



Sharon Dickinson &lt;sharon.dickinson@lacity.org&gt;

**Council File #14-0656**

2 messages

**Michael Ferguson** <mike@space-intl.com>  
To: Sharon.Dickinson@lacity.org

Fri, Jan 13, 2017 at 11:35 PM

**re: Council File #14-0656****Baseline Mansionization Ordinance / Stabilize the Conflict of Out-of-Scale Homes**

Dear members of the PLUM Committee and respected Councilpersons,

I am an architect and former educator and have been practicing in Los Angeles for over 20 years. Our small firm has been fortunate to work on many single family homes over this period, and we have directly experienced the many transformations of the residential code since the inception of the Hillside and Big House ordinances of the 1990's.

The residential code in Los Angeles has never been an easy document or standard to implement due to the fact that an entire community is difficult to reduce to a "one size fits all" mentality. This is especially true of Hillside communities which are additionally challenged by the constraints of topography, geology, access to infrastructure, not to mention additional construction costs. Nonetheless, these communities deserve the same rights as other stakeholders to have access to "reasonable" development solutions under the Zoning Code.

I am extremely concerned that several of the proposed amendments to the BHO / BMO do not take into consideration some of the specific difficulties encountered in the design of Hillside homes and are in fact detrimental to the future development of these neighborhoods. I have enumerated these concerns below:

**1. Please omit the 45 degree encroachment plane for Hillside areas** - While this provision may be appropriate for relatively flat properties, *its impacts have not at all been considered* on a Hillside lot where a structure is already constrained by a sloping height envelope (parallel offset to the topography) as well as lot coverage. The intersection of the encroachment planes to a sloping height envelope will create *virtually unusable, wedge-shaped door plates* and force such a complicated, unconventional design that will render future projects infeasible. Our office has modeled this provision on a conventional 50 foot x 100 foot parcel with a 2:1 downslope. Please review the attached diagrams provided to illustrate what I am concerned are dramatic and unanticipated effects of this provision.

**2. Please restore the exemptions for covered porches, patios & breezeways** - The elimination of the 250 sf RFA exemption for covered porches, patios & breezeways, will dramatically affect the ability to articulate the facades of buildings, resulting in more developer driven "boxes". This also severely affects a project's ability to have substantial overhangs to help reduce solar heat gain / energy costs. These provisions force smaller projects to eliminate these desirable elements in favor of door area. Additionally, please allow Architects

**3. Please restore the full 400sf exemption for garages regardless of location** - It is disingenuous for the Zoning Code to mandate a requirement for covered parking (which is an accessory use) and then require *any* portion of it to be counted toward habitable floor area (RFA). If garages are to be counted as habitable space then please relinquish the requirement that off-street parking be covered.

**4. Please keep the "recommended" maximum "by right" R-1 grading quantities (2000cy)** - The proposed amendments simultaneously seek to reduce visual bulk while also reducing grading amounts. In order to reduce building mass a Hillside project must bury deeper into the ground, thereby requiring more (not less) grading. The PLUM recommendations from the 11/29/16 meeting to reduce Hillside grading quantities from 2,000 cy to 1,000 cy are arbitrary and unfounded. Substandard Hillside Limited Streets are already limited to 75% of the "by right" grading allotment. There is no study to warrant a further reduction in these amounts.

**5. Either eliminate the 45 degree encroachment plane** - or the additional side yard setbacks - It is redundant and confusing to require additional side yard requirements (beyond the minimum) based on height of structure *and also* require an encroachment plane. These serve the same purposes. Please eliminate the encroachment plane in Hillside areas.

The specific items highlighted above target the economic viability of a modest R-1 Hillside home (< 2,500sf) and I believe will have a crippling effect on future development of these neighborhoods. At a time when both the City and the State has acknowledged a severe housing shortage, our community should be embracing reasonable and responsible measures for continued growth throughout all levels of the housing market.

I greatly appreciate the desire to have a balanced and reasonable approach to residential zoning standards; however, many of the items illuminated here will have practically no effect on "Out-of-Scale" or "Mansionized" homes (as the initial motion warrants). In general, these "form-based" amendments have not been thought out with regard to the massive interpretation and legal problems they will present in the future due to lack of study and clarification. I strongly encourage the Committee / Council to deny the proposed amendments.

If this suggestion is not viable then please consider alterations to the proposed language based on the comments above or future revisions based on further study and public comment.

I thank you for your consideration of these comments.

Respectfully,

Michael Ferguson, architect

**SPACE INT'L**

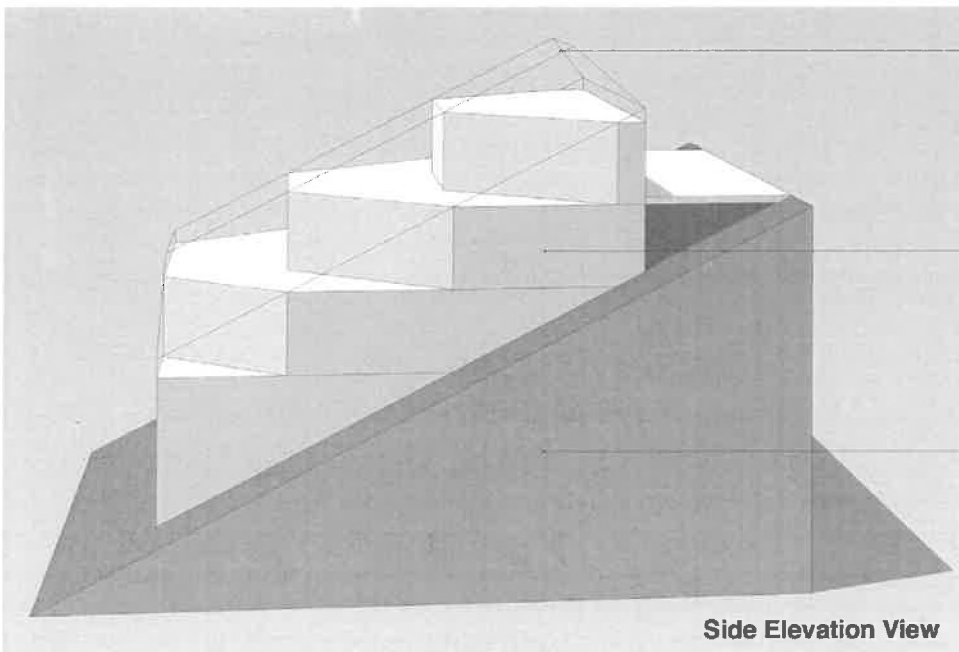
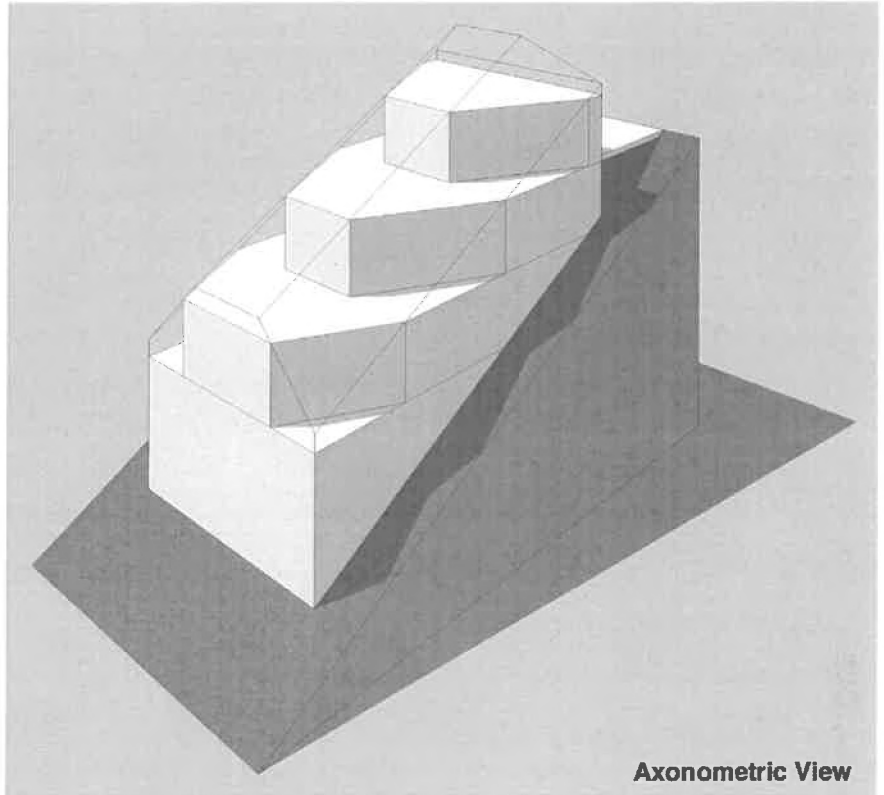
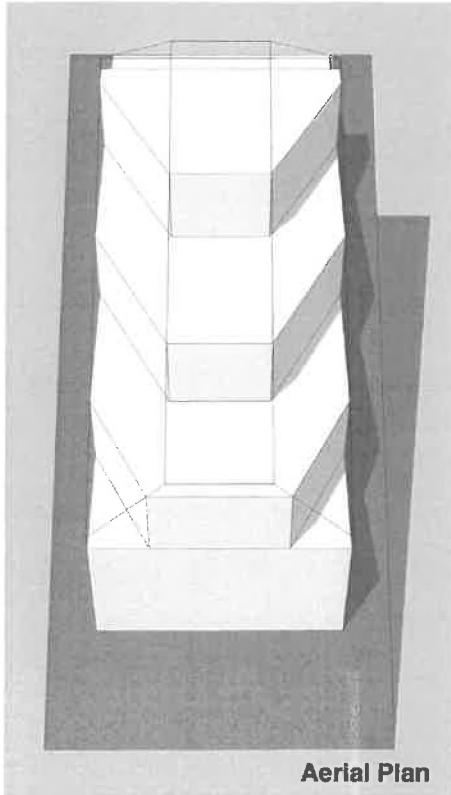
3630 Tyburn Street Los Angeles, CA 90065

p 323.255.1523 x 301

f 323.255.9105

www.space-intl.com

## Hillside Encroachment Plane diagrams (not to scale)



**45° Encroachment Plane as it intersects with Height Envelope**

**Intersection of Floor volumes with encroachment plane produces irregular, wedge shaped floor plates. (10 foot floor levels assumed)**

**Hillside slope (represented as a 2:1 downslope property)**



Sharon Dickinson &lt;sharon.dickinson@lacity.org&gt;

---

**SUBJECT: CF-14-0656 (COUNT ATTACHED GARAGES ) and CF 16-1460**

1 message

---

**Debbie & John** <debnjohn@sbcglobal.net>

Fri, Jan 13, 2017 at 5:57 PM

To: Sharon.Dickinson@lacity.org, Councilmember.Huizar@lacity.org, Councilmember.Cedillo@lacity.org,  
Councilmember.Englander@lacity.org, Councilmember.Harris-Dawson@lacity.org, councilmember.price@lacity.org  
Cc: elizabeth.carlin@lacity.org, councilmember.wesson@lacity.org

Dear Planning and Land Use Management Committee,

RE: CF 14-0656

Work on the Baseline Mansionization Ordinance Amendment has been long. The final piece of the puzzle that will help ensure neighborhoods keep their scale and character intact is to COUNT FRONT FACING ATTACHED GARAGES. We can't compromise on this!

RE: CF 16-1460

It is critical to the character of all neighborhoods that they are able to choose the new variation of the R1 Zone that applies to their area, especially with the addition of an RG Rear Detached Garage Supplemental Use District. Please support this.

While this only covers R1 Zones, we need to protect our R2 zones as well and I hope that the city begins its work on that soon.

Thank you,

Debbie Gaughan  
Picfair Village  
COUNCIL DISTRICT 10



Sharon Dickinson &lt;sharon.dickinson@lacity.org&gt;

---

**SUBJECT: CF-14-0656 (COUNT ATTACHED GARAGES ) and CF 16-1460**

1 message

---

**John Donovan** <jjdonovan019@gmail.com>

Fri, Jan 13, 2017 at 5:59 PM

To: Sharon.Dickinson@lacity.org, Councilmember.Huizar@lacity.org, Councilmember.Cedillo@lacity.org, Councilmember.Englander@lacity.org, Councilmember.Harris-Dawson@lacity.org, councilmember.price@lacity.org  
Cc: Elizabeth Carlin <elizabeth.carlin@lacity.org>, "Herb Wesson (CD 10 Councilman and Council President)" <councilmember.wesson@lacity.org>

Dear Planning and Land Use Management Committee,

RE: CF 14-0656

Work on the Baseline Mansionization Ordinance Amendment has been long. The final piece of the puzzle that will help ensure neighborhoods keep their scale and character intact is to COUNT FRONT FACING ATTACHED GARAGES. We can't compromise on this!

RE: CF 16-1460

It is critical to the character of all neighborhoods that they are able to choose the new variation of the R1 Zone that applies to their area, especially with the addition of an RG Rear Detached Garage Supplemental Use District. Please support this.

While this only covers R1 Zones, we need to protect our R2 zones as well and I hope that the city begins its work on that soon.

Thank you,

John Donovan  
Picfair Village  
COUNCIL DISTRICT 10