

Communication from Public

Name:

Date Submitted: 05/13/2026 10:34 PM

Council File No: 25-1083

Comments for Public Posting: Dear Sirs and Mesdames: I am writing with the following comments on the proposed SB 79 Implementation Ordinance (the Low-Rise Ordinance): 1. Setbacks – I OPPOSE reduction in required side and rear yard setbacks to only 4 feet. Available studies indicate that maintaining 15-foot rear yard setbacks would not preclude achieving SB 79’s development objectives. Such reductions are inconsistent with existing Los Angeles Municipal Code (LAMC) standards, which require a 15-foot rear yard and 5-foot side yards in multifamily zones such as RD1.5, R3, and R4. Serious negative impacts will result from such reduction: Fire safety: the proposed 4-foot separations limit defensible space between buildings, increasing risk of fire spread and impeding fire-fighting efforts. Urban tree canopy and environmental health: approximately 90% of the city’s tree canopy exists on private property. Meaningful tree planting and retention are not feasible within the 4-foot setback, which due to “exiting” criteria must be paved — leading to an urban heat island effect with higher temperatures. Open space and quality of life: private open space is a critical element in overall climate control and quality of life for all residents, especially given the paucity of public open space. 2. Notification – REQUIRE direct public notification to affected property owners and residents. The city must notify by mail all residents and property owners of this major change in land use. The absence of transparency undermines public trust, which is already seriously weakened. 3. Future Implementation – TIE implementation to future changes: this SB 79 implementation ordinance must be expressly tied to, and automatically updated to reflect, any future revisions to, postponement of, or repeal of SB 79. Thank you for your consideration. Respectfully, Claudia Pettit

Communication from Public

Name: Will Wright

Date Submitted: 05/13/2026 04:05 PM

Council File No: 25-1083

Comments for Public Posting: With this letter, we encourage the CPC and LA City Council to treat the Low-Rise Ordinance and SB 79 Phased Implementation Ordinance not as compliance exercises, but as a genuine opportunity to lead on transit-oriented housing that is equitable, financially viable, and well-designed. A Leadership Moment, Not a Compliance Checkbox The Low-Rise Ordinance creates the Low-Rise Incentive Area (LIA), extending housing incentives — up to 16 units at 2.90:1 FAR — across a half-mile radius of 55 Opportunity Stations in the majority of Higher and Moderate Opportunity Areas. The Phased Implementation Ordinance buys Los Angeles time to build this housing on its own terms. Together, these ordinances give the Commission a rare chance to shape how SB 79 lands in Los Angeles — in ways that advance equity, design quality, and long-term neighborhood health. We urge you to exercise that authority today. The Fear of Disruption Is Overstated Concerns that these ordinances will flood neighborhoods with speculative development are not supported by the evidence. The binding constraint on multifamily housing production in Los Angeles is not zoning capacity — it is project economics. Getting any project to pencil out requires navigating construction costs, financing gaps, interest rates, and entitlement uncertainty. Upzoning does not automatically unlock capital. The City's own record makes this plain: not a single unit has been delivered under the existing Opportunity Corridor Transition Incentive Area — the very mechanism this ordinance replaces and reforms. The fear of instant transformation is untethered from the realities of development. The pool of actually developable, financially viable parcels within the Low-Rise Incentive Areas is far smaller than aggregate zoning maps suggest. Furthermore, the actual scope of SB 79 is widely misread. Of the 141 City of LA TOD zones subject to state law, approximately 88% already qualified for delay exemptions under SB 79's own carve-outs — fire hazard zones, historic districts, lower-opportunity areas. The Low-Rise Ordinance appropriately maintains protections for RSO tenants, HPOZs, and sites in Fire Restriction Areas (Very High Fire Hazard Severity Zones within Hillside Areas). The change will be incremental and targeted, not sweeping. Recommendations: AIA|LA urges adoption of both ordinances and asks the Commission to direct staff to pursue these

improvements: 1. Extend Transitional Height Relief to All LIA Projects. The ordinance's multi-bedroom bonus correctly overrides transitional height restrictions — but only for projects providing 40% or more three-bedroom units. This leaves the majority of LIA projects still subject to a rule that routinely reduces nominally four-story projects to three or two stories on parcels adjacent to R1 zones. The Commission should direct staff to extend transitional height relief to all qualifying Low-Rise Incentive Area projects. This is the single most impactful feasibility fix available within the ordinance's existing framework. 2. Create a Sliding Scale for the Multi-Bedroom Bonus. The current all-or-nothing threshold — 40% three-bedroom units for the full density and height bonus — creates a cliff effect that excludes mixed-income and small-lot projects that cannot standardize on large units. A graduated bonus (partial incentive at 20–39%; full incentive 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 said it plainly at the March 24 Council hearing: "If this doesn't result in housing that gets built, none of this matters." The Commission should direct Planning staff, in coordination with the Housing Department, to conduct 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 Commission 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. Entitlement uncertainty is among the most-cited feasibility barriers for projects of this type. Reducing it costs the City nothing in direct subsidy. MORE IN THE ATTACHED PDF

May 14, 2026

City Planning Commission, City of Los Angeles Regular Meeting — Agenda Items #6 and #7 CPC-2026-1797-CA / CPC-2026-1798-MSV Van Nuys City Hall, Council Chamber, 2nd Floor

Re: Public Comment on the Low-Rise Ordinance and SB 79 Phased Implementation Ordinance - [Council File: 25-1083](#)

Dear Commission President Lawshe, Vice President Choe, and Honored Commissioners:

As the Director of Government & Public Affairs for the Los Angeles chapter of the American Institute of Architects (AIA|LA), I am submitting this letter in reference to Agenda Items #6 and #7. AIA|LA represents more than 4,500 licensed architects and design professionals who design, permit, and build housing across the City every day. With this letter, we urge the Commission to approach these ordinances not as compliance instruments, but as a generational design brief — one that positions Los Angeles as a national model for transit-oriented housing that is equitable, financially viable, and beautiful.

I. The Commission's Leadership Opportunity

Items #6 and #7 mark a pivotal moment. [The Low-Rise Ordinance \(CPC-2026-1797-CA\)](#) retires the Opportunity Corridor Transition Incentive Area and replaces it with a reformed Low-Rise Incentive Area, extending housing incentives — up to 16 units at up to 2.90:1 FAR — across a half-mile radius of 55 Opportunity Stations in the majority Higher and Moderate Opportunity Areas. The Phased Implementation Ordinance (CPC-2026-1798-MSV) codifies the delay framework that buys Los Angeles time to build this housing on its own terms.

This is not a minimalist state mandate response. This is a chance to define what transit-adjacent housing in a major American city can and should look like. The Commission has the authority — and the responsibility — to ensure these ordinances are adopted with provisions that go beyond baseline compliance to actively incentivize design excellence, genuine affordability, and broad-based financial feasibility. We urge you to exercise that authority today.

II. The Fear of SB 79 Is Significantly Overstated

Before this Commission acts, we want to directly address the concern — raised in public comments under Council File 25-1083 — that these ordinances will rapidly destabilize neighborhoods or unleash a wave of poorly designed, 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: as documented in the legislative history of Council File 25-1083 and reflected in this Commission's own staff materials, not a single unit has been delivered under the existing Opportunity Corridor Transition Incentive Area since CHIP's adoption. The mechanism that this ordinance replaces and reforms produced no housing. The theoretical risk that these sites will suddenly be overrun with development is refuted by the practical reality that they've been legally developable — and dormant — for years.

Moreover, the scope of SB 79 is widely misunderstood. 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 City's Approach C strategy was designed to address the remaining 12%. The ordinances before this Commission reflect that carefully scoped response. Sites with RSO tenants, designated historic resources, HPOZ protections, and Fire Restriction Areas (defined in the Low-Rise Ordinance as the intersection of VHFHSZ and Hillside designation) remain appropriately shielded. The pool of actually developable parcels within the Low-Rise Incentive Areas is far smaller than the aggregate zone maps suggest. Change will be incremental and surgical, not sweeping.

III. Recommendations

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

1. Require Transitional Height Reform as a Companion Action. The Low-Rise Ordinance's multi-bedroom bonus correctly supersedes transitional height and step-back requirements for qualifying projects (per Section 12.22 A.38(g)(3)(iv)). However, this protection is conditioned on providing 40% of total units as three-bedrooms or larger — a high bar that many small-lot infill projects cannot meet. The underlying transitional height ordinance continues to silently reduce nominally four-story projects to three or even two stories on the majority of mixed-use boulevard parcels adjacent to R1 zones. The Commission should direct staff to initiate a companion ordinance — or amend the Low-Rise Incentive Area standards — to extend transitional height relief to all qualifying Low-Rise Incentive Area projects, not only those meeting the multi-bedroom threshold. The current design creates a paradox: the most financially challenged projects get no relief from the barrier that is most directly undermining their feasibility.

2. Calibrate the Multi-Bedroom Bonus for Broader Accessibility. The multi-bedroom bonus — an additional 0.5 FAR and one additional story for projects providing 40% of units at three bedrooms or larger — is a strong design incentive, but its single threshold creates a cliff effect that excludes projects providing meaningful, though sub-40%, multi-bedroom shares. The Commission should recommend that the City Council consider a sliding scale: for example, a partial bonus for projects providing 20-39% three-bedroom units, with the full bonus at 40%. This would expand access to the density necessary for project viability across a wider range of development programs, including mixed-income projects, small lot subdivisions, and non-profit affordable housing proposals that cannot standardize on a single unit type.

3. Establish Minimum Design Standards for Low-Rise Incentive Area Projects. The Low-Rise Ordinance's performance standards address open space typologies (courtyard, landscaped setback, rooftop) and planting requirements, which AIA|LA supports. However, the ordinance does not establish streetscape-facing design standards — fenestration ratios, material quality minimums, blank-wall prohibitions, or articulation requirements — for the building elevations that will define the public realm on transit corridors for decades. The Commission should recommend that Planning staff develop and adopt form-based design standards specific to Low-Rise Incentive Area projects within Opportunity Station Areas. This need not create discretionary review; objective design standards can be administered ministerially and can coexist with by-right processing. Done well, this would distinguish Los Angeles's transit-adjacent housing from the lowest-common-denominator infill produced under less design-conscious regimes.

4. Direct a Financial Feasibility Study Tied to Low-Rise Incentive Area Implementation. Councilmember Yaroslavsky was explicit during the March 24 Council hearing: "If this doesn't result in housing that gets built, none of this matters." The ordinance's provisions — including roadway widening relief, lot coverage elimination, and parking reduction — are meaningful but may be insufficient to close the feasibility gap in the current economic environment. The Commission should

direct Planning staff, in coordination with the Housing Department and the City's development finance partners, to commission a financial pro forma analysis of representative Low-Rise Incentive Area project types across the 55 Opportunity Station corridors. This study should identify the precise subsidy, fee deferral, or additional density increment needed to move baseline projects from marginal to viable — and should feed directly into the City's next CHIP iteration and the 2030 accelerated upzoning framework.

5. Streamline Departmental Clearances for Low-Rise Incentive Area Projects. The 55 Opportunity Stations provide a defined geography within the City — a manageable footprint for targeted institutional reform. The Commission should recommend that Planning coordinate with LADBS, LADWP, the Bureau of Engineering, and LAFD to create pre-approved, expedited clearance pathways and standardized templates for four-unit-to-sixteen-unit Low-Rise Incentive Area projects. Permitting bottlenecks — including utility hookup timelines, parking stacker approvals, and fire-access interpretations for wood-frame structures — are among the most frequently cited feasibility barriers by architects and developers working in this product type. Reducing entitlement uncertainty is one of the most cost-effective tools available to the City to accelerate production without spending a dollar of public subsidy.

6. Recommend Explicit Ties Between the Phased Implementation Ordinance and Future SB 79 Revisions. The Commission should ensure that the Phased Implementation Ordinance (Item #7) includes language requiring that any future state-level amendments to, postponements of, or repeal of SB 79 trigger an automatic review of the City's local ordinance provisions — ensuring Los Angeles's implementation framework remains legally synchronized with state law and does not inadvertently codify incentives or exemptions that outlive the state statute they were designed to implement.

Conclusion

AIA|LA is prepared to serve as a technical resource and design partner as these ordinances move through adoption and implementation. We have architects ready to participate in design standard development, pro forma working groups, and departmental clearance task forces. We ask that this Commission send the City Council a strong, affirmative recommendation — paired with the directives above — that signals Los Angeles intends to lead on transit-adjacent housing, not merely comply.

The 55 Opportunity Stations are on the map. Let us build on them.

Truly yours,



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

Communication from Public

Name:

Date Submitted: 05/13/2026 11:11 AM

Council File No: 25-1083

Comments for Public Posting: The ACT-LA coalition strongly supports Exhibit 2B from the City Planning Department's Report, to ensure that deeply affordable housing is constructed. In our letter we also outline recommended amendments to the main text of the low-rise ordinance.



May 10th, 2026

To: Los Angeles City Planning Commission,
CC:

Monique Lawshe, President
Caroline Choe, Vice President
Priscilla Chavez, Member
Martina Diaz, Member
Sarah Johnson, Member
Phyllis Klein, Member
Brian Rosenstein, Member
Jacob Saitman, Member
Elizabeth Zamora, Member

RE: Support for Phased Implementation Ordinance and amended Low-Rise Ordinance incorporating Exhibit 2B to encourage deeply affordable housing. (CPC-2026-1798-MS, CPC-2026-1797-CA)(CF 25-1083)

Last year, California state legislators passed, and Governor Newsom signed, Senate Bill 79 (SB79) into law. SB79 relaxes land use restrictions near rail and bus rapid transit stations to allow multifamily housing. With thoughtful implementation, SB79 can help the city address our housing crisis by spurring production of multifamily housing in high-resource areas near transit, including in areas that currently allow only single family development. Now, it's important that the city finalize ordinances to implement SB79 in a thoughtful and deliberate way that Affirmatively Furthers Fair Housing and prevents displacement in low-income communities, before July 1 2026.

ACT-LA is writing in support of the Phased Implementation Ordinance to equitably delay effectuation of SB 79 citywide. This approach will allow the City to maintain control over its built environment and zoning standards while greatly expanding the capacity and incentives to build mixed-income and affordable housing near the City's most significant transit investments. However, we believe the low-rise ordinance should be further modified as outlined below, including by incorporating the amendments recommended in Exhibit 2B of the Department of City Planning's Recommendation Report to match the scale and depth of affordable housing need in the City of Los Angeles..

The draft Low-Rise Ordinance currently includes only "moderate-income" and "low-income" options for affordable units, at rents that most tenants cannot afford. Incorporating the amendments recommended in Exhibit 2B of the Department's Recommendation Report is critical to ensure that developers have incentive to provide rents more affordable than those laid out in the main ordinance.

In addition to incorporating incentives for deeply affordable housing in Exhibit 2B, the base incentives in the Low-Rise Ordinance should be amended to require more deeply affordable housing, at the ELI or VLI that can meet the needs of struggling renters and the overwhelming majority of transit riders in Los Angeles. Therefore, the City Planning Commission should amend the draft Low Rise ordinance to focus incentives on VLI or ELI units, not Moderate Income units. Low Rise projects should include at least 1 VLI unit, or 12% of the total units (consistent with the lowest requirement in Mixed Income Incentive Program (MIIP)). To accommodate the smaller project sizes, the ordinance should instruct rounding to the nearest value rather than rounding up. Other amendments to the ordinance are likely needed, including changes like increases to the height, FAR, and density. These changes should happen where needed to facilitate the inclusion of this deeper affordability.

Lastly, we support expanding the eligibility of the Affordable Housing Incentive Program (AHIP) into Opportunity Station Areas. This will increase opportunities for affordable development, and ensure that affordable projects can be feasibly built along with mixed-income projects. The current AHIP incentives available on sites with a maximum residential density of more than five units should be available on all sites allowing residential uses in Opportunity Station Areas.

In addition, amendments to the ordinance can be made that would facilitate larger and affordable apartments more appropriate for growing or multigenerational families. The current draft ordinance would decrease the percentage of 3-bedroom units a developer needs to provide to receive the multifamily bonus from 40 percent to 20 percent. This incentive should be further amended to require that at least one of the affordable units in a project using this incentive is a 3-bedroom unit. Doing so will help ease the impacts from displacement and provide some affordable housing for families in new developments.

By undertaking intentional deepening of affordability, and adopting the phased implementation ordinance the City can advance its obligations under AFFH through development of mixed-income multifamily housing in high resource neighborhoods near transit. We urge the City Planning Commission to move forward with supporting the proposed ordinances, incorporating the amendments above and Exhibit 2B of the Department's Recommendation Report, and ultimately create a path for the affordability we desperately need in Los Angeles.

Thank you for your consideration.

Sincerely,

The ACT-LA Coalition