

# SOUTH HOLLYWOOD NEIGHBORHOOD ASSOCIATION

July 28, 2014

Dear City Council,

The South Hollywood Neighborhood Association, by a unanimous vote by our Board on 7/10/2014 strongly urges you to **SUPPORT** Councilman Tom LaBonges motion #13-1478, which would fully review and amend the Small Lot Subdivision ordinance. Relative to this Motion, the South Hollywood Neighborhood Association, by unanimous vote of our General Membership on 4-28-2014 voted to **OPPOSE** motion #13-1478-S2, which only partially amends the ordinance.

The Small Lot Subdivision Ordinance, which had the greatest of intentions, has flaws that have permitted developers to deviate from the law's intent of providing more affordable housing, to instead maximize profits by building very tall and dense "mini-lot-mansions". These are often being built without concern for (or compatibly with) the character of existing neighborhoods.

The related problems must be corrected by law. Recent changes to the Small Lot Subdivision Guidelines are not sufficient in their completeness or legal force. Zoning Administrators and Advisory Agency deputies have repeatedly told neighborhoods (objecting to a project) that the Guidelines are not law and therefore not enforceable. Although the new guidelines come with a directive from the Planning Department's Director to follow them, not being law they are unlikely to stand up to legal scrutiny when challenged.

Councilman LaBonge's motion #13-1478 offers the opportunity for a full review and amendment of this flawed ordinance. The City Council PLUM Committee moved this motion to the full City Council, however, at that hearing, the Director of Planning, Michael LoGrande, indicated that his department does not have the resources to examine and fix the problems related to neighborhoods. It is interesting to note that the Planning Department found the resources to move forward on Motion 13-1478-S2, which will remove the "Early Start" requirements placed on developers when doing Small Lot Subdivisions.

Our neighborhood association voted unanimously on 4/28/2014 to OPPOSE Motion #13-1478-S2 removing the Early Start requirement. Although we acknowledge that the "Early Start" requirement is another problem with the Small Lot Subdivision ordinance, fixing this problem without addressing the other problems streamlines the developer's processes and increases the prospect for inappropriate developments. Since legally the ZA cases requesting "Early Start" are easier to dispute than the AA cases for Subdivisions, the threat of a neighborhood disputing the "Early Start" ZA Case will often encourage developers to negotiate with neighborhoods, which can result in better projects. The balance is that a good project will not encounter much opposition. If a project is bad for a neighborhood, that neighborhood needs the negotiating leverage provided by the "Early Start" requirement.

The Small Lot Subdivision ordinance should only be amended when both the concerns of the neighborhoods and the developers are taken into consideration. This should all be done at the same time, and we ask the council to tell the Department of Planning to allocate the needed staff to complete this.

Therefore, our neighborhood association Supports Motion #13-1478 to amend the SLS and Opposes Motion #13-1478-S2, which solely amends the ordinance by removing the "Early Start" requirements, until such time as all concerns can be addressed and a complete law be presented and passed.

Sincerely,



Don Hunt, President