



United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

July 30, 2025

Honorable Assemblyman Isaac Bryan
California State Assembly District 55
1021 O Street, Suite 5630; P.O. Box 942849
Sacramento, California 94249-0055
via email

RE: Opposition to California Senate Bill 79, *Housing development: transit-oriented development: California Environmental Quality Act: public transit agency land*

Dear Assemblyman Bryan,

The United Neighborhoods Neighborhood Council (UNNC) represents the historic neighborhoods of Arlington Heights, West Adams and Jefferson Park, all within the 55th Assembly district. UNNC's Governing Board voted during its meeting on June 5, 2025, to ask that you vote NO on the above referenced Senate Bill 79 when it comes before the State Assembly as this bill will have a substantive negative impact on your and our constituents.

UNNC has a long record of supporting equity and diversity in affordable housing. UNNC also supports major housing and mixed-use projects along our corridors instead of in stable character and historic neighborhoods. As you know, LA's housing crisis is experienced by people who are unhoused and Angelenos at risk of losing their homes. As noted by the Los Angeles City Council members John S. Lee and Traci Park in a resolution referred to the Council's Rules, Elections and Intergovernmental Relations Committee:

*"...while the intent of SB 79 may be to address issues around the supply of housing, the bill's provisions further undermines local governance, circumvents local decision-making processes, and imposes unintended burdens on communities...."*¹

SB79 does NOT require sufficient affordable housing or any housing for the homeless.

The highest priority for any housing bill should be a substantial increase in housing for extremely low income (ELI) and very low income (VLI) renters as well as housing and services for the homeless. Rather than benefiting such individuals, families, and communities, SB79 will destroy their permanent and often affordable housing. The primary benefits of the bill will accrue to developers, land speculators, and financiers seeking to build new largely market-rate six to seven story apartment

¹ John S. Lee (Los Angeles City Council District 12) and Traci Park (Los Angeles City Council District 11), [Resolution Referred to the Rules, Elections and Intergovernmental Relations](#), LACityClerk Connect Council File Management System, Council File: 25-0002-S19: (accessed June 5, 2025)

United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

buildings (with density bonuses buildings could be 10.5 stories) on properties which are often rent-controlled, naturally-occurring affordable, single and multi-family sites.

The bill makes little provision for ELI and VLI renters (and no provision for homeless) with the largest benefits accruing to market rate and so-called “low income” renters. It is critical to note that the 2025 “low income” designation is set at \$84,850/year² or \$12,000/year more than the City of Los Angeles, Planning Department, Planning Assistant full time salary (\$72,578/year)³. Per the most recent census, Council District 10 has “a lower median household income... and a higher percentage of residents living in poverty than [the] city average”⁴ and the average per capita income for Assembly District 55 is \$57,293⁵ or just above the VLI level of \$53,000.

The absence of substantial ELI and VLI affordable housing from SB 79 does NOT serve our shared community and others in Los Angeles for whom affordable housing is the most pressing need.

UNNC stands with other Los Angeles Neighborhood Councils⁶, Los Angeles City Attorney Hydee Feldstein-Soto, and more than 100 California cities that officially oppose SB79.⁷

SB 79 is an unfunded mandate for cities like Los Angeles that can ill afford additional costs to provide customary and necessary services. City Attorney Feldstein-Soto indicated in a May 23, 2025, letter to the Chair of the State Senate Appropriations Committee Anna Caballero:

“While the intent of SB 79 is to further address issues around the supply of housing, the bill’s provisions impermissibly impose billions of dollars of costs on Los Angeles and other local jurisdictions, undermine local governance, circumvent local decision-making processes, and impose unintended burdens on communities...”⁸

City Attorney Feldstein Soto highlighted in the same letter that SB79 does NOT include any funding for the approximately \$1.6B in necessary infrastructure upgrades and enhancements to first responder budgets in the City of Los Angeles alone, to support the high-density developments required by the Bill.

² Los Angeles County, Department of Regional Planning, [Los Angeles County Affordable Housing Program INCOME LIMITS Effective 5/12/2025](#) (accessed July 26, 2025).

³ City of Los Angeles, Career Pages, [PLANNING ASSISTANT 7939 \(Revised 09-23-24\)](#) (accessed July 26, 2025).

⁴ Office of Mayor Eric Garcetti, [LA Census 2020 Citywide](#) (accessed July 25, 2025).

⁵ Census Reporter, [Assembly District 55](#) (accessed July 25, 2025).

⁶ LACityClerk Connect Council File Management System, *Council File: 25-0002-S19* (Accessed June 4, 2025 <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=25-0002-S19>)

⁷ CA Senate Rules Committee, *Senate Floor Analyses*; June 2, 2025 (Accessed June 4, 2025 <https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml>).

⁸ City Attorney Hydee Feldstein-Soto to State Senator Anna Caballero, *SB 79 (Wiener) – OPPOSE Unless Amended*, May 23, 2025.

United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

The City Attorney states that such costs are a “*constitutionally required reimbursement from the State.*”⁹ The passage of SB79 without the provision of funds to pay for substantial infrastructure costs that result from implementation of the bill:

- Constitute an illegal unfunded mandate to support infrastructure expansion, administrative and legal costs. and
- Will result in substantial unplanned costs to Angelenos for the necessary upgrades through increased taxes, higher utility rates, etc.

SB79 is bad urban planning. It will:

- Destroy neighborhoods and communities by overriding existing zoning within a half mile of major rail/bus stops without ensuring housing affordability;
- Destroy hard-won generational equity in single family homes in historically underserved and under-resourced communities like the 55th Assembly district, including the UNNC communities, and across the State.
- Silence the voices of underserved communities that have been historically burdened with top-down zoning rules by removing all of the community’s existing rights provided by standard processes and replacing those rights solely with ministerial review and approval,
- Undermine Los Angeles’ State approved climate, transportation, and housing commitments by requiring increased density without review of impacts on the environment and public health. The State approved commitments already identify the geographic areas for State mandated new housing which are mostly along transit and commercial corridors, and
- Allow, through density bonuses, structures as tall as 105’ (approximately 10.5 stories). Some of the most densely populated areas within the UNNC boundary, including Jefferson Park and parts of its Historic Preservation Overlay Zone (HPOZ), are within a half mile of a major rail stop. With more than 2,000 structures, the Jefferson Park HPOZ is the second largest community in the city with such a designation. Thus, any property in those neighborhoods, including the middle of multi- or single family residential, industrial or commercial block, will be available for SB79 development.

SB79 should be stopped before it:

1. Eliminates local control of land use;
2. Obstructs the City’s ability to meet its housing commitment in the Los Angeles State certified Housing Element, including affordable housing goals, while simultaneously imposing an unfunded mandate of billions of dollars on our communities that can ill afford such costs;
3. Wastes millions of dollars and valuable resources already expended by Planning Departments across the State in creating the Housing Elements that comply with State and Federal standards. The Housing Elements already accomplish the goal of creating needed housing in a sensitive and sensible way, which SB79 does not do.

⁹ Ibid.

United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

4. Ignores and results in the loss of the careful planning that created historic zones and specific and community plans; and
5. Destroys thriving communities and neighborhoods in LA.

SB79 could be modified to improve neighborhoods by including the following critical changes:

1. **Infrastructure**: The Bill should include funding for infrastructure costs resulting from construction and increased density. Such funding should, at a minimum, cover the estimated costs of additional infrastructure and public safety, such as, increase in first responders, and address damage to streets from construction vehicles, etc., which will likely occur since such streets were not intended to support heavy building equipment.
2. **Reliance on Dedicated Bus Lanes**: Remove dedicated bus lane stops as a radial landmark for calculating the circle of inclusion of neighborhoods subject to implementation of the Bill. We ask for the removal of such bus stops as part of the bill because dedicated bus lanes can be transitory, that is, they can be implemented for a time, later moved, and bus lanes can be removed. For example, Los Angeles is considering creating dedicated bus lanes in anticipation of the 2028 Olympics, but it is reported that there is no plan at this point to make them permanent.¹⁰ The transitory nature of the bus lanes and their stops could result in:
 - a. Residents of high density areas could be left without access to the transportation that the development was predicated on if the bus stop or bus lane is removed.
 - b. An abusive use of the law, where a bus lane is installed in order to open up a section of the City for development. Once developed the bus lane is removed leaving the residents without access to the transportation the development was predicated on.
3. **Historic Cultural Preservation**: Historic Preservation Overlay Zones (HPOZ), Historic Cultural Monuments (HCM), and other duly designated historic properties should be exempt from SB79. Such Zones and properties represent the historic cultural history of our communities. Please DON'T erase the historic cultural heritage and inheritance of our communities as is being done at the federal level.

¹⁰ Jamie Ferrell, [4 Biggest L.A. Transportation Projects Being Built for The Olympics—LAX People Mover, D Line Extension, And More](#), Secret Los Angeles; May 13, 2025 (accessed July 29, 2025).

United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

4. **Address Environmental Degradation & Quality of Life:**

- a. High population density has been scientifically linked to higher mortality rates, a range of cancers, pulmonary and heart disease and other diseases.¹¹ SB79 will increase population density in dense geographic urban areas like South Los Angeles.

South Los Angeles already suffers from high population density and inequity in open green space and public parks compared with other parts of the City. Please note that Jefferson Park, within the UNNC boundary, is “*among the highest [population] densities for the city of Los Angeles and among the highest densities for the county.*”¹² Yet, our community is park-poor and has only a 15% tree canopy, far below the citywide average of 25%. UNNC and specifically Jefferson Park are in the bottom quartile and is designated “Very High Priority” in the Trust for Public Land's Park Serve tool, which characterizes the general area surrounding Crenshaw and Exposition (the very same local geography targeted in SB79) as a “Very High Priority” for park needs.¹³ In an even broader overview, the West Adams-Baldwin Hills-Leimert Park Community Plan, which already provides for intense development near major transit, states that ***the community plan area has a 1,755-acre park/open-space deficit.***¹⁴ The high-density projects promoted by SB 79 tend to eliminate any open space that would be available to plant trees and provide parks.

Public parks promote outdoor physical activities and are critical to increased public health. Research links access to urban parks to decreases in the risk of childhood obesity, heart disease, depression, anxiety, and some common cancers as well as critical increases to bone and muscle health.^{15, 16}

Since SB79 requires increases in population density that should trigger a concomitant increase in the number of neighborhood parks to address the community's health and quality of life, particularly in geographic areas like South Los Angeles that historically have few parks. Additionally, SB79 should NOT direct local governments to waive local rules that

¹¹ Elaine Ruth Carnegie, et.al., *Is Population Density Associated with Non-Communicable Disease in Western Developed Countries? A Systematic Review*, International Journal of Environmental Research and Public Health, 2022 Feb 24; 19(5) 2638 (accessed June 5, 2025).

¹² Los Angeles Times, *Mapping LA, South LA, Jefferson Park*, (accessed June 5, 2025).

¹³ Trust for Public Land, *The ParkServe Database* (accessed July 29, 2025).

¹⁴ Los Angeles City Planning, *West Adams-Baldwin Hills-Leimert Park Community Plan, Parkland Needs in the West Adams-Baldwin Hills-Leimert Community Plan*: June 2016, 5-24 (accessed July 30, 2025).

¹⁵ Jennifer Wolch, et.al., *Childhood obesity and proximity to urban parks and recreational resources: A longitudinal cohort study*; Health & Place, v17, n1 January 2011 (accessed June 5, 2025).

¹⁶ Centers for Disease Control, *Benefits of Physical Activity*, April 24, 2024 (accessed June 5, 2025).



United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

require developments to include open spaces, that is, new SB 79 buildings should retain the local requirements, such as those provided in the Los Angeles Municipal Code¹⁷.

- b. SB79 and similar initiatives in the community should require developers to substantially increase the tree canopy in order to offset the environmental degradation and damage to public health through increased construction and population density.

SB79 will result in unchecked construction that displaces hardworking people from their homes and apartments. In the process, it will drastically increase our taxes and other costs to support augmented infrastructure, erase the cultural history of our communities, negatively impact our health, and decrease our quality of life, purely for the benefit of investors exploiting the situation for their own profit without addressing our real need for affordable housing as well as housing and resources for the homeless. We need affordable housing. SB 79 ignores that need in favor of market-rate apartments that will only push housing costs up.

Please vote against SB79's negative impact on our residential communities and its undermining of the Los Angeles Housing Element, and please encourage your colleagues to do likewise.

Sincerely,

A handwritten signature in blue ink that reads 'Paula Southern'.

Paula Southern
President, UNNC
president@unnc.org

Encl: Letter from City Attorney Hydee Feldstein-Soto to State Senator Anna Caballero, *SB 79 (Wiener) – OPPOSE Unless Amended*, May 23, 2025.

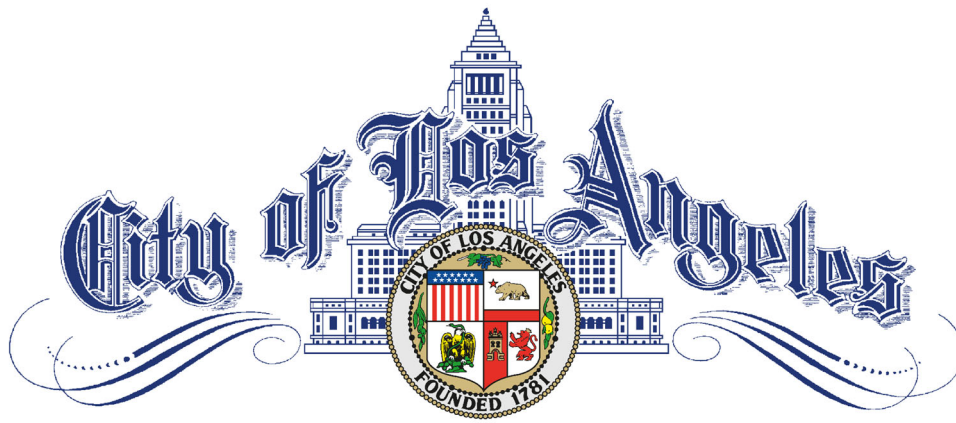
cc: Scott Weiner, Senator, California Senate District 11
Marqueece Harris-Dawson, Los Angeles City Council President (Council District 8)
Heather Hutt, Councilperson, Los Angeles City Council District 10
Caleb Rabinowitz, Chief of Staff, Assembly District 55
Joanne Kim, Chief of Staff, Council District 8

¹⁷ Los Angeles Municipal Code, *Planning and Zoning*, [General Provisions §12.21](#) (accessed July 29, 2025),



United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

Kimani Black, Chief of Staff, Council District 10
Hakeem Parke-Davis, Deputy for Planning, Council District 10



Office of the Los Angeles City Attorney
Hydee Feldstein Soto

May 23, 2025

Via E-mail

The Honorable Senator Anna Caballero
Chair, Senate Appropriations Committee
California State Senate
1021 O Street, Room 7620
Sacramento, CA 95814

RE: SB 79 (Wiener) – OPPOSE Unless Amended

Dear Honorable Chair Caballero,

For numerous reasons set forth below, I respectfully oppose SB 79 (Wiener). SB 79's mandates apply to all cities, including charter cities like Los Angeles, and explicitly state that no State reimbursement will be provided under Government Code Section 17556. This letter is limited to the assessment of mandated costs for which the State is responsible in the event SB 79 were to become law.¹

A. Billions of Dollars in Additional Costs to Communities

SB 79 establishes new state zoning standards within a half-mile radius of every train station and bus rapid transit stop, overriding local zoning to permit by right multi-family homes of up to six stories. While the intent of SB 79 is to further address issues around the supply of housing, the bill's provisions impermissibly impose billions of dollars of costs on Los Angeles and other local jurisdictions, undermine local governance, circumvent local decision-making processes, and impose unintended burdens on communities.

¹ Our office reserves all rights with regard to other objections including unconstitutionality of SB 79.

For reasons further explained below, SB 79 clearly imposes billions of dollars from our local taxpayers for infrastructure expansion and remediation (e.g., water/sewer/stormwater systems, trash collection, road upgrades and signals, and power grid upgrades; first responder and mobility costs; environmental oversight costs; traffic, parking and livability impacts; and administrative and legal compliance costs) without constitutionally required reimbursement from the State.

While a complete analysis and projection of expenses would take many months to prepare, even a cursory analysis of the primary infrastructure and direct services required to support just three (3) new high-density developments in each of the City of LA's 99 Neighborhood Council Districts would require the following:

A. Infrastructure Expansion

Component	Projected Unit Cost	Multiplier	Projected Subtotal
Water/sewer/stormwater	\$3,500/unit	30,000 units	\$105 million
Water pipe installation	\$1.25 million per development	300 developments	\$375 million
Sewer/stormwater installation	\$230K per development	300 developments	\$70 million
Road Upgrades /signals	\$1.2 million per mile	100 miles	\$120 million
Power grid	\$750K per development	300 developments	\$225 million
Solid waste pickup/management	\$60K annually per development	300 developments	\$18 million
Solid waste transfer station	\$20 million per station	2 stations	\$40 million
Materials recovery facility	\$15 million per facility	2 facilities	\$30 million
Organics processing facility	\$18 million per facility	1 facility	\$18 million
Projected Subtotal			\$1.001B

B. First Responder Costs

Service Area	Assumptions	Estimate
Fire stations	15 stations @ \$20 million each	\$300 million
Fire staffing	Annual cost for 15 stations	\$170 million
Fire equipment	15 stations @ \$8 million each	\$120 million
Police Staffing	\$900 per resident annually	\$27 million
Recruitment/training	\$800K/year for 5 years	\$4 million
Subtotal		\$621M

Totals for A & B	\$1.622B²
-----------------------------	-----------------------------

² These costs do not include the necessary administrative personnel costs and legal costs associated with planning and development staff, legal defense costs, and added judgment and settlement payouts all of which are hard to estimate but have been steadily escalating over the past several years.

The charter City of Los Angeles is spread out across more than 450 square miles and its existing water, sewer, stormwater, solid waste, and power grid infrastructure is planned and laid out under zoning where the existing infrastructure in low-density zones (1-4 units) is vastly different than the existing infrastructure needs and demands of higher-density zones (5+ units).

Higher density developments will lead to significantly greater volumes of waste, recyclables and organics, and will intensify the City's obligation to meet the regulatory requirements under SB 1383 (organics diversion), SB 54 (packaging and plastics reduction), and SB 238 (local government reporting and compliance) – all of which require a significant increase in resources. With the City's only operating landfill scheduled to close, long-haul waste transport will become a major logistical and financial burden. High-density urban development also overwhelms existing collection routes and infrastructure – especially in areas with limited space for bin placement and restricted access for collection vehicles. Mid-rise and high-rise developments require more complex collection systems that come with their own compliance challenges. Finally, Greenhouse Gas (GHG) Impact Studies will be required to assess the environmental impacts of increased waste generation and transportation, especially considering the shift to long-hauling.

Higher density developments also put extreme pressure on existing electrical systems, leading to challenges like overloaded transformers and over-burdened energy storage systems. In order to meet the demands of high-density projects, cities must update their power grid infrastructure to meet increased demand and support for electrification, including considering a mandate that developments with four or more units be served by underground infrastructure. This upgrade is to accommodate growing electric loads from electric vehicles and heating/cooling systems, and ensuring safety (including **fire** safety) and reliability in the power supply. According to the Los Angeles Department of Water and Power (LADWP), only 4% of LA's transmission lines are underground, while 54% of LA's distribution lines are underground. The LADWP has sounded the alarm on the need for undergrounding projects, particularly after many recent wildfires and especially in higher density areas. To meet enhanced standards for safety and reliability, high-density projects should be served by underground power infrastructure. For lower-voltage distribution lines that deliver electricity to homes and businesses, undergrounding costs 3 to 10 times as much as overhead installation. High-voltage transmission lines, which carry electricity over longer distances, can cost 10 to 14 times more than overhead lines in urban areas like Los Angeles. Even if overhead lines are maintained, the current distribution and transmission infrastructure in any low density zone would have to be replaced to meet the power needs of higher density developments, including upgrading individual transformers for each development.

Beyond the billions of dollars in out-of-pocket direct costs from SB 79, there are significant additional indirect costs associated with the bill that LA's taxpayers will have to cover and that must be paid or reimbursed by the State. The indirect costs cannot

reasonably be estimated without specific development plans but they include stormwater runoff and flood mitigation; urban heat island effects, emergency services equipment, displacement mitigation and homeless services, liability and legal risks, and civic engagement and public records requests.³

Article XIII, Section 35(a)(3) of the California Constitution expressly states that “public safety is the first responsibility of local government,” thereby obligating cities and counties to ensure that law enforcement, fire protection, and emergency services are not undermined by state-mandated programs. Our city recently experienced the tragedy of the Palisades Fire which highlighted the need for properly funded and staffed first responders. The current uncertainty regarding future levels of federal funding for local government increases the fiscal risks posed by unfunded state mandates. Cities facing declining or unpredictable federal support will be even less able to absorb new unfunded obligations imposed by the State. SB 79 could not be more poorly timed for Los Angeles.

B. Government Code Section 17556

Government Code Section 17556 permits the State to pass general laws without reimbursement only if cities can increase local charges to cover the increase in costs. However, California constitutional provisions, including Proposition 13, Proposition 218, and Proposition 26, limit the ability of cities to impose or raise taxes, assessments, and fees without voter approval, thereby severely restricting cities’ ability to recover the cost of state-mandated programs.

The California Courts have also ruled that a city cannot impose developer fees to fund general infrastructure improvements needed because of pre-existing deficiencies. In *Bixel Associates v. City of Los Angeles*, 216 Cal.App.3d 1210 (1989), the California Court of Appeal for the Second Appellate District held that developer fees must be limited to direct impacts from the new project. Attempting to use fees for broader fixes converts them into unlawful special taxes. Because State mandates like SB 79 require new density without enabling cities to recover the actual infrastructure costs, the mandates create unfunded obligations in the billions of dollars.

³ While school-related costs are not on the City’s budget, the same taxpayers foot the bill, and our school districts throughout California will also face significant unreimbursed costs under SB 79 for facilities, new classroom capacity, additional staffing, and transportation and special needs services. Using data related to California’s average student/teacher ratio of 22:1, to serve an additional 15,000 students (based on the average high-density population of 30,000 new residents in the new 300 high-density projects), approximately 650 new classrooms would be needed. At an average cost of roughly \$500K per classroom (with some estimates as much as \$1.5M per classroom in the larger cities), that adds **\$325M**. Additional annual staffing costs at one teacher per classroom adds another **\$52M** per year. Existing facility upgrades would cost **\$60M**, and annual bus and special need transportation services for the new population of 30,000 would be **\$12M**.

Honorable Senator Caballero
May 23, 2025
Page 5 of 5

For these reasons, I respectfully oppose SB 79 as drafted and proposed. I am available at your convenience to provide further detail and discuss the costs for which the State must reimburse the City of Los Angeles in the event that SB 79 were to become law.

Sincerely,



Hydee Feldstein Soto
Los Angeles City Attorney

cc: Senate Appropriations Vice Chair Kelly Seyarto
Senator Christopher Cabaldon
Senator Megan Dahle
Senator Tim Grayson
Senator Laura Richardson
Senator Aisha Wahab

Los Angeles Mayor Karen Bass
Los Angeles City Council
Los Angeles Controller Kenneth Mejia
Los Angeles City Administrative Officer Matt Szabo