



## HOMEOWNERS ASSOCIATION

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November 26, 2018

Committee Members, Los Angeles City Council PLUM Committee  
(via email: [clerk.plumcommittee@lacity.org](mailto:clerk.plumcommittee@lacity.org))

Commissioners, City Planning Commission  
(via email: [matthew.glesne@lacity.org](mailto:matthew.glesne@lacity.org))

Re: Accessory Dwelling Units, CF 16-1468, CPC-2016-4345-CA

To All Concerned:

The Oaks Homeowners Association understands the need for more housing in Los Angeles. This is a statewide problem which must be addressed. However, it's vital that well-intended zoning allowances be carefully balanced with safe living in hillsides. As the City of Los Angeles decides on the allowances for its Accessory Dwelling Units (ADU) Ordinance, the safety of residents subject to extra risks inherent in hillside areas should be top priority.

The City Planning Commission forwarded five exploratory options to consider for the October 11, 2018 meeting. At the meeting, Oaks Homeowners was represented with comments. After the public was heard, there was very little discussion and the item was continued until the November 29<sup>th</sup> meeting. We would like to be on the record with our input.

First, we believe the State legislation which mandates the allowance of ADU conversions within legally existing floor area is onerous in itself for some hillside communities, such as our own. This should be kept in mind when determining whether even greater allowances (ADUs created through additions and separate buildings) should be legislated for hillsides in Los Angeles.

**Street Width:** Using street width alone to guide the safe placement for ADUs misses a significant point: It's not only the over-parked narrow streets that are unsafe. What has become even more significant is ingress/egress for entire, locked-in neighborhoods, such as ours.

The Oaks community has only two principle exit routes should a brush fire break out in the dry habitat of Griffith Park which surrounds our homes. These choke points are often jammed under normal circumstances. Further congestion on escape routes could

be an unintentional result of allowing ADUs in our hillside community, which is designated as a Very High Fire Severity Zone. So far in 2018, we have had three brush fires in close proximity to our area, Western Canyon of Griffith Park.

**Public Transit:** On its face, incorporating distance from public transportation as a criterion for allowing ADUs is presumptuous. As a practical matter, it is unlikely that public transit being within a half-mile will result in ADU-occupants foregoing car ownership in steep hillside areas.

**Small-sized ADUs:** Limiting ADUs, for example, to 750 square feet instead of 1200 square feet changes very little: there will still be more cars parked on streets and more cars attempting to exit in the event of an emergency evacuation. This option is especially unwise if allowed on the narrowest 16-foot-wide streets, of which Oaks has many.

**Brush Fire Risk:** Brush fire risk should be the major criterion used for determining ADU exemptions. This metric for community safety is both logical and empirical. Areas within the designated Very High Fire Severity Zone (VHFSZ) would be exempted from ADUs, except for conversions not involving additional square footage. As a concerned homeowners association within high risk zone, we support this option. A close proxy for VHFSZ would be those areas designated as Hillside, subject to Baseline Hillside Ordinance (BHO). It provides an equally-acceptable criterion for limiting ADUs.

**Habitat and Open Space Protection:** Most hillside residential areas also serve as wildlife corridors or the “soft edge” of major natural areas such as Griffith Park. The Oaks is rich with native habitat and wildlife such as bobcats, Western gray foxes, deer, and even one mountain lion. By exempting VHFSZ and/or BHO areas, much of the conservation and preservation concerns would also be addressed.

We hope that city officials elevate the importance of fire safety to a high level, especially in light of the recent catastrophic fast-moving brush fires across the state that have cost many lives.

Thank you,

*Holly Purcell*

Holly Purcell  
President pro tem