

To the Planning and Land Use Committee,

Regarding Item No. 3, the appeal of the SVAPC decision on the proposed small lot subdivision at 11850-11594 W. Riverside Dr. and 4748-4752 N. Irvine Ave., I would like to address the fact that the Planning Department's argument that the proposed project is in compliance with the Valley Village Specific Plan is based only on those requirements in the Specific Plan that pertain to single family housing, predominantly ignoring the many requirements in the Specific Plan that govern multi-family projects.

This is despite the fact that in the Venice Coastal Specific Plan Director's Interpretation (DIR-2014-2824-DI, dated August 14, 2014), the Director of Planning, Michael Logrande, established the importance of applying "multi-family standards in the Specific Plan to the small lot development as a whole," rather than "single-family standards in the...Specific Plan to individual lots resulting from a small Lot subdivision." In this revised interpretation, he set forth several areas in which a Specific Plan's multi-family requirements should be applied, such as parking, setbacks, and density.

Additionally, the Neighborhood Council Valley Village (NCVV) recently passed a motion requesting the appropriate City departments and agencies "to uphold the primacy of the Valley Village Specific Plan's requirements on both single and multi-family development, wherever they are more strict than the City's Small Lot Subdivision regulations." This was in recognition that the Specific Plan pre-dates the Small Lot Subdivision Ordinance, and should not have its intent and goals ignored--sentiments echoed by Director Logrande's interpretation-- and that Small Lot Subdivisions are hybrid projects in nature. It was also in light of the fact that the North Hollywood-Valley Village Community Plan update is 5 years overdue, and there has been no other opportunity to address Small Lot Subdivisions directly.

It is my understanding is that there may be some areas in which the current project proposal is in line with the standard multi-family requirements and/or the Valley Village Specific Plan multi-family requirements. But as the author of the aforementioned NCVV motion, I personally feel it would be appropriate to consider an analysis of the proposed project in terms of the Valley Village Specific Plan's multi-family requirements, to determine how far the project's currently proposed form deviates from those requirements, and what adjustments would be necessary if the Planning Department were to follow the precedent set by the Venice Coastal Specific Plan Director's Interpretation (DIR-2014-2824-DI), and the policy recently established by the Neighborhood Council Valley Village.

Thank you,

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