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June 24, 2026

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 396
Los Angeles, CA 90012

Dear Honorable Members:

REPORT BACK ON RECOMMENDATIONS RELATIVE TO EQUESTRIAN USES; CF 16-1468-S4 and CF 25-0096

SUMMARY

On January 31, 2025, the City Council adopted two Motions related to equestrian uses in the City.

The first Motion, CF [16-1468-S4](#), instructed the Department of City Planning (DCP), Department of Building and Safety (DBS), and Department of Animal Services (Animal Services), in consultation with the City Attorney, to prepare a report with recommendations to amend the Los Angeles Municipal Code (LAMC) to reduce the required distance of an equine enclosure from any habitable room on neighboring properties from 75 feet to 35 feet, establish a Conditional Use Permit (CUP) process for new animal keeping structures unable to comply with distancing requirements where Accessory Dwelling Units are present, establish grandfathering rights for equine structures in "K" Equinekeeping Supplement Use District ("K" Districts), and clarify the enforcement responsibilities of the relevant departments.

The second Motion, CF [25-0096](#), instructed DCP, with assistance of DBS and in consultation with the City Attorney, to prepare and present a report with recommendations, and corresponding proposed ordinance to establish development standards that enable the use of storage containers for the purposes of equestrian equipment storage in "K" Districts. The ordinance should include, but not be limited to, the definition of "Equestrian Equipment Storage Container," setback requirements, a prohibition on stacking containers, and standards for locating them on properties. Given these two Motions are both related to equestrian-related regulations, this report will directly address and provide recommendations for both Motions.

Equine keeping has been a long time tradition within certain neighborhoods of the City of Los Angeles. The LAMC contains equine keeping regulations and established "K" Districts to preserve and protect the equestrian properties and to minimize impacts from equine keeping on neighboring properties. One of the restrictions to meet such a goal is: equine keeping enclosures

are required to observe 35-foot and 75-foot distances from dwelling units on the subject equine property as well as neighboring properties, respectively. However, for over the last decade or so, the State of California has been passing various housing laws that aim to address the housing crisis and incentivize preservation and production of additional units through exemptions from certain local development standards, including setback and distancing requirements. The reduction of setbacks and exemption from local distancing requirements create an unintended consequence of making legally established, already-existing equine keeping enclosures nonconforming as to the distancing requirements, resulting in potential enforcement actions on equestrian property owners.

Relatedly, the County of Los Angeles amended its ADU Ordinance in August 2025 to exempt ADUs and JADUs from Health and Safety Code Section 11.16.090 requiring animal keeping to be located at least 35 feet from any dwelling or food establishment to align with the State housing laws. Similarly, the City's equine keeping distancing requirements may be amended via a citywide code amendment ordinance to carve out exemptions from the distancing requirements for equine keeping structures when they are located adjacent to housing units created pursuant to State housing laws that requires reduced setbacks, such as ADUs and JADUs, Senate Bill 9 and the Starter Home Revitalization Act. The proposed ordinance could also reduce the existing 75-foot distance requirement from neighboring properties to 35 feet in order to preserve equestrian properties while also promoting the creation and maintenance of dwelling units. The Zoning Code can further protect the equestrian land use rights by amending the nonconforming sections to allow legally established equine properties to continue to exist.

As it relates to the second Motion, equine keeping has unique storage needs resulting from storage of daily horse management items to riding essentials. While the Zoning Code has land use, location and placement regulations on equine keeping, it does not have specific allowances for equipment storage of this use. Equine keeping equipment storage is currently not adequately addressed or permitted in a way that meets the needs of the equine communities. This report provides research of the City's current zoning regulations on equine keeping and storage uses and an analysis and recommendations on code amendments to continue to protect equine keeping rights and meet the equine communities' needs while also supporting the development of much needed housing within the City.

As such, the Department of City Planning proposes the following recommendation:

1. INSTRUCT the Department of City Planning, in consultation with the Department of Building and Safety, Department of Animal Services and City Attorney's Office, to prepare and present an ordinance to amend Chapters I and 1A of the LAMC to address the following:
 - a. Reconcile inconsistent housing and equine keeping policies and promote and protect the preservation and maintenance of equine keeping properties; and
 - b. Define Equestrian Equipment Storage Container to be allowed in equine keeping districts and include appropriate development standards.

BACKGROUND

Equinekeeping in the City of Los Angeles

Equinekeeping in the City of Los Angeles stems from the City’s history—such as the early ranchos and Vaquero cowboy traditions—and topography—namely the hillsides and vast network of equestrian trails in the region’s mountain ranges. Throughout the years, equine keeping has thrived in the San Fernando Valley, Northeast Los Angeles, Santa Monica Mountains, and many other parts of the City. Efforts to recognize and preserve areas in the City suitable for equine keeping have resulted in limitations and safeguards.

The City Council adopted Ordinance No. 157,144 in 1982, which established the current framework of equine keeping regulations in Chapter I of the LAMC.¹ This Ordinance significantly reorganized the equine keeping provisions in Chapter I of the LAMC by amending definitions, explicitly stating permitted zones, and defining the “K” District. As will be explained in detail in this report, equine keeping is generally allowed in most single-family zones so long as distancing, spacing, and other requirements are met. Lots located within a “K” District contain a greater degree of flexibility from some of these requirements given the focus on horsekeeping.

Nearly all “K” Districts today are found in the San Fernando Valley, namely Shadow Hills, Tujunga, Sunland, Sylmar, and Granada Hills.² Equinekeeping in non-“K” Districts primarily occurs in the San Fernando Valley, Northeast Los Angeles, Santa Monica Mountains, and sporadically in other parts of the City. Typically, equine keeping requires a large lot in which the equine is kept in the rear portion of the lot. An equine enclosure or structure may be present on the lot as an accessory to equine keeping to house tools or the equine itself. Equine keeping regulations as outlined in the LAMC are explained in the following section of this report.

Existing Equinekeeping Regulations in Chapter I of the LAMC

The City’s Zoning Code consists of Chapters I (Original Zoning Code) and 1A (New Zoning Code) in the LAMC. The New Zoning Code was adopted by the City Council in October 2024. It is currently applied in the Downtown Community Plan Area and will roll out to the rest of the City through the update of the remaining 33 Community Plans.

Chapter I of the LAMC has a dedicated set of rules that dictate where and how equines are kept. Regulations relating to equine keeping are found in the following Sections in Chapter I:

- 12.03 (Definitions)
- 12.05 to 12.20 (Permitted Equine Keeping Uses in A1 to M3 Zones)
- 12.21 (General Provisions)
- 12.22 (Exceptions)
- 12.23 (Nonconforming Building and Uses)
- 12.24 (Conditional Use and Other Similar Quasi-Judicial Approvals)
- 13.05 (“K” Equinekeeping Districts)

¹ https://cityclerk.lacity.org/onlinedocs/1975/75-3563_ord_157144_11-01-1982.pdf

²

<https://geohub.lacity.org/datasets/78b5c74b2a214cf888e928c6ae8eeb4a/explore?layer=7&location=34.244973%2C-118.378279%2C11.80>

Equine Regulating Definitions

LAMC, Chapter I, Section 12.03 defines equine-related terms as outlined in Table 1.

Table 1: Equine-Related Definitions in the LAMC, Chapter I, Section 12.03	
Term	Definition
Equine	Any horse, pony, donkey, burro, or mule which is 12 months of age or older and is issued a current Equine License by the City Department of Animal Services. An animal which is under 12 months of age and is the offspring of or is unweaned and being nursed by a female equine lawfully kept on the property where said animal is kept shall not be considered an equine and shall be allowed by right on said property.
Equine Enclosure	Any structure or fence which establishes the perimeter of an equine keeping and maintenance area.
Stable, Private	A detached accessory building which has a roof and may have one or more sides and is used in whole or in part for the housing or shelter of an equine or equines owned by the occupants of the premises and not kept for remuneration, hire or sale.
Stable, Public	A stable other than a private stable.

The definition of Equine requires an active license from the Department of Animal Services (Animal Services). The terms “equinekeeping” and “animal keeping” are used concurrently and sometimes interchangeably throughout the LAMC. Equinekeeping is a sub category of animal keeping. In other words, unless explicitly stated, equine keeping is allowed anywhere animal keeping is allowed.

Equine keeping regulations in the Zoning Code can be largely divided into two categories: non-“K” District regulations and “K” District regulations.

Non-“K” District Regulations

Sections 12.05 (“A1” Agriculture Zone) to 12.20 (“M3” Heavy Industrial Zone) in Chapter I include use and size requirements pertaining to equine keeping for each zone. These Sections set forth the maximum number of equines owned by the resident of the involved property based on the minimum lot area required per each equine. A1, A2 and RA Zones are permitted to have a maximum of two licensed equines for commercial purposes. The following is a complete list of zones that allow equine keeping subject to additional requirements set forth in each zoning allowance, subject to the restrictions summarized in Table 2:

- Agricultural Zones - A1, A2
- Residential Zones - RA, RE, RS, R1, R2, RD, RMP, R3, RAS3, R4, RAS4, R5,
- Manufacturing Zones - MR2, M2, M3 by CUP

Table 2: Equinekeeping Regulations for Non-“K” Districts

Zone	Minimum lot area (sq ft)	Minimum lot area for each equine (sq ft)	Maximum number of equines allowed not belonging to the resident¹
A1, A2, RA	17,500	4,000	2
RE	17,500	4,000	N/A
<i>*Accessory buildings/structures, such as private stables in the RE have additional requirements</i>	20,000 (Accessory structures)	5,000 (Accessory structures)	N/A (Accessory structures)
RS, R1, R2, RD, R3, RAS3, R4, RAS4, R5 including accessory buildings/structures	20,000	5,000	N/A
RMP	None	None	N/A
MR2, M2, M3	None	None	N/A
1. Permitted for commercial purposes with monetary compensation.			

Section 12.21 C.5(a) in Chapter I contains placement requirements for equine keeping structures in A and R Zones. Every equine keeping structures must be located:

- On the rear half of the lot but need not be more than 100 feet from the front lot line;
- At least 25 feet from all side lot lines;
- At least 35 feet from the habitable rooms of a dwelling unit on the subject property; and
- At least 75 feet from the habitable rooms of a neighbor’s dwelling unit.

Section 12.22 A.19 in Chapter I allows the Zoning Administrator (ZA) to approve a Class I Conditional Use Permit (CUP) pursuant to Section 12.24 X.5 in Chapter I to allow a building permit to be issued for a residential building (excluding non-habitable rooms) that is less than 35 feet from a legally established equine use. A Class I CUP may be issued if the ZA determines that the residential building cannot reasonably be constructed at a location 35 feet or greater from a legally established equine use after giving consideration to: 1) size and configuration of land parcel; 2) environmental conditions; public facilities and easements that restrict buildable area location; 4) economic hardship; and 5) feasibility of relocating the equine enclosure.

Section 12.23 in Chapter I contains regulations pertaining to nonconforming buildings and uses. As it relates to equine keeping, Section 12.23 F in Chapter I states that equine keeping and equine structures in RA-zoned lots are allowed to continue their use if the lot complied with the required size for equine keeping when it was first established.

Section 12.23.G, on the other hand, permits equine uses in non-“K” Districts to continue under the following scenarios:

- If a dwelling unit on a neighboring property is built less than 75 feet (see Table 3) from the equine use after the legal establishment of the equine use.
- If a dwelling unit on a neighboring property is allowed to be constructed closer than 35 feet from a legally existing equine enclosure pursuant to a Class I CUP granted by the ZA under Section 12.24 X.5 (Dwelling Adjacent to an Equinekeeping Use) in Chapter I, the equine enclosure *may be relocated* to be at least 35 feet from the dwelling unit and maintain its nonconforming status subject to the following limitations:
 - The equine enclosure is not closer than 35 feet from the habitable rooms of any dwelling unit.
 - The subject lot has obtained an Equine License to stable at least one licensed equine during the 12 months prior to the issuance of the building permit for the neighbor’s dwelling unit.
 - The equine enclosure shall not be expanded, extended, or relocated in such a manner as to reduce the nonconforming distance between the enclosure and the habitable rooms of the neighbor’s dwelling unit.
 - The nonconforming equine use shall be discontinued if, during a successive 3-year period, no equine is licensed by the Department of Animal Services to be stabled on the subject lot.

Section 12.23 I in Chapter I states that equine uses in non-“K” Districts that were legally established prior to November 22, 1982 *can continue to be allowed* even if the City issued a building permit between 1982 and 1986 for a residential building on an adjacent lot that is closer than 35 feet from the equine use, subject to the following limitations:

- The subject lot has obtained an Equine License to stable at least one licensed equine during the 12 months prior to the issuance of the building permit for the dwelling unit on the adjacent lot.
- The equine enclosure shall not be expanded, extended, or relocated in such a manner as to reduce the nonconforming distance between the enclosure and the habitable rooms of the residential building on an adjacent lot.
- The nonconforming equine use shall be discontinued if, during a successive 3-year period, no equine is licensed by the Department of Animal Services to be stabled on the subject lot.

“K” Equinekeeping District Regulations

A “K” District established pursuant to Section 13.05 in Chapter I of the LAMC is a type of Supplemental Use District (SUD) that is intended to promote equine keeping while ensuring that equines do not encroach or impose any negative impacts to adjacent or surrounding neighbors.

“K” District regulations in Section 13.05 include, but are not limited to:

- Equine enclosures shall not be closer to the habitable rooms of a neighbor’s dwelling unit than to the habitable rooms of a dwelling unit on the equine keeping lot;

- Equine enclosures shall not be located closer than 35 feet to the habitable rooms of any dwelling unit;
- No more than one equine is permitted for each 4,000 feet of lot area for any lot which was formed after January 12, 1975;
- Equine keeping structures cannot be located in the required front yard or 10 feet from the required side lot lines.
- If a property immediately abuts a non-"K" District property, equine keeping structures cannot be located in any side or rear yard areas;
- If, after the legal establishment of the equine use, the City issued a building permit for a residential building on an adjacent lot within the required distance between an equine use and the residential building on an adjacent lot, equine uses shall be allowed to be continued; and
- If the ZA grants a Class I CUP pursuant to Section 12.24 X.5 in Chapter I for an adjacent residential building to be constructed closer than 35 feet from a legally existing equine enclosure, the equine enclosure may be considered to be nonconforming if it is relocated not closer than 35 feet from the habitable rooms attached to any residential building with limitations. Such nonconforming equine uses must comply with the following limitations:
 - Equine enclosures shall not be closer than 35 feet from the habitable rooms of any residential building;
 - The subject lot has been designated by an Equine License to stable at least one licensed equine during the 12 months prior to the issuance of the building permit for the residential building on an adjacent lot;
 - The equine enclosure cannot be expanded, extended, or relocated to reduce the nonconforming distance between the enclosure and the habitable rooms of the residential building on an adjacent lot; and
 - The nonconforming equine use must be discontinued if, during a successive 3-year period, no equine is licensed by the Department of Animal Services to be stabled on the subject lot.

Table 3 outlines how these regulations differ between “K” and non-“K” Districts.

Table 3: Distancing Requirements between “K” and Non-“K” Districts				
Zone	Front Lot Line	Side Lot Lines	Habitable Room of a Dwelling Unit on Subject Property	Habitable Room of a Neighbor’s Dwelling Unit
Non-“K” District	100 feet ¹	25 feet	35 feet	75 feet
“K” District	Not within the required front yard	10 feet from the required side lot lines ²	35 feet	If less than 75 feet, not closer to the habitable rooms of a neighbor’s dwelling unit than to the habitable rooms of a dwelling unit on the subject property but in no instance less than 35 feet
1. On the rear half of the lot, but need not be 100 feet from the front lot line 2. Animal keeping structures cannot be located within any required side or rear yard areas which immediately abuts a lot which is not within a “K” District.				

Equine Keeping Regulations in Chapter 1A of the LAMC

Chapter 1A of the LAMC contains several definitions and provisions related to equine keeping.

Section 14.3 (Glossary) in Article 14. (General Rules) defines “Equine” as follows:

Equine is defined as any horse, pony, donkey, burro, or mule which is 12 months of age or older, and is issued a current Equine License by the City Department of Animal Services. An animal which is under 12 months of age, and is the offspring of or is unweaned and being nursed by a female equine lawfully kept on the property where said animal is kept, shall not be considered an equine.

Section 5D.10.1.D. in Article 5. (Use) of Chapter 1A defines “Equine, Commercial” as:

Animal keeping: equine, commercial is defined as the keeping, breeding, raising, training, or boarding of more than two equines not owned by and registered to residents on the same lot as the equine use. Equine includes mules and donkeys.

Section 5D.10.1.D. in Article 5. (Use) of Chapter 1A defines “Equine, Non-Commercial” as:

Animal keeping: equine, non-commercial is defined as the keeping, breeding, raising, training, or boarding of equines owned by and registered to residents on the same lot as the equine use. No more than two equines owned by or registered to persons not residing on the same lot shall be allowed. Equine includes mules and donkeys.

Section 5C.2.8. (Agricultural Uses) in Article 5 (Use) in Chapter 1A has supplemental use standards for Animal Keeping: Equine, Commercial and Animal Keeping: Equine, Non-commercial. Both are required to have a minimum lot area of 17,500 for an equine keeping use. The number of equines permitted is one equine for each 4,000 square feet of lot area. Equine, Commercial and Equine, Non-Commercial are permitted in the following Use Districts:

- Section 5B.2.1. - Agricultural 1 (A1) allows Equine, Commercial with a Class 2 Conditional Use Permit (CUP) and Equine, Non-Commercial as by-right so long as the use complies with supplemental standards in Section 5C.2.8.C.1. or 5C.2.8.D.1.
- Section 5B.3.1. - Residential (RG1) does not allow Equine, Commercial but allows Equine, Non-Commercial as by-right with supplemental standards.
- Section 5B.4.1. - Residential-Mixed 1 (RX1) does not allow Equine, Commercial but allows Equine, Non-Commercial as by-right with supplemental standards.
- Section 5B.7.1. - Industrial 1 (I1) allows Equine, Commercial with supplemental standards but does not allow Equine, Non-commercial.
- Section 5B.7.2. - Industrial 2 (I2) allows Equine, Commercial with supplemental standards but does not allow Equine, Non-commercial.
- Section 5B.8.1. - Public 1 (P1) - allowance depends on most restrictive adjoining zones for both Equine, Commercial and Equine, Non-Commercial.
- Section 5B.8.2. - Public 2 (P2) - allowance depends on most permissive adjoining zones for both Equine, Commercial and Equine, Non-Commercial.

Section 12.5.3. (Equine Keeping Exceptions) in Article 12. (Nonconformities) sets forth provisions to provide relief from the equine keeping requirements of Chapter 1A for any existing nonconformity. This Section in Chapter 1A largely mirrors the same nonconforming provisions in Chapter I of the LAMC, as discussed above.

While Chapter 1A of the LAMC contains these baseline provisions for equine keeping, additional provisions may be added through future Community Plan update process to mirror and/or add upon the existing equine keeping policies in Chapter I. As such, the Code Amendment Ordinance related to equestrian standards should cover both Chapters I and 1A.

Storage Containers in “K” Districts

As illustrated in Council Motion in CF 25-0096, a large quantity of equipment associated with horsekeeping has led to different types of storage containers being used in “K” Districts, and there is an expressed need to have storage containers for equestrian management on site .

In Chapter I of the LAMC, the closest category of a storage container in the Zoning Code is a “cargo container”, defined as follows in Section 12.03:

Any container (refrigerated or non-refrigerated) that permits the temporary storage and protection of cargo, and which may be transported by ship, rail or truck without intermediate loading and unloading of the contents of the container.

As such, storage containers used for equestrian management do not meet the definition of a cargo container. Furthermore, cargo containers are permitted only on lots where open storage of incidental materials and equipment is permitted, and they may only be located on a lot that does not contain residential uses and only within the area where open storage is allowed by Chapter I. Chapter I does not permit open storage in any A or R Zone, nor “K” Districts. Open storage is limited to the C2, C4, C5, and CM Zones as an accessory to an office, store, or building; and the MR1, M1, MR2, M2, and M3 Zones.

In Chapter 1A of the LAMC, cargo containers that are used on site for incidental storage falls under the term “Storage, Outdoor: General” defined as:

Any storage, outdoor use that is in conjunction with another use, excluding the keeping of empty cargo containers, inactive large vehicles, towing and storage for official motor vehicle impound, and inactive standard vehicles.

Similar to Chapter I of the LAMC, Chapter 1A does not have a definition of a storage container or area, or any development standards that are specifically applicable to the storage of equine keeping related equipment. Storage, Outdoor: General uses are permitted only in the following use districts: Open Space 1 (OS1), Agricultural 1 (A1), Industrial-Mixed 1 (IX1), Industrial-Mixed 2 (IX2), Industrial-Mixed 3 (IX3), Industrial-Mixed 4 (IX4), and Industrial 1 (I1) as an accessory use subject to screening standards; in Industrial 2 (I2) subject to screening standards and separation requirements from sensitive uses and residential, residential-mixed and agricultural use districts; and in Public 1 (P1) and Public 2 (P2) depending on the most restrictive adjoining zone and the most permissive adjoining zone, respectively. Therefore, the Code Amendment Ordinance should cover both Chapters I and 1A related to equestrian equipment storage.

Enforcement of Equestrian Regulations

Currently, the Department of City Planning, the Department of Building and Safety and the Department of Animal Services all play a role in implementing current equine regulations. Those roles are outlined below:

Department of City Planning

The Department of City Planning (City Planning) is responsible for ensuring that long range urban planning, zoning and development standards are met. City Planning ensures that when a discretionary action is requested or a ministerial sign off is required, the property owners comply with the outlined rules and regulations in the Zoning Code.

Department of Building and Safety

The Department of Building and Safety (LADBS) ensures that equine structures, such as private stables and enclosures, are in compliance with the structural requirements outlined in the Los Angeles Municipal Code. As part of the plan check process, LADBS verifies that proposed equine

structures meet all mandated distance and setback requirements for Over-the-Counter projects, including the minimum distances from property lines (front and side rear lot lines), from any dwelling unit located on the same lot, and from habitable rooms of dwelling units on adjacent lots; City Planning's Zoning Plan Check staff verifies the remaining project types.

LADBS Code Enforcement investigates complaints that pertain to violations of the Building and/or Zoning Code. If an investigation reveals that a site is not in compliance with these codes, an Order to Comply (OTC) is issued to the property owner. The OTC comes with a fee and a time frame of usually 30 days to either return the site to its original approved condition or to obtain all required permits, inspections, and approvals to bring the site into compliance.

Department of Animal Services

The Department of Animal Services currently holds primary responsibility for administering and enforcing equine licensing within the City of Los Angeles. Pursuant to LAMC Section 53.15.1, all equines 12 months of age or older are required to be licensed on an annual or multi-year basis. Animal Services oversees the issuance of license tags, maintains official records of equine ownership, and ensures compliance with applicable regulations. Licensing information also serves as a vital tool in reuniting lost or impounded equines with their lawful guardians, and is essential for fire response and evacuation efforts to help ensure animals can be identified, located, and safely returned during emergencies.

Additionally, pursuant to LAMC Section 53.59, Animal Services is responsible for establishing minimum distances from dwellings, churches, schools, office buildings, business establishments and other occupancies, within which animals, and the cages, coops, or other enclosures requirement for their keeping may be maintained. Under Section 53.59, "...the minimum distance between dwellings and structures and enclosures for the housing of equines, or equine uses of land shall be governed by Chapter 1, Article 2 of the Los Angeles Municipal Code." Therefore, any amendments to the Zoning Code regarding equine keeping distance requirements will allow Animal Services to revise its rules accordingly to maintain consistency. Through these functions, Animal Services supports responsible ownership, enhances public safety, and contributes to the overall welfare and traceability of the City's equine population.

DISCUSSION

California State Housing Laws

For over a decade, California has passed various housing laws to address the state's housing crisis. These laws touch all aspects of housing ranging from streamlining approvals and incentivizing affordable housing production to reforming single-family zoning and exempting housing projects from certain local development standards. While these laws are intended to preserve, protect and produce more housing, some of the provisions have unintended consequences on local jurisdictions' zoning regulations that are unique to their communities, such as the City's equine keeping distancing requirements. This section summarizes some of the existing state housing laws that allow reduced setbacks that supersede the City's setback and distancing requirements, and its impact on the equine communities.

Accessory Dwelling Unit and Junior Accessory Dwelling Unit Laws

Since 2016, California's Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) have continued to evolve to address the housing crisis across the state and lower barriers to the development of more affordable housing.

ADU is an attached or a detached residential dwelling unit that provides complete, independent living facilities for one or more persons, and is located on a lot with a proposed or existing primary residence. JADU is a unit that is no more than 500 square feet in interior livable space and contained entirely within a single-family residence. These units have been used as effective options for adding much needed housing in California and are created in areas that are already developed.

The City of Los Angeles also adopted the ADU Ordinance No. 186,481 (effective December 19, 2019) to add Section 12.22 A.23 to the LAMC and include development standards and requirements for ADUs and JADUs in accordance with the state law.

State and City regulations include various requirements and allowances that are designed to streamline the approval process and minimize development standards for ADUs and JADUs. For example, state law allows minimum four-foot side and rear yard setbacks for new construction of detached ADUs and zero-foot side and rear yard setbacks for the conversion of accessory structures to detached ADUs. City's Ordinance No. 186,481 allows minimum four-foot side and rear yard setbacks for new or converted detached ADUs. Additionally, state law allows zero-foot side and rear yard setbacks for attached ADUs contained in an existing single-family or multi-family dwelling, and the City's Ordinance allows minimum four-foot side and rear yard setbacks for attached ADUs in an existing or proposed single or multi-family dwelling.

Senate Bill 9

The Housing Opportunity and More Efficiency (HOME) Act, commonly referred to as Senate Bill 9 (SB 9), is a California law that aims to increase the housing supply and expand infill development opportunities by providing for a ministerial process to approve eligible Urban Lot Split Parcel Maps and Two-Unit Developments on lots zoned for single-family residential uses (effective January 1, 2022).

An Urban Lot Split consists of the subdivision of an existing single-family zoned lot into two individual parcels without having to meet the minimum lot size required by the underlying zone. Pursuant to Government Code Sections 65852.21.(f) and 664117.(j)(2), no more than two units are permitted on any parcel created through an Urban Lot Split. In the context of an Urban Lot Split, a "unit" means any dwelling unit including an ADU or a JADU. Therefore, ADUs and JADUs are not permitted on parcels that use both the Urban Lot Split and Two Unit Development, either together or at different times.

Two-Unit Development refers to the development of two primary dwelling units on one single-family zoned lot.

SB 9 creates a ministerial review process for proposed housing development projects with no more than two residential units that meet the criteria for a Two-Unit Development. SB 9 states that a housing development contains two residential units if the development proposes no more than two new units or if it proposes to add one new unit to a lot with one existing unit, not including an ADU or JADU. In other words, adding an ADU or a JADU to a lot with an existing or proposed home does not create a Two Unit Development.

Similar to the State and local ADU and JADU regulations, SB 9 also allows for reduced setbacks. No setback is required for an existing structure, or a replacement structure constructed in the same location and to the same physical dimensions as a legally existing structure. In all other cases, SB 9 dwelling units may be required to have a setback of not more than four feet from side and rear lot lines, but required front yard setbacks, plane break and encroachment plane requirements still apply.

Starter Home Revitalization Act

The Starter Home Revitalization Act of 2021 (SHRA) was amended by SB 684, which took effect on July 1, 2024, and subsequently further amended by SB 1123 and AB 130, both of which took effect on July 1, 2025. SHRA is a California law that seeks to increase homeownership opportunities by streamlining the subdivision approval process through the establishment of a ministerial approval process for a parcel map or a tentative and final map for a subdivision resulting in 10 or fewer parcels and corresponding housing development projects of 10 or fewer units. The SHRA includes development and subdivision standards that apply to all projects allowed under the law while also identifying the types of standards that cannot be applied because they have been superseded by the SHRA. Specifically, SHRA prohibits local agencies from requiring setbacks greater than four feet from the original side or rear lot lines and therefore exempts eligible subdivision projects from equine keeping distancing requirements.

Impacts on Equine Distancing Requirements

ADUs, JADUs and housing development projects under SB 9 and SHRA are exempt from the equine keeping distancing requirements set forth in the City's Zoning Code, as the state laws preclude them from such requirements. While the reduced setbacks certainly encourage the development of ADUs, JADUs and other housing units within the City, it also creates conflicts with the City's equine keeping regulations. Specifically, equine keeping structures in non-"K" Districts are required to maintain a minimum 75-foot distance from the habitable rooms of a neighbor's dwelling unit, including ADUs and JADUs. For "K" Districts, equine keeping structures cannot be located closer to the habitable rooms of a neighbor's dwelling unit than to the habitable rooms of a dwelling unit on the equine keeping lot. In no event can an equine enclosure be located closer than 35 feet to the habitable rooms of any dwelling unit. The state's reduced setback requirements allow ADUs, JADUs, and housing projects under SB 9 and SHRA to encroach into the existing distance observed by legally established equine keeping uses. This creates an unintended consequence of making existing legally established equine enclosures nonconforming, and in some instances may result in enforcement actions.

County of Los Angeles Animal Keeping Distance Restrictions

Pursuant to the County of Los Angeles Health and Safety Code Section 11.16.090 "Keeping Animals and Birds - Location Restrictions and Sanitation Requirements", a property owner cannot keep any animals, other than cats, dogs, canaries or birds of the psittacine family, within 35 feet of any residence, dwelling or other building used for the habitation of human beings.

However, the Board of Supervisors of the County of Los Angeles adopted Ordinance No. 2025-0029 at its meeting on July 29, 2025 to amend its ADU Ordinance. Specifically, Health and Safety Code Section 11.16.090 was amended to carve out an exemption for ADUs and JADUs from the 35-foot minimum distancing requirement from animal keeping areas (effective August 28, 2025). This amendment was made to ensure that the County's ADU and JADU regulations comply with State law.

Proposed Amendments Relating to Equine Keeping Distance Requirements

In light of the County's amendment to the Health and Safety Code to exempt ADUs and JADUs from providing the 35-foot minimum distance from animal keeping, the Department of City Planning recommends amendments to Section 12.21 C.5(a) and 13.05 C. in Chapter I to exempt equine keeping enclosures in both non-"K" Districts and "K" Districts from providing and/or maintaining any distance requirements when they are located adjacent to housing units that are constructed pursuant to the State housing laws that allow reduced setbacks and preclude local jurisdictions from imposing setback and/or distancing requirements that are more restrictive than what is permitted in the State laws. City Planning recommends that this exemption be applied retroactively to all legally established equine keeping properties. These amendments will align the City's equine keeping distance requirements with those of the County's. Additionally, these amendments would eliminate the need to establish a new CUP process for new animal keeping structures on properties that are unable to comply with distancing requirements where ADUs are present, pursuant to the instruction in the CF [16-1468-S4](#) Motion.

While the aforementioned exemption will eliminate conflicts between equine keeping enclosures and the housing units created under the State housing laws, the City's existing distancing requirements for equine keeping enclosures will continue to be inconsistent with the state law's intent to streamline the approval process and minimize roadblocks for the creation of any dwelling units in response to the housing crisis. As such, the Department of City Planning recommends an amendment to Section 12.21 C.5.a and Section 13.05 C in Chapter I and relevant Sections in Chapters 1A to reduce the distancing requirement from a neighbor's habitable room to 35 feet in both non-"K" Districts and "K" Districts. Furthermore, DCP recommends an amendment to Sections 12.23 G, 12.23 I, and 13.05 C in Chapter I and relevant Sections in Chapter 1A to establish legal nonconforming status for equine keeping uses that have been legally existing prior to neighboring dwelling units being constructed closer than the required distance.

Equine Licensing Requirement

While the Zoning Code regulates equine keeping as a land use, there are several provisions that are related to the Department of Animal Services' licensing requirements.

Section 12.03 in Chapter I defines equine as:

“Any horse, pony, donkey, burro, or mule which is 12 months of age or older and is issued a current Equine License by the City Department of Animal Services. An animal which is under 12 months of age and is the offspring of or is unweaned and being nursed by a female equine lawfully kept on the property where said animal is kept shall not be considered an equine and shall be allowed by right on said property.”

The definition requires that an owner be in compliance with licensing requirements set forth by Animal Services.

Section 12.23 G (Equine - Nonconforming Uses - Non-“K” Equinekeeping Lots) and Section 12.23 I (Equine Nonconforming Uses Adjacent to Residential Buildings) in Chapter I allow a nonconforming equine use in non-“K” Districts to continue to exist based on the requirement that the subject lot has been designated by an Equine License to stable at least one licensed equine during the 12 months prior to the issuance of the building permit for the neighbor's dwelling unit. These Sections also state that the nonconforming equine use shall be discontinued if, during a successive three-year period, no equine is licensed by the Department of Animal Services to be stabled on the subject lot.

Sections 13.05 C.7 and 13.05 C.8 in Chapter I which regulate nonconforming equine enclosures in “K” Districts have the same equine license requirements as non-“K” Districts as mentioned above.

To obtain or renew an equine license, an equinekeeper can apply through Animal Services' online portal. Licenses vary in price depending on the type (private home vs. boarding) and number of equines, starting at \$14 per equine per year. Animal Services may issue multi-year licenses of up to five years.

Equine licensing requirements were established for health and safety purposes. Having a valid, up-to-date registry of animal licenses allows Animal Services to prepare for and assist owners and their animals during emergency situations. For example, during the 2025 Wildfires, Animal Services used animal licensing information to help identify equines requiring evacuation. Animal Services focuses on compliance and actively assists equinekeepers to be in compliance with any licensing requirements.

Equine keeping is a deeply rooted vibrant culture within many areas of the City of Los Angeles,. The history of the equestrian community goes back decades, and many existing equine keeping property owners have maintained their lifestyle and tradition that contribute to the distinct character and quality of life. The equine licensing requirements embedded within the definition of equine and conditions on nonconforming status in both non-“K” Districts and “K” Districts presents a unique situation relative to the equestrian community. While most land uses permits and discretionary entitlements last in perpetuity until a new change of use permit and/or discretionary

entitlement is obtained, the licensing requirement, which needs periodic renewal, inherently puts an expiration date on the equine use of the property depending on the duration and expiration of each equine license. While the equine license requirement has a critical role in maintaining public health and safety, it also has an impact on land use rights for equestrian property owners. Regardless of the Zoning Code land use regulations, equestrian property owners are required to comply with the City's equine license requirements, as enforced by Animal Services. With regards to the instruction in the CF [16-1468-S4](#) Motion related to the enforcement responsibilities of the relevant Departments, further discussion with relevant Departments that implements and enforces the nonconforming provisions in the Zoning Code and equine license requirements, such as the Department of Building and Safety and Animal Services, may be necessary.

Storage Containers for Equestrian Uses

The equestrian community has unique storage needs pertaining to the horse maintenance and care along with riding essentials. As previously stated in the Storage Containers in "K" Districts Section, the Zoning Code as currently written does not adequately allow or regulate storage uses related to equine keeping. As such, cargo containers have become a common solution among equinekeepers.

"K" Districts, with their unique characteristics to promote equine keeping, make it an appropriate geographic limitation to allow these containers with minimal impacts to adjacent properties. To adapt to these needs, the City can adopt development standards that include land use regulatory controls for storage containers, in as much as there are no existing permitting pathways in the LAMC.

City Planning staff researched other municipalities' regulations that permit cargo containers for equine storage. Mono County, California requires a building permit for permanent cargo containers.³ Containers must conform to height, setback, and lot coverage requirements of accessory structures in the applicable land use designation. Property owners must minimize visibility from adjacent properties and roadways. One container is allowed on a property that is less than one acre. Two containers are allowed on properties between one to five acres.

The County of San Diego also requires a building permit for temporary "sea cargo containers" on residential properties for up to 180 consecutive days in any 5-year period.⁴ A sea cargo container cannot be visible from the part of the road that directly abuts the subject parcel. Only one sea cargo container is allowed on building sites less than 2 acres and must not exceed 320 square feet. On larger sites, the County of San Diego allows sea cargo containers if it complies with the other requirements in their code, including setback requirements for accessory structures. The square footage of the container is added to the allowable combined square footage of all existing and/or proposed accessory structures and the exterior must also be painted with an approved color.

³ https://monocounty.ca.gov/sites/default/files/fileattachments/building_division/page/31400/cargo_containers.pdf

⁴ <https://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/formfields/PDS-PLN-726.pdf>

The County of Los Angeles (LA County) allows cargo containers used for incidental storage subject to requirements, which could inform amendments to Chapters I and 1A of the LAMC to allow containers for equine keeping storage in the City.⁵

These requirements include:

- Containers must be constructed of steel or aluminum,
- Containers must not obstruct or reduce any required exits or parking,
- One container per parcel,
- Limits on maximum floor area,
- Container dimensions (length, width, height),
- No stacking of containers, and
- Containers cannot be used for human occupancy.

LA County does not explicitly mention applicable zones for cargo containers for incidental storage. Applicants must submit a plot plan with their application, which must be reviewed and approved by the Department of Regional Planning (DRP), Fire Department, Coastal Commission (when applicable), Health Department (when used as food storage), and the Drainage Section (where applicable).

Lastly, City Planning staff researched Alameda County’s regulations, which does not allow containers in residential districts, either temporary or permanent.⁶

Table 4 summarizes how the municipalities differ in their approaches to cargo storage containers:

Table 4: Cargo Container Regulations in other Municipalities				
County	Permitted Zones	Type of Permit Required	Allowed Temporarily	Allowed Permanently
Mono	No zone/s mentioned	Building Permit	Yes	Yes
San Diego	Any, with limitations	Building Permit	Yes	Not clear
Los Angeles	No zone/s mentioned	Miscellaneous Permit	Yes	Yes
Alameda	Not in R zones	Not in R zones	Not in R zone	Not in R zone

Based on these case studies and accompanying research, the City Planning recommends the following amendments to Chapters I and 1A of the LAMC. Please note that these are preliminary and subject to change during the Code Amendment and outreach process.

- Add an appropriate definition of “Equestrian Equipment Storage Container”

⁵ <https://dpw.lacounty.gov/bsd/lib/fp/Building/Building%20Code%20Manuals/2011/BCM%20106%20A1%20-%20Cargo%20Containers%20for%20Incidental%20Storage%2010-19-11.pdf>

⁶ https://www.acgov.org/cda/planning/landuseprojects/documents/6b_ACCESSORY_BUILDING_REGULATIONS.pdf

- Add clarity to the definitions of “Cargo Container” and “Cargo Container Storage Yard” in Chapter I and “Storage, Outdoor: General” in Chapter 1A to exclude “Equestrian Equipment Storage Containers.”
- Amend relevant Chapter I “K” District Code Sections and equivalent equine keeping district Code Sections in Chapter 1A to allow “Equestrian Equipment Storage Containers” and add associated development standards. In an effort to be consistent with Los Angeles County regulations regarding storage containers, staff is proposing to use similar regulations as a starting point. As the Ordinance process moves through the public outreach phase, the regulations can be refined by community and stakeholder input and adapted to the needs of the equestrian communities

Enforcement Changes

Based on the discussion with the Department of Building and Safety and the Department of Animal Services thus far, staff does not foresee any of the enforcement roles changing for the Department of City Planning, Building and Safety or Animal Services. These proposed changes would, in fact, provide greater clarity to the various departments regarding their enforcement responsibilities.

Timeline and Resources Required

Overall, staff foresees completion of this future proposed ordinance taking 12-18 months. This timeline includes ordinance drafting, outreach to the equine community and other interested parties, CEQA analysis as well as internal legislative processes. This timeline is typical for Citywide Code Amendments. Staff believes that this will also allow the Department to have clear and open dialogue with key stakeholders.

Environmental Analysis

The California Environmental Quality Act (CEQA) requires the City to conduct an environmental analysis whenever it makes a discretionary or legislative decision, including the adoption of a land use ordinance. Environmental factors under CEQA most likely to be affected by an ordinance to implement the City Council’s instructions on equestrian uses include: Aesthetics, Air Quality, Biological Resources, Hazardous and Hazardous materials, Hydrology and Water Quality, Land Use and Planning, Noise, etc., to name a few.

RECOMMENDATIONS

As reflected in this report, the recommendations put forth by staff relative to equestrian development standards and appropriate amendments are the result of extensive research and discussions. In particular, the recommendations in response to Council Motions 16-1468-S4 and 25-0096 are made in recognition of the complexities in our code causing inconsistencies between housing state regulations and the current needs of the equestrian community. Collaborative discussions and case studies have helped staff develop these latest recommendations based on feedback and best practices.

As such, the Department of City Planning proposes the following recommendation:

1. INSTRUCT the Department of City Planning, in consultation with the Department of Building and Safety, Department of Animal Services and City Attorney's Office, to prepare and present an ordinance to amend Chapters I and 1A of the LAMC to address the following:
 - a. Reconcile inconsistent housing and equine keeping policies and promote and protect the preservation and maintenance of equine keeping properties; and
 - b. Define Equestrian Equipment Storage Container to be allowed in equine keeping districts and include appropriate development standards.

For questions related to this report back, please contact Gabriela Juarez via email at gabriela.juarez@lacity.org.

Sincerely,



VINCENT P. BERTONI, AICP

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