Date of Hearing: June 23, 2026

ASSEMBLY COMMITTEE ON JUDICIARY
Ash Kalra, Chair
SB 1256 (Jones) – As Amended April 30, 2026

As Proposed to be Amended

SENATE VOTE: 33-0

SUBJECT: SUBDIVISION MAP ACT: ACTION OR PROCEEDING

SYNOPSIS

The California Environmental Quality Act has long been maligned as being the primary roadblock to developing more housing and other necessary infrastructure in California, thus driving the cost of living in this state ever higher. Now, some are claiming that parties opposed to development are using the Subdivision Map Act to relitigate claims that they lost while litigating projects under the California Environmental Quality Act. To the extent that this is true, it would represent an abuse of California's judicial system and will likely lead to further cost increases in housing. The author and proponents claim this is exactly what is happening to one development in San Diego County.

Although the bill may not in fact help the San Diego County development, as discussed in depth in the body of the analysis, this bill would preclude claims from being raised in a Subdivision Map Act lawsuit if the claims are substantially similar to those raised in a previous action to enforce the California Environmental Quality Act. The bill, as proposed to be amended, makes exceptions to the general claim preclusion provisions to ensure that nothing in the bill absolves local governments of their duties under the Subdivision Map Act and to ensure that the Act can be used to enforce previously agreed upon mitigation measures required by the California Environmental Quality Act. This bill's applicability is also limited to the author's home county.

This bill is supported by RCS-Harmony Partners and the Laborers International Union of North America (LiUNA!) Local 89 from San Diego. They contend that the Subdivision Map Act is permitting parties an unfair opportunity to relitigate California Environmental Quality Act claims. The bill is opposed by several habitat preservation organizations, environmental groups, and neighborhood advocacy councils. The opponents contend that the developer of one specific project in San Diego County is trying to force the construction of an unsafe development. The bill is also opposed by the Western Electrical Contractors Association over the inclusion of provisions related to project labor agreements. Should this bill be approved by this Committee it will subsequently be heard by the Committee on Local Government, which has primary jurisdiction over the Subdivision Map Act.

SUMMARY: Prohibits an action or proceeding to enforce the Subdivision Map Act from being maintained if the action contains substantially similar claims raised in a previous action to enforce the California Environmental Quality Act. Specifically, **this bill**:

1) Prohibits an action to enforce the Subdivision Map Act from being maintained if all of the following criteria exist:

a) The action or proceeding to enforce the Subdivision Map Act includes substantially similar claims or issues to claims or issues raised in an action or proceeding to enforce the California Environmental Quality Act;

b) The defendant in the action or proceeding to enforce the Subdivision Map Act was the defendant in the action or proceeding to enforce the California Environmental Quality Act;

c) The action or proceeding to enforce the California Environmental Quality Act was commenced prior to January 1, 2019, and has been fully adjudicated;

d) The project that is the subject of the action or proceeding to enforce the California Environmental Quality Act proposes at least 400 units of mixed-income housing, recognizes a valid project labor agreement and is in an unincorporated county with a specified population; and

e) The plaintiffs, petitioners, or real parties in interest in the action or proceeding to the Subdivision Map Act are the same or in privity with the plaintiffs, petitioners, or real parties in interest in the action or proceeding to enforce the California Environmental Quality Act.

2) Provides that nothing in the bill is to be construed to do the following:

a) Prohibit the filing of timely objections to an agency's return to a writ seeking to enforce its specific mandates;

b) Prohibit the timely filing of a separate action relating to the same project;

c) Prohibit the timely filing of a Subdivision Map Act Claim when necessary to enforce adherence to a mitigation measure identified in an approved environmental impact report, or ordered by a court, or contained within an approved settlement of an action or proceeding to enforce the California Environmental Quality Act; or

d) Abrogate a local agency's obligation to comply with a procedural requirement of the Subdivision Map Act.

3) Adopts a sunset date of January 1, 2032.

EXISTING LAW:

1) Establishes the Subdivision Map Act to provide for the regulation and control of the design and improvement of subdivisions vested in the legislative bodies of local agencies. (Government Code Section 66410 *et seq.*)

2) Requires that a tentative and final map be created for all subdivisions creating five or more parcels, five or more condominiums, a community apartment project containing five or more parcels, or for the conversion of a dwelling to a stock cooperative containing five or more dwelling units, except as specified. (Government Code Section 66426.)

3) Requires a service of summons to be effected within 90 days after the date of a decision in any action or proceeding to attack, review, set aside, void, or annul the decision of an

advisory agency, appeal board, or legislative body concerning a subdivision, or of any of the proceedings, acts, or determinations taken, done, or made prior to the decision, or to determine the reasonableness, legality, or validity of any condition attached thereto, including, but not limited to, the approval of a tentative map or final map or the action is barred. (Government Code Section 66499.37.)

4) Establishes the California Environmental Quality Act that, generally, requires a public agency to prepare, or cause to be prepared, and to certify the completion of, an environmental impact report on a project that it proposes to carry out or approve that may have a significant effect on the environment or to adopt a negative declaration if it finds that the project will not have significant effects. (Public Resources Code Section 21100 *et seq.*)

5) Defines a "project" for the purpose of the California Environmental Quality Act as an activity that may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and includes any of the following:

   a) An activity directly undertaken by any public agency;

   b) An activity undertaken by a person which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies; or

   c) An activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (Public Resources Code Section 21065.)

6) Provides that an action or proceeding to attack, review, set aside, void, or annul the acts or decisions of a public agency on the grounds of noncompliance with the California Environmental Quality Act may be commenced when it is alleged that:

   d) A public agency is carrying out or has approved a project that may have a significant effect on the environment without having determined whether the project may have a significant effect on the environment;

   e) A public agency has improperly determined whether a project may have a significant effect on the environment;

   f) An environmental impact report prepared by, or caused to be prepared by, a public agency does not comply with the California Environmental Quality Act;

   g) A public agency has improperly determined that a project is not subject to the California Environmental Quality Act; or

   h) Any other act or omission of a public agency does not comply with the California Environmental Quality Act. (Public Resources Code Section 21167.)

7) Provides that no part of law is retroactive, unless expressly so declared. (Civil Code Section 3.)

FISCAL EFFECT: As currently in print this bill is keyed non-fiscal.

COMMENTS: The California Environmental Quality Act (CEQA), while much derided by many developers, serves to ensure that the environmental impacts of a development project are adequately studied and mitigated by the government before permits and approvals are granted. The Subdivision Map Act serves to guide local governments to approve development projects in an orderly manner that considers a development's impacts in relation to adjoining areas. While similar issues may arise when local governments evaluate projects under two acts, they serve two distinct purposes and are different areas of law.

Because the adoption of a tentative map under the Subdivision Map Act may be deemed a discretionary act, the map itself may need to undergo review under CEQA. Any litigation surrounding the tentative map under CEQA must be resolved before the final map can be approved. Once a final subdivision map is approved it too may be litigated. Recognizing that both acts may be litigated in an attempt to stop development, this bill would prevent issues that were fully adjudicated under CEQA from being relitigated under the Subdivision Map Act, except in certain circumstances. The bill also limits its applicability to San Diego County. In support of the bill the author states:

> California's housing crisis is exacerbated by frivolous, never-ending lawsuits brought against developers of planned housing projects. Nowhere is this more apparent and frequently utilized for abuse than under the California Environmental Quality Act for which an entire cottage industry has grown around litigant services related to the Act. However, when CEQA lawsuits are fully adjudicated and developers are able to remedy any issues with the projects to the satisfaction of the court and lead agency, plaintiffs have begun to petition the court under different acts of law to further delay projects.
>
> Avoiding the legal principle of res judicata by suing project developers for the same issues already brought forward in in a previously adjudicated CEQA lawsuit under a different act is contrary to the intent of our legal system, our environmental laws and the State's stated goals on providing more housing inventory.
>
> This bill would prevent plaintiffs from performing in the end-run maneuver by barring a plaintiff from suing the same defendant for the same project under the Subdivision Maps Act – a favorite vessel for this tactic – if the issues being raised are substantially similar to those already raised in a previously adjudicated CEQA lawsuit.
>
> This bill does not erode CEQA's environmental protection, does not carve out any project from CEQA or otherwise affect the application of CEQA.

The CEQA process and potential court challenges. At its core, CEQA seeks to ensure that public agencies do not approve projects without considering the negative impacts a project may inflict on the environment. Although CEQA is too often, and incorrectly, viewed as a tool to skew outcomes in a manner that favors environmentalists and deters development, in reality, "CEQA operates, not by dictating proenvironmental outcomes, but rather by mandating that 'decision makers and the public' study the likely environmental effects of contemplated government actions and thus make fully informed decisions regarding those actions." (*Citizens Coalition Los Angeles v. City of Los Angeles* (2018) 26 Cal.App.5th 561, 577.) Thus, the primary objective of the environmental review required by CEQA is to steer agency decision makers into *approving* projects in a manner that utilizes feasible alternatives and mitigation measures to lessen the project's impact on the environment. The consideration of the impacts of a project is

to be analyzed in the agency's environmental impact report. The failure to properly consider a project's impacts is what typically results in litigation.

The process of finalizing an environmental impact report requires several steps. First the local lead agency must determine if a project qualifies for one of the many exemptions to CEQA provided in statute and the Office of Planning and Research's regulations, more commonly known as the CEQA Guidelines. If no exemption exists, the lead agency must then begin to initially study the project in order to determine the scope of the project and associated environmental review. At this point if the agency believes no environmental impacts exist, they may opt to file a negative declaration stating as much and proceed to approve the project. Once the scope of the project and review is properly determined, the environmental review is conducted and a draft environmental impact report is submitted for public comment. A lead agency must respond to all written comments on the environmental impact report received during the public comment period, and revise the environmental impact report as necessary. The responses to comments should explain why the comments are rejected or if the comment resulted in the adoption of a mitigation measure. Once the public review is completed the agency can certify the final environmental impact report.

Once a final environmental impact report is certified, and a project is subsequently approved, any litigation over the environmental review of the project can begin. Courts require an environmental impact report to make a good faith effort at fully disclosing the impacts of the project, provide a detailed set of information about project impacts and serve as the foundation for agency review. The court must review the environmental impact report in two ways. First a court must determine if the environmental impact report was prepared in a procedurally sufficient manner, as described above, and contains the proper content as required by law. Secondly, the court must determine the substantive aspect of its review and determine whether the conclusions and decisions made by the lead agency are based on substantial evidence in the record. (*Vineyard Area Citizens v. City of Rancho Cordova* (2007) 40 Cal.4th 412.)

The Subdivision Map Act and potential court challenges. The Subdivision Map Act is designed to permit local governments to manage the orderly development of subdivisions within its boundaries. The Act's primary goal is to ensure that local government properly considers a development's impacts on adjacent areas of the community. The Subdivision Map Act is triggered any time land will be subdivided into five or more parcels. Typically, a developer submits a tentative subdivision map to a local government. Then the local government, typically a planning department, reviews the map for compliance with the Subdivision Map Act and the local general plan. Case law interpreting the Subdivision Map Act has authorized local governments to adopt their own ordinances to add additional requirements to tentative maps so long as they supplement and do not supersede the Subdivision Map Act. (see, *Soderling v. City of Santa Monica* (1983) 142 Cal. App. 3d 501.) Typically, local agencies seek public comment during the review period.

Because the approval of a tentative map is legally deemed a "project" under CEQA the map must also go through the environmental review process unless a waiver is provided in statute. (See, *Rominger v. County of Colusa* (2014) 229 Cal. App. 4th 690.) It is at this stage that projects typically face their first risk of litigation, especially when neighbors wish to see improvements to any proposed environmental mitigations identified in an Environmental Impact Report. Once a project receives its CEQA approvals and the subdivision map is deemed to comply with the law, a final subdivision map can be approved and a project can commence unless there are challenges

to the adequacy of the approval of the submission map, in which case claims can be brought to challenge the adequacy of the final map so long as all administrative challenges have been exhausted (*Audubon Society v. Planning Commission* (1983) 34 Cal. 3d 412).

This bill seeks to prevent duplicative litigation under both CEQA and the Subdivision Map Act. As noted above, both CEQA and the Subdivision Map Act may study similar aspects of a development. For example, the Subdivision Map Act explicitly requires a map to consider public access to waterways (Government Code Section 66478.1) and CEQA requires consideration of a projects impact on "natural and protected lands" (Public Resources Code section 21080.1), both of which likely involve a similar review.

Recognizing that a project's environmental impacts are likely to be challenged under CEQA, this bill seeks to prevent project opponents from getting a second chance to litigate the same issue under the Subdivision Map Act. The bill would apply only to actions against the same defendant, for the same project, brought by the same plaintiff, petitioner, or real party in interest. The bill also recognizes that some actions under the Subdivision Map Act may be necessary to *enforce* a judgment or settlement in a CEQA lawsuit, thus the bill provides several exceptions to the general bar including permitting lawsuits seeking writs to enforce mandates, suits to enforce a CEQA judgment, and suits to enforce the procedural requirements of the Subdivision Map Act. The author also limited the bill's applicability, generally, to his home county of San Diego, and proposed amendments adopt a sunset date of January 1, 2032.

Res judicata and equitable estoppel. By seeking to preclude the relitigating of various claims and issues the bill implicates the judicial doctrines of res judicata (claim preclusion) and equitable estoppel (issue preclusion). The doctrine of res judicata seeks to "prevent relitigation of the same cause of action in a second suit between the same parties or parties in privity with them." (*DKN Holdings LLC v. Faerber* (2015) 61 Cal.4th 813, 824.) California courts have held that the elements of a res judicata defense include: (1) whether or not the legal claim or issue in the present action is identical to a claim or issue in a prior proceeding; (2) whether the prior proceeding resulted in a final judgment on the merits; and (3) whether the party against whom the doctrine is being asserted was a party or in privity with a party to the prior proceedings. (*Roberson v. City or Rialto* (2014) 226 Cal.App.4th 1499, 1510.)

Similarly, the doctrine of equitable estoppel is designed to prevent the relitigation of issues that were resolved in prior litigation, even if the underlying claims are not wholly identical. The elements of an equitable estoppel defense are: "(1) after final adjudication; (2) of an identical issue; (3) actually litigated and necessarily decided in the first suit; and (4) asserted against one who was a party in the first suit or one in privity with that party." (*State Compensation Insurance Fund v. ReadyLink Healthcare, Inc.* (2020) 50 Cal.App.5th 422, 447-48.) Finally, if those elements are met, then the court must determine if precluding the reconsideration of the issue would be consistent with the preservation of the "integrity of the judicial system." (*Ibid.*)

By precluding the relitigating of "substantially similar claims or issues to claims or issues raised in an action or proceeding to enforce" CEQA, this bill is largely acting as a form of equitable estoppel. While the doctrine of equitable estoppel does require a court to determine if such estoppel is necessary to protect the integrity of the judicial system, nothing in the case law appears to preclude the Legislature from asserting via statute that certain claims are deemed estopped. Given that expending precious judicial resources relitigating complex land use claims

via two similar statues seems imprudent, such estoppel appears reasonable appropriate as it relates to CEQA and the Subdivision Map Act.

The Harmony Grove development and the state "Fire Safe" regulations. This bill appears to emanate from what is now a decade-old dispute between RCS-Harmony Partners (one of the supporters of this bill) and the Elfin Forest/Harmony Grove Town Council (one of the leading opponents of the bill). The Council objected to RCS-Harmony Partner's plans to develop a neighborhood in the hills of unincorporated San Diego County, adjacent to Harmony Grove. Among the many objections to the development raised by the Council was that the development would put too much pressure on the hillside road network and make it dangerous during a wildfire. Specifically, the Council argued the main artery in and out of the development, Country Club Drive, would be overwhelmed with traffic during a wildfire. The Council filed a CEQA lawsuit against the development and the San Diego County Superior Court agreed with the Council holding, "the EIR fails to adequately address the capacity of Country Club Drive in the event of an evacuation." (*Elfin Forest Harmony Grove Town Council v. County of San Diego* (2020) Cal.Super.LEXIS 7079.) It appears that revisions were made to the EIR and the development plan, namely widening the road and adding additional fire hydrants.

However, when the case was heard on appeal, the Fourth District Court of Appeal relied on a study of the fire plan submitted by the developer and reviewed by the San Diego County Fire Authority and the Rancho Santa Fe Fire Protection District. While not weighing in on the adequacy of the specific measure proposed, as CEQA is focus on study and alternatives, the court held, "We conclude the EIR's discussion of evacuation routes and timing satisfies CEQA requirements. The EIR's purpose is informational; to inform decisionmakers and the public of the basis on which the Board decided to approve the Project involving significant environmental effects." (*Elfin Forest Harmony Grove Town Council v. County of San Diego* (2021) Cal.App.Unpub. LEXIS 6474.)

Notably, in the years between the project seeking approval and the Court of Appeal approving most of the EIR, San Diego County's General Plan was rejected by the same appellate court. (*Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App. 5th 467.) Between the original EIR litigation and *Golden Door Properties* it appears that many of the initial approvals of the tentative subdivision map expired or were rendered invalid and the County had to reevaluate the map. Nonetheless, it appears that San Diego County reapproved the subdivision map using many of the original studies related to fire safety utilized when originally approving the project.

Further complicating these matters, in 2023, the Board of Forestry and Fire Protection updated the state Fire Safe Regulations. Following the tragedy in City of Paradise, where a traffic bottleneck significantly impaired the evacuation of the town, several of these updates focused on ingress and egress to developments. The Council now contends the new map does not comply with the Fire Safe Regulations. While the Subdivision Map Act itself does not require review for compliance with the Fire Safe Regulations, San Diego County's ordinance supplementing the Act does. (San Diego County Code of Regulatory Ordinances Title 8, Div.1, Chap. 1, Section 81.109.) The Council now contends that the County has not properly evaluated the proposed subdivision map in accordance with the *new* Fire Safe Regulations.

A final note on the matter, Committee staff did consult with prior-Board staff integral in drafting the Fire Safe Regulations as well as several other subject matter experts on the topic. While

several experts indicated the road network may, in fact, still comply with state regulations, that issue is largely outside the scope of the Committee's expertise and still does not release the County from its obligations to follow its own ordinance. Whether or not the County complied with its own ordinance is a matter for the court.

This bill's potential, or not so potential, impact on pending litigation. Given the contentious nature of RCS-Harmony Partners' proposed development it should come as little surprise that the parties are once again in court. It appears that this bill may be trying to head off that litigation, in fact that is exactly what the opposition fears. However, while the Committee staff is not privy to the briefings in the matter, the present litigation appears focused on whether or not San Diego County complied with its own regulation. Although that compliance involves fire safety, it does not appear to involve the substantive discussion of the adequacy of the development's compliance with the Fire Safety regulations (arguably a topic that has been litigated) but rather the County's inability to adhere to its own procedural rules (a topic outside the scope of the above discussed CEQA litigation). As such, the bill in print may not preclude the present claim.

While this Committee aims to avoid hearing bills that would impact ongoing litigation, this bill may not do so. California's 154-year-old Civil Code Section 3 holds that all statutory changes are prospective unless otherwise stated. Similarly, modern case law holds that there is a presumption against retroactive application of statutes unless expressly authorized. (*Quarry v. Doe I* (2012) 53 Cal.4th 945, 955.) This bill contains no such retroactivity provisions nor the slightly less common provisions deeming the statutory change "declaratory of existing law." Furthermore, this is not an urgency statute and the present case appears slated for hearing later this summer, several months before the January 1, 2027 enactment date of this bill.

While the bill is unlikely to impact the present case, and thus eligible for consideration by the Committee, given the litigious history of the proposed development it merits consideration. Furthermore, to the extent that this measure forestalls future litigation that unfairly casts CEQA, or the Subdivision Map Act, as an untenable barrier to development, this bill should be considered on its overall merits.

Proposed amendments further narrow the bill to prevent duplicative CEQA claims while maintaining the integrity of the Subdivision Map Act. Seeking to ensure that the bill does not inadvertently impact meritorious Subdivision Map Act claims, while also preventing the Subdivision Map Act from becoming an avenue for relitigating losing CEQA claims, the author, the staff of this Committee, and the staff of the Committee on Local Government developed several clarifying amendments. The amendments provide that the bill does not foreclose the Subdivision Map Act from being used as a tool to enforce a prior CEQA judgment or to absolve local governments of their obligations under the Subdivision Map Act. Accordingly, subdivision (b) which provides for the exception to the estoppel provisions, will be amended to read:

> (b) ~~**Nothing in this section shall**~~ ***This section shall not*** be construed to do either ***any*** of the following:
>
> (1) Prohibit the filing of timely objections to an agency's return to a writ seeking to enforce its specific mandates.
>
> (2) Prohibit the timely filing of a separate action relating to the same project.

> ***(3) Prohibit the timely filing of a Subdivision Map Act claim when necessary to enforce adherence to a mitigation measure identified in either of the following:***
>
> ***(A) An approved environmental impact report.***
>
> ***(B) A court order in, or an approved settlement of, an action or proceeding to enforce the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).***
>
> ***(4) Abrogate a local agency's obligation to comply with a procedural requirement of the Subdivision Map Act.***

Additional amendments will adopt a sunset date of January 1, 2032 to permit the Legislature to evaluate if the Subdivision Map Act does become an avenue for abusive litigation.

ARGUMENTS IN SUPPORT*:* This bill is supported by RCS-Harmony Partners and the Laborers International Union of North America (LiUNA!) Local 89 from San Diego. In support of the bill, RCS-Harmony Partners writes:

> As the Legislature has increasingly recognized, CEQA litigation is too often used as a tool to delay or stop housing projects, These lawsuits can drag on for years, causing otherwise viable developments to be abandoned or force the project to absorb multiple millions of dollars in legal costs. Both of these outcomes work to ultimately make housing significantly more expensive for California families.
>
> SB 1256 seeks to address one aspect of that problem by prohibiting litigation or enforcement actions under the Subdivision Map Act where: 1) the claims are substantially similar to claims raised and litigated to trial judgment following appeal, in a prior adjudicated CEQA action or proceeding; 2) the defendant in the new action was a party to that prior action; and 3) the project has been approved (and re-approved, following adjudication) by the lead agency.

ARGUMENTS IN OPPOSITION*:* This bill is opposed by the Elfin Forest/Harmony Grove Town Council as well as several habitat conservation and environmental organizations. In opposition to the measure, the Endangered Habitats League writes:

> SB 1256 would bar Subdivision Map Act lawsuits whenever a developer has survived a California Environmental Quality Act ("CEQA") challenge on a "substantially similar" issue—even if the local government failed to implement State Fire Safe Regulations in a subsequent approval. By circumventing state law enacted to ensure safe evacuation, it would put the public at grave risk of fire catastrophe.
>
> SB 1256 would have the California Legislature intervene in a specific and fully legitimate lawsuit brought by two organizations, including EHL. (Elfin Forest Harmony Grove Town Council et al. v. County of San Diego et al., No. 25CU069194C) At issue is a sprawl housing project that has no secondary egress in a Very High Fire Hazard Severity Zone, in gross violation of state law. The County refused to allow the fire protection review that would have forced compliance. SB 1256 would deprive citizens of their existing legal rights to defend themselves and literally throw them out of court.

> SB 1256 would have you believe that CEQA review and complying with explicit state statutes are one and the same. They clearly are not. If they were, your Legislature would not have enacted the State Fire Safe Regulations after the loss of life from fire evacuation disasters.

Unrelated to the Fire Safe Regulations or the CEQA process, the project labor agreement provisions of the bill are opposed by the Western Electrical Contractors Association who noted in their opposition letter to the Senate Judiciary Committee:

> There is no logical nexus between preventing duplicative lawsuits and requiring a developer to surrender control over construction labor relations. A project either merits protection from repetitive litigation because of sound legal policy or it does not. Conditioning that protection on the adoption of a PLA creates the troubling precedent that access to judicial certainty and streamlined legal treatment may be purchased only through acquiescence to favored labor arrangements.
>
> PLAs are not neutral labor instruments. They are highly restrictive pre-hire collective bargaining agreements that effectively grant unions preferential and often exclusive control over project labor. These agreements impose significant burdens on the vast majority of California's construction workforce, which has chosen not to join a union. Merit shop contractors and their employees are frequently required to obtain workers through union hiring halls, contribute to union benefit and pension systems from which their employees may never benefit, comply with unfamiliar work rules, and operate under costly administrative requirements that increase construction costs and reduce competition.

REGISTERED SUPPORT / OPPOSITION:

Support

Local 89 San Diego
RCS Harmony Partners LLC

Opposition

32nd Street Canyon Task Force
Brentwood Alliance of Canyons & Hillsides
California Coastal Protection Network
Canyon Back Alliance
Center for Biological Diversity
Center for Local Government Accountability
Climate Action Campaign
Elfin Forest / Harmony Grove Town Council
Endangered Habitats League
Equitable Land Use Alliance (ELUA)
Escondido Neighbors United
Friends of Goodan Ranch and Sycamore Canyon Open Space
Friends of Hedionda Creek
Hills for Everyone
Inland Empire Waterkeeper
Los Angeles Audubon Society

Orange County Coastkeeper
Planning and Conservation League
Preserve Calavera
Preserve Wild Santee
Resource Renewal Institute
San Diego Bird Alliance
San Pasqual Valley Preservation Alliance
Sea and Sage Audubon Society
State Alliance for Firesafe Road Regulations
The Chaparral Lands Conservancy
The Escondido Creek Conservancy
The Urban Wildlands Group
Wake Up California
Western Electrical Contractors Association

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