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Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

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Franklin Hills Residents Assn.
Highlands Owners Assn.
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Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
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Lookout Mountain Alliance
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!
Save Sunset Blvd.
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.

March 21, 2017

Re: Proposed Accessory Dwelling Unit Ordinance
Council File 16-1468

Dear Chairman Huizar and Honorable Committee Members:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 44 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. Consistent with the Hillside Federation's previous communications with the City of Los Angeles regarding Second Dwelling Units (now referred to as Accessory Dwelling Units), the Federation objects to the adoption of the proposed ADU ordinance on today's PLUM agenda (agenda item 7, Council File 16-1468) without substantial changes.

The Hillside Federation agrees with the Community Impact Statement of the Bel Air-Beverly Crest Neighborhood Council that the proposed ordinance "leaves areas out of the partial ban on hillside ADUs that are in Very High Fire Hazard Severity Zones." As the March 15, 2017 memo submitted by Carlyle Hall notes, the ordinance uses a revised definition of hillside area. In so doing, the hillside areas covered by the proposed ordinance are reduced by approximately 30% compared to the City's existing regulation. The City's rationale for its Categorical Exemption fails to note this important difference weakening the City's existing law, and is thus inappropriate and inadequate to support the action.

As important, the process the City has used to arrive at the proposed ordinance is not consistent with motion 19-A in the related Council File (CF 14-0057-S8, adopted August 31, 2016), which "[d]irect[ed] the Department of City Planning to initiate a new code amendment and possible amendment to the Housing Element to conduct a comprehensive, *open, transparent review*" of the City's second dwelling unit ordinance

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that “tak[es] into account the unique characteristics of each geographic area of the city that may result in certain limitations and prohibitions” on accessory dwelling units in Los Angeles.

We join many others in urging the City to remove those portions of the ordinance introduced by the Planning Department that were not mandated by the passage of AB 2299 (*see, e.g., the* Carlyle Hall memo of March 15). If the City desires to make wholesale changes to the City’s ADU regulations beyond what is specifically required by AB 2299, it must follow the open and transparent process it promised.

Sincerely,

Charley Mims
Charley Mims