

Communication from Public

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Date Submitted: 01/19/2026 06:25 PM

Council File No: 25-1083

Comments for Public Posting: I appreciate the thoughtful concerns raised regarding SB 79 and share the goal of producing housing that is both abundant and affordable near high-quality transit. However, the proposed “Transitional Parcel Consolidation Overlay” fundamentally misdiagnoses the problem and would, in practice, undermine SB 79’s core purpose: enabling housing production at the scale required to address Los Angeles’ housing and affordability crisis. First, housing scarcity — not parcel consolidation — is the primary driver of speculation, rent volatility, and displacement. Restricting the ability to assemble parcels near transit does not protect affordability; it constrains supply precisely where it is most needed. History shows that when housing capacity is artificially limited, capital does not disappear — it bids up existing housing, accelerates rent increases, and deepens displacement pressures. Second, the assertion that mid-rise and high-density housing inherently favors “Wall Street” over local builders is not supported by evidence. Small and mid-sized builders frequently rely on parcel consolidation to make projects viable given seismic requirements, accessibility standards, construction costs, and financing realities. Limiting consolidation would disproportionately advantage only land-rich incumbents while freezing out newer, minority-owned, and mission-driven developers who cannot compete in fragmented, under-scaled markets. Third, the proposed overlay would re-introduce exactly the type of local constraints SB 79 was designed to overcome. While framed as “guardrails,” parcel-by-parcel consolidation limits function as a de facto downzoning tool, particularly in R2 and R3 areas near transit. This would sharply reduce feasible unit counts, raise per-unit construction costs, and make inclusionary or deed-restricted affordable housing far harder to deliver. Fourth, the argument that incremental, low-scale infill is inherently more affordable is misleading. Small projects are often the most expensive on a per-unit basis, rarely include on-site affordability, and cannot absorb the cost of tenant protections, relocation benefits, or family-sized units. Larger projects — including podium and mid-rise developments — are often the only projects that can feasibly deliver subsidized units, deeper affordability, and long-term tenant stability. Fifth, delaying housing production through a ten-year “transition period” is inconsistent with the

urgency of the crisis. Los Angeles cannot afford another decade of constrained housing supply while rents continue to rise faster than incomes. Affordability does not emerge from waiting; it emerges from sustained, abundant production near jobs and transit. If the City wishes to address concerns about displacement and affordability, there are proven, non-supply-constraining tools available: Strong tenant protections and right-to-return policies Robust inclusionary housing requirements Public land acquisition for social and mixed-income housing Anti-rent-gouging enforcement Preservation programs for existing naturally affordable housing These tools address the real harms without suppressing housing production. SB 79 recognizes a fundamental truth: we cannot regulate our way out of a housing shortage by limiting who can build and where. Housing abundance near transit is not the enemy of affordability — it is a prerequisite for it. Policies that restrict parcel consolidation risk protecting neighborhood aesthetics at the expense of renters, workers, and future Angelenos who are currently locked out of the city. For these reasons, I urge the Council to implement SB 79 faithfully, without overlays that would re-create the very barriers the legislation was intended to remove.