

## **Communication from Public**

**Name:** Thomas Selden  
**Date Submitted:** 06/22/2026 08:25 PM  
**Council File No:** 25-1083-S3  
**Comments for Public Posting:** Please see attached letter.



**Jun 22, 2026**

**Los Angeles City Hall  
200 N. Spring St.  
Los Angeles, CA 90012**

**Via Online Submission**

**Re: Low-Rise and Phased Implementation Ordinances**

Dear City Council,

The California Housing Defense Fund (CalHDF) and Californians for Homeownership submit this follow-up to our May 13<sup>th</sup> and June 6<sup>th</sup> letters to inform the City Council that the contingency on SCAG maps contained in the Low-Rise Ordinance will make the Ordinance ineffective for any time at which SCAG does not have valid maps.

If enacted, the Low-Rise ordinance would amend Paragraph (b) of Subdivision 38 of Subsection A of Section 12.22 of Article 2, Chapter I of the LAMC to require TOD Stops to be “identified as eligible for Abundant and Affordable Homes Near Transit Act (2025) implementation by the Southern California Association of Governments” in order for the surrounding half-mile radius area to be eligible for the Low-Rise Incentive Program. However, the Southern California Association of Governments will not identify eligible stops until July 2<sup>nd</sup> at the earliest.

Further the Ordinance states that “eligibility for the Low-Rise Ordinance is contingent on the availability of a final TOD Zone map that has not yet been produced and approved by the Southern California Association of Governments (SCAG).” Therefore, on July 1<sup>st</sup> and at any time thereafter that SCAG may not have valid maps of eligible TOD zones, the Low-Rise Incentive Program will not be a knowable, objective building standard and the Ordinance as a whole will be invalid. This will also render the Phased Implementation Ordinance invalid for sites not meeting the criteria of Gov. Code section 65912.161 subd. (b) absent the Low-Rise Ordinance, and applicants will be able to apply for projects up to the standards of section 65912.157 in the interim.

Given the City’s letter identifying a missing stop and the large discrepancies between the City’s previous SB 79 map and SCAG’s draft SB 79 map, the City seems aware that there are serious concerns about the validity of SCAG’s draft map. Any Regional Council deliberation or subsequent litigation could extend the window where section 65912.157 applies.

The City Council should strike the references to SCAG's draft maps and identify the parcels where the Low-Rise Ordinance applies via reference to the maps with which the City has been working with since the start of the adoption process in order to ensure the City adopts a knowable, objective standard prior to July 1<sup>st</sup>.

Sincerely,



Matthew Gelfand  
*Californians for  
Homeownership*



Dylan Casey  
*CalHDF*