



**SOUTH BAY CITIES**  
COUNCIL OF GOVERNMENTS

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October 27, 2022

The Honorable Holly J. Mitchell, Chair  
Los Angeles County Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012

RE: Concerns Regarding Los Angeles County Land Bank Program  
Dear Supervisor Mitchell,

The South Bay Cities Council of Governments (SBCCOG) has concerns regarding the county's proposal to establish a land bank pilot program that would undermine local land use and zoning regulations and exempt property taxes while the county "holds" land for future use. Local jurisdictions are required by law to carefully study and develop sound General Plan Land Use and Housing Elements. The county should not implement the Land Bank Pilot without input from incorporated cities, particularly if it does not conform with local development standards and is not restricted to unincorporated areas.

As proposed, the Land Bank Pilot would not only negate the extensive community and stakeholder input received and analyzed as part of the development of General Plans, but also would explicitly usurp local authority over land use decisions. City Councils are elected by voters to listen, respond, and work with the community to adopt these local priorities. Allowing the county to indefinitely hold land for potential future uses overrules local land-use decision making, cripples cities' ability to implement their prepared plans and threatens future funding for local services.

If the county moves forward with implementation of the Land Bank Pilot, it should only apply to unincorporated areas of the county and should be voluntary for incorporated cities. The county should also ensure that the pilot program adheres to all local land use and zoning requirements for cities that do participate.

The fact that the county has developed the program without stakeholder input further erodes trust between the county and the 88 cities in it. The Blue Ribbon Commission on Homelessness (BRCH) report released earlier this year highlighted the severe challenges the county faces in its attempts to solve homelessness through LAHSA and Measure H. The BRCH report clearly identified the need for the county to partner with cities to address the complex issue of homelessness. Housing affordability is as complex an issue and there is no reason the same philosophy shouldn't apply to the Land Bank Pilot.

We understand the dire need for affordable housing in Los Angeles County. Like the county, cities are responding and continuing to plan, zone, and promote opportunities for the construction of housing projects to meet that need. Additionally, state legislation continuously propels cities and the county to reexamine current land-use functions. The implementation of major housing bills, like SB 9 and most recently AB 2011 and SB 6, will drastically transform the supply, affordability, and landscape of housing throughout the region. These statewide laws, along with the reasons stated above, make the creation of a countywide land bank program unnecessary.

LOCAL GOVERNMENTS IN ACTION

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Nevertheless, we understand that the county, like SBCCOG member cities, also has its own land use authority and must find opportunities to create and fund affordable housing in its unincorporated areas. We believe the land bank program may be most suitable for the unincorporated areas in each Supervisor's jurisdiction, or in cities that chose to participate.

Again, the SBCCOG urges you to reconsider the land bank proposal and to work collaboratively with cities throughout the county to address the urgent affordable housing needs our region faces.

Sincerely,

John Cruikshank, Chair  
South Bay Cities Council of Governments  
Councilmember, City of Rancho Palos Verdes

CC: Los Angeles County Supervisors Hahn, Kuehl, Solis, Barger  
Los Angeles County CEO  
Los Angeles County Division, League of California Cities  
California Contract Cities Association

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