

THE FEDERATION

OF HILLSIDE AND CANYON ASSOCIATIONS, INC.

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



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November 29, 2018

Los Angeles City Planning Commission
200 N. Spring Street, Room 360
Los Angeles, CA 90012

Re: CPC-2016-4345-CA (CF 16-1468)
Planning Commission Nov. 29, 2018, agenda item 8
OPPOSE Accessory Dwelling Units in Hillside Areas

Argyle Civic Association
Beachwood Canyon Neighborhood
Bel-Air Association.
Bel-Air Hills Assn.
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.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
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
Residents of Beverly Glen
Save Coldwater Canyon!
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.

Dear President Millman and Honorable Commissioners:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 43 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Federation has followed Accessory Dwelling Unit (ADU) regulation very closely since early 2016, and communicated our strong objection to the relaxation of prohibitions against ADUs in hillside areas in letters to the Planning Commission and the Council's Planning and Land Use Management Committee.

We agree with Councilmembers Koretz and Ryu that ADU development must be prohibited from *all* hillside zones. This has been the clear direction from the Council's PLUM Committee, and is consonant with Councilmember Bonin's recent motion to establish a Wildland-Urban Interface Hazard Mitigation Task Force to consider new regulations to protect against hazards such as wildfires. (CF 18-1120.) These regulations could include expansion of the City's designated Very High Fire Hazard Severity Zone. The past two fire seasons have been devastating to Los Angeles and California. Ignoring the reality of year-round fire seasons and allowing increased development in hillside areas before comprehensive study of hazards is assessed would be grossly irresponsible.

We urge you to reject the staff recommendation to exclude ADU development only from Hillside Construction Regulation Supplemental Use Districts, and instead exclude ADUs from *all* hillside areas.

Sincerely,

Charley Mims
Charley Mims
President, Federation of Hillside and Canyon Associations, Inc.

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BRENTWOOD RESIDENTS COALITION
ZONING | LAND USE | PLANNING | ENVIRONMENTAL

November 29, 2018

Via PERSONAL DELIVERY & EMAIL to cpc@lacity.org

Los Angeles City Planning Commission
200 N. Spring Street, Room 360
Los Angeles, CA 90012

RE: CPC-2016-4345-CA (related CF No. 16-1468); Nov. 29, 2018 agenda item 8
OPPOSE recommendation to restrict ADUs from *only* HCR Supp. Use Districts

Dear President Millman and Honorable Commissioners:

Brentwood Residents Coalition (“BRC”)¹ submits this comment in response to the staff recommendation report for the above-captioned agenda item regarding a citywide zoning code amendment regarding Accessory Dwelling Units (“ADUs”).² BRC is strongly opposed to staff’s recommendation to prohibit ADUs only from Hillside Construction Regulation Supplemental Use Districts (“HCR SUDs”). (CPC-2016-4345-CA, Recommendation Report (“Staff Report”), p. A-6.)

As the Staff Report notes, the HCR district regulations were adopted “to provide a more context-sensitive set of development regulations for neighborhoods that were experiencing particularly acute *construction-related impacts* of hillside development.” (*Ibid.*, emphasis added.) These regulations apply to only *three* communities in our City’s hillside areas, and are currently under consideration for a fourth. (*Ibid.*) But HCR Districts were created to address *construction-related impacts*, *not* operational impacts once construction has ended, and were certainly *not* intended for the purpose of enhancing or promoting fire safety. (L.A. Ord. No. 184827, sect. 4; *see* LAMC § 13.20.A.)

A recommendation to protect only a small part of at-risk hillside community areas from public safety hazards associated with ADU development, while completely ignoring and utterly failing to analyze the potential public safety hazards associated with development in other areas, especially in the City’s designated Very High Fire Hazard Severity Zones, is remarkably short-sighted only weeks after one of the most impactful fires in Los Angeles history burned almost 100,000 acres across the Santa Monica Mountains. (*See* Staff Report, p. A-7 [map showing the small portion of HCR SUD-zoned areas within the City’s hillside zones].) Indeed Councilmember Bonin recently introduced a motion for an analysis of whether “the VHFHSZ itself needs to be expanded beyond currently defined boundaries” – not contracted, which is what the staff recommendation would effectively do. (See Motion CF 18-1120.)

¹ BRC is a grass roots, non-profit advocacy group whose purposes are to preserve and enhance the environment and quality of life in Brentwood, to protect the integrity of residential neighborhoods, to assist with planning, to uphold zoning and municipal codes, to encourage traffic safety, and to educate the public

² BRC notes for the record that despite one of its members being on the email notification list for CPC-2016-4345-CA, no notice of a supplemental staff recommendation report was provided until *after* the CPC agenda was emailed on November 26, 2018.

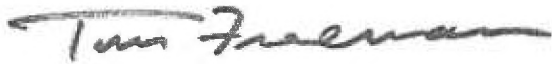
BRENTWOOD RESIDENTS COALITION

We urge the Planning Commission to accept the previous direction of the City Council's Planning and Land Use Management ("PLUM") Committee, which requested the City Attorney prepare a final ordinance for consideration to include an amendment to municipal code section 12.22.A subdivision 32(b)(5) stating: "No Accessory Dwelling Unit is permitted on parcels located in Hillside Areas as defined by the Hillside Area map per LAMC Section 12.03." (PLUM, Request for Final Ordinance and Report Back, March 31, 2017, available at: http://clkrep.lacity.org/onlinedocs/2016/16-1468_misc_03-31-17.pdf.)

Respectfully submitted,



John P. Given



Tom Freeman



Wendy-Sue Rosen

cc:

Councilmember Mike Bonin, CD-11
Councilmember David Ryu, CD-4
Councilmember Paul Koretz, CD-5
Councilmember Mitch O'Farrell, CD-13