



June 12, 2019

The Honorable Phil Ting
California State Assembly
State Capitol
Sacramento, CA 95814

RE: Assembly Bill 1486 (Ting) – Oppose Unless Amended [As Amended May 16, 2019]

Dear Assembly Member Ting:

The Cosumnes Community Services District (CSD) is respectfully opposed to Assembly Bill 1486 unless it is amended to address our concerns. AB 1486 would impose onerous new requirements on public agencies attempting to dispose of their land. The Cosumnes CSD serves an estimated 190,680 south Sacramento County residents in a 157-square mile area. Its award-winning parks and recreation services – including the operation of 97 CSD parks – operate exclusively within the Elk Grove community. It provides fire protection and emergency medical services for the cities of Elk Grove and Galt and unincorporated areas of south Sacramento County.

The Surplus Land Act (SLA) requires special districts and other local agencies to offer the right of first refusal to affordable housing developers, schools, and parks before selling their land. The new requirements imposed by AB 1486 would force public agencies to open up land currently preserved for public purposes to private development by applying a new definition to the requirements of the SLA limiting public agencies' flexibility in maximizing their land and facilities.

AB 1486 also would require a local agency to notice the availability of property prior to participating in any formal or informal negotiations to dispose of the land and would prevent local agencies from negotiating anything other than price in the disposition of surplus land. These provisions would make it difficult for an agency to get a good sense of the market value of their land and impossible to negotiate reserved rights and easements.

Finally, AB 1486 would invalidate any transfer or conveyance of land for value where a public agency did not comply with the requirements of the SLA. This provision would make public agencies' land less marketable when buyers are aware a purchase could be invalidated and would make it difficult for potential buyers to secure the financing and insurance necessary to make property purchases possible, costing public agencies and the communities they serve millions of dollars.

The new requirement in the bill is a challenge for the Cosumnes CSD when the District has reason to lease or otherwise protect land they own, such as buffer land surrounding a landscape corridor, a trail, or land designated for park, new fire stations, open space or facility development. Providing for local growth and balanced communities. Additionally, under the provision of this bill the District would be restricted from managing its property and working closely with the

community to address unforeseen needs as concessions of easements. AB 1486 would make it more difficult to protect District's land for a future governmental use.

We respectfully request AB 1486 be amended to address these issues. Our opposition is not a challenge to the need for affordable housing, but a validation of the need for local flexibility when it comes to proper governmental land use management.

For these reasons, the Cosumnes CSD respectfully opposes AB 1486 unless it is amended.

Sincerely,

A handwritten signature in black ink that reads "Joshua Green". The signature is fluid and cursive, with the first name "Joshua" and the last name "Green" clearly distinguishable.

Joshua Green, General Manager
Cosumnes Community Services District

CC: Tara Gamboa-Eastman, Office of Assembly Member Phil Ting [Tara.Gamboa-Eastman@asm.ca.gov]
Jim Cooper, State Assembly, District 9
Richard Pan, State Senate, District 6
Rylan Gervase, Legislative Representative, California Special Districts Association [advocacy@cdda.net]