

December 11, 2025

TO: David W. Louie, Chair
Elvin W. Moon, Vice Chair
Yolanda Duarte-White, Commissioner
Pam O'Connor, Commissioner
Michael R. Hastings, Commissioner

FROM: Mitch Glaser, AICP, Assistant Deputy Director
Current Planning Division



DECEMBER 17, 2025, REGIONAL PLANNING COMMISSION MEETING – AGENDA ITEM 5(c) – RPC SPECIAL NO. RPPL2025005022: INFORMATIONAL PRESENTATION ABOUT BUNGALOW COURTS

We are providing an update regarding the informational presentation about bungalow courts, with a focus on their relationship to Altadena recovery, scheduled for December 17, 2025. If you have any questions, please contact me at mglaser@planning.lacounty.gov.

In the previous memo provided to your Commission on December 4, 2025, we stated that we anticipated that the Director of Regional Planning would issue an interpretation memo regarding bungalow courts before December 17, 2025. This is no longer the case. We will not be presenting any policy changes. Instead, we will present the current policies and regulations that allow bungalow court-style housing developments to be constructed in our unincorporated communities, which are described below. In addition, the informational presentation will serve as a listening session because various speakers may share ideas for future policy changes and other ways the County can encourage the construction of bungalow court-style housing developments in the future.

The order of the speakers has changed. The [Beacon Housing](#) team will begin the presentation by sharing their efforts to complete a “like-for-like” rebuild of a bungalow court destroyed by the Eaton Fire that will provide income-restricted affordable housing. Next, Senior Planner Zoe Axelrod of our Disaster Recovery Team will share her work helping Beacon Housing and other stakeholders who want to expand affordable housing options in Altadena and will explain the current policies and regulations that allow bungalow court-style housing developments to be constructed in our unincorporated communities. Afterwards, the [Altadena Heritage](#) team will share the history of bungalow courts in Altadena and surrounding communities as well as their thoughts on what is needed to make them a successful housing option in Altadena. Lastly, the [Casa Nova](#) team will share their innovative home designs and

how those homes can be incorporated into bungalow courts. Earlier this year, they entered the “[Sun-kissed Court](#)” into the “Small Lots, Big Impacts” design competition hosted by [cityLAB](#), [LA4LA](#), and the City of Los Angeles.

CURRENT POLICIES AND REGULATIONS

As noted in the previous memo provided to your Commission on December 4, 2025, bungalow courts are a “[missing middle](#)” [housing type](#) that exist throughout Southern California. However, relatively few new bungalow courts have been built over the last several decades, partly because subdivision and zoning regulations have made them infeasible on many properties.

“Bungalow court” is defined in the County Zoning Code (“Zoning Code”) as “a development which consists of multiple detached buildings organized around a shared courtyard. Each building may include multiple units, such as a duplex or a triplex configuration.” Although “bungalow court” is defined in the Zoning Code, it is not listed as a permitted use in any zone. However, current policies and regulations provide four options that allow bungalow court-style housing developments with multiple detached buildings, which may be organized around a shared courtyard, to be constructed in our unincorporated communities:

Option 1: Lease Project Subdivision

Pursuant to the California Subdivision Map Act, and as codified in the County Subdivisions Code (“Subdivisions Code”), a “lease project” is defined as “a development wherein two or more residential, commercial, or industrial buildings are constructed and maintained on a parcel of land, and apartments, offices, stores, or similar spaces are leased within one or more of the buildings, with overall control of the land and buildings comprising the project being retained by the lessor.” A lease project subdivision requires a tentative map and a final map.

Each building in a lease project subdivision must comply with zone-specific and other development standards in the Zoning Code, including but not limited to:

- Minimum setbacks, as determined by the zone.
- A minimum floor area of at least 800 square feet for each single-family residence.
- At least two covered parking spaces for each single-family residence or townhome; at least three covered parking spaces and one uncovered parking space for each duplex; and at least three covered spaces for each triplex.
- Residential design standards for “multi-unit (private entry)” projects.

The Zoning Code’s inclusionary housing provisions require that affordable housing units be included in housing developments with at least five primary units in certain submarket areas, such as the San Gabriel Valley Submarket Area, which includes Altadena. Developments that include affordable housing units may provide covered or uncovered parking. Developments with at least five primary housing units, including at least one affordable unit, can also request a density bonus to increase the maximum number of units, and may utilize incentives and waivers to modify development standards.

Option 2: Ministerial Site Plan Review or Conditional Use Permit

Certain housing developments are exempt from the lease project subdivision requirement, including:

- Apartment houses, which contain three or more housing units in a building.
- Developments with two or more residential buildings containing no more than a total of four primary housing units, on lots of 15,000 net square feet or less, in Zones R-2 (Two-Family Residence) and R-3 (Limited Density Multiple Residence), subject to locational criteria and site requirements.

Based on these exemptions, and assuming locational criteria and site requirements are met, the following housing developments would be exempt from the lease project subdivision requirement, and could be organized around a shared courtyard to form a bungalow court:

- Four detached single-family residences.
- A duplex and two detached single-family residences.
- Two duplexes.

In addition to the examples above, bungalow court-style housing developments which are configured as attached townhomes or as multiple triplexes, which are functionally equivalent to apartment houses, as defined above, are exempt from the lease project subdivision requirement. These uses can be developed with a Ministerial Site Plan Review, subject to locational criteria. If the locational criteria are not met, these uses can be developed with a Conditional Use Permit.

Additionally, multiple primary housing units with accessory dwelling units (“ADUs”) may be configured around a shared courtyard to form a bungalow court. For example, if two duplexes were constructed under the lease project subdivision exemption described above, then per State ADU law, the property could have one attached ADU and four detached ADUs, for a total of nine housing units on the property.

In each instance described above, each building must comply with zone-specific and other development standards in the Zoning Code, including but not limited to:

- Minimum setbacks for single-family residences, as determined by the zone, and four-foot side and rear setbacks for ADUs.
- A minimum floor area of 800 square feet for each single-family residence.
- A minimum floor area of 150 square feet and a maximum floor area of 1,200 square feet for each ADU.
- At least two covered parking spaces for each single-family residence or townhome; at least three covered parking spaces and one uncovered parking space for each duplex; and at least three covered spaces for each triplex. No parking is required for ADUs outside of a mapped Very High Fire Hazard Severity Zone.
- Residential design standards for “multi-unit (private entry)” projects.

As noted above, developments that include affordable housing units may provide covered or uncovered parking. Developments with at least five primary housing units, including at least

one affordable unit, can also request a density bonus to increase the maximum number of units, and may utilize incentives and waivers to modify development standards.

Option 3: Compact Lot Subdivision

A “subdivision” is defined in the Subdivisions Code as “the division by any subdivider of any unit or units of improved or unimproved land, or any portion thereof...for the purpose of sale, lease, financing or transfer of title, whether immediate or future.” Any lot may be subdivided, subject to a tentative map and a final map, if each newly created lot meets the minimum lot size of 5,000 square feet, or as otherwise specified by a community-based plan.

Given the minimum required lot size for a regular subdivision, configuring the housing units around a shared courtyard may not be practical or feasible. However, a compact lot subdivision that creates up to eight fee-simple lots is another option in Zones R-2 (Two-Family Residence), R-3 (Limited Density Multiple Residence), and R-4 (Medium Density Multiple Residence). Each lot must have a minimum lot size of between 1,200 and 1,750 square feet, depending on the zone. Each lot can be developed with a single-family residence, and ADU(s) if desired.

A bungalow court-style housing development, comprised of multiple lots with one single-family residence and ADU(s) per lot configured around a shared courtyard, may be created through a compact lot subdivision. Each building must comply with development standards for single-family residences on compact lots and other development standards in the Zoning Code, including but not limited to:

- Minimum 15-foot front yard setback, five-foot side yard setbacks, and 10-foot rear yard setback for single-family residences, and four-foot side and rear setbacks for ADUs.
- A minimum floor area of at least 575 square feet for each single-family residence.
- A minimum floor area of 150 square feet and a maximum floor area of 1,200 square feet for each ADU.
- At least two covered parking spaces for each single-family residence. Parking may be located on a parking-only lot with shared ownership. No parking is required for ADUs outside of a mapped Very High Fire Hazard Severity Zone.
- Residential design standards for “multi-unit (private entry)” projects.

As noted above, developments that include affordable housing units may provide covered or uncovered parking. Developments with at least five primary housing units, including at least one affordable unit, can also request a density bonus to increase the maximum number of units, and may utilize incentives and waivers to modify development standards.

Option 4: Senate Bill (“SB”) 1123

As explained in an [informational memo](#) dated August 12, 2025, SB 1123 requires ministerial review of a housing development project that includes a subdivision resulting in 10 or fewer lots and single-family residences in Zone R-A (Residential Agricultural), Zone R-1 (Single-Family Residence), and any zone where multi-family residential development is permitted. Each single-family residence must be on a fee-simple lot, unless housing units are provided

as part of a common interest development or constructed on land owned by a community land trust and rented or sold as income-restricted units. SB 1123 projects may also include ADUs. SB 1123 projects are subject to a tentative map and a final map.

The lot that will be subdivided must meet locational criteria, site requirements, pre-existing site conditions, housing type and tenure requirements, and required density, as specified by the law. An SB 1123 project must comply with all applicable objective zoning, subdivision and residential design standards in the Subdivisions Code and the Zoning Code, except those that physically preclude the project from being built at the minimum specified density. SB 1123 also includes development standards that supersede any conflicting provisions in the Subdivisions Code and the Zoning Code, including but not limited to:

- A minimum lot area of 1,200 square feet in Zones R-A (Residential Agricultural), R-1 (Single-Family Residence), or a single-family residential zone within a specific plan, and a minimum lot area of 600 square feet in all other zones.
- A maximum floor area of 1,750 square feet for each single-family residence.
- Four-foot side and rear setbacks.
- One uncovered parking space for each single-family residence. Parking is not required if the lot is located within one half mile of a major transit stop or high-quality transit corridor, or if there is a car share vehicle within one block.

SB 1123 projects with at least five primary housing units, including at least one affordable unit, can also request a density bonus to increase the maximum number of units, provided that the total number of units does not exceed 10, and may utilize incentives and waivers to modify development standards.

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