

FreelandBuck

October 11, 2016

David Freeland, AIA response to November 29th PLUM Recommendations:
Council File #14-0656

As part of its action at the November 29 meeting, the PLUM Committee recommended several modifications to the proposed ordinance. My *response* to the PLUM Committee's recommended changes to the proposed ordinance include:

- Reduce Hillside Area guaranteed minimum Residential Floor Area from 1,000 to 800 square feet.

800 SF is not a financially feasible by-right RFA when construction and land costs are taken into account. In addition, modern domestic life includes family sizes, equipment, home offices and other programs that require additional square footage than a post-war home. The by-right RFA should remain at 1000SF.

- Reduce R1 Zone, Hillside Area by-right maximum grading from 2,000 to 1,000 cubic yards.

A majority of grading amounts on hillside sites is derived from foundation requirements, circulation for code-required access to the building, city-required parking, as well as the existing BHO height envelope of 28'-33'. Architects, property owners, and builders, do not have control over depth of their piles and foundations or the size of these below-grade structural systems. Furthermore, trim slopes required for site safety during construction adds considerably to the overall grading quantities, and are important for maintaining the stability of the surrounding slopes. Therefore the final grading amounts are often the combined result of the steepness of the terrain, the building code, parking, and the state-mandated seismic design criteria- not the size of the home or the lot size.

All grading that is the result of the code-required structural foundation and city required 2-car covered parking of hillside homes should remain exempt and the by-right maximum must recognize that hillside sites with slopes of >2:1 (H-V) pose unique technical, safety and design challenges when compared to "flat" lots, which are the exception in the hillside zone.

These realities were better addressed in the previous draft Code Amendment from City Planning dated July, 2016. Calculation of grading quantities is nuanced and the reduction proposed here by PLUM is unclear in how it integrates and applies to this earlier and more clearly articulated language.

- Change starting height of R1 encroachment plane from 20 to 22 feet.

The proposed encroachment plane starting height in hillside areas affected by the BHO should be increased from 22'-0" to 24'-0", on sloping sites with a grade of > 2:1 (H/V). Our analysis shows that the proposed regulation of 20'-0" will cut into required covered parking reducing the head clearance at the perimeter of the automobiles toward the mid-point of the garage and street-level floor of the residence. Since the grade on slopes >2:1 (H/V) descends faster than the building mass can accommodate the required covered parking and residential entry, the encroachment plane provision should be revised to reflect the topographical challenges of actual hillside sites here in Los Angeles, instead of the flat-lot diagram shown in the Planning document dated, 10.11.16.

Additionally, the depth of current, code-mandated hillside structural systems above the foundation (drag beams, trusses, etc) requires deeper floor plates and therefore taller floor-to-floor heights. The encroachment plane should therefore start at 24'-0" above natural or finish grade (whichever is lower) for hillside sites with a slope of >2:1 (H-V) and should only be required in the side-yards of the project.

- Remove front articulation requirement in the R1 Zone.

Front Façade Articulation: This should be removed entirely for the hillside zones covered by the BHO, or there should be an exemption for lots of substandard width (<50'-0") since a majority of the building mass

on these lots is the required two-car covered parking, which will take up more than 2/3 of the allowable frontage, when required side yard setbacks are taken into account.

- Restore 0.5 Floor Area Ratio for R1 lots smaller than 7,500 square feet.

No changes suggested.

- Restore full 400 square foot exemption for garages, regardless of location.

Due to the fact that the Department of City Planning requires two covered parking spaces, and the terrain of a majority of hillside sites do not allow for parking in the rear, it is important that the city-required 400 SF parking area be exempt from the total RFA in the new code amendment.

- Clarify that conditionally permitted uses are subject to the provisions of the BMO and BHO.

No comments.

- Add a provision exempting projects currently in the process of seeking zoning entitlements from following the ordinance.

No comments.

- Other technical edits and clarifications.

During the revision process, the BHO and BMO language should be considered separately in order to avoid confusion between these two codes and their intentions toward the areas they protect.

By-Right Grading limits and under structure exemptions should be considered separately for the BHO and BMO, since below-grade spaces on hillsides generally are a direct technical product of the terrain and not the desire to add additional habitable square footage to the home.

Exemptions should be maintained from the original 2011 BHO in order to recognize the technical and financial challenges posed by lots of substandard width (<50.0'), lots of substandard depth (<120.00'), and lots of substandard (<5000 SF) size. Existing exemptions concerning streets of substandard width should also be maintained in their current form from the original 2011 code.