

Communication from Public

Name: Jacob Pierce
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Council File No: 26-0290
Comments for Public Posting: Please see the attached letter in opposition. Thank you.



March 25, 2026

Councilmember Harris-Dawson
Los Angeles City Hall Office
200 N. Spring St Room 465
Los Angeles, CA 90012

OPPOSITION: CF: 26-0290 – interim control ordinance and proposed changes to parking permitting re: AB 2011 (Wicks)

Dear President Harris-Dawson and Members of the Los Angeles City Council,

I write, on behalf of Abundant Housing LA, to share our opposition to Council File: 26-0290, which would undermine the City's ability to create badly needed affordable and mixed-income housing. The motion attempts to block an active development application but, in so doing, would violate state law. The motion, as written, could also have broader implications and reduce development opportunities throughout Los Angeles.

LA is not currently on track to meet housing production numbers at any of the five income categories in the current Regional Housing Needs Assessment (RHNA) cycle, which runs through October of 2029. It will take a variety of state and local tools to deliver the housing required to fulfill state obligations and serve working and middle-class families who desperately need more housing options. Assembly Bill 2011 (Wicks), passed in 2021 and amended in 2024, is one such tool. The Affordable Housing and High Road Jobs Act ensures by-right approval for affordable and mixed-income housing on qualifying commercial land, if the project fulfills objective standards and meets specified affordability criteria. The bill also requires that all developers using its provisions pay construction workers prevailing wage and provide health benefits.

Projects are able to use AB 2011 on specified types of parcels, including on ones where parking is a "principally permitted use." Under the law, as amended by AB 2243 (Wicks), parking uses shall be deemed principally permitted, regardless of whether a conditional use permit is required for their provision. The motion up for consideration pursues two avenues to attempt to prevent the use of AB 2011 at the specific site. The first directs City staff to draft an ordinance that would disallow public parking in the Agricultural Zone and prepare a report with recommendations to consider modifying allowable public parking in Residential Zones in sensitive areas. The proposed changes to regulations have nothing to do with transportation or how parking is regulated. They have everything to do with attempting to block a housing project already vested under the Housing Crisis Act. As such, these changes will have no impact on the ability of the project to move forward.

The other key component of the motion's operative clause is to issue an interim control ordinance (ICO) disallowing the issuance of parking approvals and permits in the Agricultural Zone that are wholly or partially located in the Very High Fire Severity Zone (VHFSZ) or

Hillside Areas. The motion says the ICO would last 45 days with opportunities for two extensions that would, combined, lengthen its duration to a full year. The issue for the City is that, in order to pass an ICO, the City must establish clear legislative findings that the urgency ordinance is needed to prevent an immediate threat to the public health, safety, or welfare. State laws governing these criteria are strict, as detailed stated in a six-page letter, from Attorney General Rob Bonta's office addressed to cities and counties from July 2023. Mr. Bonta's letter clearly states that local governments may not use urgency ordinances to circumvent state laws, including but not limited to AB 2011.

Furthermore, although this motion attempts to target a specific project, it would have wider-reaching implications and could reduce developable land available for mixed-income and affordable housing. While the impulse to avoid building housing in areas designated very-high-fire risk may sound intuitive, VHFSZ maps reflect broad risk conditions, not parcel-level safety. Risk factors issues can be mitigated, and using them as a blanket barrier to housing excludes many urban neighborhoods where risk can be managed through design, planning and appropriate building standards. As the housing shortage worsens and rents rise, the land covered by very-high-fire severity zones (VHFSZ) has expanded. These zones now cover dense areas home to many residents, large public schools, quality public transit, urban parks and other amenities associated with a vibrant metropolitan life. In the era of climate change, we are increasingly seeing that fires are not even necessarily restricted to VHFSZs, and thus, a more holistic approach to risk management will be required. If we want to live in an area with more affordable housing, we must be realistic about allowing homes in a variety of infill areas and focus on mitigating risk and harms.

For these reasons, I respectfully urge your "no" vote on the motion. Interfering with proposed projects does not only delay housing. It can imperil funding and sends a message to builders that, despite a historic housing shortage, the City is closed to business. To ensure affordable housing options at all income levels, we must plan for the future, allow state housing laws to expedite housing and not be careful not to undermine state tools meant to build a more affordable California.

Sincerely,

A handwritten signature in black ink, appearing to read 'Azeen Khanmalek', with a stylized flourish at the end.

Azeen Khanmalek
Executive Director
Abundant Housing LA