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Ministerial Housing Approvals: Navigating the Evolving Legal Landscape

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Ministerial Housing Approvals: Navigating the Evolving Legal Landscape

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Agenda

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1. Introduction
2. Breaking: AB 130's Amendments to Permit Streaming Act (effective immediately)
3. ADUs
4. SB 35/423
5. SB 6/AB 2011/AB 2243
6. SB 9/SB450
7. SB 648/SB 1123
8. SB 4
9. Miscellaneous (AB 1397, AB 2162, and AB 101)
10. Best Practices, Q&A

Introduction

- The following covers noteworthy state laws requiring streamlined ministerial review
- Goal: provide a high-level overview that summarizes key requirements
- Not comprehensive; many of the laws are technical with detailed requirements and exceptions (and exceptions to exceptions)
- Consult with legal counsel to confirm a law’s applicability and ensure that statutory requirements are satisfied
- When in doubt: consult with legal counsel

Introduction

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- California has a “statewide housing crisis, represented by a shortage of nearly 3,500,000 homes” Attributable, in part, to “restrictive zoning, land use, and burdensome permitting policies at the local level . . .”
- Legislative response: Numerous bills that restrict local agencies’ ability to review, delay, or deny housing development projects
- Common theme: Require streamlined ministerial review and approval of qualifying applications that comply with objective development standards

AB 130

- Part of the California budget trailer bill. Signed by Governor Newsom on June 30, 2025 and takes immediate effect
- Amends several key provisions of state housing law, including some of the bills addressed in the following slides
- Expands applicability of Permit Streamlining Act to now cover housing projects subject to ministerial review

PSA – AB 130’s Updates

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- PSA now covers any “housing development project that requires an entitlement from a local agency, regardless of whether the permitting process is discretionary or ministerial.” (Gov. Code, § 65928(b)(1)(A))
  - Does not include not include post-entitlement phase permits approved under Gov. Code section 65913.3
- Application checklists are required, must list everything local agency will require for a complete ministerial housing application
- Application completeness determination required within 30 days of when the ministerial housing application was submitted (or deemed complete)

PSA – AB 130's Updates Cont.

- AB 130 amends Gov. Code section 65950 to require local agencies to approve or deny a "complete application" subject to ministerial review within 60 days of the local agency's receipt of the complete application
- Amends PSA's "deemed approved" provision by removing the "public notice required by law" requirement
- Any project not approved or denied within the required time period (including ministerial projects) = deemed approved (Gov. Code, § 65956(b))

Accessory Dwelling Units (ADUs)

ADUs – Overview

- Legislature has found and declared that allowing ADUs in zones that allow single-family and multifamily uses provides additional rental housing, and is an essential component of California's housing supply
- State ADU law is intended to provide for the creation of ADUs and to streamline provisions relating to unit size, parking, fees, and other requirements in a manner that does not unreasonably restrict the ability of owners to create ADUs
- Recent bills reduce barriers, streamline approval processes, and expand capacity to accommodate the development of ADUs and junior ADUs (JADUs)

State ADU Law

- Two categories of ADUs:
  - ADUs and JADUs created under Gov. Code section 66323 (referred to by HCD's ADU Handbook as "66323 Units")
  - ADUs created under Gov. Code section 66314-66322

66323 Units (Building Permit Only)

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- Four categories of ADUs under Gov. Code section 66323:
    - Converted ADU or JADU on SF lot (66323(a)(1))
    - Detached ADU on SF lot (66323(a)(2))
    - Converted ADU on MF lot (66323(a)(3))
    - Detached ADU on MF lot (66323(a)(4))
- Only subject to the development standards provided in section 66323(a)(1), (a)(2), (a)(3), or (a)(4), as applicable.
- No other local development standards apply (e.g., front setback, architectural, FAR apply) (Gov. Code, § 66323(b))

66314-66322 Units

- Unlike 66323 Units, state law gives local agencies more authority to regulate units created under Gov. Code section 66314-66322
- May be subject to additional objective development standards provided in (e.g., size, front setbacks, FAR, architectural standards etc.)

Timing – General Rule

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- For all applications, if there is an existing SF or MF dwelling on the lot, must approve or deny the ADU/JADU application within 60 days from the date that the local agency's "receives a complete application" (Gov. Code, § 66317(a))
- <u>Not</u> 60 days from the application completeness determination
- If a complete application is not approved or denied within 60 days, application is "deemed approved" by operation of law

Timing – Preapproved Plans

- Must approve/deny an application for a detached ADU within 30 days from the date that the local agency receives a complete application if the applicant uses either:
  - A plan preapproved by the local agency within the current triennial California Building Standards Code rulemaking cycle; or
  - A plan identical to a plan for detached ADU approved by the local agency within the same cycle

(Gov. Code, § 65852.27(b)(1)-(2))

Processing Best Practices

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- Review applications for completeness right away. Do not wait full 30 days
- If an application is complete when submitted, the 60-day clock to approve or deny began on the date that the local agency received the application
- The local agency's application checklist should include everything that the local agency's needs to approve or deny the application
- Cannot receive an application and then deem it incomplete for something not required by the local agency's application checklist

Processing Best Practices

- Approve or deny the application within 60 days of when the complete application was submitted
- Deadline missed = deemed approved
- If denied, provide the applicant with a “full set of comments with a list of items” that must be corrected in order to qualify for ministerial approval (Gov. Code, § 66317(b))

SB 35/423

Streamlined Ministerial Approval of Multifamily Projects

SB 35

- SB 35 (2017) created a streamlined approval process (Gov. Code, § 65913.4) for qualifying multifamily housing projects, and the statute has had 12 different versions since enactment
- Between 2018 and 2021, 156 projects were approved for streamlining or had a pending application, comprising over 18,000 new proposed housing units (Terner Center)
- SB 35 was historically applicable to jurisdictions not meeting RHNA (number of units that have been issued building permits is less than the locality's share of the regional housing needs, by income category, for that reporting period)
- HCD keeps track of jurisdictions subject to SB 35

SB 423

- SB 423 (2023) expanded application to jurisdictions **lacking compliant housing element**
- Applies to some property in the coastal zone
- Changed Affordability Requirements (projects over 10 units)*:
  - Jurisdictions not meeting above-moderate RHNA: eligible projects must dedicate: (i) 10 percent of units to housing affordable to households making at or below 80 percent of area median income ("AMI"), or (ii) in nine-county San Francisco Bay Area ("Bay Area"), 20 percent of units to housing affordable to households making below 120 percent of AMI with the average income at or below 100 percent of AMI.
  - Rental projects must dedicate: dedicate 10 percent of units to housing affordable at or below 50 percent of AMI.
  - For-sale projects:10 percent of units (before density bonus), to housing affordable at or below 80 percent of AMI.
  - Bay area *option*: 20 percent of the units (before density bonus) to housing affordable below 100 percent of AMI, with all units to average at or below 80 percent of the AMI.
  - Local inclusionary ordinance requirements generally apply if they require greater affordability.

SB 423

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- Changed Affordability Requirements – jurisdictions not meeting very low or low income RHNA**
  - Project must dedicate 50 percent of the total number of units, before calculating any density bonus, to housing affordable to households making at or below 80 percent of the area median income.
  - Project submitted before January 1, 2019, includes at least 500 units of housing, dedicates 20 percent of the total number of units, before calculating any density bonus, with at least 9 percent affordable to households making at or below 50 percent of the area median income and the remainder affordable to households making at or below 80 percent of the area median income.
- Expanded zoning districts***, expanded application to VHFSZ****
- Labor standards: Government Code Section 65913.4 required developers to comply with certain wage and labor standards, including that all construction workers will be paid prevailing wages. Now, these requirements do not apply to a project that consists of 10 or fewer units and is not a public work. In addition, SB 423 modified requirements regarding labor standards. Projects with over 50 units must employ apprentices and provide health care for workers. For projects more than 85 feet high, a “skilled and trained” workforce must be used, unless qualified contractors are not available

SB 35/423 Process

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- Preliminary Application (Gov. Code § 65941.1):
  - Review project eligibility: two or more units, affordability; demolition provisions
  - Review site eligibility - urbanized area or urban cluster; 75 percent of the perimeter of the site adjoins parcels developed with urban uses; coastal zone provisions; flood hazard provisions; not habitat, farmland, wetlands, under conservation
  - Public meeting requirement within 45 days if project is in a moderate resource area, low resource area, or an area of high segregation and poverty —a determined by the most recent "CTCAC/HCD Opportunity Map"
- Tribal consultation must be initiated within 30 days; confidentiality provisions; requirement for enforceable agreement
- Application filed (*AB 130)
  - Review for consistency with objective standards; development, excluding any additional density or any other concessions, incentives, or waivers of development standards - decision w/in 60 days ~~/ 90 days if more than 150 units~~
  - ~~Design review by planning commission or equivalent with 90 days~~

AB 130 (2025)

- After the tribal consultation process is completed, applicant submits their application. Although specific processing deadlines are specified in Gov. Code section 65913.4, following AB 130:
  - Local agency’s must make an application completeness determination within 30 days of submittal
  - If the application is complete, the local agency’s must approve or deny it within 60 days of when the complete application was submitted
  - If the project is inconsistent with the local agency’s objective standards, deny it within 60 days.
  - These deadlines are shorter than those provided in Gov. Code section 65913.4, so they are applicable and override the deadlines provided in Government Code section 65913.4

SB 6/AB 2011/2243

By-Right Housing in Commercial Zones

AB 2011 & SB 6 – Residential Development in Commercial Zones

- Both bills permit residential development on sites currently zoned and designated for commercial or retail uses as of July 1, 2023
  - **AB 2011 (**Affordable Housing and High Road Jobs Act of 2022): New, CEQA-exempt, ministerial approval process for certain multifamily housing developments (w/ affordability requirement) on sites within a zone where office, retail or parking are the principally permitted use
  - **SB 6 (**Middle Class Housing Act of 2022): Makes qualifying projects an "allowable use" where "office, retail, or parking" are a principally permitted use. Multifamily projects meeting certain criteria may invoke SB 35 and the Housing Accountability Act for streamlined ministerial approval
- **Housing does not need to be an allowed use**: if housing is not an allowed use in the zone, housing density will be based on the closest parcel that allows multifamily projects (AB 2011) or the density necessary to accommodate local agency's lower-income planned units on its sites inventory (SB 6)

AB 2011 – Eligible Projects

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- Eligible projects must:
  - Be 100% affordable or mixed income and abut a commercial corridor
  - Propose a multifamily housing development project;
  - Be within an urban area;
  - Be on a site that at least 75 percent of which adjoins parcels developed with urban uses, but does not adjoin a site where more than one-third dedicated to industrial uses;
  - Not be on a mobile home park site;
  - Not be located within 500 feet of a freeway or within 3,200 feet of an oil or natural gas extraction or refinery; and
  - Miscellaneous other criteria (SB 35, neighborhood plans, vacant land, environmental assessment, etc.).
- Additional criteria apply for mixed-income projects (i.e., 20 acres or less, no demolition of certain buildings, more than 4 dwelling units, not zoned for single-family, notice to tenants & relocation benefits)
- Local agencies can allow ground floor commercial uses
- Applicant must complete a Phase I environmental assessment

AB 2011 – Affordability Requirements

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- AB 2011 allows two different types of projects with different affordable housing requirements
  - 100% Affordable
    - 100% of the units (excluding managers' units) are dedicated to lower-income households at an affordable cost or affordable rent
  - Mixed-Income Projects
    - Rental project: 15% lower-income restricted units, or 8% very-low income and 5% extremely low income units. For-sale project: 30% moderate-income households or 15% to lower income households

AB 2011 – Approval Process

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- Limited Processing Time
    - 150 units or less → must be processed in 90 days
    - More than 150 units → must be processed in 180 days
- Must identify any inconsistencies with qualifying criteria within prescribed timelines, otherwise development is deemed to be in compliance
    - 150 units or less → Notice within 60 days of application submission
    - More than 150 units → Notice within 90 days of application submission
- **Only** objective standards apply
    - Ministerial Design Review – While the local agency can hold a design review hearing, it must be "**strictly focused**" on objective, applicable standards and it "***shall not in any way inhibit, chill or preclude the ministerial approval***" of the project

AB 2243 – Residential Projects in Commercial Zones

- AB 2243 expanded eligibility.
  - Mixed-income projects at regional mall sites and in narrower commercial corridors
  - Near freeways blanket restriction removed, but air filtration/HVAC required.
  - Changed definitions of industrial use
  - Aligns Coastal Act requirements with SB 35
- Imposed more rigorous streamlining requirements.
  - Notify applicants of inconsistencies within 60 days (or 90 days if more than 150 units)
  - 30 days for resubmittals
  - Exhaustive list of conflicting standards, new information prohibited
  - Project approval 60-90 days deemed consistent w/ objective planning standards

AB 2243 – continued

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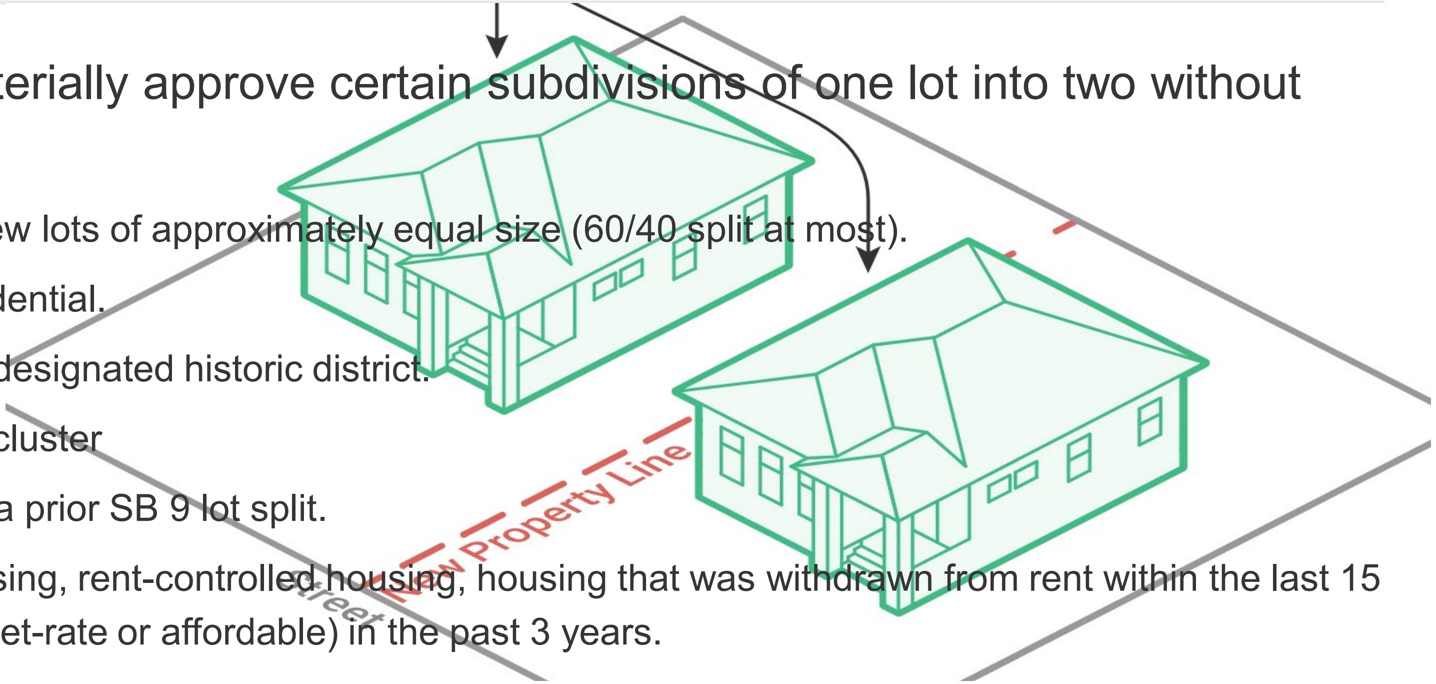
- Increased Maximum Density; New Mixed Income Minimum Density Requirements:
  - Projects deemed complete before 1/1/27: minimum density is 50% of allowed applicable density; 75% of applicable allowed density if within one-half mile of an existing passenger rail or bus rapid transit station.
  - After 1/1/27: minimum density is 75% of the applicable allowable density
- Conversion of Existing Buildings
  - No maximum density limitation, unless it includes new square footage > 20% of overall project.
  - No common open space requirements allowed beyond levels for existing project site
- Expansion of SB 6
  - Amended qualifying criteria: adds exception for “regional mall” sites that do not exceed 100 acres

SB 9/450

Urban Lot Splits & Two-Unit Projects

SB 9 – Gov. Code 66411.7 (Urban Lot Split)



- Under SB 9, local agencies must ministerially approve certain subdivisions of one lot into two without discretionary review or a hearing:
  1. Each new lot is at least 1,200 square feet New lots of approximately equal size (60/40 split at most).
  2. The lot to be split is zoned single-family residential.
  3. The lot is not a historic landmark or within a designated historic district.
  4. The lot is within an urbanized area or urban cluster
  5. The original lot was not established through a prior SB 9 lot split.
  6. No demolition or alteration of affordable housing, rent-controlled housing, housing that was withdrawn from rent within the last 15 years or housing occupied by a tenant (market-rate or affordable) in the past 3 years.
- A local agency may only deny a qualifying SB 9 lot split if the building official finds that the resulting housing development project would have a specific, adverse impact on public health and safety or the physical environment and there is no feasible, satisfactory mitigation

SB 9 – Gov. Code 65852.21 (Two Unit Project)

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- “No more than two residential unit” development projects – applies to new one unit projects or addition of second unit
- Similar qualifying site criteria to urban lot splits
- Requirement to prohibit short-term rental
- Must prohibit short-term rentals on any dwelling created under SB 9
- Exceptions to ADUs
  - When a lot is both created by an SB 9 lot split and developed with an SB 9 two-unit development project, a local agency does not need to allow an ADU or JADU; and
  - A local agency does not need to allow an ADU or JADU on a lot if there are already two units of any kind on the lot.
- Coastal Act applies, but local agency is not required to hold a public hearing on a coastal development permit for an SB 9 approval

SB 450 – Updates to SB 9

- SB 450 limits local restrictions on these projects.
  - Lot splits: objective standards must relate to design and improvement of a parcel
  - “Up to two unit” projects: any objective standards must apply uniformly throughout the zone
  - Must approve or deny a “completed application” for an urban lot split or two unit project within 60 days (Failure to act results = deemed approval)
  - Must provide detailed comments with any denial of an urban lot split or second primary dwelling unit application.

AB 130 (2025)

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- To comply with SB 450 and AB 130:
  - Determine whether an application is complete within 30 days of submittal
  - If an application is complete, approve or deny it within 60 days of when the complete application was submitted to the local agency

SB 648/1123

Streamlined Approval of Subdivisions and Projects with 10 or Fewer Lots/Units

SB 648/1123 – Overview

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- Enacted in 2023, effective Jan. 1, 2024 and known as the “Starter Home Revitalization Act.” Recently amended by SB 1123, which took effect on July 1, 2025
- Requires ministerial approval of:
  - Subdivision resulting in 10 or fewer parcels for a SB 684 housing project
  - A housing project consisting of 10 or fewer units created on a parcel created from an SB 684 subdivision

Subdivision Requirements

- Parcel must be zoned to allow MF residential use <u>or</u> vacant and zoned to allow for SF residential use
- Must be in an urban area
- If parcel is zoned to allow MF residential use, cannot exceed 5 acres in size; if vacant and zoned to allow SF residential use, cannot exceed 1.5 acres in size
- Ineligible if the parcel was created from an SB 684 or SB 9 subdivision

Subdivision Requirements

- Must satisfy certain site requirements that are similar to SB 35/423 (e.g., no farmland, wetlands, hazardous waste site, earthquake fault zone etc.)
- If in MF zone, each parcel must be at least 600 SF; SFR at least 1,200 SF. No other requirements governing the size, width, depth, frontage, or dimensions of an individual parcel apply
- Subdivision must comply with all objective Subdivision Map Act requirements
- Resulting parcels must be served by a public or municipal water system
- No demolition or alteration of affordable housing or housing that was Ellis'd within the last 15 years

Subdivision Requirements

- Subdivision must be for a SB 648 housing project
- If parcel is a housing element inventory site, development must create at least as many units as projected for the site. If parcel is designated to accommodate low or very-low income RHNA, development must result in at least as many low or very low income units as projected
- If parcel is not on an inventory site, development must result in the greater of at 66% of maximum allowable density under local zoning or 66% of the applicable residential density under Gov. Code section 65583.2 (i.e., *Mullin* density)

Additional Requirements for Housing Projects

- May only impose objective standards that do not, or are not, any of the following:
  - Physically preclude the project from being built at the densities specified in Gov. Code section 65583.2
  - Imposed on a project solely or partially because it is an SB 684 project
  - Require a setback between units, except to as required by the Building Code, or certain side and rear yard setbacks inconsistent with SB 9
  - Impose a FAR that is: less than 1.0 for projects with 3-7 units or less than 1.25 for projects with 8-10 units
  - Require enclosed parking, or covered parking, or any parking requirement inconsistent with SB 9

Streamlined Review & Other Requirements

- Must ministerially review and approve or deny a parcel or tentative map within 60 days from the date that the local agency "receives a completed application."
- Deadline missed = deemed approved
- Same timing rules for a SB 684 housing project
- If the local agency denies the application, it must provide the applicant with a full set of written comments explaining the denial and how the applicant can remedy the application
- Applicants must comply with local inclusionary ordinance
- The local agency does not have to allow ADUs, JADUs, or SB 9 lot splits on parcels created from an SB 684 subdivision

AB 130 (2025)

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- Allows an SB 648 subdivision to designate a remainder parcel that meets specified requirements (and if it does, does not count towards the 10-parcel limit)
- Prohibits any person from selling, leasing, or financing any parcel created from an SB 648 subdivision until each parcel that is sold, leased, or financed satisfies one of the following:
  - The parcel contains a residential structure completed in accordance with the CBC
  - The parcel already contains an existing legally permitted residential structure
  - The parcel is reserved for internal circulation, open space, or common area
  - The parcel is the only remaining parcel within the subdivision and complies with specified criteria (Gov. Code, § 66499.41(e)(1)
- Allows the local agency by ordinance or map condition to authorize the sale, lease, or finance of a parcel without complying with the above requirements (Gov. Code, § 66499.41(e)(2))
- Does not functionally alter application processing requirements (i.e., make application completeness determination within 30 days; if an application is complete, approve or deny within 60 days of when the application was submitted)

SB 4

Affordable Housing Developments on Church & Private Higher Ed Lands

SB 4 – Overview

- Enacted in 2023, effective January 1, 2024, & expires January 1, 2036
- New by-right, ministerial approval process for certain housing projects on land owned by non-public higher ed or religious institutions <u>on or before January 1, 2024</u>
- Affordability Requirements
  - 100% affordable (not including manager's unit(s)) for lower income households
    - Up to 20% may be for moderate-income households; and
    - Up to 5% of the units may be for staff of the institution (Gov. Code, § 65913.16(c)(9))

Site Requirements & Standards

- Site Requirements
  - Urban area;
  - 75% of site adjoins parcels developed with urban uses, BUT cannot adjoin parcel w/ > 1/3 industrial uses;
  - No farmland, wetlands, VHFHSZ, hazardous waste site, earthquake fault zone, flood hazard area, regulatory floodway, conservation areas or easements, protected habitats, etc.;
  - No demolition or alteration of affordable housing, rent-controlled housing, rental housing (last 10 years), or historic structure
- Local agencies may only require compliance with *objective* standards & must allow certain densities & heights

Density & Height

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- Density
  - *Mullin* density on residentially-zoned or mixed-use sites
  - 40 du/a on commercially-zoned sites
  - OR the density allowed on the site
  - OR the density allowed on any adjoin parcel
- Height
  - Height allowed on parcel + 1 additional story
  - OR height allowed on any adjoining parcel
- + Density Bonus
  - BUT density bonus cannot be used to increase height for SB 4 projects in non-residential zones

Parking & Ancillary Uses

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- Limited parking requirements
  - One off-street parking space per unit (but local agency can allow less)
  - No parking within ½ mile walking distance of a “high-quality transit corridor” or a “major transit stop” as defined in subdivision (b) of Section 21155 of the Public Resources Code or if there is a car share vehicle located within one block of the project
- Ancillary Uses
  - If located in SFR zone, following uses allowed on ground floor:
    - Childcare centers; and
    - recreational, social, or educational facilities operated by community-based organizations;
  - If not located in SFR zone, may have commercial uses that do not require a CUP or PDP

Streamlined Review & Other Requirements

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- Streamlined Review (* AB 130)
  - Limited timeframes for agencies to notify an applicant if a development conflicts with objective development standards
    - 150 units or less → Within 60 days of submittal of the development proposal; or
    - 150 units or more → Within 90 days of submittal of the development proposal
  - Design review → 90 or 180 days of submittal of the development proposal
- BUT prevailing wages req’d (& more for projects > 50 units)

AB 130

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- Make application completeness determination within 30 days of submittal
- If the application is complete, approve or deny it within 60 days of when the application was submitted
- If a complete application is inconsistent with the local agency’s objective standards, deny it within 60 days of submittal
- Functionally, the inconsistency determination is now also the denial (if inconsistent)
- AB 130’s deadlines are shorter than those provided in Gov. Code section 65913.16, so they are the applicable deadlines
- Prohibits local limits on number of children served by on-site childcare center, modifies allowable building height, and places new limits on parking requirements (see Gov. Code, § 65913.16(h) – (j))

Miscellaneous

Miscellaneous

- AB 1397 – Housing Element Inventory Sites
  - Changed housing element law to require that “100 percent of the need for housing for very low and low-income households . . . for which site capacity has not been identified in [the sites inventory] . . . [shall be on] sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower income households.”
  - “Use by right” means the local government “may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a “project” for purposes of [CEQA].” (Gov. Code. § 65583.2)

Miscellaneous

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- AB 2162 – By Right Supportive Housing
  - Codified in Government Code section 65650 et seq. and requires qualifying supportive housing to be permitted as a “use by right” in zones where multifamily and mixed uses are permitted, including non-residential zones permitting multifamily uses
  - 100% of units (excluding managers’ units) must be affordable to lower income households and are or will be receiving public funding to ensure affordability
  - Specified percentage of units must be reserved for residents in supportive housing
  - Project must comply with detailed requirements, including generally applicable objective development standards that apply to multifamily development in the same zone

Miscellaneous

- AB 2162 cont.
  - Local agency must notify applicant within 30 days if the application is complete
  - Must approve or deny the application within 60 days (if 50 or fewer units) or 120 days (if 50+ units) from the application completeness determination date (* AB 130)
  - Following AB 130, if an application is complete, regardless of the size it must be approved or denied within 60 days of the date that the application was submitted
- AB 101 – Low Barrier Navigation Centers
  - Codified in Gov. Code section 65660 et seq. and requires qualifying Low Barrier Navigation Centers to be permitted as a “use by right” in areas zoned for mixed-use and non-residential zones permitting multifamily uses

Miscellaneous

- AB 101 cont.
  - Can impose objective standards provided they are consistent with Gov. Code section 65583(a)(4)(e.g., maximum number of beds, parking, size and location of client intake areas, security, lighting, length of stay etc.)
  - Must notify applicant whether application is complete within 30 days. If complete, must approve or deny within 60 days
  - Not subject to AB 130 because Low Barrier Navigation Centers area a type of emergency shelter, not a “housing development project” (as defined by Gov. Code, § § 65589.5, 65905.5)

Best Practices

- Prepare comprehensive application checklists
- When an application is submitted, make the completeness determination as soon as possible – do not wait 30 days
- If the application is incomplete, notify the applicant within 30 days and list everything from the local agency's application checklist that is missing
- If the application is complete, the shot clock has begun and local agency's has 60 days (from the date that the application was submitted) to approve or deny
- Approve or deny the application within 60 days of the local agency's receipt of a complete application. If denied, explain why the project does not qualify for ministerial approval

Questions?

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