



Jun 3, 2026

Los Angeles City Hall
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Los Angeles, CA 90012

To: City Clerk's Office, clerk.cps@lacity.org via online submission

Cc: City Attorney's Office, cityatty.help@lacity.org ; Theadora Trindle, City Planner, planning.sb79@lacity.org ; Erika Cui, City Planner planning.sb79@lacity.org

Re: Low-Rise and Phased Implementation Ordinances

The California Housing Defense Fund (CalHDF) and Californians for Homeownership submit this follow-up to our May 13th letter to inform the City that the industrial exemptions in the phased implementation ordinance are unlawful.

The City's SB 79 ordinance permanently excluded sites located in industrial employment hubs. While SB 79 does contemplate such an exemption, that exemption explicitly does not apply to sites where housing is "a permitted use" where it would be excluded, including through the creation of an "industrial employment hub." (Gov. Code section 65912.160, subd. (e)(2).)

Therefore, sites in the Chatsworth and Downtown hubs which are zoned CM can not be excluded; even if they have multiple zoning designations or are "primarily" industrial. Because they allow residential use, their primary use is irrelevant, and they are ineligible for exclusion.

Additionally, to use the industrial exemption, the designated industrial employment hub must meet the criteria in state law. Government Code section 65912.160, subdivision (e)(2) defines industrial employment hub as "a contiguous area of at least 250 acres designated in the jurisdiction's general plan on or before January 1, 2025, as an **employment lands area** ..."

The City has not designated any sites as employment lands areas in the General Plan. Instead, the City is exempting land designated as industrial land because the Framework Element discusses the job potential of those lands. However, the Framework Element's purpose is to discuss how the City is planning for 1.) increased population and 2.) increased employment. It is only reasonable, then, that the City discusses the importance of lands designated as industrial to job growth. This does not mean that the City has designated

those lands as “employment lands” as other cities have in their General Plans (*see, e.g.*, San Jose). These lands are designated as industrial lands in the General Plan.

Sincerely,



Matthew Gelfand
*Californians for
Homeownership*



Dylan Casey
CalHDF