Communication from Public

Name: YIMBY Law
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Comments for Public Posting: Please find attached correspondence from YIMBY Law.

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YIMBY LAW

3/18/2026

Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012
Via email: cpc@lacity.org

Re: Council Motions on AB 2011 & AB 2243

Dear Los Angeles City Council,

YIMBY Law is a 501(c)3 non-profit corporation, whose mission is to increase the accessibility and affordability of housing in California. YIMBY Law sues municipalities when they fail to comply with state housing laws, including the Housing Element Law. Should the City fail to follow the law, YIMBY Law will not hesitate to file suit to ensure that the law is enforced.

Despite its legal duties to provide for housing and Affirmatively Further Fair Housing, this Council is considering actions that would undermine AB 2011, as modified by AB 2243 & AB 893 ("AB 2011"), and in so doing violate state housing law. Multiple draft policy initiatives recently adopted by this Council would contradict the explicit advice of California state authorities. Finalizing those policies would be illegal, and further threaten the compliance status of Los Angeles' Housing Element.

On February 13th, the Council initiated a motion to reduce the width of Canoga Avenue. It is the explicit stated intention of this motion to make the Canoga Avenue development ineligible under AB 2011.[1] In order to fight the potential danger of fire danger, the Council is working to make its roads harder to use as egress routes. There is no serious argument that this serves the interest of improving emergency safety. Not when the council file itself says otherwise.

[1] Los Angeles City Council File No. 26-0198.

In fact, an application was recently submitted for a high-density multi-family project on a golf course currently owned by the Woodland Hills Country Club in the Third Council District. The site is in a single family neighborhood and in a Very High Fire Severity Zone. The applicant inappropriately seeks to utilize the Act by contending that this segment of Canoga Avenue is a "commercial corridor," which could cause the project to be approved ministerially although the site is in a Very High Fire Severity Zone.

On March 4th, this Council approved a motion to redefine Vacant Sites to include golf courses which are already in use and developed, and to support future legislation to that end. City Departments are specifically directed to define golf courses as such within Very High Fire Severity Zones "in the absence of any other contrary controlling definition authoritatively issued by the California Department of Housing and Community Development." Given that HCD *has* authoritatively spoken on this issue, the motion would be functionally worthless, serving only to frustrate and confuse, an effort I would like to think is beneath the dignity of this Council.

According to HCD's official guidance, "[a] vacant site is a site without any houses, offices, buildings, or other significant improvements on it."[2] HCD advises that vacant sites have "[n]o existing uses, including parking lots" and that "[i]mprovements such as crops, high voltage power lines, oil wells, etc.) or structures on a property that are permanent and add significantly to the value of the property." This guidance follows Los Angeles' own, existing ordinances, which exclude parcels with buildings or structures from the definition of Vacant Lots.[3] The golf course in question remains in use and contains buildings that also remain in use. Contending that a functioning golf course in Los Angeles doesn't add significantly to the property's underlying value is a farce that does not comport with California law, HCD guidance, Los Angeles own code, or simple common sense.

The March 10th Planning and Land Use Commission's vote directs City Planning to draft the ICO, which would prohibit all permits for public parking areas utilizing a Conditional Use Permit on parcels in the Agricultural (A) zone that are wholly or partially located in the Very High Fire Severity Zone or Hillside Areas. California's Attorney General already notified cities that urgency ordinances cannot be used for this purpose. They are appropriate to respond to current and immediate public health and safety threats, but

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[2] California Department of Housing & Community Development, *Housing Element Site Inventory Guidebook*, June 10, 2020, https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf.

[3] Los Angeles Municipal Code, § 12.03.

they do not provide an avenue to avoid the substantive application of relevant state law."[4] Such a scheme is invalid unless supported by written findings. AB 2011 requires projects within VHFSZs to include "fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures".[5] Los Angeles' legislature has made no findings that would explain why the fire mitigation measures already contained within AB 2011 are insufficient.

Each of these actions seek to thwart state housing law to block a single project. None withstands legal scrutiny, as attested to by the state's Attorney General, Department of Housing and Community Development, and Los Angeles' own code. These efforts are as much bad policy as they are legally indefensible, and we urge this Council to abandon these unlawful actions before forcing the courts to do so.

Sincerely,

Sonja Trauss
Executive Director
YIMBY Law

[4] Office of the Attorney General of California, *Letter Urgency Ordinances and Ministerial Approval of Housing Projects*, Rob Bonta, July 17 2023, https://oag.ca.gov/system/files/attachments/press-docs/7-17-23%20Letter%20Urgency%20Ordinances%20and%20Ministerial%20Approval%20of%20Housing%20Projects.pdf.
[5] CA Gov Code § 65913.5(a)(4)(A).