

## Communication from Public

**Name:**

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**Council File No:** 25-0002-S19

**Comments for Public Posting:** Please see attached comment letter



Baldwin Hills Estates Homeowners Association (BHEHOA)  
P.O. Box 561403  
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May 31, 2025

Los Angeles City Council Representatives  
Mayor of Los Angeles  
CA State Representatives  
(Sent electronically)

As the representative organization for 3800 residents in the South Los Angeles area, we strongly oppose CA Senate Bill 79 (SB79). We implore our local City of L.A. representatives to support the action in Council File CF 25-0002-S19, move the motion, and establish an official City opposition. Likewise, we call upon our state representatives to vote to oppose SB79 in the state legislature. Our opposition, along with that of many Angelenos, is based upon the following reasons:

- 1) While housing is of statewide interest, Los Angeles spent years of engagement and formulation of its recently completed Housing Element (H.E.), including a CHIP upzoning component, designed to comply with its state-mandated share of additional housing as required via RHNA. The complex and nuanced Housing Element was approved by the City Planning Commission, full City Council, and was approved as compliant by the CA HCD. Including specifics as to the extent and location of additional zoned capacity.
- 2) Usurpation of local ability for engagement and refinement of land use policy details, beyond basic requirements. Inasmuch as the L.A. rezoning is compliant, additional rezoning is excessive and not necessary to meet local housing allocations. Additional zoning changes can and should be processed locally, through actions such as Community Plan updates, as stated in the approved H.E. Further significant upzoning by the state should be reserved for cities with non-compliant H.E.
- 3) SB79 undermines nuances within the approved L.A. H.E. and CHIP upzoning as follows:

- A) Failure to categorically exempt Fire Zones, which BHEHOA is, from significant upzoning and additional density, as the L.A. H.E. does, due to public safety concerns. Recent devastating wildfires have clearly reinforced concerns for economic loss, public safety, evacuation and service challenges, and environmental impact of density in Fire Zones. SB79 has no categorical exemption for Fire Zones, but rather only a qualification standard that fails to adequately mitigate clear additional risks to current and future residents. There is a clear public safety risk for Fire Zones.
  - B) The allowances in SB79 are beyond modest (such as the 4 units allowed via SB9) and will largely alter the scale and character of existing single-family neighborhoods. In some cases, 5-6 story apartments, comprised of 17+ units, amidst modest homes. The L.A. H.E. is able to achieve required upzoning, without such a large effect on low-density neighborhoods by accommodating density specifically on larger boulevards and already designated multi-family locations.
  - C) With no parking requirement, the added street load can exacerbate existing parking issues in already moderate-density areas in centralized locations like South Los Angeles.
  - D) SB79 contains no gains of Affordable Housing (AH) in return for additional zoned capacity, as done in L.A. TOC, the rezoning in the CHIP program, CA SDB or AB 2011. Such a return is reasonable and essential to meet AH goals. Without it, upzoning becomes a gift to developers and landowners. Inasmuch as the L.A. CHIP is a key to creation of AH, providing a more lucrative alternative program for development with no such requirement in SB79, clearly undermines our ability to create desperately needed AH, which is actually a state requirement.
  - E) South LA is a sensitive cultural community that is particularly vulnerable to speculation and gentrification. The L.A. CHIP rezoning seeks to address this by concentrating upzoning in other areas of higher resources, and lower existing density. With a large share of public transit, South LA and other vulnerable communities will have a disproportionate amount of SB79 redevelopment. Despite already being of higher density, with fewer single-family homes, and high demand for larger multi-generational dwellings; often due to previous redlining. SB79 will undermine the attention given to this concern in the L.A. H.E.
- 4) The results of SB79 will place a costly unplanned burden on the City of Los Angeles by way of straining services and infrastructure requirements which cannot be minimized by concentrating development in particular areas and cannot be recovered in the building fee process. Per L.A. City Attorney Hydee Feldstein's letter of 5/23/2025 to the Senate Appropriations Committee, the unfunded costs to the city could easily exceed \$1 billion. Such a burden, amid severe financial crisis and strained services, is unacceptable.

Out of serious concern for the above factors, we strongly oppose SB79. It's an extreme, over-reaching program, trumping local policy, with many negative consequences which can be avoided by the enactment of more conscientious programs, many of which are already included in the approved L.A. H.E. We urge our local and state representatives to not undermine so many of our concerns as residents and oppose SB79.

Thank You,

Shirley Worrels  
President - BHEHOA