

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**DIVISION OF HOUSING POLICY DEVELOPMENT**

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October 10, 2018

Arthi Varma, AICP, Principal Planner
Department of City Planning
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012-2601

Dear Arthi Varma:

RE: Proposed City of Los Angeles Accessory Dwelling Unit (ADU) Ordinance

Thank you for the opportunity to review and comment on the City of Los Angeles' draft Accessory Dwelling Unit (ADU) ordinance. Housing and Community Development (HCD) submits these comments pursuant to Government Code Section 65852.2(h).

HCD appreciates the City's efforts to draft the ordinance and meet the requirements of ADU law (Government Code Section 65852.2). The Department offers the following comments for your consideration:

- *Converting Existing Structures:* Requirements for conversion of existing structures should not be limited to pre-existing as of a specified date such as the date of the ordinance. This type of requirement can limit future capacity for ADUs and is potentially burdensome to the creation of ADUs.
- *Hillside Area:* The draft ordinance currently precludes ADUs in the Hillside Area. While exempting ADUs from this prohibition pursuant to Gov. Code sub. section 65852.2(e) complies with statute, a prohibition on large areas of the City could be burdensome on the creation of ADUs and inconsistent with statute. HCD encourages the City to consider alternatives that balance health and safety issues and the importance of addressing housing needs. For example, considering additional standards that are tailored for Hillside Areas such as street widths could be a viable alternative.
- *Exemptions for ADU Parking:* Although the draft ordinance exempts ADUs from parking requirements under specified circumstances as required in ADU law. Pursuant to Gov. Code section 65852.2(d)(4), ADUs meeting the following must also be exempt from parking requirements:

When on-street parking permits are required but not offered to the occupant of the accessory dwelling unit

- *Movable Tiny Homes*: HCD supports the City's efforts to explore and allow a variety of housing choices, including permitting "movable tiny homes" as an ADU.

HCD appreciates the City's efforts in the preparation of the proposed ordinance and welcomes the opportunity to assist the City in the preparation and implementation of the ADU ordinance. Please feel free to contact Greg Nickless, of our staff, at (916) 274-6244.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall". The signature is stylized and somewhat abstract, with a large, sweeping flourish at the end.

Paul McDougall
Housing Policy Manager