

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