To: Council President Herb Wesson  
RE: Proposed Repeal of the City’s Existing Second Unit Dwelling Ordinance  
Case No. CF-14-0057-S8  
CPC-2016-1245-CA

Dear Council President Wesson and fellow City Council Members:

We urge you to vote “no” regarding the proposal to repeal the existing Second Unit Dwelling Ordinance, thus abandoning current protective standards.

We urge you to NOT adopt the State’s default development standards in Government Code Section 65852.2(b)(1) in approving second dwelling units.

We urge you to NOT ALLOW the City of Los Angeles to have the dubious distinction of being California’s only major municipality that does not have its own ordinance governing second units, when the state law expressly permits the City to have its own ordinance.

The Planning Department in 2003 adopted a policy that helps protect the character of our residential neighborhoods, and it should be the policy retained now. In contrast, without the current limitation (for ministerial applications) of 642-square-feet for a by-right secondary unit behind a principal residential home, second units governed solely by statewide standards that allow the construction of a 1,200-square-foot residence would simply overwhelm the built environment in much of our community. The pattern of development in many of our neighborhoods is that of one-story, single-family bungalows, typically circa 1,000-1,400 square feet on small lots typically measuring 5,000 square feet. Secondary units that are the same size or larger do not meet any other citywide design guidelines.

For this reason and other concerns outlined below, at its Governing Board meeting of May 5, 2016, The United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Communities Neighborhood Council (UNNC) has voted to OPPOSE this proposal.
Issues and Concerns

We understand that SB 1866 requires municipalities to adopt measures (consistent with this state law) that permit the construction of secondary units meeting certain guidelines by right (e.g., as ministerial approvals). We also understand that the City has a housing shortage. But addressing this housing shortage should not then at the same time change the visual character of neighborhoods, nor cause major increased density in neighborhoods zoned for LOW density. The City should, indeed, meet our increasing housing needs, but should do so in a way that is respectful to the varying character of diverse neighborhoods throughout Los Angeles.

The City adopted such standards (established in LAMC subsections 12.24 W.43 and 12.24 W.44), and should retain them. These standards include: a minimum lot size; construction of 640 square feet as the maximum; an entry that is not visible from the street; additional parking space to accommodate the new resident(s); and conformance to existing height, setback and lot coverage standards. UNNC’s stakeholders have made it clear to us that changes/amendments to these standards, if any, should come about after open public discussions in neighborhoods here and throughout the City, and not simply as a result of this proposed repeal, which puts in place only the too-generous state standards.

Within UNNC’s boundaries, and doubtless this is true throughout the city, there are a variety of patterns of development. In Jefferson Park in particular, we have the typical development pattern of one-story homes on smaller lots. In Arlington Heights, the lots are a bit larger (typically 7,500 square feet) with both one-story and two-story homes. We also have larger “mansion-sized” single family homes on larger lots, typically originally built with carriage house-style rear servants’ quarters/accessory apartments over auto garage spaces.

Because these are diverse development patterns, it is clear that a one-size-fits-all new standard – a standard that would indeed likely be appropriate for a rear, secondary structure behind a 5,000-square-foot 2½ story home on a 10,000-square-foot lot, but would equally likely be completely inappropriate behind a one-story cottage on a tiny lot – does not work.

Another issue: Who would be building a secondary dwelling unit? The AB 1866 legislation was designed to allow homeowners to build “Granny Flats” in order to efficiently house extended family or, potentially, renters, while the homeowner remains in occupancy at the primary residence on the parcel. AB 1866 does not contain language proposing that investors/developers were the target beneficiaries of the legislation. Here in Los Angeles, without a restriction – perhaps a covenant of owner-occupancy – repealing the existing citywide standards may open up single family neighborhoods to, in effect, become multi-family/duplex zones, contrary to our adopted Community Plans.

UNNC believes it would be better to open a discussion about fixing the City’s current ordinances and municipal code, rather than simply repealing existing protections that, in fact, do protect our neighborhoods.

United Neighborhoods Neighborhood Council  
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About UNNC

The United Neighborhoods N.C. was certified in May, 2002, and is one of the largest neighborhood councils in the City of Los Angeles, representing 80,000+ residential and non-resident stakeholders in the neighborhoods roughly bounded by Pico on the north, Exposition Place on the south, Crenshaw to the west and Normandie-Western-Arlington to the east.

In the years since adoption, UNNC has continuously had an active Planning and Zoning Committee, which meets twice each month and engages numerous stakeholders as committee members. It deals with specific proposed projects and land use cases, as well as citywide initiatives, such as this. We feel that as a result UNNC has knowledgeably and with fairness given advice to both City staff and elected officials (as is mandated in the City Charter) and hope you will agree that the advice we give today, that you NOT ADOPT this proposal, reflects this neighborhood council's thoughtful consideration of the issue(s).

Respectfully submitted,

Jeff Camp
UNNC President