



## CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE • BEVERLY HILLS, CALIFORNIA 90210

**Lili Bosse, Mayor**

June 7, 2022

The Honorable Buffy Wicks  
California State Assembly, District  
1021 O. St, Suite 4240  
Sacramento, CA 95814

Re: AB 2011 (Wicks) – Affordable Housing and High Road Jobs Act of 2022  
**City of Beverly Hills – OPPOSE**

Dear Assemblymember Wicks:

On behalf of the City of Beverly Hills, I write to you in respectful **OPPOSITION** to **AB 2011**, your measure that seeks to establish a ministerial, streamlined approval process for 100 percent affordable housing in commercially-zoned areas and for mixed-income housing along commercial corridors. While the idea of repurposing underperforming commercial sites may have merit as a strategy to increase housing production, **AB 2011** could result in a number of inappropriately located and sized housing developments across the state.

Local jurisdictions invest an incredibly large amount of time and resources to develop their housing elements. This process includes deep analysis and large amounts of time gathering community input. Through this process, local jurisdictions take time to analyze and identify the most suitable locations for housing to meet their Regional Housing Needs Allocation (RHNA) targets. This bill could lead to development on sites that would follow out-of-character zoning standards.

**AB 2011** would have the effect of overriding these carefully crafted, locally informed plans, leaving local officials accountable to local impacts from a planning decision that would be out of their hands. Long after Legislators have moved on to different topics, local officials will be living with the consequences of this state override of local planning and zoning.

This one-size fits all approach fails to account for the wide variation in community characteristics across local jurisdictions. Roughly nine percent of the land in the City of Beverly Hills is zoned commercial, but these areas of the City generate 70 percent of the City's revenue. This override of local planning and zoning could diminish revenue to the City of Beverly Hills and lower the ability of the City to pay for vital public services such as police and fire.

Moreover, AB 2011 does not provide any additional resources or funding to cities to offset this loss in revenue nor does it provide funding to improve the existing infrastructure to support a different demand on services. AB 2011 does not take into account how cities will fund the additional city services that would be needed to support these new developments and the resulting increased populations.

Additionally, our City is concerned that AB 2011 would eliminate opportunities for public review of housing development projects. This goes against the principles of transparency and public engagement. Public hearings allow members of the community to inform their representatives of their support or concerns about project impacts. Our City believes that neighborhood concerns about traffic, parking, and other development impacts, should be heard; however, **AB 2011** would streamline the process for review of these projects and undercut the ability of our community to provide their feedback to a developer.

Finally, many jurisdictions create a graduated barrier from a busy commercial area to residential areas through adoption of a general plan. This bill would allow residential housing to be placed in a busy commercial area that could adversely affect the health of residents in the area. Many studies show direct, negative health impacts on people who live adjacent to heavily used commercial areas. Many times, this impacts people from the lower end of the socio-economic spectrum.

For these reasons, the City of Beverly Hills must respectfully **OPPOSE** your **AB 2011**. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Lili Bosse".

Lili Bosse

Mayor, City of Beverly Hills

Cc: The Honorable Ben Allen, Senator, 26th District  
The Honorable Richard Bloom, Assemblymember, 50<sup>th</sup> District  
Andrew K. Antwih, Shaw Yoder Antwih Schmelzer & Lange