



CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE • BEVERLY HILLS, CALIFORNIA 90210

Lili Bosse, Mayor

September 26, 2022

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, Suite 9000
Sacramento, CA 95814

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

Dear Governor Newsom,

On behalf of the City of Beverly Hills, I respectfully request that you **VETO AB 2011 (Wicks)**, which would 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.

AB 2011 was recently amended to exempt development on vacant sites in very high fire hazard severity zones and exempt development within 3,200 feet of an oil or gas refinery. The bill was also amended to add new provisions that authorize a local government to exempt a site for a 100 percent affordable housing project if the local government identifies an alternative site. Recent amendments also preclude heights of 65 feet in the coastal zone.

While we appreciate these amendments, they do not go far enough to address our city's longstanding concerns with provision in this measure that override local control. We remain opposed to **AB 2011** after reviewing the most recently amended version of this bill, which has reached your desk for final action.

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.

This one-size fits all approach fails to account for the wide variation in community characteristics across local jurisdictions. Roughly 9 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 to 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.

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.

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

Sincerely,

A handwritten signature in black ink that reads "Lili Bosse". The signature is written in a cursive, flowing style.

Lili Bosse
Mayor, City of Beverly Hills

Cc: The Honorable Buffy Wicks, Assemblymember, 17th District
The Honorable Ben Allen, Senator, 26th District
The Honorable Richard Bloom, Assemblymember, 50th District
Andrew K. Antwih, Shaw Yoder Antwih Schmelzer & Lange