

Communication from Public

Name: Emily Farnham
Date Submitted: 08/27/2024 03:01 PM
Council File No: 16-1468-S2
Comments for Public Posting: We are in the middle of an unending severe housing crisis. Now is not the time for NIMBY, Wealthy neighbors to manipulate the powers that be to halt one of the only successful means to speed up housing creation. Furthermore, this attempt to end exceptions for ADUs in the related neighborhoods will inevitably result in more law-suits, wasting tax-payer money.

Communication from Public

Name: Gregory Van Grunsven

Date Submitted: 08/27/2024 02:52 PM

Council File No: 16-1468-S2

Comments for Public Posting: Dear PLUM committee members, I am writing to express my strong opposition to Council file CF-16-1468-S2. Since 2017, 40% of my architectural practice has been ADU projects. Through this work, I have become familiar with the possibilities offered by state and local ADU reforms. I'm very proud to have played a role in creating dozens of units across Southern California, units that add much needed housing type diversity. The ADU units I've designed range from single car garage and carport conversions, to detached 3 bed/ 2 bath houses. At a maximum of 1,200 square feet, these are a size typical to pre-war single family houses, and the size and type that is almost never built now. The smaller conversions provide units for single people, also at a size also rarely built by the market. The units I've designed are in areas that would otherwise be obtainable only to households that can afford market rate single -family homes. Such areas are hillside neighborhoods, good school districts, and walkable neighborhoods on major throughfares. They are also close to job centers, reducing the need for long commutes. Some examples of the clients I have worked with on ADU's include: -Older couples who wish to rent out existing space in their home (basements, garages, lower floors) so that the extra income can transition them into retirement. -People wanting to create housing for their ageing parents -Empty nesters realizing that their large single-family home is oversized, and who wish to create more housing for others. -Adult siblings with a single-family property, needing to create separate living spaces to share with each of their partners. -I also have worked for a fair number of small-scale landlords who add ADU's to existing single and multi-family properties as an additional source of revenue. The units they create add unique options to the rental market and increase the overall supply of housing. This proposal will have many destructive effects. A. It will chill the creation of new units. B. It will limit development in hillside areas to single-family, the most expensive and exclusionary category of housing. It's important to note that for so many of the properties that fall under Hillside zoning do not exemplify what we would consider to be steep hillsides, nor pose a fire safety risk. Particularly in the North East Los Angeles and Silverlake areas, the hillside zone is unusually and inaccurately expansive. In these zones there are many areas of low-slope lots,

with adequate streets and easy access to commercial zones, schools and parks. My own “hillside” zoned home in Eagle Rock is an example of this, on a wide street, with a 2% slope, within 500 feet of a transit served street, large public high school, and a wonderful park. We and our neighbors consider ourselves fortunate to live here and 16-1468-S2 would critically close off the possibility for more to join us. When I’ve been presented with a lot that has an actually steep hillside, the ADU project has almost always been either a basement conversion, or new builds with JADU’s integrated into the overall building volume. It’s been difficult to design detached ADU units in steep lots due to grading, foundation design, access, and other logistical concerns. This is to point out that the sort of lots that would be of the most concern from traffic and fire safety considerations are self-limiting from larger development options. However, the effect of implementing CF-16-1468-S2 would be to limit many other types of conversion, in a much, much broader area, in many streets that have no real fire safety concern. To use an old cliché, it would be throwing out the baby with the bathwater. To address the specific requirements that would apply if this proposal were to proceed; due to site constraints, it is often impossible to create more parking. Widening of substandard streets is prohibitively expensive, disruptive to neighbors, and sometimes infeasible. The addition of fire sprinklers can also be a project killer. To use one example from a past ADU project of mine, which was required to add sprinklers, the cost ballooned exponentially. This was due to an existing water meter, inadequately sized for sprinklers. Installing a larger meter meant work in the street. As the street was a major thoroughfare, partial closure of the street was an expensive and disruptive process. Due to our aging infrastructure, these projects can become expensive, difficult, or impossible beyond our expectations. This above example also illustrates how the city has leverage to require sprinklers, even when the project is not hillside nor VHFHSZ. The example project was neither, and the sprinkler requirement was triggered by inadequate distance to a hydrant, a standard that applies to all detached ADU projects. If allowed to proceed, CF-16-1468-S2 would be a big step backwards on the most critical issue facing our city and region.

GVG CD-14



Gregory Van Grunsven – Principal
CA #36145
LEED-AP

gregvang@gmail.com

August 27nd, 2024

To: Planning and Land Use Management Committee

Re: Council file 16-1468-S2.

Dear PLUM committee members,

I am writing to express my strong opposition to Council file CF-16-1468-S2.

Since 2017, 40% of my architectural practice has been ADU projects. Through this work, I have become familiar with the possibilities offered by state and local ADU reforms. I'm very proud to have played a role in creating dozens of units across Southern California, units that add much needed housing type diversity.

The ADU units I've designed range from single car garage and carport conversions, to detached 3 bed/ 2 bath houses. At a maximum of 1,200 square feet, these are a size typical to pre-war single family houses, and the size and type that is almost never built now. The smaller conversions provide units for single people, also at a size also rarely built by the market.

The units I've designed are in areas that would otherwise be obtainable only to households that can afford market rate single -family homes. Such areas are hillside neighborhoods, good school districts, and walkable neighborhoods on major throughfares. They are also close to job centers, reducing the need for long commutes.

Some examples of the clients I have worked with on ADU's include:

- Older couples who wish to rent out existing space in their home (basements, garages, lower floors) so that the extra income can transition them into retirement.
- People wanting to create housing for their ageing parents
- Empty nesters realizing that their large single-family home is oversized, and who wish to create more housing for others.

-Adult siblings with a single-family property, needing to create separate living spaces to share with each of their partners.

-I also have worked for a fair number of small-scale landlords who add ADU's to existing single and multi-family properties as an additional source of revenue. The units they create add unique options to the rental market and increase the overall supply of housing.

This proposal will have many destructive effects. A. It will chill the creation of new units. B. It will limit development in hillside areas to single-family, the most expensive and exclusionary category of housing.

It's important to note that for so many of the properties that fall under Hillside zoning do not exemplify what we would consider to be steep hillsides, nor pose a fire safety risk. Particularly in the North East Los Angeles and Silverlake areas, the hillside zone is unusually and inaccurately expansive. In these zones there are many areas of low-slope lots, with adequate streets and easy access to commercial zones, schools and parks. My own "hillside" zoned home in Eagle Rock is an example of this, on a wide street, with a 2% slope, within 500 feet of a transit served street, large public high school, and a wonderful park. We and our neighbors consider ourselves fortunate to live here and 16-1468-S2 would critically close off the possibility for more to join us.

When I've been presented with a lot that has an actually steep hillside, the ADU project has almost always been either a basement conversion, or new builds with JADU's integrated into the overall building volume. It's been difficult to design detached ADU units in steep lots due to grading, foundation design, access, and other logistical concerns. This is to point out that the sort of lots that would be of the most concern from traffic and fire safety considerations are self-limiting from larger development options.

However, the effect of implementing CF-16-1468-S2 would be to limit many other types of conversion, in a much, much broader area, in many streets that have no real fire safety concern. To use an old cliché, it would be throwing out the baby with the bathwater.

To address the specific requirements that would apply if this proposal were to proceed; due to site constraints, it is often impossible to create more parking. Widening of substandard streets is prohibitively expensive, disruptive to neighbors, and sometimes infeasible. The addition of fire sprinklers can also be a project killer. To use one example from a past ADU project of mine, which was required to add sprinklers, the cost ballooned exponentially. This was due to an existing water meter, inadequately sized for sprinklers. Installing a larger meter meant work in the street. As the street was a major thoroughfare, partial closure of the street was an expensive and disruptive process. Due to our aging infrastructure, these projects can become expensive, difficult, or impossible beyond our expectations.

This above example also illustrates how the city has leverage to require sprinklers, even when the project is not hillside nor VHFHSZ. The example project was neither, and the sprinkler requirement was triggered by inadequate distance to a hydrant, a standard that applies to all detached ADU projects.

Yes, many hillside streets create challenges for fire safety. Limiting the opportunity to live in hillside areas to the very affluent is not the solution. If allowed to proceed, CF-16-1468-S2 would be a big step backwards on the most critical issue facing our city and region.

Thank you,
Gregory Van Grunsven
Architect and CD-14 homeowner

Communication from Public

Name: Ira Belgrade, YimbyLA, LLC
Date Submitted: 08/27/2024 01:21 PM
Council File No: 16-1468-S2
Comments for Public Posting: Please read and post the attached letter requesting that PLUM quash the motion and instead properly update the city's ADU ordinance to be State compliant.



8-27-24

To: Planning and Land Use Management Committee, Los Angeles City Council
Re: Council File 16-1468-S2 – Quash Eunisses Hernandez Motion and properly amend ADU Ordinance 186481 to be State Compliant

Dear Councilmembers,

I'm one of the people who helped get our state ADU laws passed in 2016 and contributed to Housing And Community Development's (HCD) guide books. I'm writing to ask you to quash the motion by Eunisses Hernandez and update the city's ADU ordinance to be State compliant by removing the restrictions for new ADU construction in the Very High Fire Hazard Severity Zones (VHFHSZ). The city rushed to put together an ordinance at the beginning of 2019 to show they were being compliant and included the VHFHSZ carve out in part to appease the wealthy homeowner associations of the west side who didn't want any ADU's and Gil Cedillo and his constituents on the east side who wanted them. The following is what they inserted:

(4) No ADU is permitted on any lot that is located in both a Very High Fire Hazard Severity Zone designated by the City of Los Angeles Fire Department pursuant to Government Code Section 51178 and a Hillside Area as defined by the Hillside Area Map pursuant to Section 12.03 of this Code, unless it meets one of the following exceptions:

- (i) The ADU is located within the boundaries of either the Northeast Los Angeles Community Plan Area or the Silver Lake - Echo Park - Elysian Valley Community Plan Area; or*
- (ii) The ADU complies with all of the following requirements:*
 - (a) Notwithstanding Subparagraph (c)(10) below, the ADU is protected throughout with an approved automatic fire sprinkler system, in compliance with the Los Angeles Plumbing Code;*
 - (b) Notwithstanding Subparagraph (c)(12) below, one off-street parking space is provided for the ADU; and*
 - (c) The ADU is located on a lot fronting on a street that is improved with a roadway width of 20 feet or more in unobstructed width, as measured along the entire frontage of the subject property, after any associated dedication and improvement. In the event the ADU is located on a Through Lot or a Corner Lot, the lot must front on at least one street that is improved with a roadway width of 20 feet or more in unobstructed width after any associated dedication and improvement.*

The above violates statute: under no circumstances can you ever require someone to widen a road, provide a parking spot if they meet one of the 5 exemptions or provide fire sprinklers if the main house isn't required to have them. Furthermore, the city made all of the above non-applicable if you're creating an ADU from a conversion in the VHFHSZ. So what's the point of putting costly, difficult and illegal restrictions on one homeowner who wants to build an ADU from scratch vs. his/her neighbor who's building from a conversion and has no VHFHSZ restrictions? None. It was all politics.

Government code 65852.2 states in the first paragraph (a)(1)(A) that a local agency may "...Designate areas within the jurisdiction of the local agency where accessory dwelling units may be permitted. The designation of areas may be based on the adequacy of water and sewer services and the impact of accessory dwelling units on traffic flow and public safety..." But you have to submit studies to HCD to prove safety risks and it would most likely mean LA requesting that ALL ADU's be banned in hillside for fire safety because there are no "fix" options in the government code like the city of LA improperly put in its ordinance. Let's get the ordinance right this time and help move housing production forward.

Sincerely,

Ira Belgrade, Founder, YimbyLA, LLC

Cc: Matt Glesne, Sr. City Planner Housing Policy, City of Los Angeles
David Zisser, Assistant Deputy Director, Local Government Relations and Accountability, HCD
Mike Van Gorder, Housing Policy Representative, Local Government Relations and Accountability, HCD

Communication from Public

Name: NORMA HUNT-ALLEN

Date Submitted: 08/27/2024 12:33 PM

Council File No: 16-1468-S2

Comments for Public Posting: I support the motion by Councilwoman Hernandez.

Communication from Public

Name: Priscilla Johnston

Date Submitted: 08/27/2024 11:08 AM

Council File No: 16-1468-S2

Comments for Public Posting: I support the motion by Councilwomen Hernandez. The City Council adopted Ordinance 186481 to add safety requirements for ADUs and JADUs located in Very High Fire Hazard Severity Zones. For some reason, Mount Washington's hillsides (along with hillsides located within the Northeast LA Community Plan and the Silver Lake-Echo Park-Elysian Valley Community Plan) were not included under these protections. The motion #16-1468-S2 will require equal protection for all Los Angeles hillsides within a VHFHSZ by applying the same safety requirements for ADUs and JADUs that are currently in place only in West Los Angeles and the San Fernando Valley. We deserve to have safe access just like West LA and San Fernando Valley. The Mount Washington area is in a high fire severity zone that requires annual brush clearance to mitigate fire risk. With compromised roads and multiple construction sites, we have experienced multiple fires/emergencies where emergency vehicles were unable to reach addresses due to blocked or narrow roads. And as density increases, more cars block already narrow and substandard streets, making it difficult or impossible for emergency vehicles to reach residents. Restoring Ordinance 186481's requirements for ADUs and JADUs to include our hillsides will support the health and safety for both residents and emergency responders. Please do not put our community's safety at risk.

Communication from Public

Name: Yael Pardess

Date Submitted: 08/27/2024 09:35 AM

Council File No: 16-1468-S2

Comments for Public Posting: I support Councilwoman Hernandez motion. We keep warning the city that Mount Washington and all hillside areas on the North East are a high severity FIRE DANGER areas. There is no logical reason to exempt our areas from the regulations that other parts of the city have regarding ADUs and JADUs. Builders must provide an additional parking space. It is of the most crucial importance with our substandard streets. Builders MUST improve all substandard streets to a minimum of 20 feet. Without these two measures we are all in danger and the city is playing with our lives. New home that received waivers in the past not to widen their streets, caused a very serious danger to all of us, aside from causing congestion and frustration daily. Every extra foot of improvement means a difference between life and death. We had many incidents in which LAFD trucks could not reach people in time because of cars parked legally and illegally on a substandard street. We afford one more life lost or property burned. Additionally- stress need to be improved BEFORE construction Strats. Please see many examples attached. Thank you

STREET CONDITION & TRAFFIC ON MOUNT WASHINGTON

The importance of widening narrow substandard street and providing an additional parking spot for ADUs

NARROW STREETS TRAFFIC

Large trucks barely pass down the street



Sep 3rd 2023- 4880 Glenalbyn. Amazon truck had to reverse uphill to allow a small size fire truck to pass on its way to a brush fire on 4450 Beauvais



Fire truck barely
passing at night Glenalbyn Dr
Note many cars parked



TRUCKS STUCK ON NARROW STREET



4866-4888 Glenalbyn Dr

A cement truck stuck on curve had to reverse all the way back down the hill



NARROW STREETS TRAFFIC

Example 1 | 640 Quail dr

Two way traffic is not possible



TRUCKS STUCK or BLOCKING

656 Quail



Precarious leaning of cement truck trying to pass, making it only after parked cars reversed to allow safe passage

Cement truck blocking traffic completely

656 Quail-another day



Another narrow dangerous street

Fire truck getting stuck on Quail unable to get a gas leak incident



4683-91 Glenalbyn Dr LA 90065

Construction in progress

(right below 4701 who got a waiver not to widen street and has 3 cars parked on street)

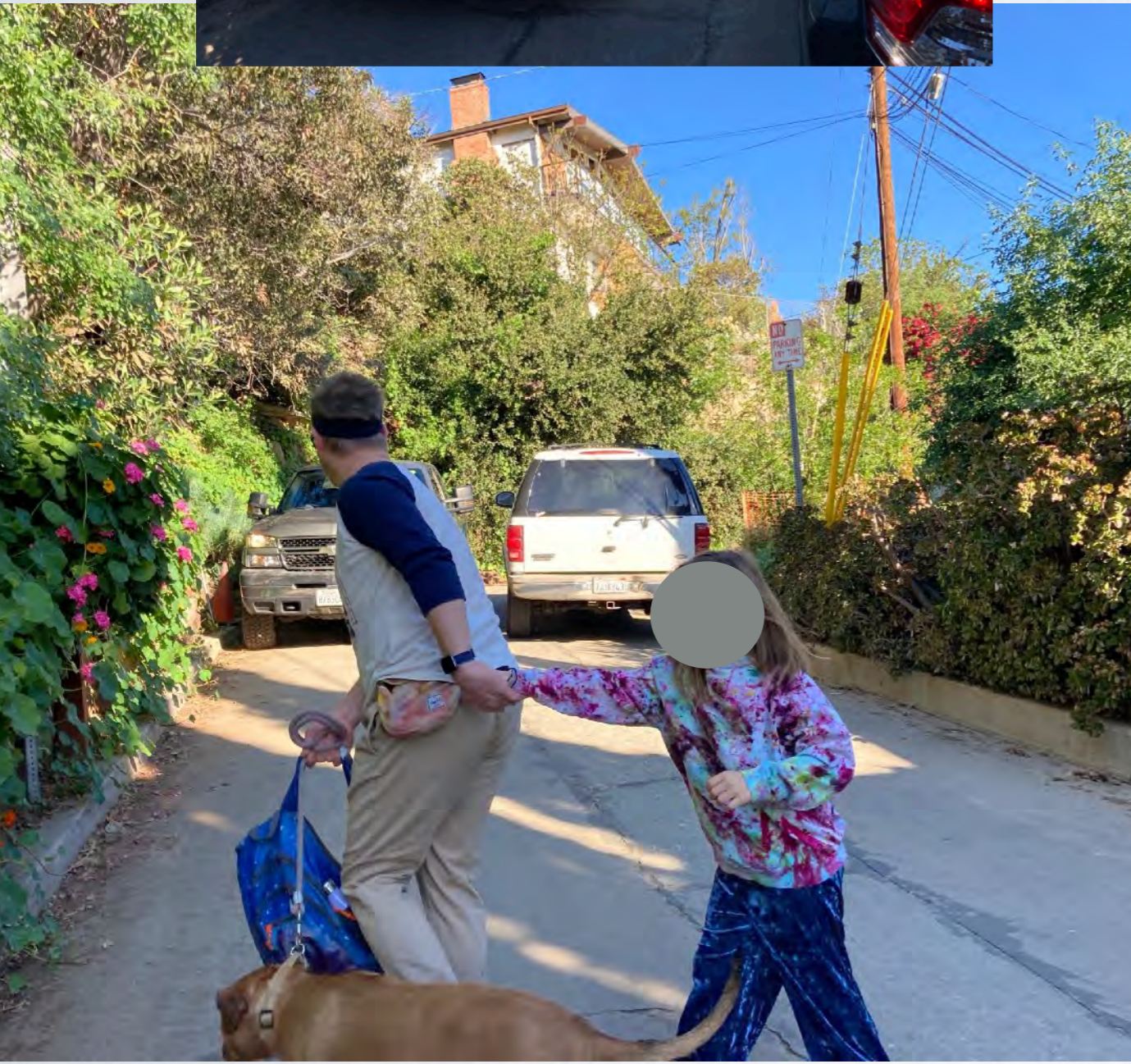


4683 -469 I will not widen street.
Everyday is a traffic nightmare.

4683-91 Glenalbyn Dr LA 90065
Construction in progress
Daily traffic problems



4876 Glenalbyn Dr
School traffic





4866-4888 Glenalbyn Dr

A cement truck stuck on curb has to reverse all the way back down the hill



The crucial importance of street widening

Original street





This property on **4701 Glenalbyn Dr** got a waiver not to widen street. They now have **3 cars parked** on the street daily on a steep incline making it Very difficult to navigate during rush hour. **There is no room for a two way traffic!**

Note that the driveway is impossibly steep and cannot really be accessed by any ANY car and somehow it was approved by the city



4861 Glenalbyn Dr widened the street



Every feet count!

16 feet

Partial list of fires in Mount Washington

LIST OF FIRES IN MT WASHINGTON				
	Date	Year	Location	Facts
1	24-May	1997-00	Elyria Canyon	Entire canyon engulfed evacuations/homes lost and
2	20-Feb	2014-00	533 W Ave 44	home lost, 1 dead
3	7-Nov	2015-00	140 S ave 59	3 story Home lost, 1 injured
4	9-Aug	2015	1800 Alder Dr	Garage Home fire 1 dead
5	20-Oct	2016	4057 Seaview	3 story Home lost, 1 dead, animals and other injured or lost
6	20-Jul	2017	624 Quail /727 Pheasant	Home lost,
7	18-Aug	2017	700 Blk Cross Ave	Vacant home lost
8	23-Feb	2018	1114 Oban Dr	large 3 story home damage
9	4-Jul	2019	1300 Cliff Dr	Brush fire
10	4-Jul	2019	4000 Marmion	Brush Fire
11	30-Jun	2020	834 W ave 37	brush fire
12	14-Apr	2022	4649 San Andreas	house lost fire fighter injured
13	27-May	2022	Kite Hill Ave 37	Brush fire
14	march april	2023	multiple locations Mt Washington	Arson/ tree fires
15	1-Apr	2023	4688 E Cleland Ave	Home fire Gas leak Worker injured
16	4-Jun	2023	4430 San Rafael	
17	5-Jul	2023	West Point Place	Brush fire
18	3-Sep	2023	4450 Beauvais	Brush fire-fire trucks could not access for 22 minutes

Communication from Public

Name: Denise M Eberle

Date Submitted: 08/27/2024 07:59 PM

Council File No: 16-1468-S2

Comments for Public Posting: I support the motion by Council Woman Hernandez. Mount washington streets are dangerously narrow, parked cars create a safety hazard. Emergency vehicles have difficulty passing by.
Thank you, Denise Eberle Deberle88@yahoo.com