



Sharon Dickinson <sharon.dickinson@lacity.org>

Number 16-1045 / 13-1478-S3

SOHO <southhollywoodnha@gmail.com>
Bcc: Sharon.Dickinson@lacity.org

Tue, Jan 31, 2017 at 11:07 AM

SOUTH HOLLYWOOD NEIGHBORHOOD ASSOCIATION

Dear Councilmember,

On Jan 24th, the PLUM committee passed the Proposed Small Lot Subdivision ordinance number 16-1045 / 13-1478-S3 which still does not address the big issues that neighborhoods are concerned about and only improves a few of the small ones. Throughout this process, our neighborhood association has submitted a number of emails to the Planning Department requesting changes that will make projects more compatible with neighborhoods. The big issues of Height, Massing, and Style have still not been addressed. The "one size fits all" 15 ft front yard setback should be "Prevailing Setback". Simply using a few architectural design elements does not make these huge SLS projects compatible with many existing neighborhoods. We strongly request that when this ordinance comes to your attention that you send it back to the Planning Department with specific instructions to fix these issues. Below is a copy of the last approved email recommending changes. Although some of the small issues have been included and some numbers have changed, this email is still pertinent as it reflects the most important issues that have not been addressed.

The South Hollywood Neighborhood Association strongly feels that the proposed Small Lot Subdivision (SLS) Ordinance is lacking in many ways. We are very concerned about a law that gives the Planning Department the authority to make and adjust (at any time and without the due process of law) Small Lot Subdivision conditions included in the "Advisory Agency Small Lot Map Standards" and the "Small Lot Design Standards" that are defined as having the effect of law. Further, complete versions of the "Advisory Agency Small Lot Map Standards" and the "Small Lot Design Standards" should be provided to the public along with ample notification and time for public input and hearings prior to passage.

Regarding the revised proposed ordinance, we ask that RD and R2 zoning designations be removed from clause 27 in the ordinance. SLS are mostly infill projects, but the majority of existing buildings in these zones have a far lower FAR than what Small Lot Developers can and are building. The projects often do not fit in. Small Lot Subdivisions are like the McMansions of the RD and R2 zones.

We strongly feel that clause 27 (a) (7) be changed to reflect that the front yard shall be the prevailing setback or greater. Also that clause 27 (a) (8) be changed to reflect a required 15 ft rear yard setback if a project abuts any residential zone (not just R1). And, the 5ft side yard setback should be increased to 7 feet for buildings 2 stories or more.

We further ask the following clauses be included in the **ordinance** itself. These items are too important to risk challenges to an authorization created by clauses 27 (a) (1) and (2) which utilizes ancillary documents that supposedly have the effect of law. Or, the possibility that changes to these clauses may be made at any time prior to or after implementation of the law without due process. Please note that most of these suggestions are of great concern to neighborhoods, and yet the majority are not included in any of the current proposed documents.

1. SLS Driveways cannot be named as streets.
2. There must be CC&Rs requiring a "Governing Body, such as an HOA or equivalent to ensure proper maintenance of the SLS properties.
3. Using street trash pickup is not allowed and an SLS must utilize on-site trash pickup from an independent vendor. Trash containers must be stored in an enclosure out of sight from the street.
4. Incremental Street Widening cannot be required on any infill SLS projects.
5. No roof top decks will be allowed.
6. Parking cannot overlap into any side yard and tandem parking is not permitted. For every 4 SLS houses or units, two additional guest parking spaces should be required.
7. First floor bonus rooms cannot have an adjoining bathroom.
8. Building heights must not exceed the prevailing height of the buildings on the street that fall within the zoning height limits/restrictions. All roof edges will have a 45 degree bevel on all sides for any SLS structure of 2 stories or more to ensure adjacent properties have adequate access to light and air."
9. Prior to any Planning Department hearing the ZA or AA must personally visit the site and surrounding area.
10. All SLS drawings and renderings that are submitted for review must clearly and accurately show surrounding context. Most of the SLS drawings deliberately do not show the context of the project in their drawings or renderings.
11. Entry door to the front units must face the street.
12. Ordinance states that the SLS purpose is to create fee-simple home ownership. In cases where the developer or unit owner chooses to rent SLS units instead of selling, and where prior rent control tenants have been evicted to accommodate the development, such evicted tenants must be offered the new units at

their previous rent controlled prices. This should apply to the developer or any owner for the first 5 years after completion of the project.

13. Sideyard landscaping must be required. In the case of the minimum 5' side yard the requirements are a 3' sidewalk and a 6" x 6' tall CMU wall there is still 18" for infiltration and a landscape strip against the required wall. For 3 stories, that would jump to 30" wide. Neither width is enough for large trees, but plenty for infiltration and hundreds of species of small flowering trees, fruit trees, vegetables, shrubs, vines and ground covers.

14. Required Open Space must be open to the sky, and such openings shall remain so in perpetuity.

Thank you.



Sharon Dickinson <sharon.dickinson@lacity.org>

Council File Number: 16-1045, 13-1478-S3

1 message

dh nhwd <dnhnwd@yahoo.com>
Reply-To: dh nhwd <dnhnwd@yahoo.com>

Tue, Jan 31, 2017 at 11:09 AM

Subject: Council File Number: 16-1045, 13-1478-S3**Dear Councilmember,**

In the near future you will be voting on the Proposed Small Lot Subdivision ordinance number 16-1045 / 13-1478-S3 which does not address the big issues that citizens are concerned about and only improves a few of the small ones. The big issues are Height, Massing, Setbacks and Style and simply using a few architectural design elements does not make these huge SLS projects compatible with the existing neighborhoods. We strongly request that when this ordinance comes to your attention that you send it back to the Planning Department with specific instructions to fix these issues. Specific items should include:

- 1. Front setbacks should be the Prevailing setback as determined by the city's "Setback Calculator".**
- 2. Building heights should not exceed the average height of the buildings that fall within the zoning height limitation (on the project side of the street). Transitional Heights and Stepbacks (which are included in many community plans).**
- 3. The median Floor Area Ratio (FAR) for the project side of the street can easily be determined and the FAR for the new project should not exceed 20% of that.**

4. Projects should be required to be contextual with neighborhood/NC Land Use recommendations.

**Sincerely,
Don Hunt**