

Date of Hearing: March 23, 2026

ASSEMBLY COMMITTEE ON NATURAL RESOURCES

Isaac G. Bryan, Chair

AB 2051 (Wicks) – As Introduced February 18, 2026

**SUBJECT:** Public resources: Coastal Resilience Permitting Working Group

**SUMMARY:** Requires the Secretary of the Natural Resources Agency (NRA), in consultation with the Secretary for Environmental Protection (CalEPA), to convene a Coastal Resilience Permitting Working Group (Working Group) for the purpose of developing a Coastal Resilience Permitting Roadmap (Roadmap) for coastal resilience projects proposed along the California coast and in the San Francisco Bay, and in and adjacent to state and federal waters.

**EXISTING LAW:**

- 1) Establishes the California Coastal Act of 1976 (Coastal Act), establishes the California Coastal Commission (Coastal Commission), and prescribes the membership and duties of the Coastal Commission. (Public Resources Code (PRC) 30301)
- 2) Establishes the San Francisco Bay Conservation and Development Commission (BCDC) to regulate the San Francisco Bay and the first 100 feet inland from the shoreline around the Bay. (Government Code (GC) 66620)
- 3) Pursuant to the Permit Streamlining Act (GC 65920-65923.8), which applies to all public agencies:
  - a) States that there is a statewide need to ensure clear understanding of the specific requirements which must be met in connection with the approval of development projects and to expedite decisions on such projects.
  - b) Provides specified timeframes by which a public agency that is the lead agency for a development project is required to approve or disapprove a project.
  - c) Requires any public agency to determine in writing whether an application is complete within 30 days of receiving the application for a development project. Establishes iterative processes and timelines for reviewing complete applications.
  - d) Requires, upon final approval of a housing development project, a city, county, or city and county to provide the development proponent with an itemized list and a good faith estimate of the total sum amount of all fees and exactions that will apply to the project within 30 business days.

**THIS BILL:**

- 1) Requires the Secretary of NRA, in consultation with the Secretary for CalEPA, to convene a Working Group for the purpose of developing a Roadmap for coastal resilience projects proposed along the California coast and in the San Francisco Bay, and in and adjacent to state and federal waters.

- 2) Requires the Working Group to consist of representatives from federal, state, and local agencies, including, but not limited to, representatives from all of the following entities:
  - a) The Coastal Commission;
  - b) CalEPA;
  - c) The California Regional Water Quality Control Boards, San Francisco Bay, North Coast, and Central Coast (regional water boards);
  - d) The Department of Fish and Wildlife (CDFW);
  - e) The Governor's Office of Land Use and Climate Innovation;
  - f) NRA;
  - g) The Ocean Protection Council (OPC);
  - h) BCDC;
  - i) The State Coastal Conservancy (SCC);
  - j) The State Historical Resources Commission;
  - k) The State Lands Commission;
  - l) The State Office of Historic Preservation; and,
  - m) The State Water Resources Control Board (SWRCB).
- 3) Requires development of the Roadmap to incorporate, but not delay, progress to advance responsible permitting and development of coastal resilience projects.
- 4) Requires, on or before January 1, 2028, the Secretary of NRA to submit the Roadmap to the Governor and the relevant fiscal and policy committees of the Legislature. Sunsets this requirement on January 1, 2032.
- 5) Requires the Roadmap to include, at a minimum, recommendations that address all of the following:
  - a) Administrative reforms that can be implemented by state agencies within their existing authority to improve permit issuance timelines, including all of the following:
    - i) Streamlining the process for determinations that applications are complete, including limits on additional information requests and timelines for initial and successive reviews;
    - ii) Unified applications with a predictable sequence and timeline of permitting information requests and interagency reviews;

- iii) An interagency project management team for multiagency permitting, modeled on the Bay Restoration Regulatory Integration Team;
  - iv) Methods to standardize compensatory mitigation across agencies, including use of engineering with nature features to enable projects to self-mitigate and a de minimis fill policy that allows de minimis fill within defined thresholds without the need to mitigate;
  - v) Delegating permit issuance to executive officers or using consent calendars when commission or board action is required by law;
  - vi) Expanded use of regional general permits and programmatic agreements for known categories of coastal resilience projects;
  - vii) Process improvements that allow for permit approval earlier in the design process, and for subsequent design changes arising from field conditions and in-depth engineering analysis; and,
  - viii) Standard measures that can be applied to pile driving and fill placement techniques, and other practices that are known to safeguard marine resources, including the types of conditions under which these measures should be utilized and can be scaled to varying project scope and footprint.
- b) A state process to align agency mitigation requirements and enable in-lieu fees or advance mitigation through which applicants can contribute funding to eligible restoration or mitigation initiatives, thereby avoiding temporal loss of habitat and associated increased mitigation requirements, and reducing the need for individual applicants to develop and implement project-specific compensatory mitigation projects.
  - c) Legislative reforms that can further accelerate permitting for projects that increase coastal resilience, with a focus on current legislative requirements that result in extensive analysis that could be avoided by application of standardized compensatory mitigation, advance mitigation, or standard construction practices.
  - d) If needed to test alternative approaches, a coastal resilience project pilot program along with any required legislative authorizations to evaluate the effectiveness of recommended reforms and environmental protection.
  - e) An evaluation of whether consolidated coastal resilience permits similar to those provided for offshore wind projects would facilitate timely permits.
  - f) A workforce assessment and funding options for regulatory staffing positions and as-needed permitting support contracts to supplement staff, including a specific analysis of recommended pay scales needed to recruit and retain permitting staff that reflect the educational requirements for these positions, the cost of living in areas where these staff live and work, and private sector compensation for similar skills.
- 6) Requires, on or before April 1, 2027, the Coastal Commission and BCDC, in collaboration with CDFW, and the regional water boards with jurisdiction over the California coast and San Francisco Bay, to convene a Coastal Resilience Permit Advisory Group (Advisory

Group). Requires the Advisory Group membership to include, but not be limited to, representatives of each of the following:

- a) The Department of Transportation, SCC, and other relevant state agencies that seek permits for projects in coastal areas;
  - b) Local governments required to update their local coastal plans for sea level rise;
  - c) California ports;
  - d) Local transportation agencies and wastewater treatment agencies;
  - e) California Native American tribes that are on the contact list administered and maintained by the Native American Heritage Commission; and,
  - f) Other members of the public, including businesses, home and affordable housing builders, commercial and recreational fishers, environmental organizations, environmental justice organizations, and others.
- 7) Requires the Coastal Commission and BCDC, in consultation with the CDFW, and the regional water boards, to conduct a series of public workshops with the Advisory Group to do all of the following:
- i) Solicit feedback regarding challenges with existing permitting processes, and recommendations and concerns from permittees and other interested parties regarding streamlining proposals; and,
  - ii) Review and seek comment on draft reform proposals from the Working Group's Roadmap.

**FISCAL EFFECT:** Unknown

**COMMENTS:**

- 1) **Permit reform.** Permits and approvals are required and administered under various statutes and regulations at the federal, state, regional, and local levels. The value of an approved permit is assurance a project is in compliance with all applicable laws. The specific types of permits and approvals that are required for a project will depend on the scale and nature of the proposed project, location in a special area (i.e., the coastal zone, on public land), ecological conditions (when protected biological resources are or are anticipated to be, in or adjacent to the project area), or project size.

The bill's findings state that the combination of overlapping, and sometimes duplicative, federal and state authorities, requirements for project-specific studies, limited regulatory agency staffing, interagency coordination needs, and inconsistency and uncertainty regarding mitigation requirements results in extended permitting timelines for all projects in or adjacent to federal waters, including coastal resilience projects.

Improved communication, coordination, and collaboration can reduce unnecessary duplication of effort, streamline information needs, and decrease the time and cost for permit approvals.

- 2) **Permit Streamlining Act.** The Legislature enacted the Permit Streamlining Act in 1977 to expedite permit processing across all public agencies. Under the Act, once an agency receives an initial application, it has 30 days to notify the applicant of any additional materials needed to complete the application. There is no timeline for when the applicant must respond or provide the requested information, but when the public agency does, it has another 30 days to review it to determine whether it is complete. If not, the 30-day cycle starts again. Once the application is complete, the agency is required to take final action within 180 days. That time limit may be extended one time for up to 90 days upon the mutual consent of the agency and the applicant. If an agency fails to approve or disapprove the permit within the time limits specified, the permit is subject to being deemed approved.

The PSA has resulted in truncated permit timelines, but doesn't address a project's cumulative timing for obtaining numerous permits from different public entities.

- 3) **Cutting the Green Tape.** In 2019, NRA launched the Cutting Green Tape initiative to accelerate ecological restoration, conservation, and stewardship by advancing permitting and funding efficiencies across agencies, regulations, policies, and practices. The initiative has led to programmatic permits to authorize a set of related projects or multiple projects that are substantially similar. This approach significantly reduces time and resources that would otherwise be devoted to issuing individual permits at the project level. These authorizations require substantial up-front investment, but once established, have been shown to reduce permitting times by up to 50%. Programmatic permits are currently offered across different agencies for environmental restoration projects.

Examples include the SWRCB's Large Habitat Restoration General Order, a programmatic permit for common habitat restoration activities exceeding five acres in size to streamline larger projects for improvements to stream crossing and fish passage, floodplain restoration, and removal of non-native invasive species. CDFW developed a new process for issuing consistency determinations that involves CDFW's "pre-approval" of biological opinions to ensure general consistency with the California Endangered Species Act coupled with an expedited review of project-specific applications. CDFW also developed the Restoration Management Permit (RMP) after meeting with restoration stakeholders to identify the specific constraints they face when implementing restoration projects where protected species are present. The RMP consolidates authorizations that voluntary habitat restoration projects may need into a single streamlined permit, truncating permit processing from up to five state departments and up to two years to four to five months. Also, the Coastal Commission uses Public Works Plans (PWP) to streamline fuel reduction projects in the coastal zone. PWPs authorize projects with streamlined review and without the need for additional coastal permits over 10 years.

- 4) **Other permit reform.** BCDC is proposing amendments to its regulations as part of an ongoing effort to modernize its permitting program. In 2024, staff completed a year-long assessment of the permitting process and developed a roadmap identifying targeted improvements for the permitting program. BCDC's existing regulations allow BCDC to authorize similar categories of activities under two different permit programs, one for regionwide permits and another for abbreviated regionwide permits. The proposed amendments will repeal the existing regulations governing regionwide permits and abbreviated regionwide permits in their entirety and adopt a new set of amended regulations

for the regionwide permit program only. BCDC notes that its proposed amendments are consistent with statewide efforts to improve permitting processes.

The Bay Restoration Regulatory Integration Team (BRRIT) is comprised of staff from each of the six state and federal regulatory agencies with jurisdiction over San Francisco Bay. This team provides project proponents with a “one-stop shop” for complex multi-benefit habitat restoration and associated flood management projects, increasing efficiencies by 1) establishing a collaborative pre-application process in which agencies and project proponents identify and resolve issues early in project planning, and 2) diminishing the time involved for serial review, one agency at a time, for needed multi-agency permitting.

- 5) **Select Committee on Permit Reform.** In 2024, the Select Committee met to discuss permit challenges and permit process reform for infill housing, clean energy, transit, and climate resiliency projects. The resultant *California Assembly Select Committee on Permitting Reform Final Report*<sup>1</sup> (March 2025) notes that despite permit reforms already undertaken, many stakeholders expressed concern that further permitting reform is necessary for the state to achieve its housing production goals, such as eliminating uncertainty in the application process; minimizing uncertainty in the entitlement process; creating more consistency across permitting entities; focusing CEQA on environmental issues; and, minimizing uncertainty for post-entitlement permits.

The report identified best practices for permitting reform, including prioritizing agency objectives and workload, providing a clear and straightforward permit application process, and establishing specific timeframes for reviewing permits.

NRA participated in the Select Committee’s hearings, and the SWRCB, Bay Area Air Quality Management District, CDFW, and other public agencies contributed to the research and preparation of the report, all of which can facilitate incorporation of preexisting feedback into the Working Group’s Roadmap.

- 6) **This bill.** AB 2051 requires NRA to convene a Working Group to develop a Roadmap for coastal resilience projects proposed along the California coast and in the San Francisco Bay, and make recommendations on myriad administrative reforms and alignment of agency requirements to streamline permitting processes and timeframes.

Numerous recent reports completed by agencies participating in the Working Group and/or Advisory Group have been published with recommendations to streamline the permitting process for coastal development projects. These reports can both inform the Roadmap and eliminate unnecessary redundancies in the Working Group’s efforts.

For instance, this bill acknowledges some of those reports, including the National Oceanic and Atmospheric Administration’s North-Central California Coastal Sediment Coordination Committee’s *2024 Efficient Permitting Roadmap* that synthesizes guidance, tips, and best practices from 20 federal, state, and local agencies to create a ‘how to’ guide and clearinghouse of information for navigating efficient permitting and environmental review process for coastal habitat restoration projects. The 2023 *Cutting Green Tape Along the Coast and San Francisco Bay* report recommended an interagency permitting team in Southern California to be established as a subteam of the existing Southern California Wetlands Recovery Project, which is comprised of essentially the same agencies as the

BRRIT. This bill gleans from that by requiring consideration of an interagency project management team for multiagency permitting, modeled on BRRIT.

- 7) **Staff resources.** The bill acknowledges that workforce capacity is a contributing factor to permit review and turnaround times and requires the Working Group to include a workforce assessment and funding options for regulatory staffing positions. It is worth noting that the agencies being required to participate in the Working Group may not have surplus staff time to commit to developing the Roadmap, which could lead to reduced staff needed to process current permit applications. To reconcile that, the author may wish to consider working with the public agencies to address participating in the Working Group without jeopardizing permit review. Alternatively, adjusting the timeframes in the bill to allow more time for the Working Group to meet and report to the Legislature could address potential workload and personnel issues.
- 8) **Statewide application.** The Working Group's Roadmap would apply to statewide permitting reform, but the 1,100 mile coast line is incredibly topographically, meteorologically, and economically variable, and permit reform under the auspices of any one-size-fits-all is unlikely. The Bay Area region, for instance, is roughly 30% of the state's coastline, but bay-shoreline is quite different from Pacific Ocean shoreline. The author may wish to consider either teasing apart Bay Area coastal resilience permit reform from the rest of the state, or narrowing the bill with a regional focus.
- 9) **Defining climate resiliency.** Coastal resilience refers to the ability of coastal ecosystems and communities to adapt, recover, and withstand disturbances such as storms, sea level rise, and other climate related impacts. It involved both natural solutions, like restoring wetlands, and engineered solutions, such as hard armoring with seawalls. The concept emphasizes the importance of adaptive strategies to enhance both natural and built environments, ultimately reducing vulnerabilities to future threats and ensuring long-terms sustainability. Establishing a definition for 'coastal resilience' projects would provide clarity for the Working Group about how to discuss permit reform in the roadmap. Further, directing the Working Group to consider permit reforms for project-types may help focus relevant permit improvements depending on whether the project is nature-based, infrastructure-based, or a combination of the two.

10) **Author's statement:**

AB 2051 takes a targeted, expert-driven approach. Rather than legislating specific process changes from Sacramento, the bill directs the Secretary of the Natural Resources Agency to convene a Coastal Resilience Permitting Working Group — drawing on the California Coastal Commission, the Bay Conservation and Development Commission, Regional Water Boards, the Department of Fish and Wildlife, and other state, federal, and local partners — to develop a Coastal Resilience Permitting Roadmap. The Roadmap will identify actionable reforms: administrative changes to improve permit timelines, a state process to align agency mitigation requirements, legislative recommendations to accelerate permitting, and a workforce assessment to address staffing gaps.

The communities most at risk from climate change are disproportionately low-income and communities of color, located in low-lying areas adjacent to San Francisco Bay and the Pacific coast, with limited resources to self-finance

adaptation. Every year of permitting delay is a year these communities remain exposed to harm they did not cause and cannot afford to absorb. AB 2051 would outline a process that could help accelerate the delivery of flood protection, wetland restoration, and shoreline adaptation infrastructure to the people who need it most.

Vitaly, AB 2051 does not alter existing permitting requirements or weaken any environmental protection. The bill's Coastal Resilience Permit Advisory Group is specifically charged with ensuring that streamlining efforts do not weaken protections for fish and wildlife habitat, tribal cultural resources, or public access. California has made commitments and investments. What we need now is the institutional capacity to deliver. AB 2051 is a practical, durable, and overdue step toward making that possible.

11) **Double referral.** This bill is also referred to the Assembly Water, Parks and Wildlife Committee.

12) **Committee amendments.** The *committee may wish to consider* the following amendments to clarify that administrative reforms should be recommended to the extent feasible, provide a definition for “coastal resilience project,” require CNRA as a single facilitator for the advisory groups, and other clarifying changes.

#### **REGISTERED SUPPORT / OPPOSITION:**

##### **Support**

Bay Area Council  
 Bay Planning Coalition  
 California State Association of Counties  
 Exploratorium, the  
 Kiewit Infrastructure West Co.  
 McFadden Finch Holdings Company  
 Port of San Francisco  
 San Francisco International Airport  
 Wareham Development

##### **Opposition**

None on file

**Analysis Prepared by:** Paige Brokaw / NAT. RES. /

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<sup>i</sup> [permitting reform report cover 042525 v2](#)