Government Code Section 65915(m). Prior to that amendment, in the Commission's opposition letter to the Senate Housing Committee, it stated "...[t]he Commission has historically taken the position that housing density bonus ordinances need to be consistent with other LCP and Coastal Act policies, and therefore should be formally amended into any applicable LCP." The Commission's August 7, 2002 letter to the author of AB 1866 states that the Commission voted to remove its opposition and take a neutral position on the bill because "the most recent amendments clarify that nothing in the bill is meant to supersede or lessen the application of the Coastal Act policies..." The Assembly Concurrence in Senate Amendments analysis, which appears to be the only legislative analysis of AB 1866 that directly addresses this amendment, describes the amendment as "[p]rovid[ing] that the requirements of the California Coastal Act shall not be superseded by any of the provisions in this measure."

- b) *SB 619 (Ducheny, Chapter 793, Statutes of 2003)*, made several changes to laws relating to the development of affordable housing, including requiring the Commission to encourage housing opportunities for low- and moderate-income households. It also provided that the Commission may not take measures that reduce the density of a housing project below the level allowed by local zoning ordinances and state DBL unless the Commission makes a finding that there is no feasible method to accommodate the density

without creating a significant adverse impact on coastal resources. This Committee's analysis noted that the “author asserts that in spite of overwhelming need, many communities continue to resist new housing development, especially multifamily housing and higher density housing.” According to the Senate Natural Resources Committee analysis, “California coast cities, with the current rate of growth, will have to support more housing. From an environmental perspective, coastal areas should consider increasing housing density and affordability...Affordable housing projects developed in coastal areas, as long as they are consistent with LCPs, are an environmental bonus, not a detriment.”

- 7) *Recent litigation and legislation affecting DBL in the coastal zone.* In 2013, City of Los Angeles planning officials approved a proposed residential development in the Venice area. The project would have involved tearing down a two-story, three-unit apartment building and replacing it with a 15-unit housing development including five duplexes and five single-family homes. Pursuant to DBL, the developer was allowed to exceed the normal density restrictions for that location because two of the units would have been designated for very low-income households. DBL also entitled the developer to other zoning concessions, including a height variance. The City approved the project’s vesting tentative tract map, including findings that the project complied with the City’s General Plan as well as the Venice Specific Plan, and also approved a CDP under the Act.

In September 2013, a neighborhood group appealed the planning department’s development approvals, including the CDP: *Kalnel Gardens, LLC v. City of Los Angeles* (3 Cal.App.5th 927 (2016)). The residents argued the project violated the Act because its height, density, setbacks, and other visual and physical characteristics were inconsistent with the existing neighborhood. The Planning Commission found that the development did not conform to the Act because its size, height, bulk, mass, and scale were incompatible with and harmful to the surrounding neighborhood and because the setbacks were too small. The developer appealed the Planning Commission's decision to the City Council, which denied the appeal.

The developer then brought an administrative mandate action against the City, alleging that it had violated DBL (among others). The trial court found that the density bonus, height and setback variations initially approved for the project were proper under the housing density statutes and other City zoning plans and regulations, including the Commission-approved Venice Land Use Plan. However, the trial court found that the housing density statutes were subordinate to the Act and that substantial evidence supported the Planning

Commission’s findings that the project violated the Act because it was visually out of step with the surrounding coastal community.

The developer appealed, and the appellate court affirmed the trial court's decision, holding that that state DBL is subordinate to the Act and that a project that violates the Act as the result of a density bonus may be denied on that basis. The court noted that “the Legislature appears to have struck a balance” between the Act and DBL “by requiring local agencies to grant density bonuses *unless doing so would violate the [Act].*” (emphasis added)

In 2018, AB 2797 (Bloom, Chapter 904), further clarified the law in response to *Kalnel Gardens, LLC* to provide that any density bonus, concessions, incentives, waivers or reductions of development standards and parking ratios to which the applicant is entitled under density bonus law shall be accommodated, but in a manner that harmonizes DBL and the portions of the Act relating to Coastal Resources Planning and Management Policies.

- 8) *Recent land use reforms that facilitate more housing supply.* A variety of causes have contributed to the lack of housing production, including: (a) restrictive zoning ordinances such as single family zoning and restrictions on development intensity, (b) local permitting processes that provide multiple avenues to stop a project, and (c) fiscal incentives associated with development decisions. These issues pose challenges to constructing multifamily market-rate and affordable housing developments alike. Given the complexities of developing housing in California, and in particular multifamily housing, the Legislature and Governor have passed over 150 bills since 2016 in an effort to facilitate more housing production. One such set of reforms have included expediting and simplifying the approval process at the pre-entitlement, entitlement, and post-entitlement phases, including creating multiple pathways for by-right approvals for multifamily housing developments.

Clear timelines for affordable housing permitting is particularly critical as affordable developers often require between eight and 12 different sources of funding to make an affordable housing development pencil financially, and any delays risk the loss of available public funds.

- 9) *Impacts of land use decisions on affordable housing in the coastal zone.* California’s high—and rising—land costs necessitate dense housing construction for a project to be financially viable and for the housing to ultimately be affordable to lower-income households. However, a 2016 Legislative Analyst’s Office (LAO) analysis found that the housing density of a typical neighborhood in California’s coastal metropolitan areas increased only by *four percent* during the 2000s. The LAO also compared California’s coastal

areas to similar metropolitan areas across the country and found that new housing constructed during the 2000s in California's coastal cities was nearly 30% less dense on average than new housing in other comparable cities—10 units/acre in California compared to 14 units/acre in the other metropolitan areas.

The consequence of these land use restrictions is that housing production has not kept up with the increase in population in many parts of California, and especially in the coastal zone. Land use restrictions that limit density also have various negative consequences, such as increased displacement and segregation, as well as lower economic growth. These impacts are seen directly through the demographics of those living in the coastal zone, as California coastal communities are on average wealthier and less diverse than the state as a whole. Within 1km of coastal access, there are roughly 25% more white people, while at the same time there are 52% fewer Hispanic or Latino people, 60% fewer Black or African American people, 57% fewer American Indians, and 18% fewer households below the poverty line as compared to their population predicted by a proportionate distribution. Coastal residents earn on average 20% more than the state average income, and on average, people from low-income communities and communities of color must travel further to access the social, economic, scenic, and health benefits of the coast.

Given this correlation, increasing housing equity – *i.e.*, housing density – in the coastal zone is essential to fulfilling the Coastal Act's goal of maximizing public access to and along the coast, as well as the State's goal of advancing environmental justice and equality.

- 10) *What's the bottom line?* As noted above in Comment 5, DBL was created and recently reformed as a means to provide regulatory flexibility to market rate developers to encourage the construction of below market rate units without government subsidies. However, presently, in the coastal zone – an area disproportionately impacted by the housing crisis and prone to exclusionary land use decisions that limit multifamily housing developments – developers continue to struggle to utilize the benefits of density bonus to deliver critically needed housing units.

According to the author, the benefits of DBL have been significantly reduced due to the California Coastal Commission's interpretation of the "harmonization" between DBL and the Act. For example, one project was challenged to the Coastal Commission for using incentives to exceed local height requirements. Staff determined the project to be "not consistent with the community character of the surrounding area" because the project was 41 feet,

which was “significantly larger than the surrounding residences,” which did not exceed 30 feet. One project faced “substantial issue” based on eligibility for reductions in parking to meet coastal access requirements under the Act.

Given the high costs of developing in the coastal zone and zoning limitations that are prevalent in the coastal zone, the limiting the utility of DBL in the coastal zone is a lost opportunity to facilitate the construction of mixed income projects by reducing costs through parking maximums and modest height increases.

This bill would amend DBL to instead apply DBL in the Coastal Zone notwithstanding the Coastal Act. Instead, a developer would be entitled to the benefits of density bonus law, including concessions and incentives, density bonuses, and parking limitations unless the development is located on a site that is with a certain distance of the sea; within specified environmentally sensitive areas or sensitive coastal resource areas; an area not subject to a certified local coastal program; vulnerable to five feet of sea level rise. Additionally, the project must be on a site zoned for multifamily housing (*i.e.*, not single family).

There is precedent for allowing multifamily housing projects on specified sites in the coastal zone, as these provisions are substantially similar to language signed into law on January 1, 2024 by SB 423 (Wiener, Chapter 778, Statutes of 2024); that bill expanded SB 35 (Wiener) by allowing for by-right development on sites in the coastal zone that local jurisdictions have identified, through their zoning, as appropriate for housing. Key differences between the application of SB 423 in the coastal zone and this bill are that this bill also does not apply in areas designated by a local government to be a sensitive coastal resource area nor does it apply to areas with just a certified land use plan, rather than a local coastal plan.

As noted above, certainty in the permitting process can be the key to success for a housing developer, and in particular for affordable housing development. Conversely, an uncertain timeline or risk of delays can mean increased costs or even the loss of state funding for affordable housing projects. In other words, delays – or even threats of delays – can kill projects entirely. According to the author and sponsors, uncertainty in this process has presented challenges for developers seeking to build denser, multifamily housing projects in the coastal zone. The committee has heard from over a dozen housing developers – both for and non-profits alike – expressing longstanding challenges developing in the coastal zone. Some of the reasons include high land costs, few sites zoned for multifamily development, local opposition, and challenges with local approval processes; others, however, include the mere risk of project appeals to the CCC, delays in appellate review at the CCC, or in circumstances in which the CCC

hold primary jurisdiction, the need to obtain an initial coastal development permit. As noted above, developers of 100% affordable housing projects are particularly risk adverse given the myriad of funding sources and regulatory processes they have to navigate to make a project “pencil-out.” Several affordable housing developers have communicated to the Committee that they do not even attempt to develop in the coastal zone given the uncertainty in timelines for development approvals and application of DBL.

- 11) *Let’s be clear.* The intent of the author and the text of the bill provide that density bonuses, concessions, *etc.*, “shall be permitted” notwithstanding the Coastal Act. In other words, the bill does not eliminate the permitting process. This is because a density bonus project in the coastal zone would still require a coastal development permit (CDP) so long as a permit is consistent with what the applicant is entitled to under DBL. Additionally, LCP requirements that are outside the scope of the requested density bonus, concessions, *etc.* could still be enforced. The CCC and many environmental groups who oppose this bill, however, state that the bill text allows for density bonus projects in the coastal zone to be exempt from the CDP process. *Moving forward, the author may wish to clarify the intent of the bill, which is to require a CDP for density bonus projects in the coastal zone pursuant to the parameters under this bill, so long as the authorization of the permit does not deny or reduce any density bonus, concessions, incentives, waivers or reductions or development standards, or parking ratios to which the applicant is entitled under this section.*
- 12) *If at first you don’t succeed.* In 2023, AB 1287 (Alvarez, Chapter 755), was approved by the Assembly Housing and Community Development Committee with language that would apply DBL to the Coastal Act without limitation. AB 1287 was subsequently amended in the Assembly Committee on Natural Resources to remove that provision. The bill was signed into law without that provision.
- 13) *Opposition.* In addition to the concerns noted above in Comment 11, the California Coastal Commission (CCC) and local governments are opposed to the bill, stating that environmentally sensitive habitat areas do not receive adequate protections under the bill. The CCC provides that the solution to the housing crisis is to “incorporate affirmative policies into LCPs designed to facilitate housing production.” They allege that this bill “could be used to build in coastal areas projected to experience significant sea level rise, as well as in locations containing sensitive habitat, public coastal accessways, or other resources that would otherwise be addressed through Coastal Act compliance.” A coalition of state and national environmental groups are opposed unless amended for similar reasons to the CCC, but in discussions with the committee,

note they would rather this bill seek an alternative method of encouraging housing.

- 14) *Double referral.* This bill was also referred to the Natural Resources and Water Committee.

RELATED LEGISLATION:

SB 423 (Wiener, Chapter, Statutes of 2023) — expanded upon SB 35 (Wiener) by allowing for by-right development in certain portions the coastal zone on sites that local jurisdictions have identified, through their zoning, as appropriate for housing.

AB 1287 (Alvarez, Chapter 755, Statutes of 2023) — Required a city, county, or city and county to grant additional density and concessions and incentives if an applicant agrees to include additional low or moderate income units on top of the maximum amount of units for lower-, very low-, or moderate-income units.

FISCAL EFFECT: Appropriation: No Fiscal Com.: No Local: No

POSITIONS: (Communicated to the committee before noon on Wednesday, June 12, 2024.)

SUPPORT:

California Housing Partnership Corporation
California Rural Legal Assistance Foundation, INC.
California School Employees Association
East Bay YIMBY
Grow the Richmond
Housing Action Coalition
Housing California
How to ADU
Mountain View YIMBY
Napa-Solano for Everyone
Northern Neighbors
Peninsula for Everyone
People for Housing Orange County
Progress Noe Valley
Public Interest Law Project
San Diego Regional Chamber of Commerce
San Francisco YIMBY

San Luis Obispo YIMBY
Santa Cruz YIMBY
Santa Rosa YIMBY
South Bay YIMBY
Southside Forward
Streets for People
Urban Environmentalists
Ventura County YIMBY
Western Center on Law and Poverty
YIMBY Action

OPPOSITION:

Azul
California Coastal Commission
California Coastal Protection Network
California Coastkeeper Alliance
California Contract Cities Association
California Cultural Resources Preservation Alliance, INC.
California Environmental Voters
California Native Plant Society
California River Watch
Canyon Back Alliance
Center for Biological Diversity
Chiatri De Laguna Farm
City of Carlsbad
City of Del Mar
City of Hermosa Beach
City of Manhattan Beach
City of Oceanside
City of Rancho Palos Verdes
City of Redondo Beach
City of Solana Beach
City of Torrance
Cleaneearth4kids.org
Defenders of Wildlife
Endangered Habitats League
Environment California
Environmental Action Committee of West Marin (EAC)
Environmental Center of San Diego
Environmental Defense Center
Forest Unlimited

Friends of Harbors, Beaches and Parks
Gaviota Coast Conservancy
Green Foothills
Humboldt Waterkeeper
Idle No More SoCal
Livable California
Los Cerritos Wetlands Land Trust
Natural Resources Defense Council
North Coast Rivers Alliance
Orange County Coastkeeper
Our City SF
Pacific Palisades Community Council
Planning and Conservation League
Protect Ballona Wetlands
Puvunga Wetlands Protectors
Resource Renewal Institute
San Francisco Bay Physicians for Social Responsibility
Santa Clara Valley Audubon Society
Save Lafayette
Save the Sonoma Coast
Smith River Alliance
SoCal 350 Climate Action
Southern California Watershed Alliance
Surfrider Foundation
The Climate Center
Watershed Alliance of Marin
West Sonoma County Alliance

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