



Posting to CF 25-1083: CFAC's letter sent to: [cpc@lacity.org](mailto:cpc@lacity.org)

RE: CPC-2026-1797-CA / ENV-2026-1799-SE / Low Rise Ordinance

Dear City Planning Commissioners,

May 7, 2026

The Community Forest Advisory Committee (CFAC) has reviewed the proposed Low Rise (LR) Ordinance and shares the following **objections and concerns**:

1. **Opposed to the 4-foot rear yard setback.** The proposed incentive to permit a 4-foot rear yard setback and 3-foot side yard setback provides no space to preserve existing healthy mature trees let alone plant replacement and/or new trees. As it stands, we are unnecessarily losing our tree canopy at an alarming rate due to development over the last 5 years especially, primarily because of housing programs and public right of way competing infrastructure interests. As we densify, we need to ensure we provide sufficient **ground area** for landscaping and shade trees.

For example, it is very unlikely that we will see 15-foot front yard setbacks due to the option of front yard averaging. Additionally, and more importantly, it is clear to see what is happening today with new multi-family development projects, where competing infrastructure occupies most if not all of the space within the front yard setback, such as LID planters, LAFD control pipes/cages, DWP transformers, and right of way improvements such as street lights and 100% concrete sidewalks with no parkways. Because of this, there is often no room for trees in the ground within the front yard setback.

Lastly, to date, most of the density bonus incentives for reduced side and rear yard setbacks have been permitted up to a 30% decrease. The proposed 4-foot rear yard setback versus the 15-foot required setback, is a **73% decrease** which is excessive.

2. **Environmental Degradation:** Included in the 400-page recommendation report is a lengthy analysis on the financial feasibility of what pencils out for developers, however there *no discussion* of the potential environmental impacts or financial costs associated with the incentives (such as reduce ground cover and less trees/landscaping) that can lead to further environmental degradation of our communities (high opportunity areas or otherwise). For example, what are the cumulative impacts, including worst case scenario, of reducing existing yard space, removal of all on-site trees, requiring less landscaping in common open space areas (i.e. the proposed 15 % landscaping verses 25% for current incentives), and not replacing the trees removed. Such impacts include increasing the urban heat island affect in our severe high heat index areas such as in the San Fernando Valley, increasing stormwater runoff (flooding and pollution) due to increased impermeable surfaces, air pollution impacts long after construction with not enough trees to absorb our bad air quality, increased energy usage (HVACs), and the ongoing and eventual loss of wildlife habitat.

The Housing Element EIR, addendums, and the Environmental Protection Measures in the LAMC, do not sufficiently address the environmental impacts on the specific implementations of such ordinances, such as reduce ground cover and removal of significant trees. We urge that the potential environmental impacts of the LR Ordinance be given the similar weight of discussion, analysis, and consideration.

3. **Delayed Implementation of Essential Ordinances:** The updated Landscape and Site Design Ordinance was approved by the City Planning Commission over 1 ½ years ago (November 2024) yet it has not been implemented (See CF 24-1399). This updated ordinance was sorely needed to ensure this city has room for trees, landscaping, and decent on-site open space as we continue to densify. It is unacceptable for the city to continue to ignore or hold up such an important component to healthier development in the city. We would like to see the updated Landscape and Site Design Ordinance get approved along with the implementation of housing ordinances, such as the subject LR Ordinance, and for Planning staff to provide an analysis now of how the LR Ordinance may comply or conflict with the updated Landscape and Site Design Ordinance.
  
4. **The new definitions being proposed for the LR Ordinance effectively become hidden incentives and create confusion.** For example, the *Buildable Lot Area* is that area excluding required yard setbacks. The LR Ordinance proposes changing the Buildable Lot Area to include the required yards, thereby giving greater Floor Area to a project than otherwise would be permitted at the base zoning level. This is an indirect way to provide incentives. It also creates confusion with terminology, having more than one definition for Buildable Lot depending on where it comes from in the Code. Additionally, proposing that *Lot Coverage* is not applicable in the LR Ordinance, but is applicable elsewhere, is another incentive giveaway that does not need to be requested under the LR Ordinance. Lastly, the new terminology and definition "*Fire Restriction Area*" instead of Very High Fire Hazard Severity Zone (VHFHSZ) is unnecessary and concerning, as again, it creates confusion and potential future loopholes by continuing to redefine things in separate areas of the code, essentially to promote a development agenda without having to deal with the repercussions. The proposed new definitions just for the LR Ordinance should not be permitted. A better approach is to keep uniform definitions in the LAMC 12.03 where they belong, to ensure we are all talking the same language.

Commissioners, CFAC strongly urges you to consider our concerns and objections, and that you hopefully agree there needs to be a more balanced healthier approach to denser housing while including the natural environment, for the health, safety and welfare of all Angeleno's.

Sincerely,



Joanne D'Antonio

Chair, Community Forest Advisory Committee

Cc: Councilmembers and key staff