

February 8, 2017

Los Angeles City Council Planning and Land Use Committee
Councilmember Englander
Councilmember Cedillo
Councilmember Price

Via email: Sharon.Dickerson@lacity.org

RE: Exhibit A – APPROVED BY THE CITY PLANNING COMMISSION
CPC-2016-4345-CA

Honorable Members of the Planning and Land Use Committee:

I am writing today to comment on the proposed amendments to Section 12.03 and Section 12.22 of the Los Angeles Municipal Code regarding Accessory Dwelling Units.

I am generally in support of the proposed amendments, but I would like to discuss the language in a couple of specific areas and offer alternate thresholds for your consideration.

1. New Subdivision 32(b)(4) of Subsection A of Section 12.22 states the following:
“An Accessory Dwelling Unit is permitted only on a parcel that contains an existing single-family dwelling unit.”

I believe that it is a mistake to limit Accessory Dwelling Units to lots that contain existing SFDs. Sec. 5 of Exhibit A (the Urgency Clause) acknowledges that “the City is currently in the midst of a housing crisis, with the supply of affordable options unable to support the demand for housing in the City.” By restricting ADUs from being planned/built along with new SFDs, this language will unnecessarily reduce the number of possible ADU sites in the city. The best time to address and plan for additional parking requirements is in the planning stages for a new SFD. I propose the following change to the proposed language:

“An Accessory Dwelling Unit is permitted only on a parcel that contains an existing single-family dwelling unit **or where a new single-family dwelling unit is proposed.**”

2. New Subdivision 32(b)(5) of Subsection A of Section 12.22 states the following:
“No Accessory Dwelling Unit is permitted on parcels located in Hillside Areas as defined by the Hillside Area Map per LAMC 12.03, except in instances where:
 - i. The parcel is located within one-half mile of a transit stop, including but not limited to bus stops and rail stations, and;***
 - ii. The parcel is adjoining a street meeting standard roadway dimensions.”***

I believe that, again, this section as written is will unnecessarily limit the number of possible ADU sites in the City. The great proportion of parcels located in Hillside Areas will not meet requirement #1 for proximity to public transportation. In this case, it would appear that the concern is in adding more cars to substandard hillside streets. Where the streets do comply with the required roadbed width, this concern goes away. However, the language of this item should be tightened and/or written to correspond more closely to the existing language in LAMC 12.21.C.10 in order to properly limit ADUs on inappropriate streets, while allowing them in Hillside Areas that can accommodate the additional units. Section 12.03 defines “Standard Hillside Limited Street” as one with a minimum width of 36’ and paved to a minimum roadway width of 28’. Section 12.21.C.10(i) makes a distinction between right-of-





way width (requiring dedication) and roadway width. I propose the following change to the proposed language:

"No Accessory Dwelling Unit is permitted on parcels located in Hillside Areas as defined by the Hillside Area Map per LAMC 12.03, except in instances where:

- i. **The parcel is adjoining a street paved to a minimum roadway width as defined in Section 12.03 Hillside Standard Limited Street or**
- ii. **The proposed construction complies with Section 12.21.C.10.(i)(2) Adjacent Minimum Roadway Width."**

3. New Subdivision 32(c)(1) of Subsection A of Section 12.22 states the following:
"Detached Accessory Dwelling Units are allowed a maximum size of the larger of: 640 square feet, or fifty percent of the total floor area, excluding garages, of the existing single-family dwelling unit, up to a maximum of 1200 square feet."

I am concerned that the lower limit of 640 square feet seems arbitrary and will not allow for 2-bedroom units (necessary to accommodate a parent/child set of occupants). I propose the following change to the proposed language:

"Detached Accessory Dwelling Units are allowed a maximum size of the larger of: **740** square feet, or fifty percent of the total floor area, excluding garages, of the existing single-family dwelling unit, up to a maximum of 1200 square feet."

4. New Subdivision 32(c)(3) of Subsection A of Section 12.22 states the following:
"Detached Accessory Dwelling Units shall not be located between the existing single-family dwelling unit and the street adjoining the front yard."

Los Angeles has many lots where the garage sits in the front half of the lot (generally due to topography restrictions). Since the proposed ordinance revision will allow for both the conversion of existing garages to ADU and the addition of ADUs over garages, it seems unnecessarily restricting to prohibit garages in the front half of the lot from being used in the same way. I propose the following change to the proposed language:

"Detached Accessory Dwelling Units shall not be located between the existing single-family dwelling unit and the street adjoining the front yard **unless attached to an existing or proposed garage or part of the conversion of an existing garage."**

Sincerely,

Tracy A Stone AIA LEED AP BD&C

