

August 28, 2015

Councilmember Jose Huizar
Chair, Planning and Land Use Management Committee
Los Angeles City Council
200 N Spring Street Rm 465
Los Angeles CA 90012

RE: Council File 13-1478-S3 - LA City Council Motion Regarding the Small Lot Subdivision Ordinance

Dear Councilman Huizar,

As the City Council and its Planning and Land Use Committee prepare to take action on the July 1, 2015 motion by Councilmember O'Farrell and Councilmember Bonin to thoroughly review the Small Lot Development Ordinance, it is our hope that you will consider an aspect perhaps unforeseen when the ordinance was conceived.

The San Francisco Greenbelt Alliance notes in the publication *Smart Infill* that fine-grained, varied infill development can be used to help create active downtowns and neighborhood centers where people can gather and connect, and it can help communities grow in areas of existing or pliable infrastructure. A similar vision inspired Los Angeles' Small Lot Subdivision Ordinance, approved to promote residential infill development in multifamily and commercial zones throughout our city and encourage additional housing opportunities for first-time home-buyers in multifamily residential and commercial zones.

Yet in the past year Council District 14 has seen two troubling Small Lot proposals filed with City Planning. Unlike the case-study projects located near transit hubs or growing commercial areas encouraging human-scale neighborhood centers, these Small Lot projects each request zone changes to bring 40 or more units to undeveloped hillsides and hilltops in El Sereno. One proposes 23 retaining walls and the removal of over 40 California Black Walnuts, a now protected native tree whose once broad habitat has been devastated by hillside development.

Not at all restrained by the spirit and intent of the law, these misplaced projects use the Small Lot Ordinance to maximize the number of top-of-the-market units built on 'view sites.' The Council's review of the ordinance is well-timed to address the creep of Small Lots away from more intricate high density areas toward the low hanging fruit of undeveloped hillsides. Urban infill development like Small Lot housing must be carefully and actively guided if it is to facilitate only the positive changes for which it is intended.

While Los Angeles works to focus density in areas of existing infrastructure and provide for a more focused live-work-play trajectory, the current Small Lot Ordinance places the open spaces that balance our urban environment at risk without strict restrictions on zone changes and variances to existing protective ordinances.

Our area is not yet characterized by sprawl, thanks to community doggedness and your responsiveness as Councilman. Continuing to protect the Northeastern Los Angeles hillsides, hilltops and remaining pockets of open space located in existing single family zones is crucial to the health and vitality of the area's unique neighborhoods. To consider privately built amenities an effective replacement for existing natural resources would be a mistake.

While we encourage a range of housing and public spaces throughout each neighborhood to accommodate a diverse population of different ages, cultures and stages of life, we respectfully

ask the Council to seek ways to ensure the Small Lot Ordinance does not facilitate encroachment on natural areas. Successful greenbelt, green space and urban growth boundary practices implemented in other major metropolitan areas demonstrate the potential for safeguarding our City's distinctive topography of hilltops, canyons and natural areas and the generations whose understanding of their own place in the natural world depends on them.

Respectfully and with many thanks for your time and consideration,

Preserve El Sereno:

Melissa Kellogg and Demi Contreras, El Sereno Residents

Nate Tharp, El Sereno Resident

Erica and Ashley Armijo-Mora, El Sereno Residents

CC:

Councilmember O'Farrell

Councilmember Bonin

Paul Habib, Council District 14

Martin Schlageter, Council District 14

Shawn Kuk, Council District 14