

Communication from Public

Name: Abundant Housing LA

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Council File No: 25-1083

Comments for Public Posting: Abundant Housing LA, Inner City Law Center, Streets for All, Housing Action Coalition, and YIMBY LA support Option 3 in 2/18/26 Staff report from LADCP.



February 20, 2026

Councilmember Blumenfield
Los Angeles City Hall Office
200 N. Spring St Room 465
Los Angeles, CA 90012
(213) 473-7003

RE: Council File: 25-1083 – Impacts of SB 79 (Wiener)

Dear Chair Blumenfeld and Members of the Planning and Land Use Management Committee,

We, the undersigned organizations, write in response to the Department of City Planning's February 18, 2026 report regarding the implementation of SB 79 and to support the adoption of Option 3 as recommended by the Department. We want to begin by recognizing the constructive work of the Department in developing a thoughtful framework to meet the City's obligations under SB 79 while furthering the City's commitment to Affirmatively Furthering Fair Housing (AFFH).

Los Angeles has continually shown a commitment to implement state law while adapting policies and programs to the local context. The Planning Department's proposal reflects that commitment. In particular, the report demonstrates a clear understanding that SB 79 presents an opportunity to further local goals, including focusing growth near transit and affirmatively furthering fair housing. **Option 3 in particular is the only option that ensures that the City of Los Angeles can further its goal of tailoring state policies to local context while implementing SB 79 in a manner that is legally defensible.**

Option 3 ensures that Los Angeles will remain in compliance with SB 79 regardless of how the Department of Housing and Community Development (HCD) ultimately issues guidance on capacity analysis. As HCD continues to clarify questions regarding floor area and density calculations and capacity analysis methodologies, it is critical that the City adopt an approach that provides sufficient legal durability and a reasonable compliance buffer. In Appendix A, we

highlight some of the questions we have about the methodology used to calculate both SB 79 and local capacity.

In the current enforcement environment surrounding state housing laws, jurisdictions are expected to demonstrate that zoning capacity is realistic, legally defensible, and consistent with state definitions. Option 1 and 2 have the potential to expose the City to findings of noncompliance or litigation risk if state guidance ultimately diverges from local capacity assumptions. Adopting Option 3 is the best strategy to enact a feasible local alternative plan while also accessing legally allowed deferrals.

By proactively adopting standards that clearly satisfy SB 79, the City retains substantial discretion over how transit-adjacent growth is shaped. If Los Angeles chooses to proceed with Option 1 or 2 and is later found out of compliance, SB 79 would take effect throughout all transit zones in the City and eliminate the City's ability to tailor implementation to neighborhood context. A durable, forward-looking implementation strategy today preserves City Hall's ability to adopt strategies that further both state and local goals.

Moreover, Option 3 most fully advances the City's AFFH obligations, by increasing project feasibility in high opportunity neighborhoods. Transit-rich areas—particularly in higher-resource communities—have historically been underutilized for multifamily housing. A robust implementation of SB 79 furthers the City's goals to increase access to opportunity, jobs, and transit. The Planning Department's framework rightly recognizes that compliance with SB 79 and advancement of AFFH are mutually reinforcing goals.

Los Angeles has demonstrated leadership in implementing state housing law in a manner that centers equity, feasibility, and legal compliance. We are grateful to the Department of City Planning for its careful work on this proposal and strongly support adoption of Option 3 to ensure the City meets its obligations under SB 79 and AFFH in a durable and defensible manner.

Thank you for your continued leadership on this critical issue.

Sincerely,

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Executive Director
Abundant Housing LA

Mahdi Manji
Director of Public Policy
Inner City Law Center

Marc Vukceвич
Director of State Policy
Streets for All

Jesse Zwick
Southern California Director
Housing Action Coalition

Zachary Pitts
LA Director
YIMBY Action

Cc: Mayor Karen Bass
Councilmember Eunisses Hernandez (CD1)
Councilmember Adrin Nazarian (CD2)
Councilmember Nithya Raman (CD4)
Councilmember Katy Young Yaroslavsky (CD5)
Councilmember Imelda Padilla (CD6)
Councilmember Monica Rodriguez (CD7)
Councilmember Marqueece Harris-Dawson (CD8)
Councilmember Curren D. Price, Jr. (CD9)
Councilmember Heather Hutt (CD10)
Councilmember Traci Park (CD11)
Councilmember John S. Lee (CD12)
Councilmember Hugo Soto-Martínez (CD13)
Councilmember Ysabel J. Jurado (CD14)
Councilmember Tim McOsker (CD15)

Appendix A: Technical Clarifications Requested

1. Did the calculations of allowed floor area use SB 79's definition of FAR, or the Los Angeles Municipal Code definition?
2. Did the calculations of SB 79 capacity include potential bonus density and FAR achievable under the State Density Bonus Law (SDBL)?
3. How were stations such as Chinatown analyzed, where zoning may allow a higher number of units but significantly less floor area than contemplated under SB 79? How does that discrepancy affect capacity calculations?