

May 26, 2026

Planning and Land Use Management (PLUM) Committee  
Los Angeles City Council  
c/o Office of the City Clerk, City Hall, Room 395  
Los Angeles, California 90012

**Re: Public Comment — PLUM Committee Agenda Item #8 | SB 79 Phased Implementation Ordinance & Low-Rise Ordinance | CF 25-1083-S4 | CPC-2026-1797-CA / CPC-2026-1798-MS**

Dear Honorable Committee Members:

As the Director of Government & Public Affairs for the Los Angeles chapter of the American Institute of Architects (AIA|LA), I am writing to share recommendations on how to improve the City of LA's implementation of SB 79. AIA|LA represents more than 4,500 licensed architects and design professionals who design, permit, and build housing across the City every day. We write in strong support of PLUM Agenda Item #8 and urge the Committee to advance both ordinances to the full City Council **with the additional directives outlined below** — ensuring Los Angeles leads on transit-oriented housing, not merely complies.

### **I. The CPC Has Acted — Now PLUM Must Lead**

On May 14, 2026, the City Planning Commission unanimously approved both the Low-Rise Ordinance ([CPC-2026-1797-CA](#)) and the SB 79 Phased Implementation Ordinance ([CPC-2026-1798-MS](#)), recommending their adoption by the City Council. On May 21, 2026, Director of Planning Vincent P. Bertoni transmitted the Phased Implementation Ordinance to the Council File ([CF 25-1083-S4](#)), recommending four specific Council actions: CEQA findings, preparation of the ordinance by the City Attorney, adoption of the CPC Findings, and a direction to DCP to amend the SB 79 Map Inventory to reflect final Council action and any HCD guidance.

AIA|LA supports all four recommended actions and urges the PLUM Committee to advance them without delay. With SB 79 taking effect July 1, 2026 — less than six weeks away — the window for local action is closing. The Low-Rise Ordinance establishes the Low-Rise Incentive Area (LIA), extending housing incentives of up to 16 units at 2.90:1 FAR across a half-mile radius of 55 Opportunity Stations in majority Higher and Moderate Opportunity Areas. The Phased Implementation Ordinance codifies the delay framework that buys Los Angeles time to build this housing on its own terms, rather than defaulting to full SB 79 effectuation on July 1.

This is not a minimalist state mandate response. This is the City Council's opportunity to define what transit-adjacent housing in a major American city can and should look like. The PLUM Committee has the authority — and the responsibility — to ensure these ordinances reach the Council floor paired with improvements that go beyond baseline compliance to actively incentivize design excellence, genuine affordability, and broad-based financial feasibility.

### **II. The Fear of Disruption Is Significantly Overstated**

As these ordinances advance, we want to directly address the concern — raised in public comments throughout [CF 25-1083](#) — that the Low-Rise Ordinance will rapidly destabilize neighborhoods or unleash speculative development. That fear, while understandable, is not supported by the evidence.

The binding constraint on housing production in Los Angeles is not zoning capacity — it is project economics. Getting any multifamily project to pencil out requires threading a needle of construction costs, interest rates, financing gaps, entitlement timelines, and pro forma land residuals. Upzoning a parcel does not guarantee — or even make likely — that a project will be built. The City's own record confirms this: not a single unit has been delivered under the existing Opportunity Corridor Transition Incentive Area since CHIP's adoption. The mechanism this ordinance replaces and reforms produced no housing. The theoretical risk that these sites will be overrun with development is refuted by the practical reality that they've been legally developable — and dormant — for years.

Furthermore, the scope of SB 79 is widely misread. Of the 141 SB 79 TOD zones within the City, approximately 88% already qualified for delay exemptions under the law's own criteria — fire hazard zones, historic districts, and lower-opportunity areas. The ordinances before the Committee reflect that carefully scoped response. Sites with RSO tenants, designated historic resources, HPOZ protections, and Fire Restriction Areas (the intersection of VHFHSZ and Hillside designation, as defined in the Low-Rise Ordinance) remain appropriately shielded. Change will be incremental and targeted, not sweeping.

### **III. Recommendations for PLUM Committee Action**

AIA|LA urges the Committee to recommend adoption of both ordinances to the full Council and to direct staff to pursue the following improvements, which are squarely within the Council's authority:

**1. Extend Transitional Height Relief to All LIA Projects.** The Low-Rise Ordinance's multi-bedroom bonus correctly supersedes transitional height and step-back requirements — but only for projects providing 40% or more three-bedroom units (Section 12.22 A.38(g)(3)(iv)). This leaves the majority of LIA projects subject to a rule that routinely reduces nominally four-story projects to three or two stories on mixed-use boulevard parcels adjacent to R1 zones — the very sites where the ordinance is meant to produce housing. The Committee should direct City Planning to extend transitional height relief to all qualifying LIA projects as a companion amendment. The current design creates a paradox: the most financially challenged projects get no relief from the single barrier most directly undermining their feasibility.

**2. Create a Sliding Scale for the Multi-Bedroom Bonus.** The all-or-nothing 40% three-bedroom threshold creates a cliff effect that excludes mixed-income and small-lot projects that cannot standardize on large units. A graduated scale — partial bonus at 20–39%; full bonus at 40%+ — would broaden access to the density increments necessary for project viability across a wider range of programs and developers, including non-profit and community land trust partners.

**3. Commission a Financial Feasibility Study Before 2030.** Councilmember Yaroslavsky was direct at the March 24 Council hearing: “If this doesn't result in housing that gets built, none of this matters.” The Committee should direct Planning staff, in coordination with the Housing Department, to produce a pro forma analysis of representative LIA project types across the 55 Opportunity Station corridors — identifying the precise fee deferrals, subsidy levels, or additional density needed to move marginal projects to viability. This study should directly inform the 2030 accelerated upzoning framework before it is written.

**4. Streamline Departmental Clearances for LIA Projects.** The 55 Opportunity Stations define a bounded geography within the City — a manageable footprint for targeted permitting reform. The Committee should

recommend that Planning coordinate with LADBS, LADWP, the Bureau of Engineering, and LAFD to establish pre-approved, expedited clearance pathways for four-to-sixteen unit LIA projects. Permitting bottlenecks are among the most-cited feasibility barriers for projects of this type, and reducing entitlement uncertainty costs the City nothing in direct subsidy.

**5. Require Ongoing Legal Synchronization with SB 79.** The Phased Implementation Ordinance should include language requiring that any future state-level amendments, postponements, or repeal of SB 79 trigger an automatic review of the City's local provisions — ensuring Los Angeles's implementation framework remains legally synchronized with state law and does not inadvertently codify incentives or exemptions that outlive the statute they were designed to implement. Director Bertoni's May 21 transmittal already anticipates this through its recommendation to amend the SB 79 Map Inventory to reflect HCD guidance; the Committee should codify this as an ongoing obligation, not a one-time directive.

### **Conclusion**

AIA|LA is ready to serve as a technical partner in design standard development, pro forma working groups, and departmental clearance task forces. We ask the Committee to advance both ordinances to the Council floor promptly — paired with the directives above — and to signal that Los Angeles intends to lead on transit-adjacent housing, not merely comply.

The 55 Opportunity Stations are on the map. The CPC has acted unanimously. Now let us build on them.

Truly yours,



Will Wright, Hon. AIA|LA  
Director, Government & Public Affairs