



MONICA RODRIGUEZ  
COUNCILWOMAN, 7<sup>TH</sup> DISTRICT

December 10, 2019

Honorable Marqueece Harris-Dawson, Chair  
Planning and Land Use Management Committee  
City of Los Angeles  
200 N Spring Street, Room 340A  
Los Angeles, CA 90012

**RE: 6433 LA TUNA CANYON ROAD  
CPC-2007-3082-VZC-SPR-SPP VTT-69976-1A; ENV-2007-3083-EIR**

Dear Chair Harris-Dawson and Committee Members,

I respectfully request that the Planning and Land Use Management Committee deny the project in its entirety.

For the past 12 years, the project before you has gone through several iterations. These changes resulted from the designation of the property as a Historic Cultural Monument, and were necessitated by the California Environmental Quality Act review for the proposed project. What should not change however, is the City's commitment to good land use practices and its responsibility to protect the health and safety of the community and its residents. While I understand the need for new units to address our State's housing crisis, I do not believe that the requested zone change is consistent with good zoning practices, and I have serious concerns regarding the potential public health and safety risks posed by the increased density being proposed at this site.

Pursuant to Section 12.32-C of the Los Angeles Municipal Code, findings of fact must be made in the affirmative in order to recommend an action to be consistent with public health and safety, general welfare, and good zoning practice. The applicant's request for a Vesting Zone Change for a portion of the project site to be rezoned from A1-1 and RA-1 to (T)(Q)RD5-1; and RA-1 to R1-



1 would increase the density by allowing the construction of 215 units instead of the 19 units that could be built by-right. Granting the zone change would be inconsistent with the surrounding density of the subject site, and is not consistent with good zoning practice. Allowing the requested zone change will increase density in a manner that is not to scale and is incompatible with the existing environment. The proposed density of this development is not appropriate for the subject site.

The proposed project site's absence from the City's Regional Housing Needs Assessment (RHNA) further highlights the project's inconsistency with good zoning practice. The City of Los Angeles periodically completes a RHNA, pursuant to State law. This analysis determines strategic and desirable areas to allocate the necessary housing to accommodate projected growth throughout the city. The City's RHNA allocation excludes the subject site's parcels from the suitable site selection because they are located within a hillside area subject to the Slope Density Ordinance. As such, a positive finding cannot be made that the requested zone change is consistent with good zoning practice.

Further, findings for the requested zone change must be made in the affirmative that the recommended action will not have an adverse effect on public health and safety. In this case, the location and scope of this proposed project does not allow us to make that finding in the affirmative. The subject site, only having two ingress/egress points, is located at a critical access point for the existing single family residential properties along Tujunga Canyon Boulevard north of I-210. That fact, in combination with the subject site's topography and location within the City's Very High Fire Hazard Severity Zone raises real concerns about fire and life safety that need to be placed paramount. The Department of City Planning Recommendation Report prepared for the May 23, 2019 City Planning Commission references a Los Angeles Fire Department memo that included standard conditions of approval which have historically been suggested for all projects located in the Very High Fire Hazard Severity Zone. However, the growing frequency of wildfires is far from "standard" and the City needs to do more to adjust to the new normal. Fires are getting worse. They are not getting better.

Within the last two years, the foothill communities of my district were center stage to what were respectively the two largest wildfires in the City's recent history—the Creek and La Tuna Fires. Since this item was heard at the City Planning Commission in May, the Seventh District saw *yet another* fire erupt within the Very High Fire Hazard Severity Zone—the Saddle Ridge Fire. Taking Saddle Ridge as a recent example, 88 structures were damaged, 19 were destroyed, one person died of a heart attack, and many schools were closed due to poor air quality that lingered for weeks. At its peak, more than 100,000 people were under mandatory evacuation. The Creek, La Tuna, and Saddle Ridge Fires are examples of the new reality we face in my district and across California. What we've learned from these fires statewide should inform our decision-making to uphold public health and safety. The tragic loss of life and property of the Camp Fire in Northern California, in which firefighters experienced many difficulties, including limited water and road access, should guide our decision. Our hillside communities are in great danger, and that danger will only grow.

These examples make clear that the City must reevaluate existing land-use policies in an effort to ensure the safety of the community. The City Council recently recognized that the City needs to do more to address this pressing public safety issue. Council Motion (CF 18-1120) was introduced to assemble a Wildland-Urban Interface Hazard Mitigation Task Force to reevaluate several issues, including additional development, current building codes and standards within the Very High Fire Hazard Severity Zone. The motion prompted presentation of a report at the April 10, 2019 Public Safety Committee recommending the establishment of a Wildland-Urban Interface Hazard Mitigation Working Group. The Working Group's recommendations related to best practices for development are forthcoming.

Given that the findings related to public health and safety, and good zoning practices cannot be made in the affirmative, I request that the proposal for a Vesting Zone Change to change a portion of the project site from A1-1 and RA-1 to (T)(Q)RD5-1; and RA-1 to R1-1 be denied.

Sincerely,

A handwritten signature in black ink that reads "Monica Rodriguez". The signature is written in a cursive, flowing style.

Monica Rodriguez  
Los Angeles City Councilwoman, 7th District