

SENATE JUDICIARY COMMITTEE
Senator Thomas Umberg, Chair
2025-2026 Regular Session

SB 625 (Wahab)
Version: April 7, 2025
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Fiscal: Yes
Urgency: No
ID

SUBJECT

Housing developments: disasters: reconstruction of destroyed or damaged structures

DIGEST

This bill makes void and unenforceable rules of a common interest development that prohibits, or has the effect of prohibiting, a substantially similar reconstruction of a residential structure damaged or destroyed by a disaster, provides a process for the review and approval of a modification of a homeowner's separate interest in a common interest development, and provides a streamlined, ministerial approval process for certain housing developments on lots where a residential structure was damaged or destroyed by a disaster, as specified.

EXECUTIVE SUMMARY

In early January 2025, extremely dry conditions and high winds in Los Angeles resulted in two of the worst wildfires in state history: the Palisades and Eaton fires. The fires burned 37,469 acres and damaged or destroyed almost 18,000 structures, and resulted in 29 fatalities. In addition, just under 13,000 households were displaced by the Palisades and Eaton fires, exacerbating Los Angeles' ongoing housing and homelessness crises. In response to the wildfires and the need to rebuild, SB 625 proposes to remove barriers for the reconstruction of residential structures destroyed by a disaster in common interest developments (CIDs), and to provide a streamlined, ministerial approval process for housing development proposals where residential structures were damaged or destroyed by a disaster. It also provides specific timelines and a review process for any proposals for a modification of a separate interest within a CID, and limits local government ordinances that prohibit homeowners' use of mobilehomes or recreational vehicles on their land while they are rebuilding. SB 625 is part of the Golden State Commitment legislative package to help California rebuild from the Palisades and Eaton fires. The Committee has received no timely letters of support. It is opposed by the Community Associations Institute - California Legislative Action Committee. SB 625 previously passed the Senate Housing Committee by a vote of 11 to 0.

PROPOSED CHANGES TO THE LAW

Existing law:

- 1) Establishes the Davis-Sterling Common Interest Development Act, providing the rules governing the formation and operation of common interest developments, defining a common interest development (CID) as a community apartment project, condominium project, planned development, or a stock cooperative. Specifies the rights and responsibilities of homeowners and the homeowners' association that governs the CID. (Civ. Code §§ 4000 et seq.)
- 2) Specifies that a CID is created whenever a separate interest coupled with an interest in a common area or membership in an association is conveyed, provided that a declaration, condominium plan, if any, and a final map or parcel map are recorded. (Civ. Code § 4200.)
- 3) Establishes the contents and limitations of a CID declaration, how a declaration can be amended, and that the declaration shall describe the restrictions on the use or enjoyment of any portion of the CID that are intended to be enforceable equitable servitudes. (Civ. Code §§ 4250-4275.)
- 4) Provides that the covenants and restrictions in a CID's declaration are enforceable equitable servitudes, unless unreasonable, and shall take effect to the benefit of and bind all owners of separate interests in the CID. Specifies that these servitudes may be enforced by any owner of a separate interest, or by the association, and that in an action to enforce the servitudes, a prevailing party shall be awarded reasonable attorney's fees and costs. (Civ. Code § 5975.)
- 5) Enables the legislative body of any county or city to adopt zoning ordinances that regulate the use of land and the size, shape, location, and intensity of any buildings and structures on that land. (Gov. Code § 65850.)
- 6) Requires each city and county to adopt a housing element, which must contain specified information, programs, and objectives, including but not limited to:
 - a) an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs, including a quantification of the locality's existing and projected housing needs for all income levels and an inventory of land suitable and available for residential development;
 - b) a statement of the community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing;
 - c) a program that sets forth a schedule of actions during the planning period, and timelines for implementation, including actions that will be taken to

make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the local government's share of the regional housing need for each income level that could not be accommodated on sites identified in the sites inventory without rezoning, among other things. (Gov. Code §§ 65583(a)-(c).)

- 7) Permits a housing development proponent to submit an application for a development that is subject to a streamlined, ministerial approval process and not subject to a conditional use permit or discretionary approval if the development is in-fill development on which the developer commits to place affordability restrictions on the property's deed for any lower- or moderate-income housing units in the development, among other requirements. (Gov. Code § 65913.4.)

This bill:

- 1) Deems any covenant, restriction, or condition in any deed or other instrument, and any provision of a governing document, void and unenforceable to the extent that it prohibits, or includes conditions that have the effect of prohibiting, a substantially similar reconstruction of a residential structure that was damaged or destroyed during a declared disaster or state of emergency.
- 2) Specifies that a court must award reasonable attorney's fees to the proponent of a housing development proposal who prevails in an action to enforce (1), above.
- 3) Defines, for the purposes of (1), above, the following:
 - a) "declared disaster" or "state of emergency" as a state of disaster or emergency declared by the federal government; a state of emergency proclaimed by the Governor; or a local emergency proclaimed by a local governing body, as specified.
 - b) "substantially similar reconstruction of a residential structure" as a housing development proposal that complies with local building code; that has an interior livable square footage not more than 110% of the square footage of the previous structure; the exterior footprint of the proposed housing development is constructed in the same location as the previous structure or has specified set backs; and that the height of the proposed development is not more than 110% the height of the previous structure.
- 4) Specifies a process by which a reviewing body must review and approve a modification to a separate interest in a CID, if any CC&R or any provision of a governing document subjects such modifications to review.

- a) Specifies that the reviewing body must determine whether an application for a modification is complete and provide written notice of their determination within 15 business days of reviewing the application.
- b) Specifies that, if the reviewing body determines that an application is incomplete, the reviewing body must also provide the applicant with a list of incomplete items and a description of how the application can be made complete.
- c) Permits an applicant to cure and address the incomplete items by resubmitting the application after they have received a notice that it is incomplete.
- d) Specifies that a reviewing body must not require an applicant to include an item in their resubmission that was not identified as required by the CC&R and the governing documents in effect when the application was originally submitted.
- e) Specifies that, if an applicant resubmits an application, the reviewing body must determine whether the additional application remedied all incomplete items, and that the reviewing body must make and provide the applicant notice of this determination within 15 days.
- f) Specifies that, if the reviewing body does not make a timely determination as required, the application or a resubmitted application is deemed complete.
- g) Requires, once an application is deemed complete, that the reviewing body must conduct a review of the proposed modification, including a housing development proposal, within 30 business days.
- h) Specifies that, if the reviewing body determines that the application is not compliant with the reviewing body's lawfully adopted standards in effect at the time that the application was submitted, the reviewing body must provide the applicant a full set of comments with a comprehensive request for revisions in writing, and must provide this information when it provides its determination.
- i) Specifies that, if the reviewing body finds that the application is compliant, the reviewing body must approve the application and notify the applicant accordingly.
- j) Allows an applicant to attempt to remedy an application found to be noncompliant, and if an applicant does so, the review of this application should follow the timelines described above.
- k) Requires a reviewing body to provide a process for an applicant to appeal a decision of the body that finds the application incomplete or noncompliant, with a final determination on the appeal due no more than 60 days after the application for appeal.
- l) Specifies that, once a reviewing body approves an application, the reviewing body may not subject the applicant to any appeals or additional hearings.

- m) Requires a court to award reasonable attorney's fees to an applicant who prevails in an action to enforce these provisions.
- 5) Permits a housing development proponent to submit an application for a housing development that is subject to a streamlined, ministerial approval process that is not subject to a conditional use permit or any other discretionary approval if the housing development:
- a) is located on a parcel where a residential structure was destroyed or damaged by a disaster;
 - b) is consistent with objective zoning, subdivision, and design standards in effect at the time that the housing development application is submitted;
 - c) is proposed by a development proponent that owned the site on the date of the disaster;
 - d) is proposed by a development proponent that complies with specified labor standards regarding proving prevailing wages;
 - e) is not on an existing parcel of land governed by the Mobilehome Residency Law, the Recreational Vehicle Park Occupancy Law, the Mobilehome Parks Act, or the Special Occupancy Parks Act; and
 - f) is not located within an historic district or on property included in the State Historic Resources Inventory, or is within a site designated or listed as a city or county landmark or historic property.
- 6) Permits a local agency to waive any objective standard to the extent that the standard would preclude construction of a proposed housing development that does not exceed 110% of the square footage of the previous residential space.
- 7) Requires, if a local government's planning director or equivalent position determines that a housing development application submitted pursuant to (5), above, is consistent with objective planning standards, that the local government approve the housing development within 90 days of the submission of the proposal.
- 8) Requires that, if it is determined that the development is in conflict with any of the objective planning standards, the local government staff or relevant department that made the determination provide the development proponent written documentation of with which standard or standards the proposal conflicts, and an explanation for the reason or reasons that the development conflicts. Requires this documentation to be provided either:
- a) within 60 days of the submission of the proposal; or
 - b) within 30 days of submission of the proposal that was a resubmission to address previous written feedback from the local government.
- 9) Specifies that, if the local government fails to provide the required documentation pursuant to (8), above, the development is deemed to satisfy the objective planning standards.

- 10) Specifies that a housing development is consistent with objective planning standards if there is substantial evidence that would allow a reasonable person to conclude that the development is consistent with the objective planning standards.
- 11) Requires all departments of a local government that are required to issue approval of the housing development prior to the granting of an entitlement to comply with these requirements upon the submission of an application for a streamlined, ministerial approval.
- 12) Specifies that, if a local government approves an application pursuant to these provisions, the local government may not in any way inhibit, chill, or preclude the ministerial approval provided.
- 13) Defines, for the purposes of the provisions in (5), above, "objective zoning standards," "objective subdivision standards," and "objective design review standards" to mean standards that involve no personal or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion that is available and knowable.
- 14) Defines "disaster," for the purposes of (5) through (14), above, as a declared disaster or state of emergency, including a state of disaster or emergency declared by the federal government, a state of emergency proclaimed by the Governor pursuant to specified law, or a local emergency proclaimed by a local governing body pursuant to specified law.
- 15) Specifies that, any ordinance adopted by local governments that is located within an area impacted by a disaster that precludes the placement and use of a manufactured home, mobilehome, or recreational vehicle on a private lot outside a mobilehome park or special occupancy park for use during the reconstruction or repair of any home damaged or destroyed in a disaster shall be unenforceable on a residential parcel that had a structure damaged or destroyed by the disaster for a period of three years following the disaster declaration.

COMMENTS

1. Author's statement

According to the author:

California has a housing shortage of 2.5 million homes, and the Palisades and Eaton fires have added nearly 13,000 homes to that total. It is critical that we ensure a speedy recovery for Los Angeles, and any future disaster sites, in order to curb the ongoing displacement from an already painful housing crisis. SB 625 allows families to cut red tape, while maintaining appropriate adherence to

safety standards, to expedite rebuilding these homes and communities. While Governor Newsom acted swiftly to support rebuilding efforts in Los Angeles, the increasing frequency of climate disasters makes it necessary to codify these actions for all future disasters.

2. The Palisades and Eaton fires were some of the most destructive in California history

In early January 2025, extremely dry conditions and high winds in Los Angeles resulted in two of the most destructive wildfires in state history. The Palisades fire, which started on January 7th, burned a total of 23,448 acres and damaged or destroyed almost 8,000 structures in the Pacific Palisades and Topanga State Park area of west Los Angeles.¹ That same day, other fires also broke out in the greater Los Angeles area: the Eaton and Hughes fires. The Eaton fire consumed 14,021 acres and damaged or destroyed more than 10,000 structures, including significant portions of the city of Altadena.² About half of all properties in the Pacific Palisades and Altadena were destroyed by the Palisades and Eaton fires, and both fires together tragically took the lives of 29 civilians and injured a dozen firefighters. Real estate losses have been estimated to be as high as \$30 billion, and just under 13,000 households were displaced by the Palisades and Eaton fires.³ An estimated 9,592 single family homes and condominiums, 678 apartment units, 2,210 duplex and bungalow courts, and 373 mobilehomes were either heavily damaged or destroyed. Additionally, records show that about 770 rent-controlled units were destroyed in the Pacific Palisades. All told, the January wildfires in Los Angeles were some of the most tragic and destructive wildfires in state history.

3. Common interest developments are important part of California's affordable housing stock

Common Interest Developments (CIDs) are self-governing housing developments comprised of individually-owned housing units and common space that all homeowners and residents of the CID can enjoy. Arrangements of CIDs can vary widely, from condominiums, townhouses, and detached single-family homes, to apartment-like high rises. They may be comprised of only a few housing units, or thousands. CIDs are commonly referred to as homeowner associations, or HOAs, for the body that provides for the CID's self-governance.

¹ CalFire, "Palisades Fire," (3/27/2025) <https://www.fire.ca.gov/incidents/2025/1/7/palisades-fire>.

² CalFire, "Eaton Fire," (3/04/2025) <https://www.fire.ca.gov/incidents/2025/1/7/eaton-fire>.

³ Doug Smith and Sandhya Kambhampati, "Real Estate losses from fires may top \$30 billion, from old mobile homes to \$23-million mansions," Los Angeles Times (Feb. 21, 2025)

<https://www.latimes.com/california/story/2025-02-21/real-estate-losses-from-palisades-and-eaton-fires-top-30-billion#:~:text=Los%20Angeles%20Housing%20Department%20records,the%20city's%20rent%20stabilization%20ordinance>.

The laws that regulate CIDs are encompassed in the Davis-Sterling Common Interest Development Act (Civil Code §§ 4000 et seq.). Many of the rules and structure of the CID are determined by the Declaration of Covenants, Conditions, and Restrictions (CC&Rs) that are filed with the county recorder when the CID is established. These CC&Rs identify the CID's common area, the HOA's responsibilities, the obligation of the HOA to collect assessments from homeowners to cover the HOA's expenses, and a variety of other topics. All homeowners in the CID are members of the HOA, which provides for the self-governance of the CID, managing and maintaining the common space of the CID, setting the rules for the CID, and resolving disputes. The HOA elects a board of directors, and usually has bylaws outlining the governance rules of the HOA and its board of directors (board). The board of the association has a number of duties and powers, such as managing the community, frequently by hiring an individual or entity to do so on its behalf. The board also determines the annual assessments that members must pay in order to cover communal expenses.

The HOA has significant power over individual members: when a homeowner in the CID does not pay their assessments, the HOA has the authority to impose a lien and foreclose on an individual's property. (Civ. Code §§ 5660, 5700.) The HOA may also impose fines on individual members for violations of the rules of the HOA. The Davis-Sterling Act also sets out the various responsibilities for maintenance of the facilities of the CID between the HOA and the individual homeowners. The association is generally responsible for repairing, replacing, and maintaining the common area in the CID, while each owner is responsible for repairing, replacing, and maintaining their separate interest in the CID (typically their individual unit). (Civ. Code § 4775.)

An HOA's board can establish rules governing a broad variety of topics relating to the CID. Such rules can prescribe a great variety of limitations on homeowners; for example, they may limit what can be placed on a homeowner's balcony, prohibit a homeowner from having pets, and specify what kinds of improvements a homeowner is allowed to make on the exterior of their unit. These rules, or Architectural Guidelines, can require submission to an "Architectural Committee" or other body within the HOA of any proposed alterations or additions to a homeowner's property, with approval required before a homeowner can begin the alteration. However, the Davis Sterling Act also includes a variety of provisions in its "protected uses" article that limit the authority of the HOA or the governing documents to regulate a member's separate interest or the member's use or modification of their separate interest. (Civ. Code §§ 4700-4753.) For example, one provision makes any provision of an HOA's governing documents or architectural guidelines void and unenforceable if they prohibit or have the effect of prohibiting the use of low water-using plants. (Civ. Code § 4735.) Another makes any covenant, restriction, or condition in the CC&Rs or any governing document that effectively prohibits or unreasonably restricts the installation or use of an electrical vehicle charging station void and unenforceable. (Civ. Code § 4745.)

The rules of the CID on individual homeowners can be enforced by the association or by other individual homeowners through a lawsuit. In addition, an individual homeowner may sue the HOA for failing to comply with the Davis Sterling Act or the board for failing to fulfill one of its duties, though provisions of the Davis Sterling Act require arbitration in many circumstances before a suit can be brought.

4. SB 625 would streamline rebuilding HOA units when destroyed by a disaster

SB 625 aims to streamline the rebuilding of CIDs and individual units when they have been destroyed by a disaster. Specifically, it makes a CC&R and any provision of an HOA's governing documents void and unenforceable to the extent that that CC&R or provision prohibits or has the effect of prohibiting a substantially similar reconstruction of a residence in a CID that was destroyed during a disaster. This protection would only apply when a state of disaster or emergency has been declared by the federal government, or when an emergency has been proclaimed by the Governor or a local governing body. In addition, SB 625 specifies that a substantially similar reconstruction is one that: complies with local building code; is within 110% of the square footage of interior living space of the previous structure; has a height not more than 110% of the height of the previous structure; and that either will be constructed in the same location and dimensions of the previous structure, or will have specified set backs from the side and rear lot lines.

SB 625 also proposes an expedited review process for any modifications of a separate interest in the CID when the HOA requires that such modifications be subject to review by a reviewing body or architectural committee. This process requires the body to first determine whether an application for a modification is complete within 15 days of receiving the application. If the application is deemed incomplete, the reviewing body must provide the homeowner with a list of incomplete items and how to make the application complete, and the reviewing body must allow the applicant to cure the insufficient items. If an applicant resubmits an application with corrections, the reviewing body must review this application and determine whether all insufficiencies were adequately remedied within 15 days. If the reviewing body fails to make a timely determination of the application's completeness, the application is deemed complete.

Once an application is deemed complete within that timeline, SB 625 requires the reviewing body to review the proposal and take action within 30 days. If it determines that the application is not compliant with the HOA's standards, the reviewing body must return the application to the applicant with a full set of comments and request for revisions for the applicant. An applicant may resubmit their application with the identified noncompliant items remedied, and the timelines for such a resubmission would be the same. If the reviewing body determines that the application is compliant, it must approve the modification.

SB 625 also requires an HOA to provide for an appeal process to appeal a reviewing board or architectural committee's determination that an application for a modification is incomplete or noncompliant. If an applicant brings a civil action to enforce this process, SB 625 requires a court to award reasonable attorney's fees to the applicant if they prevail. It should be noted that SB 625's process for the review of a request to modify a separate interest is not specific to a disaster, and thus would apply this timeline in any instance in which a homeowner must apply to modify their separate interest.

The purpose of these provisions of SB 625 is to help Los Angeles and any city or area of the state recovering from a disaster like a wildfire be able to rebuild quickly after the disaster. This is particularly important considering that Los Angeles, and the state as a whole, is in a severe housing crisis. The state is experiencing a record shortfall of an estimated 1,283,734 affordable homes⁴ and Los Angeles itself is experiencing a housing shortage of almost 500,000 units.⁵ This shortfall has resulted in record high home prices and rent, and the Palisades and Eaton fires have exacerbated this crisis.

Recognizing the need to rebuild quickly to meet the region's housing need and help displaced residents return, the state and Los Angeles County have prioritized streamlining the process for rebuilding. In January, Governor Newsom issued an Executive Order that suspended the California Environmental Quality Act (CEQA) and the California Coastal Act for review of facilities substantially damaged or destroyed by the fires, and directed the HCD and other state and local agencies to coordinate in identifying and enacting measures to expedite and reduce the barriers to rebuilding.⁶ Los Angeles County itself also took steps to streamline permitting for buildings that are "like-for-like" rebuilds and to establish centralized one-stop permit centers for facilitating permitting.⁷ SB 625 builds on these efforts by streamlining the process for rebuilding in CIDs.

5. SB 625 prohibits ordinances that prevent homeowners from using mobilehomes and RVs while reconstructing their homes

SB 625 also makes unenforceable any local ordinance that restricts a homeowner's use of a mobilehome or recreational vehicle (RV) while they are repairing their homes. Specifically, it relates to any ordinance that precludes the placement and use of a

⁴ California Housing Partnership, "Housing Needs Dashboard," Mar. 2024, available at <https://chpc.net/housingneeds/>.

⁵ California Housing Partnership, 2024 Los Angeles County Annual Affordable Housing Outcomes Report (Jun. 28, 2024), available at https://chpc.net/?sfid=181&sf_s=los%20angeles&sf_resources_type=housing-need+level-county.

⁶ Governor Gavin Newsom, Executive Order N-4-25 (Jan. 12, 2025).

⁷ LA County Recovers, "Rebuilding," County of Los Angeles (accessed Apr. 14, 2025), <https://recovery.lacounty.gov/rebuilding/#:~:text=LA%20County%20has%20committed%20to,attend%20the%20appointment%20as%20well>.

manufactured home, mobilehome, or RV on a private lot outside of a mobilehome park or special occupancy park where such mobilehomes and RVs typically are used for habitation. It applies when the jurisdiction that passed the ordinance is within an area impacted by a disaster, and the mobilehome or RV is for use during the reconstruction of a home damaged or destroyed by a disaster on that lot. This provision would help ensure that homeowners can live on their properties, and thus have housing, albeit temporary housing, while rebuilding their home. SB 625 would apply this requirement to three years following a disaster declaration.

6. SB 625 streamlines approvals of housing built to recover from a disaster through the Planning and Zoning Law

The Planning and Zoning Law governs land use and planning throughout the state. (Gov. Code § 65000.) Among other things, it requires each city and county to adopt a comprehensive, long-term general plan for the development of the city and surrounding areas. This plan must include a statement of development policies and a description of the objectives, principles, standards, and plan proposals. (Gov. Code § 65302.) It must also include certain elements, including transportation, housing, conservation, open-space, noise, safety, environmental justice, and land use elements. The planning agency can include additional elements in the plan, and the general plan may address each element to the extent to which that element exists in the planning area. How a city can adopt or amend a city or county's general plan is likewise described by statute. The statute requires that the planning body drafting the general plan share it with numerous stakeholders, and consult a variety of groups and related planning documents (like a groundwater sustainability plan). (Gov. Code § 65350.5.)

The Planning and Zoning Law also contains provisions relating to cities' approvals of housing development that are meant to expedite the approval of new affordable housing developments. This section includes provisions that provide for an expedited review process that is ministerial for housing development proposals when the development commits to making lower or moderate income housing units in the development restricted as affordable housing by deed, or the project is in-fill development. (Gov. Code § 65913.4.) When a housing development application is subject to ministerial review, it is subject to minimal review and discretion such that if it meets objective standards, it must be approved. Such projects subject to ministerial approval typically also are not subject to review under CEQA.

SB 625 proposes a ministerial approval process for developments that are located on a parcel where a residential structure was destroyed or damaged by a disaster. Such a development must be consistent with objective zoning, subdivision, and design review standards, though a local agency must waive any such standards to the extent that they preclude construction that does not exceed 110% of the square footage of the previous residential space. SB 625 provides that a development is considered consistent with the objective planning standards when there is substantial evidence that would allow a

reasonable person to conclude that it is consistent. Such a development also must comply with specified labor standards for paying prevailing wages on the project, and the development proponent must have owned the land on the date of the disaster. This ministerial approval process would not apply to any mobilehome parks or recreational vehicle parks, or any developments located within an historic district.

If a development qualifies, SB 625 specifies that the local government must approve the development within 90 days of the submission of the application for the development. If a local government determines that the development does not comply with one of the objective standards, it must provide the development proponent written documentation of the standards by which it is noncompliant within 60 days of the submission of the application, or within 30 days for any proposal that was resubmitted to address feedback.

Lastly, SB 625 provides mechanisms meant to ensure compliance with its provisions. It specifies that, if a local government fails to provide the required documentation regarding why a proposal is inconsistent with the objective standards, the development is deemed to satisfy the objective planning standards. In addition, SB 625 prohibits a local government from inhibiting, chilling, or precluding the ministerial approval of a project if the application is approved.

These new provisions create an expedited, streamlined approval process for residential developments aimed at rebuilding housing that was damaged or destroyed by a wildfire or other disaster, thereby also helping to speed Los Angeles' recovery and help alleviate the state's housing crisis that was only made worse by the Palisades and Eaton fires.

7. Opposition arguments

According to the Community Associations Institute, which is opposed to SB 625:

SB 625 creates Civil Code Section 4752 to void any covenants or restrictions that have the effect of prohibiting a substantially similar reconstruction of a residential structure destroyed or damaged during a state of emergency. This section introduces new terminology to the Davis- Stirling Act which might be confusing to associations and homeowners. The section also does not consistently use the term "substantially similar reconstruction" which will again create confusion. We believe these issues are addressable with some relatively minor changes.

SB 625 also creates Civil Code Section 4766 that introduces prescriptive standards for architectural review and approval during reconstruction efforts, requiring an architectural review committee to finalize review within 15 days. These standards are overly ambitious and unrealistic, particularly in the context of a

disaster. HOAs, even under normal operating conditions, face challenges in meeting these demands.

After a disaster, which destroys an entire community, it takes time for the community to regroup and HOAs to re-establish operations. HOAs are often tasked with managing limited resources while dealing with the fallout of widespread destruction. The strict timelines imposed by the bill would make compliance difficult, hindering the rebuilding process and potentially delaying residents' ability to return to their homes.

In addition, Section 4766 is not clearly tied to emergency or disaster scenarios, which raises concerns its provisions could be applied beyond post-wildfire situations. Without clear limitations, the bill's provisions could extend to any situation where an architectural review committee is dealing with the modification of a separate interest.

While we support the goal of ensuring communities can rebuild quickly and effectively after a disaster, we believe SB 625 introduces provisions that are impractical and could have the opposite effect.

SUPPORT

None received

OPPOSITION

Community Associations Institute - California Legislative Action Committee

RELATED LEGISLATION

Pending Legislation:

SB 749 (Allen, 2025) prohibits a mobilehome park from pursuing a closure, cessation, or change of use of the park unless management has provided specified resident and nonprofit organizations and public agencies with an opportunity to submit an offer to purchase the mobilehome park, as specified, and makes other changes relating to mobilehomes. SB 749 is currently pending before this Committee.

SB 676 (Limón, 2025) extends CEQA review streamlining to projects for rebuilding after disaster. SB 676 is currently pending before this Committee.

SB 582 (Stern, 2025) establishes licensing flexibilities for nursing homes and assisted living facilities that were destroyed or damaged in the Los Angeles fires, including

creating expedited building permits. SB 582 is currently pending before the Senate Health Committee.

SB 522 (Wahab, 2025) provides that the exemption from just-cause eviction protections for housing built within the last 15 years does not apply to housing built to replace housing substantially damaged or destroyed by a disaster, if the previous housing was covered by just-cause protections, and other requirements are met. SB 533 is currently pending before this Committee.

Prior Legislation:

SB 330 (Stats. 2019) suspended restrictions on development of new housing during a period of a statewide emergency and placed various other restrictions on cities and counties regarding the permitting and approval of housing.

SB 35 (Stats. 2017) required a non-discretionary, ministerial approval process for housing developments that are in-fill projects with affordability restrictions and meet existing objective standards.

PRIOR VOTES:

Senate Housing Committee (Ayes 11, Noes 0)
