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Planning and Land Use Management Committee  
John Ferraro Council Chamber  
200 N Spring St, Rm 340  
Los Angeles, CA 90012

Dear PLUM Committee,

I recently had the pleasure of speaking with Mr. Matt Glesne about the upcoming small lot subdivision ordinance changes. He encouraged me to reach out to the committee with comments.

I really appreciate the opportunity to comment, and I'm excited to hear back. Call me anytime!

Thank you so much!

#### SUMMARY OF THOUGHTS

1. Perhaps it's possible to allow a front setback that matches prevailing setbacks on adjacent lots.
2. Consider no administrative clearance process for small projects that only need a parcel map.
3. It might make sense to keep the 80% lot coverage for small projects that only need a parcel map.
4. For your consideration, is it possible to allow a small lot sub on R2 if it's only 2 lots?
5. Keeping the old design guidelines may make sense if they were made mandatory for projects that are large enough to require a tract map.
6. If the new design guidelines are to be adopted, consider adding more flexibility so that the design requirements aren't so prescriptive that they bar many reasonable, good designs.

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#### DETAIL FOLLOWS:

I'm an aspiring developer looking for sites for my first small lot development. I have a unique concept that aims to create more common space and less private space per unit so as to decrease the cost of construction enough to provide housing at approximately 65-70% of market rate without subsidy.

I would use the small lot subdivision ordinance to divide a standard lot in to 2 or 3 smaller lots, or 2 lots in to 4 lots. My concept aims to create very high quality common areas and building facades.

Keeping in mind the proposed ordinance changes, I have a few comments, if you'll allow me.

Firstly, it's clear the department has spent a great deal of time hearing community concerns and thoughtfully considering how to address them. Thank you for these efforts as they really help developers build better, I think.



Please, if I may, I think developments like the image above are just as unacceptable as the communities do...  
ugh!

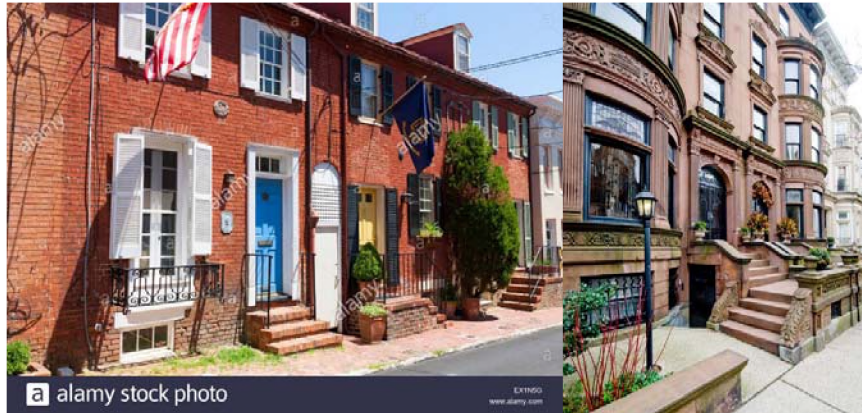
Many of these atrocities are already addressed by the existing small lot subdivision design guidelines, which I think may be sufficient. It's just that those haven't been mandatory.

I also think in many cases the most egregious cases of incompatible developments result from attempts to cram as many lots as possible on to a site, and this results in big, blank walls. It's possible smaller projects like mine shouldn't be subject to the administrative clearance process, I think.

Here's my take --

1. The proposed ordinance mandates a front yard in conformance with the underlying zone. But much of LA was built before current zoning, and the existing design guidelines already specify matching prevailing setbacks on adjacent lots. I wonder if the lesser setback between the underlying zone and the prevailing setbacks might allow more flexibility for projects in older neighborhoods in LA.
2. As I understand it the small lot ordinance was really intended for smaller projects like the ones I have in mind rather than giant projects as we're often seeing. In order not to discourage smaller scale development maybe it might be appropriate to say that projects that are small enough to only require parcel maps instead of tract maps don't have to get an administrative clearance, can keep an 80% lot coverage since their sites are much smaller, etc. A lot of the proposed design guidelines don't really seem to apply to little developments -- such as the concern of long walls of adjacent units with no plane breaks or facade variations, for example.
3. Perhaps the barring of small lot subdivisions from R2 sites could not apply to projects with only 2 lots (where one lot is being subdivided in to 2). This would chiefly allow the new project not to have interior setbacks between lots, which I think is critical for small double-home-like projects.
4. On the new mandatory design guidelines, in addition to a possible exception for parcel map projects with few units, I have a few other thoughts.
  - a. It might be the case that the existing design guidelines are pretty good, and since they aren't mandatory right now it just looks like they're not good enough. But most of the most important stuff seems to already be addressed. Such as the aforementioned front yard prevailing setback guideline.
  - b. Sec. A.2.a. gets very specific in terms of what good design is. I think it's in large part correct, but there's no accounting for taste. I'm concerned about the specificity here. Mandating a step might mean developers who try to make ADA homes can't do it. Entry porticos (which I LOVE) violate maximum yard encroachment heights, and so will be impossible on homes that face the street. If you can't do those you have to try to do all four of the rest of them, but some people don't like windows near their front door, etc, for privacy reasons. The section just isn't very flexible.

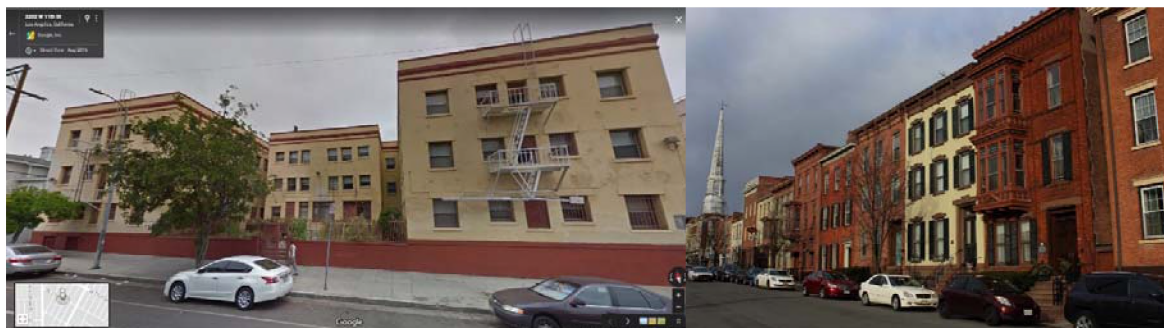
c. Sec. A.3.a. mandates a minimum 8 foot separation between entrances on adjacent homes. This would seem to forbid a very common townhome configuration.



See above 4 examples from Annapolis, Brooklyn, Chicago, and New Orleans, respectively. Why does the city want to make this illegal in small lot projects?

d. Sec. A.4 would greatly raise the cost of construction, and thus the rental/purchase price, because providing the side yard facade with an "equal level of detail and articulation" would be prohibitively expensive. This is without precedent in most beautiful historic architecture, which leaves side yard walls very basic. I already believe in basic pretty window treatments and recessed windows, but the requirement to do either i. or ii. will ALWAYS result in i. because ii. requires a setback (reduction in floor area) to avoid a yard encroachment. The intent here is good, but really I think the desire is to avoid bad, blank walls, and that has nothing to do with whether it's one material or two. You can make a beautiful facade with all stucco, and a horrible blank wall with cheap cement board siding and metal spandrel. I'm concerned about the lack of flexibility.

e. Sec. A.5, which bans flat roof lines, would also greatly raise the cost of construction. Unusual framing structures, trusses, and odd corners are among the biggest cost differentiators. This section isn't very flexible, and would seem to ban many of the most common townhome facades.





See above two examples, one of a courtyard apartment building in LA that would also work as a small lot site orientation, and another of row homes from the east coast. Both would seem to be nonconforming under these guidelines.

f. Sec. A.7.c. could be very expensive depending on how it's interpreted. Does the uniqueness requirement apply to a development of 4 lots? How unique must the dwellings be?

g. Sec. C.1.b. "Any common open space areas shall be located at grade level..." Does this preclude open space sunken patios?



Are open space areas below grade not allowed?

Thank you for your time, your efforts, and your gracious consideration! Feel free to call me on my cell phone or my workplace LINC Housing, an affordable housing developer here in LA.

All the best,

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CC: Matthew Glesne