



June 14, 2024

The Honorable Juan Carrillo, Chair  
Assembly Local Government Committee  
1021 O Street, Suite 4320  
Sacramento, CA 95814

Re: **SB 1134 (Caballero): Surplus land**  
**As amended 6/10/24 – SUPPORT IF AMENDED**  
**Set for hearing 6/19/24 – Assembly Local Government Committee**

Dear Assembly Member Carrillo:

On behalf of Urban Counties of California (UCC), Rural County Representatives of California (RCRC), California Special Districts Association (CSDA), California Association of Sanitation Agencies (CASA), and the California State Association of Counties (CSAC), we write to express our position of “support if amended” on Senate Bill 1134, which would delete the statutory exemption from the Administrative Procedure Act (APA) for the California Department of Housing and Community Development (HCD) to administer the Surplus Lands Act (SLA). Local agencies continue to be challenged by implementation of carefully negotiated language in the Surplus Lands Act in numerous bills over the last five years. Requiring HCD to utilize the APA process will provide important opportunities for stakeholder input in the spirit of transparency, clarity on the law, and improved understanding of implementation procedures.

Counties, cities, and special districts have worked in good faith to address legislative concerns about use of the SLA, including clarifying statutory definitions of “exempt surplus lands”. As a result, we are concerned about a proposed amendment to Section 54222.3 in the current version of the bill that suggests that HCD has authority to regulate the disposal of exempt surplus lands via utilizing the APA. We understand that this language was an inadvertent drafting error that will be corrected in a future version of the measure and appreciate the author’s responsiveness to our concerns.

To that end, we respectfully urge your “aye” vote on SB 1134 if the bill is amended to remove the new language included in Section 54222.3. Please contact us if you have any questions about our position.

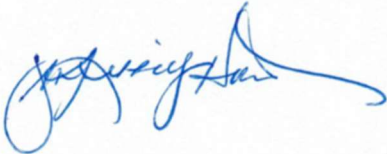
Sincerely,



Aaron Avery  
California Special Districts Association



Mark Neuberger  
California State Association of Counties



Jean Kinney Hurst  
Urban Counties of California



Tracy Rhine  
Rural County Representatives of California



Jessica Gauger  
California Association of Sanitation Agencies

cc: Members and Consultants, Assembly Local Government Committee  
The Honorable Anna Caballero, California State Senate