

## Communication from Public

**Name:** John Colter

**Date Submitted:** 08/28/2024 07:10 PM

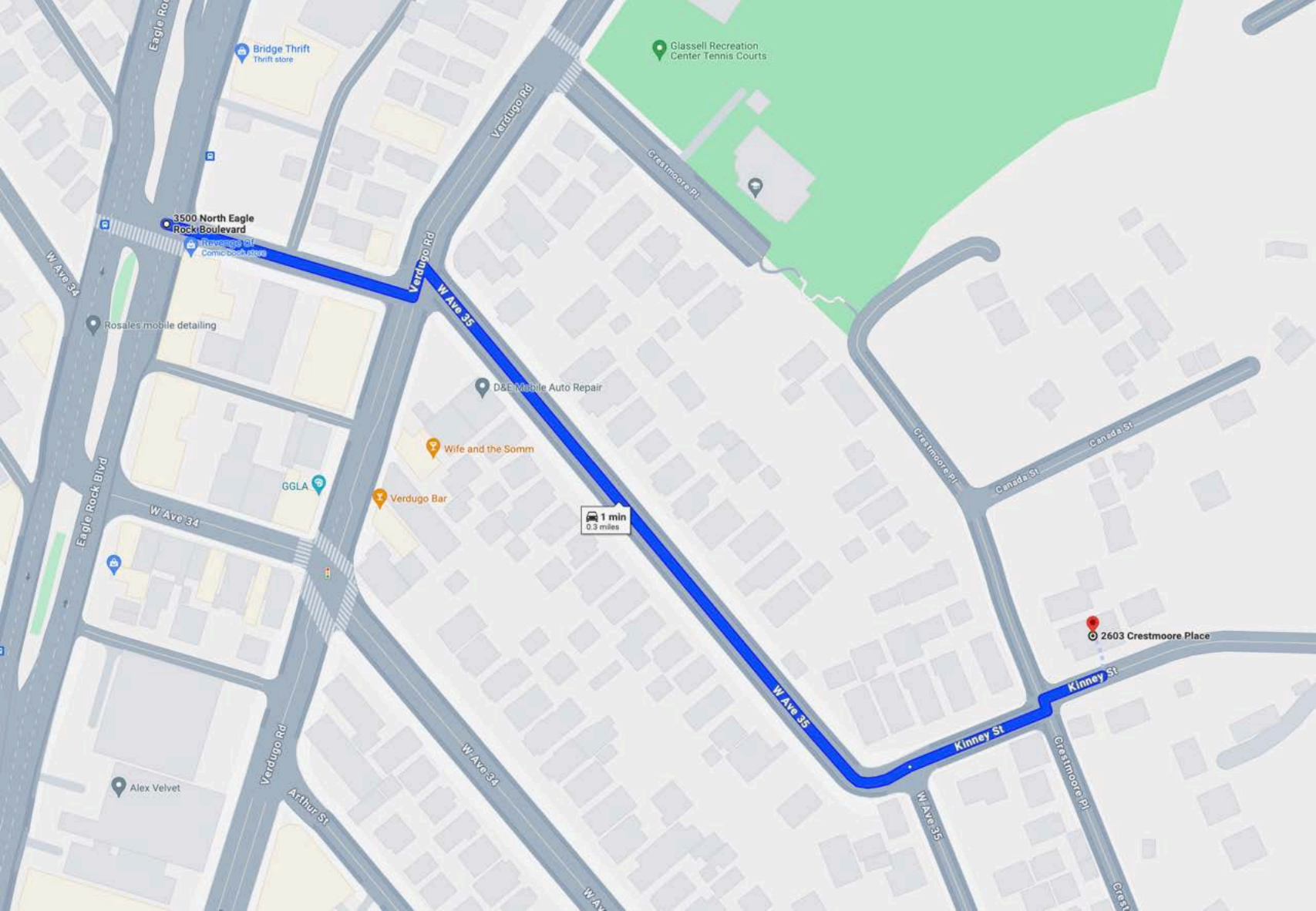
**Council File No:** 16-1468-S2

**Comments for Public Posting:** Dear PLUM Committee Members, The motion in question (Council File 16-1468-S2) would in effect downzone much of North East Los Angeles, Silver Lake, Echo Park, and the Elysian Valley and I encourage the Planning and Land Use Management Committee to not continue the motion any further. At a time when the City is experiencing a severe housing crisis and is woefully behind on reaching new housing targets mandated by the State, downzoning is going the wrong direction. The whole point of the exceptions outlined in the current ADU ordinance for parcels within the boundaries of the Northeast Los Angeles Community Plan and Silver Lake—Echo Park—Elysian Valley Community Plan is that large areas of these communities have the Hillside and VHFHSZ designations applied even where there are no infrastructure or access issues that would make an ADU inappropriate. Because these designations are so widely and loosely applied to these communities, without the exceptions in the ADU ordinance that Hernandez is proposing to remove, there would essentially be a widespread to near blanket ban on the development of affordable ADUs in these communities. In almost all cases this motion would make it more expensive to build an ADU in these communities and in many cases it would make it impossible to build an ADU. Again, to be clear, in many cases this would be on parcels where the addition of an ADU is entirely appropriate and desirable. This issue was much debated, discussed, and thought about for years before the City ADU ordinance was adapted in 2019. It was determined then and it remains the case that without these specifically tailored exceptions residents of these communities would be unfairly denied the benefits that ADU development can bring to families and their communities. The tragic Glassel Park fire at 2603 W. Crestmoore Place mentioned in the motion is a complete red herring to the point of being so misleading that it has no place in an official City motion. The fire took place in a primary house built in 1921. There was no ADU involved. The VHFHSZ designation has to do with wildfire risks. News reports say that arson was being investigated as the suspected source of the fire. The streets leading to the home are standard width street with adequate sidewalks on both sides. The fire engines only had to travel approximately 1,000 feet from Verdugo Road or

approximately 1,500 from Eagle Rock Blvd. along Ave. 35 (illustrations below) which is a gently sloping 50' wide street again, with sidewalks on both sides. There is a fire hydrant directly in front of the house that caught fire. There are absolutely no issues with inadequate road access or inadequate infrastructure with the example Hernandez used in the motion. Interestingly there is an active permit for an ADU on this property that was issued in 2023 post fire. I wonder if the homeowners are aware that their Councilmember is using their property in a misleading manner to make the case that they should be burdened with additional expenses and constraints. While the example of 2603 W. Crestmoore Place contradicts the point Councilmember Hernandez is trying to make it does perfectly illustrate the fact that there are parcels throughout NELA where ADUs should be built and that without the tailored exceptions already in the City ADU Ordinance homeowners would be faced with unfair and unwarranted additional costs and in some cases an outright ban on building an ADU on their property. In 2024 we all know that the most often used tools in the NIMBY toolbox to block new housing are parking minimums and fear stoking. Finally, the last photograph is of the street I live on in NELA. My house is a block and a half away from Eagle Rock Blvd. and a bus stop. My street is 80 feet wide and paved to 60 feet wide. It has a negligible slope. I once saw a fire truck make an easy u-turn on my street. Despite all this my property falls under the hillside category. I hope this helps to make clear that in NELA and the Silver Lake—Echo Park—Elysian Vally Community Plan area the hillside category often doesn't mean what people imagine the hillside designation to mean. This is the reason the exceptions that Councilmember Hernandez wants to remove were put into the ADU ordinance in the first place. Thank you, John Colter

2652 W Ave 35  
Los Angeles, California  
📍 Google Street View  
May 2022 [See more dates](#)





Bridge Thrift  
Thrift store

Glassell Recreation  
Center Tennis Courts

3500 North Eagle  
Rock Boulevard

Reverend of  
Comichon Motors

Rosales mobile detailing

D&E Mobile Auto Repair

Wife and the Somm

Verdugo Bar

GGLA

1 min  
0.3 miles

Alex Velvet

2603 Crestmoore Place



## Communication from Public

**Name:**

**Date Submitted:** 08/28/2024 03:00 PM

**Council File No:** 16-1468-S2

**Comments for Public Posting:** Dear PLUM Committee Members, The motion in question, Council File 16-1468-S2, must be dismissed. We have an enormous housing crisis and desperately need the additional units that ADUs can provide. In particular, the Hillside Zone and VHFHSZ designations should not be applied when there are no infrastructure or access issues that would make an ADU inappropriate. If you actually look at the local conditions in many parts of North East Los Angeles, Silver Lake, Echo Park, and the Elysian Valley, ADUs are absolutely appropriate. Councilmember Hernandez has a broad history of suppressing development of new housing and her motives are highly questionable. Hernandez has blamed rising housing prices and evictions on new housing developments: a wrong-headed approach. We simply need more housing, and tactics like blocking the Mayfair Hotel conversion run counter to our mutual needs. Thank you, Emily Jagoda CD14

## Communication from Public

**Name:** John Southern, AIA  
**Date Submitted:** 08/28/2024 09:59 AM  
**Council File No:** 16-1468-S2

**Comments for Public Posting:** I am writing to express my strong concerns regarding the proposed ordinance 186481 further restricting the construction of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) in Very High Fire Hazard Severity Zones (VHFHSZ). Based on my experience as a licensed architect, university professor, and builder in the City of Los Angeles, I believe that the current proposal is flawed and fails to adequately address the housing needs of our city while maintaining safety. My main points of contention are as follows: ?

**Housing Crisis Impact:** This ordinance will exacerbate the ongoing housing crisis by limiting the potential for new, affordable housing units in these areas. Home prices and rents will continue to spiral out of control forcing Angelenos to look outside the city for affordable housing options. ?

**Inequitable Treatment:** The Council's intention to incorporate Northeast Los Angeles Community Plan (NELA) and the Silver Lake-Echo Park-Elysian Valley Community Plan into the proposed revision to the ADU ordinance unfairly deprives homeowners in these areas of their by-right remedy to develop ADUs or JADUs on their land, creating an inequitable situation where they do not share the same development entitlements as other neighborhoods in the city. ?

**Overemphasis on Fire Risk:** While fire safety is crucial, the blanket prohibition on ADUs and JADUs in VHFHSZs is an overreaction that unnecessarily limits new housing options city-wide. All neighborhoods need to do their share to provide additional housing stock. ?

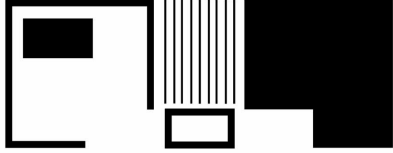
**Lack of Nuance:** The ordinance generalizes the varying degrees of fire risk within VHFHSZs and doesn't account for properties that may already have sufficient fire safety measures in place. Nor does it account for the fact that the existing building codes governing ADU's already have provisions for resisting combustion in fire-prone areas. ?

**Economic Burden:** The required safety measures (sprinkler systems, additional parking, road improvements) will be cost-prohibitive for many homeowners, effectively preventing them from building much-needed housing units to help solve our housing crisis. ?

**Parking Requirements:** The one off-street parking space requirement contradicts the city's goals of reducing car dependence and promoting sustainable transportation options. ?

**Potential for Unintended Consequences:** Strict regulations may

lead to an increase in unpermitted construction, potentially creating more unsafe living conditions. ? Insufficient Data: The ordinance doesn't provide clear evidence that the building of ADUs and JADUs significantly increase fire risk compared to other new construction in VHFHSZs. ? Alternative Solutions: The proposal overlooks other potential solutions, such as improved evacuation planning, community-wide fire prevention measures, or targeted infrastructure improvements, including city-funded road widening and upgrades to existing fire-fighting infrastructure. I urge the members of PLUM, DCP, and the City Council to reject this proposed revision to the ADU Ordinance and focus on laws that reduce project review schedule, reduce permitting costs, and aggressively encourage the rapid construction of more housing so that we can increase our supply to meet the severe shortfall our city is experiencing, a shortage that is keeping home prices and rents beyond the reach of average Angelenos. Creating more restrictions will only make the problem worse! -John Southern, Architect, Educator, and Hillside Construction Expert



## URBAN OPERATIONS

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Los Angeles, CA 90031  
info@urban-ops.net  
t: 323.644.1415  
License # C 31796

**8.28.2024**

Dear Members of the Planning and Land Use Committee,

I am writing to express my strong concerns regarding the proposed ordinance 186481 further restricting the construction of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) in Very High Fire Hazard Severity Zones (VHFHSZ). Based on my experience as a licensed architect, university professor, and hillside builder in the City of Los Angeles, I believe that the current proposal is flawed and fails to adequately address the housing needs of our city while maintaining safety. My main points of contention are as follows:

- **Housing Crisis Impact: This ordinance will exacerbate the ongoing housing crisis by limiting the potential for new, affordable housing units in these areas. Home prices and rents will continue to spiral out of control forcing Angelenos to look outside the city for affordable housing options.**
- Inequitable Treatment: The Council's intention to incorporate Northeast Los Angeles Community Plan (NELA) and the Silver Lake-Echo Park-Elysian Valley Community Plan into the proposed revision to the ADU ordinance unfairly deprives homeowners in these areas of their by-right remedy to develop ADUs or JADUs on their land, creating an inequitable situation where they do not share the same development entitlements as other neighborhoods in the city.
- Overemphasis on Fire Risk: While fire safety is crucial, the blanket prohibition on ADUs and JADUs in VHFHSZs is an overreaction that unnecessarily limits new housing options city-wide. All neighborhoods need to do their share to provide additional housing stock.
- Lack of Nuance: The ordinance generalizes the varying degrees of fire risk within VHFHSZs and doesn't account for properties that may already have sufficient fire safety measures in place. Nor does it account for the fact that the existing building codes governing ADU's already have provisions for resisting combustion in fire-prone areas.
- Economic Burden: The required safety measures (sprinkler systems, additional parking, road improvements) will be cost-prohibitive for many homeowners, effectively preventing them from building much-needed housing units to help solve our housing crisis.
- Parking Requirements: The one off-street parking space requirement contradicts the city's goals of reducing car dependence and promoting sustainable transportation options.
- Potential for Unintended Consequences: Strict regulations may lead to an increase in unpermitted construction, potentially creating more unsafe living conditions.
- Insufficient Data: The ordinance doesn't provide clear and consistent evidence that the building of ADUs and JADUs significantly increase fire risk in VHFHSZs.
- Alternative Solutions: The proposal overlooks other potential solutions, such as improved evacuation planning, community-wide fire prevention measures, or targeted infrastructure improvements, including city-funded road widening and upgrades to existing fire-fighting infrastructure.

I urge the members of PLUM, DCP, and the City Council to reject this proposed revision to the ADU Ordinance and focus on laws that reduce project review schedule, reduce permitting costs, and aggressively encourage the rapid construction of more housing so that we can increase our supply to meet the severe shortfall our city is experiencing, a shortage that is keeping home prices and rents beyond the reach of average Angelenos. Creating more restrictions will only make the problem worse!

Sincerely,

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

John Southern, AIA