



June 15, 2026

The Honorable Sharon Quirk-Silva
California State Assembly
1021 O Street, Suite 4210
Sacramento, CA 95814

**RE: AB 956 (Quirk-Silva) Accessory dwelling units and junior accessory dwelling units
Notice of Opposition – City of Irvine**

Dear Assemblymember Quirk-Silva,

On behalf of the City of Irvine, I write to respectfully express our opposition to AB 956, which would require local agencies to ministerially approve two detached, new construction accessory dwelling units on a lot with a proposed or existing single-family dwelling. The bill would also broaden existing restrictions on covenants, conditions, and restrictions by applying ADU and JADU protections to lots zoned to allow single-family residential use and to common interest developments.

The City recognizes the important role that accessory dwelling units can play in expanding housing opportunities, supporting multigenerational households, and providing more flexible housing options. However, AB 956 would significantly expand state-mandated ADU approvals without providing local governments with adequate tools to address infrastructure capacity, neighborhood conditions, parking constraints, emergency access, utility impacts, or cumulative land use effects. By requiring ministerial approval of two detached ADUs on single-family lots, the bill would further limit the ability of cities to apply locally appropriate development standards and evaluate how multiple new units on individual parcels may affect surrounding neighborhoods.

AB 956 would also continue a troubling pattern of removing local discretion over residential development while assigning implementation responsibility to local agencies. Cities are best positioned to understand their own infrastructure limitations, street widths, fire access needs, utility capacity, stormwater conditions, and neighborhood design considerations. A uniform statewide mandate does not account for the significant differences between communities, including built-out neighborhoods, hillside areas, high fire hazard zones, older subdivisions with limited parking, and communities where sewer, water, or roadway infrastructure may not have been designed to accommodate multiple additional detached units on single-family parcels.

The City is particularly concerned that the bill would increase the number of detached ADUs that must be approved ministerially while also prohibiting local agencies from imposing objective development or design standards beyond those expressly authorized by state law. This approach reduces the ability of cities to ensure that new detached units are designed and located in a manner compatible with existing neighborhoods and site conditions. While the City supports

housing production, housing policy should balance new unit creation with public safety, infrastructure capacity, environmental constraints, and the quality of life of existing residents.

We suggest cities that are excellent producers of housing be exempt from this law. Irvine has been one of the leaders of housing development in Orange County, building more housing than the 10 largest cities in the county combined over the last decade.

AB 956 would also impose additional duties on local governments without reimbursement. The bill expressly states that no reimbursement is required because local agencies have authority to levy service charges, fees, or assessments sufficient to pay for the mandated program or level of service. In practice, however, cities continue to face increasing administrative burdens from state housing mandates, including ordinance updates, application review, public information demands, enforcement issues, and coordination with building, planning, public works, and fire departments. These costs are real, even when the state determines that they do not require reimbursement.

The City respectfully believes that additional ADU policy changes should preserve a reasonable role for local governments to address site-specific constraints and community impacts. Rather than creating a broad new ministerial entitlement for two detached ADUs on single-family lots, the Legislature should work with cities to identify targeted reforms that support housing production while maintaining local authority to protect public health, safety, infrastructure, and neighborhood compatibility.

For these reasons, the City of Irvine respectfully opposes AB 956.

Sincerely,

A handwritten signature in black ink that reads "Larry Agran". The signature is written in a cursive, flowing style.

Larry Agran
Mayor
City of Irvine

cc: Irvine City Council
Sean Crumby, City Manager