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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