

Contact Information

Neighborhood Council: Greater Echo Park Elysian Neighborhood Council

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The Board approved this CIS by a vote of: Yea(16) Nay(0) Abstain(0) Ineligible(0)
Recusal(0)

Date of NC Board Action: 08/23/2016

Type of NC Board Action: For if Amended

Impact Information

Date: 08/24/2016

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 13-1478

Agenda Date:

Item Number:

Summary: The Echo Park Neighborhood Council supports the proposed amendment to the Small Lot Subdivision Ordinance with Recommendations. The current proposal does not go far enough in addressing the problem of design guidelines being unenforceable nor in reducing the negative impacts of SLS units on our communities.

First, the ordinance should expressly incorporate the design and map standards so that they may not be unilaterally amended by the Planning Department without public input and City Council action.

Second, SLS projects should be prohibited in RD and R2 zones, as they tend to have a far greater FAR than the surrounding structures and do not fit with the neighborhoods. They are the McMansions of these multi-family zones.

Third, SLS projects should be prohibited in areas such as Echo Park and Silver Lake on lots subject to the Hillside Ordinance, and particularly on narrow streets.

Further, there should be greater setbacks provided - front, rear, and side - and additional requirements added to the ordinance itself, such as guest parking, no rooftop decks, pitched or beveled roofs in relation to adjacent properties, a floor area ratio established, provide for a percentage of units to be ADA compliant and accessible, and ensure protections for rent control tenants when the SLS units are offered for rent within 5 years of completion.

Further details on attached CIS

ECHO PARK NEIGHBORHOOD COUNCIL

P.O. BOX 26557, L.A. CA 90026



Community Impact Statement (CIS) Proposed Small Lot Subdivision Code Amendment and Policy Update

Council Files 13-1478 & 13-1478-S3

August 23, 2016



**CERTIFIED NEIGHBORHOOD
COUNCIL
APRIL 16, 2002**

To: Honorable City Council, Los Angeles City Hall, 200 N. Spring Street,
room 395, Los Angeles, CA 90012 c/o Office of the City Clerk

The Echo Park Neighborhood Council (EPNC) is requesting that the following Community Impact Statement be attached to City Council Files 13-1478 & 13-1478-S3.

On August 23, 2016, with a quorum of 16, the EPNC Board of Governors held a Brown Act-noticed meeting to discuss, and adopt or not adopt, the motion in support of the proposed amendment to the Small Lot Subdivision Ordinance (*see* CPC-2015-4499-CA). With a vote of 16 yeas, 0 nays, and 0 abstentions, the EPNC voted to support the Proposed Amendment to the Small Lot Subdivision Ordinance with Recommendations.

Recommendations:

First, it is problematic that the structure of this ordinance gives the Planning Department the authority to make and adjust conditions at any time, either before or after passage, even though these standards are supposedly incorporated into and have the effect of law. The specifics of the “Advisory Agency Small Lot Map Standards” and the “Small Lot Design Standards” should be expressly incorporated into the ordinance itself so that they may not be amended unilaterally without public input and City Council action.

Second, RD and R2 zoning designations should be removed from clause 27 of the ordinance. Small Lot Subdivisions (“SLS”) are mostly infill projects, but the majority of existing buildings in these zones have a far lower FAR (floor area ratio) than SLS projects contain, so that the projects often do not fit in. Small Lot Subdivisions are the McMansions of the RD and R2 zones.

Third, given the disproportionate effect on traffic, parking, viewsheds, and conformance with neighborhood character and topography in hillside areas such as Echo Park and Silver Lake, SLS Projects should be prohibited in areas subject to the Hillside Ordinance; at the very least, they should be prohibited in hillside areas on streets less than 30 feet in actual width either in front of the original property or in front of the properties abutting the proposed SLS property fronting on that street.

Regarding the revised proposed ordinance:

- 1) subsection 27(a) (7) should be changed to require that the front yard shall conform to the underlying zoning or to the prevailing setback, whichever is greater;
- 2) subsection 27(a) (8) (b) (ii) should be changed to reflect a required 15 ft rear yard setback if a project abuts any residential zone (not just R1);
- 3) subsection 27(a)(8) (b) (i)) should be changed so the 5ft side yard setback is increased to 7 feet for buildings 2 stories or more, or alternatively, Small Lots should not be exempt from LAMC 12.21.A.17(b) of the Hillside Ordinance relating to side yard setbacks.

Further, the following clauses should be included in the law itself (and not merely the Design Standards or Map Standards):


1. There must be CC&Rs requiring a Governing Body, such as an HOA or equivalent, to ensure proper maintenance of the SLS common areas, including driveways, walkways, landscaping, fences, and retaining walls.
2. Using street trash pickup is not allowed and an SLS must utilize on-site trash pickup from an independent vendor.
3. Incremental Street Widening cannot be required on any infill SLS projects.
4. No roof top decks will be allowed.
5. Parking cannot overlap into any side yard and tandem parking is not permitted. For every 4 SLS houses or units, two additional guest parking spaces must be required.
6. Parking stalls and driveways shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk.
7. The garage interior-doors must not lead to a bedroom or living room but to a hallway or stairway to prevent the use of garages as dwellings.
8. First floor bonus rooms cannot have an adjoining bathroom.
9. Building heights must be restricted to be in relation to the surrounding adjacent properties and all roof edges will have a 45 degree bevel on all sides for any SLS structure of 2 stories or more to ensure adjacent properties have adequate access to light and air.
10. Prior to any Planning Department hearing, the ZA or AA must personally visit the site and surrounding area.
11. All SLS drawings and renderings that are submitted for review must clearly and accurately show surrounding context of the project.
12. Entry door to the front units must face the street.
13. There should be an FAR (floor area ratio) established for SLS units.
14. The pedestrian walkway and common access driveway should not overlap and shall be counted separately in terms of compliance with minimum width requirements.
15. At least 25% of units in an SLS project must be compliant with the ADA and Title 24 of the California Code of Regulations, including wide doors for wheelchair accessibility as well as a ramp on the side door to the dwelling and elevators or lifts as needed.

16. Sideyard landscaping must be required, allowing for infiltration and a landscape strip against the required wall.

17. As applied to SLS projects, recommendations and/or footnotes in the General Plan specific to a community or local plan should supersede generalized citywide ordinance provisions not specific to local plans (for example, the General Plan's footnote re: observing a 36 foot height limit in hillside areas should govern over the Hillside Ordinance provision allowing the 45 foot limit allowed by underlying zoning on a fully improved street).

18. Once an SLS project's proposed plans have completed their MND, EIR, or other CEQA requirement and have been approved by the Planning Dept., the project shall not be altered or expanded by positioning new balconies or new windows to face adjacent residential dwellings. If such shall occur, the City shall cite and require removal of such additions not found in the plans submitted to and approved by the Planning Dept. If plans are changed, they require a new EIR, MND or other CEQA document to be prepared based on the revised project description.

19. The stated purpose of the SLS ordinance is to create fee-simple home ownership. In cases where the developer or unit owner chooses to rent SLS units instead of selling, and where prior rent control tenants have been evicted to accommodate the development, such evicted tenants must be offered the new units at their previous rent controlled prices. This should apply to the developer or any owner for the first five years after completion of the project.



Tad Yenawine
Chair, Echo Park Neighborhood Council