



May 13, 2020

The Honorable Robert Rivas  
Member, California State Assembly  
State Capitol, Room 5158  
Sacramento, CA 95814

**Re: AB 3155 (Rivas): Subdivision Map Act: streamlined approval process  
As Amended on May 12, 2020 – Notice of Concerns  
Set for hearing in Assembly Housing and Community Development May 20, 2020**

Dear Assembly Member Rivas,

The California State Association of Counties (CSAC) and the Urban Counties of California (UCC) write to share our concerns with your AB 3155, which would apply SB 35 streamlining provisions to qualifying subdivision projects, as well as create a ministerial process for approval of subdivisions of up to ten lots in the Subdivision Map Act.

We are concerned that this bill undermines one of the core premises of SB 35, which applies a streamlined ministerial process to qualifying development applications, but only when development in a jurisdiction lags behind planned allocations in specified income categories, or a local government fails to submit their housing element annual progress report. This bill adds a streamlining requirement for qualifying market-rate subdivisions regardless of whether development in the city or county has exceeded planned allocations for market-rate housing.

The Subdivision Map Act exists to ensure orderly development, including necessary improvements to protect public health and safety. We are concerned that overlaying the new ministerial map provisions with the SB 35 streamlining process could create unintended consequences that could hinder the ability of counties to ensure compliance with local standards and completion of necessary improvements. Moreover, since AB 3155's map act provisions are not limited to qualifying infill sites in urbanized areas, we want to ensure that appropriate local standards are already in place and can be enforced through this new ministerial process, especially since there is no sunset date for these provisions.

We look forward to working with you to address the aforementioned concerns. Should you have any questions about our position, please do not hesitate to contact Christopher Lee (CSAC) at [clee@counties.org](mailto:clee@counties.org) or Jean Kinney Hurst (UCC) at [jkh@hbeadvocacy.com](mailto:jkh@hbeadvocacy.com).

Sincerely,

Handwritten signature of Christopher Lee in black ink.

Christopher Lee  
California State Association of Counties

Handwritten signature of Jean Kinney Hurst in black ink.

Jean Kinney Hurst  
Urban Counties of California

cc: The Honorable David Chiu, Chair, Assembly Housing and Community Development Committee  
Members, Assembly Housing and Community Development Committee  
Steve Wertheim, Consultant, Assembly Housing and Community Development Committee  
William Weber, Consultant, Assembly Republican Caucus