

April 15, 2026

Santa Monica Planning Commission

City of Santa Monica

Department of Planning and Community Development

1685 Main Street, Room 212

Santa Monica, California 90401

Re: Strong Support for Item 14-A — Missing Middle Housing Definition and Realignment Plan

Dear Chair and Members of the Planning Commission:

As the Director of Government and Public Affairs for the Los Angeles Chapter of the American Institute of Architects (AIA|LA), I am writing to share **strong and enthusiastic support of Item 14-A** on your April 15, 2026 agenda: the adoption of a clear, applied definition of Missing Middle Housing and the accompanying Missing Middle Housing Realignment Plan (MMHRP). This agenda item represents one of the most constructive, design-informed, and financially pragmatic housing policy discussions to come before a Southern California planning commission in years, and we urge the Commission to advance it decisively.

Why a Precise Definition Matters:

The absence of a codified, applied definition of Missing Middle Housing has long been one of the primary reasons well-intentioned housing policies fail to produce buildable outcomes. When the term remains vague — used to describe everything from a backyard ADU to a 40-unit mid-rise — it becomes impossible to calibrate zoning standards, development fees, building code pathways, or affordability covenants to the specific typologies that actually pencil financially. The result is what Commissioner Landres's report aptly calls 'performative zoning': rules that technically permit housing that the market cannot build.

The proposed definition — residential development of 2 to 12 dwelling units on a single lot, in building forms compatible with single-unit neighborhoods, serving households earning between 80% and 200% of Area Median Income — is exactly the kind of precision that enables targeted, design-excellent outcomes. It distinguishes missing middle housing from both deeply subsidized affordable housing (which serves households below 80% AMI) and luxury market-rate development (which targets households above 200% AMI). It names the gap that neither the LIHTC pipeline nor the unassisted market reaches, and it provides a legal and programmatic basis for the concessions — setback reductions, CBC R-3 classification, fee restructuring, pre-approved plans — that make these buildings financially feasible.

The Design Imperative:

As architects, we are especially encouraged that this proposal centers design quality as a non-negotiable element of the definition. The hallmarks of historically beloved missing middle typologies — garden courtyard apartments, cottage courts, townhomes, duplexes with front porches, street-facing entries, generous light and air, fine-grained craftsmanship — are precisely what make these buildings beloved by the communities that host them. The proposed standards for the R-1 district, including requirements that street-facing facades present a unified elevation, that no more than two rooflines be visible from the public right-of-way, and that exterior materials reflect the prevailing residential character of the block face, reflect an admirable commitment to contextual sensitivity.

We strongly support the inclusion of pre-approved cottage court plan designs as part of the Realignment Plan. Pre-approved plans — developed with design excellence standards in mind — reduce soft costs by \$8,000–\$11,000 per unit, accelerate permitting timelines, and ensure that the city's investment in streamlining is matched by a baseline of design quality. We encourage the Commission to engage the architectural community in the development of these prototypes.

Financial Feasibility and Equitable Homeownership:

The MMHRP's most powerful innovation is its alignment of developer incentives with affordability production. By making the local pathway — with its affordability covenant — demonstrably more profitable than SB 9 or SB 1123 on the same parcel, the plan avoids the trap that has doomed most inclusionary programs: mandating affordability as a cost without providing the development economics to absorb it. The three-pathway comparison in the Landres report makes this clear: the local program yields \$360,000 more pre-tax profit than SB 1123 on a 7,500 SF lot, while producing two deed-restricted units rather than zero.

Equally important is the program's orientation toward existing property owners — families, long-term residents, institutional landowners — rather than professional land-acquisition developers. This shift moves the financial burden away from the public sector and back to private capital, reduces speculative teardown pressure, and creates pathways to homeownership and wealth building for households currently priced out of Santa Monica entirely.

Our Recommendations to the Commission:

We respectfully urge the Commission to:

- **Adopt the proposed Missing Middle Housing definition by resolution, establishing it as the programmatic foundation for subsequent zoning code amendments, fee restructuring, and legislative advocacy;**
- **Direct staff to commission the economic feasibility study described in the Realignment Plan's implementation sequence, and to engage the architectural community in the design of pre-approved cottage court plan types;**

- **Support the disaggregated transportation impact fee structure as a legally sound, nexus-grounded mechanism that aligns infrastructure cost with actual development impact;**
- **Affirm the exclusivity of MMH pathway concessions, ensuring that reduced setbacks, R-3 classification, and AHPP tiered fee trades are available only to projects meeting the full affordability covenant conditions;**
- **Advocate at the state level for AB 6 and a California Missing Middle Housing Investment Tax Credit (MIHTC), as the Realignment Plan recommends.**

Santa Monica has an opportunity to demonstrate to the region — and to the state — that design-excellent, financially feasible, contextually appropriate missing middle housing is not a theoretical aspiration but an achievable outcome. The Missing Middle Housing Realignment Plan provides the policy architecture to make it real. AIA|LA is ready to be a partner in that work.

Truly yours,

A handwritten signature in black ink, appearing to read 'Will Wright', with a long horizontal flourish extending to the right.

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