



**Cahuenga  
Pass  
Property  
Owners  
Association**

*Representing the Cahuenga Pass Since 1952*

June 6, 2016

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

- O RE:0 LAMC 12.24.W.43 and 12.24.W.44
- O O Second Dwelling Unit Ordinances

Dear Councilmember Huizar:

The Board of Directors of the Cahuenga Pass Property Owners Association wants to express our concern about the City's possible repeal of the above-referenced municipal codes, especially as they pertain to second dwelling units in hillside areas and on substandard streets.

As a hillside community, many of our streets are less than standard width and the prohibition on second dwelling units is an important statute. Because many of our residences are old and without garages or off-street parking, homeowners often must park on the street. Increasing density in a neighborhood such as this, with the concomitant increase in demand for parking, would be a significant change.

We do not understand the City's seeming rush to repeal these ordinances, especially when so much is at stake. We understand the pressing need for additional housing, but this is a city with great diversity in the topography of neighborhoods, and a single all-purpose policy in terms of land use seems not only shortsighted but out-of-date.

If these ordinances are repealed and the prohibitions on second dwelling units abolished, the state law default standards would allow 1,200 sq.ft. dwelling units on single-family residential lots. Many single-family homes are 1,200 sq.ft in size. Allowing such large secondary structures in R1 neighborhoods amounts to gutting the R1 zoning regulation.

We urge you to delay any action by the PLUM Committee, and allow the communities in this city an opportunity to review the proposed changes and analyze the effects on their individual neighborhoods, and then respond to the Council about any potential negative impacts they expect to suffer.

Respectfully,

Krista Michaels  
President, CPPOA

O O O O O O O O O

LAW OFFICE OF JOHN P. GIVEN

2461 Santa Monica Blvd., #438  
Santa Monica, CA 90404  
john@johngivenlaw.com  
(310) 471-8485

June 6, 2016

Los Angeles City Council  
Planning and Land Use Management Committee  
Councilmember Jose Huizar, Chair  
Councilmember Marqueece Harris-Dawson  
Councilmember Gilbert A. Cedillo  
Councilmember Mitchell Englander  
Councilmember Felipe Fuentes  
Los Angeles City Hall  
200 North Spring Street  
Los Angeles, CA 90012

*VIA E-MAIL to Leg. Asst. Sharon.Dickinson@lacity.org*

RE: CF 14-0057-S8 (CPC-2016-1245-CA)  
Oppose Proposed Repeal of LAMC §§ 12.24 W.43 and W.44

Honorable PLUM Committee Members:

I am a resident of Council District 11, and I serve as an officer on the boards of both my local homeowners association, Brentwood Hills Homeowners Association, and the Federation of Hillside and Canyon Associations, Inc. (the "Hillside Federation"). Both organizations voted to oppose the City's proposed repeal of its second dwelling unit ordinance without consideration of the potential negative impacts on hillside communities, including potentially significant environmental impacts. Both submitted letters to the City Planning Commission ("CPC"). Those letters, attached as Exhibits A and B, are incorporated by reference.

**Background.**

The project description in the Planning Department Transmittal for the above-captioned council file describes that the reason for the repeal of the City's existing second dwelling unit ordinance is, in part, "for the purpose of complying with state law AB 1866 on Second Dwelling Units." As the Hillside Federation and other letters and testimony to the Planning Commission make clear, this description and similar information found in the Planning Department's report to the CPC is not accurate. When AB 1866 was passed in 2002, the legislature realized that many cities, including Los Angeles, had already enacted second dwelling unit ordinances. So long as the standards within those local ordinances were applied ministerially, the legislature did not require cities to take any additional legislative action. *See* Govt. Code § 65852.2(a)(3) ("When a local agency receives its first application on or after July 1, 2003, for a permit pursuant to this

subdivision, the application shall be considered ministerially without discretionary review or a hearing. . . . Nothing in this paragraph may be construed to require a local government to adopt or amend an ordinance for the creation of second units.”). The City’s stated reason for the repeal action is thus inaccurate, and highly misleading.

Nor is the City’s proposed action necessary to comply with any court order, including any order related to the recent LA Superior Court case *Los Angeles Neighbors in Action v. City of Los Angeles, et al.* (LA Super. Ct., 2016, BS150599). In that case, the court invalidated ZA Memo 120 as the basis to approve second dwelling units and ordered the City to invalidate one particular second dwelling unit approval. Nothing in that action invalidated the City’s existing ordinance, nor required any particular action be taken to validate previously issued entitlements, many of which may very well be entirely valid under the City’s existing zoning code. The *LA Neighbors* case held that the legal advice that led to the promulgation of ZA Memo 120 was incorrect, but that the City’s ordinance was not necessarily illegal under state law so long as it is applied ministerially.

Rather than proceed to determine whether the ordinance’s existing and reasonable protections can be applied ministerially, the City has instead proposed to scrap the ordinance altogether. The conclusory analysis provided by the City does not provide adequate information to members of the public to understand how this draconian action is justified. Moreover, there is no evidence that the numerous protections in the City’s ordinance, now proposed to be eliminated through a cursory process without consideration of the public policy implications or environmental impacts, have ever hampered the production of affordable housing in the City of Los Angeles in any meaningful way.

Most important, the City claims that its action in repealing its second dwelling unit ordinance is exempt from environmental review. It is not.

**Repeal of the existing Second Dwelling Unit ordinance is not exempt from CEQA.**

**Public Resources Code Section 21080.17 does not apply.**

The primary justification for exemption offered by the City is Public Resources Code Section 21080.17, which states: “[t]his division does not apply to the adoption of an ordinance by a city or county to implement the provisions of Section 65852.1 or Section 65852.2 of the Government Code.” Public Resources Code Section 65852.2 relates to California law on second dwelling units.<sup>1</sup>

“In keeping with general principles of statutory construction, exemptions are construed narrowly and will not be unreasonably expanded beyond their terms. [Citations.] Strict construction allows CEQA to be interpreted in a manner affording the fullest possible environmental protections within the reasonable scope of statutory language. [Citations.] It also comports with the statutory directive that exemptions may be provided only for projects which

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<sup>1</sup> Public Res. Code § 65852.1 relates to senior housing, and is inapplicable to the issues presented here.

have been determined not to have a significant environmental effect. [Citations.]” *Cal. Farm Bureau Fed’n. v. Cal. Wildfire Conservation Bd.* (2006) 143 Cal.App. 4th 173 (quoting *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 966.) “Statutory language is not considered in isolation. Rather, we instead interpret the statute as a whole, so as to make sense of the entire statutory scheme.” *Bonnell v. Medical Bd.* (2003) 31 Cal.4th 1255, 1261 (internal quotation marks omitted).

If the City were proposing to adopt an ordinance to implement state law, the cited exemption would clearly apply. But the City is not proposing to *adopt* an ordinance *implementing* AB 1866. The action now proposed is to *change* existing City standards and allow development on virtually all residentially zoned parcels in the City by *repealing* an existing ordinance. In the absence of a local second dwelling unit ordinance, the City will be required to use the state default standards. By the plain language of Public Resources Code 21080.17, the City’s proposed action is not exempt from environmental review, because the action is not “the *adoption* of an ordinance by a city or county *to implement* the provisions of . . . Section 65852.2.” Pub. Res. Code § 21080.17 (emphasis added). The City’s extremely broad interpretation would dramatically expand the scope of the exemption, as if the legislature intended the exemption to apply to ordinances that related in any way to state law on second dwelling units. Had the legislature so intended, it could easily have drafted the statute more broadly. For example, knowing that many cities had existing second dwelling unit ordinances, the legislature could have included actions in its exemption that *repeal* local ordinances in order to allow cities to change to the state default standards. It could have, but did not.

On its face, Public Resources Code Section 21080.17 does not apply.

**CEQA Guidelines § 15061(b)(3) (“common sense exemption”) does not apply.**

The City also cites the CEQA “common sense exemption.” “Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” CEQA Guidelines, Cal. Code Regs. § 15061(b)(3). The burden is on the City to provide substantial evidence to justify its use of the “common sense” exemption. *Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal. 4th 372, 386-387. “[A]rgument, speculation, [or] unsubstantiated opinion” are not substantial evidence. *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204, 228. This is a high burden, and the showing required to challenge use of the “common sense” exemption is slight. *Davidon Homes v. City of San Jose* (1997) 54 Cal. App. 4th 106, 117-118. “[I]f a reasonable argument is made to suggest a possibility that a project will cause a significant environmental impact, the agency must refute that claim *to a certainty* before finding that the exemption applies.” *Id.* at 118 (emphasis in original).

A project is “the whole of the action, which has a potential for resulting in either direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” CEQA Guidelines, Cal. Code Regs. § 15378(a). Environmental analysis of projects such as zoning ordinances should focus on the secondary effects that can be expected to follow from their adoption. CEQA Guidelines, Cal. Code Regs. § 15146. “An agency obviously

cannot declare with certainty that there is no possibility that the activity in question may have a significant effect on the environment if it has not considered the facts of the matter.” *Muzzy Ranch*, 41 Cal. 4th at 387 (internal citation and quotation marks omitted).

Here, the proposed action is to: (1) repeal the City’s existing second dwelling unit ordinance, and (2) “grandfather” both previously constructed second dwelling units and permit construction of “approximately 175 SDU’s currently in the development pipeline.” CPC-2016-1245-CA, Findings at F-5.<sup>2</sup> The proposed CEQA findings are somewhat vague as to whether the common sense exemption is intended to apply to the entire action or only to the grandfathering provision. In either case, the common sense exemption does not apply.

It is instructive to compare potential development that could occur now under the City’s existing statutory scheme, to development that could occur using the state default standards that would become operative upon repeal of the City’s ordinance. Under the City’s existing zoning code, second dwelling units are permitted in A, RA, RE, RS, R1, RMP, and RW1 zones, but *not* “in a Hillside Area, as defined in Section 91.7003 of this Code, in an Equinekeeping District, along a Scenic Highway designated in the General Plan, or where the width of the adjacent street is below current standards as defined in Section 12.37H.” Los Angeles Municipal Code § 12.24.W.43(g) (adopted in 2000). For proposed second dwelling units on lots in RA, RS, or R1 zones, the Zoning Administrator must similarly find that the “lot is not located in a “H” Hillside or Mountainous area or in a “K” Equinekeeping District.” LAMC § 12.24.W.44(f).<sup>3</sup>

Under the state default standards none of the hillside or other restrictions or their related required findings would apply. Thus, the repeal of the existing ordinance will permit additional development across the City, including in hillside and other areas where such development is not currently permitted. The City previously determined that there were legitimate reasons to exclude second dwelling units from those locations. As a matter of law, the City’s use of the common sense exemption must fail, because the City has provided no evidence whatsoever, let alone substantial evidence, to support its assertion that “it can be seen with certainty that there is no possibility that [the] project may have a significant effect on the environment.”

As noted above, the burden is on the City to provide such evidence. “Imposing the burden on members of the public in the first instance to prove a possibility for substantial adverse environmental impact would frustrate CEQA’s fundamental purpose of ensuring that government officials ‘make decisions with environmental consequences in mind.’” *Davidon*

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<sup>2</sup> It is important to note that there is no indication from the proposed Findings where these 175 projects that are “in the development pipeline” would be constructed, whether any conform with the City’s existing ordinance, or whether any progress toward construction of the units has been undertaken. The lack of basic information provided falls far short of what is necessary to fulfill CEQA’s goals to inform decisionmakers and members of the public about the potential environmental consequences of their actions. *See Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

<sup>3</sup> Existing code provisions include other limitations and require additional related findings, but the “big picture” restrictions are sufficient for purposes of comparison. *See* LAMC §§ 12.24.W.43, .44.

*Homes v. City of San Jose* (1997) 54 Cal.App.4th 106, 116 (quoting *Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 283). “[T]he agency's exemption determination must be supported by evidence in the record demonstrating that the agency considered possible environmental impacts in reaching its decision.” *Davidon Homes, supra*, at 117.

Hillside community members and organizations can attest that there are many considerations that make second dwelling unit development in hillside areas inappropriate, including: impacts related to roadways and other infrastructure that were neither designed nor intended to support such increased density, additional grading activity and related impacts (including public safety impacts from haul route activity on frequently narrow and steep hillside roadways), traffic and circulation impacts, lack of adequate parking, lack of sufficient public services (particularly fire services, given that virtually all of the City's communities that are designated as part of the hillside zone are also in the Very High Fire Hazard Severity Zone), and direct and indirect impacts on wildlife from loss of habitat and wildlife connectivity, among other impacts.

The City's own recent actions acknowledge the special nature of our City's hillside resources and the impacts of development and other activity on environmental resources. The City recently approved the preparation and consideration of a Wildlife Corridor in the eastern Santa Monica Mountains. *See* Council File 14-0518 (adopted *unanimously* by the City Council its April 22, 2016 meeting). In support of the action, National Park Service Superintendent David Szymanski noted that “[d]uring approximately 15 years of research in the Santa Monica Mountains, the NPS has identified increasing urbanization and habitat fragmentation as one of the key challenges to protecting local wildlife and a functioning ecosystem. The proposed [wildlife corridor] ordinance would support NPS goals and objectives to protect open space and provide for wildlife movement throughout the Santa Monica Mountains and the greater vicinity.” David Szymanski, National Park Service Superintendent, letter to Los Angeles City Council (April 19, 2016) (attached as Exhibit C).

With respect to “grandfathered” units, only some of which have been built, and none of which are identified by the City or even summarized by zone type, neighborhood, council district, or on some other basis, without additional information and analysis about the many individual projects now underway, it is not possible to know whether direct or indirect secondary impacts would occur for those not yet constructed, or even whether any existing or future second dwelling units would comply with the City's current standards. The repeal ordinance recitals speculate that the reason “grandfathering” is needed is because the validity of approvals under the ZA Memo “*may* be made uncertain,” but the City provides no evidence to suggest that any approvals other than the one invalidated in the *LA Neighbors* matter have been contested, including projects that are not completed. The recital's use of “*may*” in this context illustrates that the basis for the action is speculative. Without more information, it is impossible for community members to know whether “grandfathering” is truly needed.

The City should be aware that if it “has failed to study an area of possible environmental impact, a fair argument [that an EIR is required] may be based on the limited facts in the record. Deficiencies in the record may actually *enlarge* the scope of fair argument by lending a logical



plausibility to a wider range of inferences.” *Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d 296, 311 (emphasis added).

**CEQA Guidelines 15303(a) does not apply.**

Finally, the City asserts that as to the approximately 175 second dwelling units that have received building permits but have not yet been constructed or completed, CEQA’s Class 3 Categorical Exemption for “new construction or conversion of small structures” also applies. Findings at F-5, *see* CEQA Guidelines § 15303(a). The guideline language does contemplate the exemption of second dwelling unit structures, but specifically limits the number of dwelling units that can be constructed pursuant to the exemption to three. “In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.” The City’s proposed project seeks to exempt “approximately 175” second dwelling units under this exemption. This is much greater than three. CEQA Guideline 15303(a) clearly does not apply.

**Conclusion.**

The City’s proposed action to repeal its current second dwelling unit ordinance would substantially erode existing protections that, by their very nature, guard against potentially significant environmental impacts. Opening the City’s hillside zones to second dwelling units on an expedited basis and with limited outreach to affected communities, without considering the above issues, is not good public policy. This is especially true where the action is not likely to meaningfully advance the goals of AB 1866 and the City’s second dwelling unit ordinance to provide for additional *affordable* housing in the City.

I urge the City to follow the guidance of the Hillside Federation and others, and either retain existing hillside and other protections afforded by the City’s current zoning code, or follow the ordinary land use process and engage in appropriate outreach and perform an appropriate level of environmental review, using the City’s current standards as the environmental baseline and comparing those standards with the state default standards found in Government Code Section 65852.2(b), before taking action.

Sincerely,



John Given

Exhs.

*cc's next page*

Planning and Land Use Management Committee

June 6, 2016

Page 7

cc: City Councilmembers  
Gerald Gubatan, Sergio Infanzon (CD1)  
Julia Duncan (CD4)  
Faisal Alserri (CD5)  
Claudia Rodriguez, Susan Wong (CD7)  
Ashley Thomas, Steve Garcia (CD8)  
Tricia Keane (CD11)  
Hannah Lee, Doug Tripp (CD12)  
Shawn Kuk, Clare Eberle (CD14)  
Vince Bertoni, Director of City Planning  
Matthew Glesne, City Planner  
Charley Mims, Hillside Federation President  
Eric Edmunds, President, Brentwood Hills Homeowners Association



# EXHIBIT A

P.O. Box 27404  
Los Angeles, CA 90027  
[www.hillsidefederation.org](http://www.hillsidefederation.org)



PRESIDENT  
Charley Mims  
CHAIRMAN  
Marian Dodge  
VICE PRESIDENTS  
Mark Stratton  
John Given  
SECRETARIES  
Carol Sidlow  
John Given  
TREASURER  
Don Andres

President David H. Ambroz, President and  
Honorable Commissioners of the  
Los Angeles City Planning Commission  
200 N. Spring Street, Los Angeles, CA 90012

Beachwood Canyon Neighborhood  
Bel-Air Association  
Bel Air Knolls Property Owners  
Bel Air Skycrest Property Owners  
Benedict Canyon Association  
Brentwood Hills Homeowners  
Brentwood Residents Coalition  
Cahuenga Pass Property Owners  
Canyon Back Alliance  
CASM-SFV  
Crests Neighborhood Assn.  
Franklin Ave./Hollywood Bl. West  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
Hollywoodland Homeowners  
Holmby Hills Homeowners Assn.  
Kagel Canyon Civic Assn.  
Lake Hollywood HOA  
Laurel Canyon Assn.  
Lookout Mountain Alliance  
Los Feliz Improvement Assn.  
Mt. Olympus Property Owners  
Mt. Washington Homeowners All.  
Nichols Canyon Assn.  
N. Beverly Dr./Franklin Canyon  
Oak Forest Canyon Assn.  
Oaks Homeowners Assn.  
Outpost Estates Homeowners  
Rancho Verdugo Estates  
Residents of Beverly Glen  
Roscomare Valley Assn.  
Save Coldwater Canyon!  
Save Sunset Blvd.  
Shadow Hills Property Owners  
Sherman Oaks HO Assn.  
Silver Lake Heritage Trust  
Studio City Residents Assn.  
Sunset Hills Homeowners Assn.  
Tarzana Property Owners Assn.  
Torreyson Flynn Assn.  
Upper Mandeville Canyon  
Upper Nichols Canyon NA  
Whitley Heights Civic Assn.

May 9, 2016

Re: CPC-2016-1245-CA  
Repeal of LAMC Sections 12.24 W.43 and 12.24 W.44

Dear President Ambroz and Honorable Planning Commissioners:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 resident and homeowner associations with approximately 250,000 constituents spanning the Santa Monica Mountains. At its meeting of May 4, 2016, the Federation voted to oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24 W.43 and 12.24 W.44 and to support retention of the protections embedded within those code sections.

The proposed draft ordinance to repeal the City's long-ignored Second Dwelling Unit ordinance is based on the false premise that the recent invalidation of ZA Memo 120 by the Court in *Los Angeles Neighbors in Action v. City of Los Angeles, et al.* (LA Super. Ct., 2016, BS150599) requires the City to take immediate action. Repeal of the City's ordinance would default the City to the second dwelling unit standards codified in California Government Code Section 65852.2(b)(1). These default standards provide little protection against the potential overdevelopment of our City's hillside areas, whereas the City's existing Second Dwelling Unit ordinance provides substantial protections to hillside and other areas.

As noted in the Court's recent decision in *Los Angeles Neighbors in Action*, in passing AB 1866, the legislature acknowledged that many cities had approved discretionary Second Unit Ordinances, but AB 1866 specifically allowed that cities needn't amend those ordinances. *See* Govt. Code § 65852.2(a)(3) ("When a local agency receives its first application on or after July 1, 2003, for a permit pursuant to this subdivision, the

CHAIRS EMERITI  
Shirley Cohen  
Jerome C. Daniel  
Patricia Bell Hearst  
Alan Kishbaugh  
Gordon Murley  
Steve Twining  
CHAIRS IN MEMORIAM  
Brian Moore  
Polly Ward

application shall be considered ministerially without discretionary review or a hearing. . . . Nothing in this paragraph may be construed to require a local government to adopt or amend an ordinance for the creation of second units.”). The *LA Neighbors* Court summarized AB1866’s legislative intent as follows: “local agencies may continue to apply their existing adopted second unit standards on a ministerial basis without formally amending their ordinance to delete CUP discretionary procedures.” Thus, so long as the standards of the Second Dwelling Unit ordinance are applied ministerially, no City action is required, let alone emergency action.

Further, the immediate repeal of the City’s Second Dwelling Unit ordinance is unlikely to resolve any lingering questions about the validity of past approvals. The *LA Neighbors in Action* opinion and judgment say nothing about the validity of any of those approvals, and the City’s proposed action would not validate earlier approvals if they were void at inception. Moreover, it is impossible to know without reviewing specific cases whether any are consistent with the City’s existing standards. Additional study of these issues is needed before action is justified.

AB 1866 encourages cities to adopt their own customized second dwelling unit standards. The City of Los Angeles did so long ago, and those standards provide significantly greater protections to community members than the default state standards. The recent Superior Court action invalidated only the former Planning Director’s memo and one approval, not the existing ordinance. The Court considered but rejected the City’s assertion that the City Council’s 2013 Housing Element is controlling. Importantly, in 2013 policymakers made their decisions believing that ZA Memo 120 was legally valid, which we now know is wrong. A major policy decision such as regulation of Second Dwelling Units in a City as large as Los Angeles should not be built upon a foundation of erroneous legal advice.

Repeal of the City’s Second Dwelling Unit ordinance will require planning and building officials to follow the very lenient default standards of AB 1866, which would remove carefully considered protections to hillside and other areas of the City. If policymakers desire to change the City’s Second Dwelling Unit ordinance, this should be considered only after thorough study (including potential negative environmental impacts to hillside areas) and public input.

The Hillside Federation urges the City Planning Commission to recommend that the existing Second Unit Dwelling ordinance be retained, not repealed.

Sincerely,

*Charley Mims*  
Charley Mims

cc: Honorable City Council  
Dept. of City Planning: Dir. Vince Bertoni, Ken Bernstein, Claire Bowin, Matt Glesne

# EXHIBIT B



*Brentwood Hills Homeowners Association*

May 10, 2016

President David H. Ambroz, President  
Los Angeles City Planning Commission  
200 N. Spring Street, Los Angeles, CA 90012

VIA Email to [cpc@lacity.org](mailto:cpc@lacity.org) & [james.k.williams@lacity.org](mailto:james.k.williams@lacity.org)

**RE: CPC-2016-1245-CA; Opposition to Repeal of LAMC Sections 12.24 W.43 & W.44**

Dear President Ambroz:

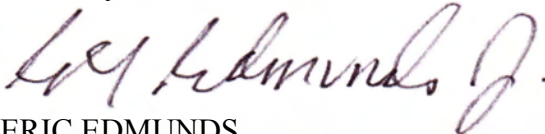
Brentwood Hills Homeowners Association (BHHA) is a non-profit voluntary organization representing approximately 450 homeowners located on the west side of Los Angeles in the Santa Monica Mountains, entirely within the hillside zone of the City of Los Angeles. BHHA is opposed to the proposed repeal of the City's Second Dwelling Unit ordinance. The action would result in a substantial weakening of carefully considered protections codified in the municipal code sections slated for repeal, including protection of hillside areas such as ours.

Based on even a cursory review of the recent opinion in *Los Angeles Neighbors in Action v. City of Los Angeles, et al.* (LA Super. Ct., 2016, BS150599), the City's justification for "fast track" action appears to be greatly overblown. The Court in *LA Neighbors* did not invalidate the City's ordinance, rather it invalidated Planning's ZA Memo 120 and one approval granted based on that memo. The City is poised to reflexively take the most draconian action possible on an emergency basis, resulting in a substantial change in City policy with extremely limited public input.

In addition, the City's claim that its action is categorically exempt from CEQA deserves considerably greater scrutiny. It is not clear that repeal of the ordinance is exempt from environmental review, and stakeholders have been given far too little time to investigate whether the City's past legal errors are now being compounded by hasty repeal of the existing ordinance.

The City should retain its Second Dwelling Unit ordinance, not repeal it. If policymakers desire to change the ordinance substantially they must first engage in the appropriate outreach to interested community members across the City.

Sincerely,



ERIC EDMUNDS  
President, Brentwood Hills Homeowners Association

cc: Councilmember Mike Bonin (CD11)  
Dept. of City Planning: Dir. Vince Bertoni, Matthew Glesne

# EXHIBIT C



## United States Department of the Interior

NATIONAL PARK SERVICE  
Santa Monica Mountains National Recreation Area  
401 West Hillcrest Drive  
Thousand Oaks, California 91360-4207

April 19, 2016

Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

Honorable Los Angeles City Councilmembers:

Thank you for hearing Council File 14-0518 on April 19th, 2016. The National Park Service (NPS) offers the following comments on the proposed Santa Monica Mountains Wildlife Corridor Ordinance. NPS is a voting member on the Santa Monica Mountains Conservancy's Board of Directors, and we concur with the comments of the Santa Monica Mountains Conservancy in their resolution dated July 28, 2014.

The U.S. Congress recognized the Santa Monica Mountains as nationally significant in 1978 when it created Santa Monica Mountains National Recreation Area. Much of the area affected by the proposed ordinance is within the recreation area boundary or within the Santa Monica Mountains Ecological Zone, also recognized by Congress in the park's enabling legislation.

During approximately 15 years of research in the Santa Monica Mountains, the NPS has identified increasing urbanization and habitat fragmentation as one of the key challenges to protecting local wildlife and a functioning ecosystem. The proposed ordinance would support NPS goals and objectives to protect open space and provide for wildlife movement throughout the Santa Monica Mountains and the greater vicinity.

The NPS provides comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. Thank you for the opportunity to comment. If you have questions, please call Kate Kuykendall at (805) 370-2343.

Sincerely,

David Szymanski  
Superintendent





Sharon Dickinson <sharon.dickinson@lacity.org>

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## NO on Repeal of R-1 Single-Family Municipal Code -- Item 2. CF #14-0057-S8.

1 message

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**Jennifer Rothman** <jrothman@alumni.princeton.edu>

Mon, Jun 6, 2016 at 7:28 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Councilmember.Englander@lacity.org, Clare.Eberle@lacity.org, hannah.lee@lacity.org, Doug.tripp@lacity.org, councilmember.cedillo@lacity.org, Gerald.Gubatan@lacity.org, Sergio.Infanzon@lacity.org, councilmember.krekorian@lacity.org

Dear Councilmembers and Planning Committee Members:

**RE: OPPOSE CF #14-0057-S8 & Repeal of Single-Family Municipal Code**

This would destroy Los Angeles neighborhoods and open a can of worms for the city. I am strongly opposed to this poorly thought out and destructive proposal.

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. Particularly, in our previous hillside communities.

A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City. And this rushed plan likely violates state and federal environmental laws.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Jennifer Rothman  
Resident of Studio City



Sharon Dickinson <sharon.dickinson@lacity.org>

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## Oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44

1 message

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**Greg Williams** <gregpaulw@aol.com>

Mon, Jun 6, 2016 at 11:07 AM

To: councilmember.huizar@lacity.org, Sharon.Dickinson@lacity.org

Dear Councilman Huizar:

The Federation of Hillside and Canyon Associations, Inc., recently voted to oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. We are particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

The Hillside Federation urges you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Gregory P. Williams  
[323-363-5426](tel:323-363-5426)



Sharon Dickinson <sharon.dickinson@lacity.org>

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**(no subject)**

1 message

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**blueseas2@roadrunner.com** <blueseas2@roadrunner.com>  
To: Sharon.Dickinson@lacity.org

Mon, Jun 6, 2016 at 8:04 PM

Dear Councilman Huizar:

RE: CF #14-0057-S8

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Yours Truly,  
Mark Ormandy  
3995 Alta Mesa Drive  
Studio City



Sharon Dickinson <sharon.dickinson@lacity.org>

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## Municipal Code Repeal

1 message

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**Deborah Ambrosino** <deborahambrosino@me.com>  
To: Sharon.Dickinson@lacity.org

Mon, Jun 6, 2016 at 7:58 PM

Dear Ms. Dickinson

**RE: CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,  
Deborah



Sharon Dickinson <sharon.dickinson@lacity.org>

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**CF #14-0057-S8**

**Karen Brooks** <karenxbrooks@gmail.com>

Mon, Jun 6, 2016 at 7:46 PM

To: Sharon.Dickinson@lacity.org

Cc: Chaircouncilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Clare.Eberle@lacity.org, Hannah.lee@lacity.org, Doug.tripp@lacity.org, Gerald.Gubatan@lacity.org, Sergio.Infanzon@lacity.org, Councilmember.Englander@lacity.org, councilmember.cedillo@lacity.org, councilmember.krekorian@lacity.org

Dear Councilman Huizar:

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,  
Karen Brooks  
11521 Canton Drive  
Studio City, CA 91604



Sharon Dickinson <sharon.dickinson@lacity.org>

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## Item 2. CF #14-0057-S8

1 message

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**Tom Holland** <tomholland\_480@hotmail.com>

Mon, Jun 6, 2016 at 7:41 PM

To: Sharon Dickinson <sharon.dickinson@lacity.org>, councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Clare.Eberle@lacity.org

Cc: Councilmember.Englander@lacity.org, Doug.tripp@lacity.org, councilmember.cedillo@lacity.org, Gerald.Gubatan@lacity.org, Sergio.Infanzon@lacity.org, SCC <savecoldwatercanyon@gmail.com>, kathi holland <kmbholland@hotmail.com>

Dear Councilman Huizar:

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets.

I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Tom Holland

Studio City, Ca. 91604



Sharon Dickinson <sharon.dickinson@lacity.org>

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## Second Dwelling Unit ordinances

1 message

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**Kathleen Nielsen** <caitnielsen10@gmail.com>

Mon, Jun 6, 2016 at 7:41 PM

To: Sharon.Dickinson@lacity.org

Dear Councilman Huizar:

**RE: CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Kathleen Nielsen





Sharon Dickinson <sharon.dickinson@lacity.org>

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## cold water canyon

1 message

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**Anne** <amosell@pacbell.net>  
To: Sharon.Dickinson@lacity.org

Mon, Jun 6, 2016 at 7:33 PM

Dear Councilman Huizar:

**RE: CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,  
anne mosell



Sharon Dickinson <sharon.dickinson@lacity.org>

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**RE: 14-0057-S8 (Hearing June 7, 2016)**

1 message

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**Linda Othenin-Girard** <llothenin@gmail.com>

Mon, Jun 6, 2016 at 1:39 PM

To: Sharon.Dickinson@lacity.org

Cc: David Ryu <David.Ryu@lacity.org>, Sarah Dusseault <sarah.dusseault@lacity.org>, Julia Duncan <julia.duncan@lacity.org>

June 6, 2016

PLANNING AND LAND USE MANAGEMENT COMMITTEE

200 NORTH SPRING STREET

LOS ANGELES, CA 90012

Honorable Chair Jose Huizar and Committee Members,

The public outreach for Council File 14-0057-S8 regarding loosening existing restrictions on residential second dwellings has been extremely limited. Furthermore, the interplay of provisions, including State Code, the lawsuits, and the various memorandums, as referenced in the proposed Council Motion itself, is confusing to many residents who are trying to decipher the implications.

As we best understand it, the proposed Council Motion throws out existing prohibitions in Hillside Areas and on substandard streets. No longer will the City operate under under ZA Memo 120 (2010). Rather, passage of the Motion will allow the California Government Code §65852.2 under its Section (b)(1), to provide the only legal guidance on second dwellings. While this keeps it simple for our City, we wonder if it fully protects communities such as ours.

As a Hillside Area community with many substandard streets, our constituents are concerned that the proposed changes may have important consequences with regard to our safety. We are within a "Very High Fire Severity Zone," with many streets sporting Red Flag Warning signs. The Oaks is also concerned about aesthetics and retaining a contextual stock of homes.

Additionally, we predict that creating "second dwellings" will merely supply more nightly or short-term rentals which the City is concomitantly proposing to allow. We wonder if there would really be an increase in long-term rentals to supplement the lower or middle-income rental market by allowing second dwellings in Hillside areas.

We request that workshops be conducted in our hillside communities to get feedback from concerned communities. We also hope that the Planning Department does a complete analysis to understand all implications of abandoning the City's code, rather than tailoring it to protect all communities and satisfying the State's mandates for housing at the same time.

Sincerely,

Linda Othenin-Girard

President

Oaks Homeowners Association

Cell: [323-854-7564](tel:323-854-7564)

cc:

David Ryu <[david.ryu@lacity.org](mailto:david.ryu@lacity.org)>

Julia Duncan <[julia.duncan@lacity.org](mailto:julia.duncan@lacity.org)>

Sarah Dusseault <[sarah.dusseault@lacity.org](mailto:sarah.dusseault@lacity.org)>



Sharon Dickinson <sharon.dickinson@lacity.org>

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## any action by the PLUM Committee

1 message

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**Marian Kaneko** <marian@kaminskikaneko.com>

Mon, Jun 6, 2016 at 1:34 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org

Dear Councilman Huizar:

The Federation of Hillside and Canyon Associations, Inc., recently voted to oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. We are particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

The Hillside Federation urges you to delay until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Marian Kaneko, Michael Kaminski

2917 Belden Drive



Sharon Dickinson <sharon.dickinson@lacity.org>

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**RE: CF #14-0057-S8**

1 message

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**Pam Friedman** <pam.friedman4@gmail.com>

Mon, Jun 6, 2016 at 7:18 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org

Dear Councilman Huizar:

**RE: CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Pamela Friedman  
4218 Alcove Ave.  
Studio City, CA 91604



Sharon Dickinson <sharon.dickinson@lacity.org>

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## City's Second Dwelling Unit ordinances

1 message

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**Christine Kent** <ckent321@gmail.com>

Mon, Jun 6, 2016 at 8:44 AM

To: Sharon.Dickinson@lacity.org, councilmember.huizar@lacity.org

Dear Councilman Huizar:

The Federation of Hillside and Canyon Associations, Inc., recently voted to oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. We are particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

The Hillside Federation urges you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Christine Kent

—

Sincerely,

Christine Kent  
[323 871-1454](tel:323-871-1454) Office  
[323 333-8371](tel:323-333-8371) Cell



Sharon Dickinson <sharon.dickinson@lacity.org>

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## Second Dwelling Unit ordinances

1 message

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**Ratzel Bander** <ratziello@gmail.com>

Mon, Jun 6, 2016 at 8:39 PM

To: Sharon.Dickinson@lacity.org

Cc: rcouncilmember.huizar@lacity.org

Dear Councilman Huizar:

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,  
Ratzel Bander  
1977 Coldwater Canyon Drive  
Beverly Hills





Sharon Dickinson <sharon.dickinson@lacity.org>

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## Second Unit Dwelling

1 message

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**Ratzel Bander** <ratziello@gmail.com>

Mon, Jun 6, 2016 at 8:43 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Councilmember.Englander@lacity.org, Doug.tripp@lacity.org, Sergio.Infanzon@lacity.org, Gerald.Gubatan@lacity.org

Dear Councilman Huizar:

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,  
Ratzel Bander  
1977 Coldwater Canyon Drive  
Beverly Hills 90210



Sharon Dickinson <sharon.dickinson@lacity.org>

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## CF #14-0057-S8

**Susan Goldberg** <goldberg@switzer.com>  
To: Sharon.Dickinson@lacity.org

Mon, Jun 6, 2016 at 8:39 PM

Dear Councilman Huizar:

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Susan Goldberg

Studio City, CA



Virus-free. [www.avast.com](http://www.avast.com)



Sharon Dickinson <sharon.dickinson@lacity.org>

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## **OPPOSE : CF #14-0057-S8 repeal of Second Unit Dwelling Unit ordinance**

1 message

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**LRB** <thisislawrence9524@gmail.com>

Mon, Jun 6, 2016 at 8:38 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Clare.Eberle@lacity.org, Councilmember.Englander@lacity.org, - Chief Legislative Deputy <Doug.tripp@lacity.org>, councilmember.cedillo@lacity.org, councilmember.krekorian@lacity.org

Dear Councilman Huizar:

**RE: CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Lawrence Broch and Susan Dickes



Sharon Dickinson <sharon.dickinson@lacity.org>

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## **NO on Repeal of R-1 Single-Family Municipal Code -- Item 2. CF #14-0057-S8.**

1 message

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**Jennifer Rothman** <jrothman@alumni.princeton.edu>

Mon, Jun 6, 2016 at 7:28 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Councilmember.Englander@lacity.org, Clare.Eberle@lacity.org, hannah.lee@lacity.org, Doug.tripp@lacity.org, councilmember.cedillo@lacity.org, Gerald.Gubatan@lacity.org, Sergio.Infanzon@lacity.org, councilmember.krekorian@lacity.org

Dear Councilmembers and Planning Committee Members:

**RE: OPPOSE CF #14-0057-S8 & Repeal of Single-Family Municipal Code**

This would destroy Los Angeles neighborhoods and open a can of worms for the city. I am strongly opposed to this poorly thought out and destructive proposal.

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. Particularly, in our previous hillside communities.

A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City. And this rushed plan likely violates state and federal environmental laws.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Jennifer Rothman  
Resident of Studio City



Sharon Dickinson <sharon.dickinson@lacity.org>

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## CF #14-0057-S8

1 message

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Sarah Boyd <stboyd69@yahoo.com>

Mon, Jun 6, 2016 at 9:01 PM

Reply-To: Sarah Boyd <STBoyd@aya.yale.edu>

To: "Sharon.Dickinson@lacity.org" <Sharon.Dickinson@lacity.org>

Cc: "councilmember.huizar@lacity.org" <councilmember.huizar@lacity.org>, Councilmember Paul Krekorian <councilmember.krekorian@lacity.org>, "Shawn.Kuk@lacity.org" <Shawn.Kuk@lacity.org>, "Clare.Eberle@lacity.org" <Clare.Eberle@lacity.org>, "Councilmember.Englander@lacity.org" <Councilmember.Englander@lacity.org>, "Hannah.lee@Lacity.org" <Hannah.lee@lacity.org>, "Doug.tripp@lacity.org" <Doug.tripp@lacity.org>, "councilmember.cedillo@lacity.org" <councilmember.cedillo@lacity.org>, "Gerald.Gubatan@lacity.org" <Gerald.Gubatan@lacity.org>, "Sergio.Infanzon@lacity.org" <Sergio.Infanzon@lacity.org>

Dear Councilman Huizar et al:

## RE: CF #14-0057-S8

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input. What's the hurry? There has been NO community outreach on this matter.

LA homeowners seek out R1 areas to buy their homes because they trust they will be able to remain in single-family residential neighborhoods -- we have invested many years and countless dollars in our homes and neighborhoods. If the existing ordinance is repealed, everyone could build a 1,200-square-foot second dwelling on their property, **even in R-1 in the hillsides where it is currently prohibited**. This would be the end of R-1 zones, as all single family dwelling parcels would effectively become 2-dwelling parcels.

A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,  
Sarah Boyd  
3958 Van Noord Ave  
Studio City CA 91604



Sharon Dickinson <sharon.dickinson@lacity.org>

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## Fwd: ACTION ALERT - please send email tonight or tomorrow

1 message

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**Kim Glazer** <kglazer1@gmail.com>  
To: Sharon.Dickinson@lacity.org

Mon, Jun 6, 2016 at 9:59 PM



Dear Ms. Dickinson:

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

The repeal of the Second Dwelling Unit ordinances would result in the state's default standards for second dwelling units applying in every neighborhood in the City. This "one size fits all" approach is the wrong land use policy for a City with so many different neighborhoods and will have a negative and lasting impact on our single-family neighborhoods. A major policy decision such as the repeal of the Second Dwelling Unit ordinances should be considered only after a thorough study of the potential neighborhood impacts and the options available to the City.

I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,  
Kim Glazer

Save Coldwater Canyon! Inc., 12400 Ventura Blvd #775, Studio City, CA 91604

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Sharon Dickinson <sharon.dickinson@lacity.org>

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## CF #14-0057-S8

4 messages

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**Jackie Hunsicker** <thejax@me.com>

Mon, Jun 6, 2016 at 7:52 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org, Gerald.Gubatan@lacity.org

Dear Councilman Huizar:

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

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I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

I urge you to be very careful about our land and the misuse of our land. I urge you to gather input from the residents you represent.

Sincerely,

Jackie Hunsicker  
3251 Coldwater Canyon Avenue  
Studio City, CA 91604

---

**m** <wantsomewater@gmail.com>

Mon, Jun 6, 2016 at 8:26 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Clare.Eberle@lacity.org,

Councilmember.Englander@lacity.org, Hannah.lee@lacity.org, Doug.tripp@lacity.org, councilmember.cedillo@lacity.org,

Gerald.Gubatan@lacity.org, Sergio.Infanzon@lacity.org

Dear Councilman Huizar:

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

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I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Mayim Bialik, Ph.D., CLEC

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**Karen Durinzi** <karendurinzi@gmail.com>

Mon, Jun 6, 2016 at 8:52 PM

To: Sharon.Dickinson@lacity.org, councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Clare.Eberle@lacity.org, councilmember.cedillo@lacity.org, Gerald.Gubatan@lacity.org, Sergio.Infanzon@lacity.org

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

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I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Karen Durinzi

---

**Skip** <animalco@pacbell.net>

Mon, Jun 6, 2016 at 8:56 PM

To: Sharon.Dickinson@lacity.org

Cc: councilmember.huizar@lacity.org, Shawn.Kuk@lacity.org, Clare.Eberle@lacity.org,

Councilmember.Englander@lacity.org, Doug.tripp@lacity.org, councilmember.cedillo@lacity.org, Gerald.Gubatan@lacity.org, Sergio.Infanzon@lacity.org, David Ryu <david.ryu@lacity.org>, "Save Coldwater Canyon! Inc."

<savecoldwatercanyon@gmail.com>

**This is not acceptable in the hills - the infrastructure can't take it. Stop giving it away to developers and start enforcing the rules.**

RE: **CF #14-0057-S8**

Please oppose the City's proposed repeal of Los Angeles Municipal Code Sections 12.24.W.43 and 12.24.W.44 and to instead retain the protections embedded within those code sections, particularly the prohibition on second dwelling units in Hillside Areas and on substandard streets. I am particularly concerned that the City Council is rushing the proposed repeal without giving our City's neighborhoods and residents an adequate opportunity to provide their input.

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I urge you to delay any action by the PLUM Committee until it has received a full analysis of the options that the City has to comply with state law, the policy implications of repealing the Second Dwelling Unit ordinances, and the potential negative impacts to our neighborhoods.

Sincerely,

Skip Haynes

[323-822-1764](tel:323-822-1764)

Skip Haynes  
Community Relations & Spotlight Projects Director  
The Concerned Citizens of Kirkwood Bowl Foundation  
[animalco@pacbell.net](mailto:animalco@pacbell.net)  
323.822.1764  
[www.kirkwoodbowlfoundation.org](http://www.kirkwoodbowlfoundation.org)