



August 26, 2016

re: File # 14-0656, CPC-2015-3484-CA & ENV-2015-4197-EAF

To Whom It May Concern:

I am a CA licensed Architect practicing residential Architectural design on the west side of Los Angeles. I have over 25 years of licensed Architectural experience across six states, the last seven designing, permitting and building residential additions and new homes in Los Angeles. In that working familiarity with the code proposed to be revised, I recommend the following revisions to better assure the intent of the changes is met without the potential for negative effects on design excellence in our community.

**Corrections for coordination with existing code:**

Side yard

The base code's Section 12.08.C.2.(a) second sentence, and all of (b) were previously added to the code to affect what the encroachment plane now achieves in the R1 zone. Leaving these two clauses in the code inadvertently, further and unnecessarily magnifies the effects of the new encroachment plane to a degree excessive and detrimental to good design, especially on 50' or narrower lots predominant in so many R1 areas. 12.08.C.2.(a) second sentence, and all of (b) should be deleted in lieu of the new encroachment plane language.

**Accommodations for encouraging design excellence:**

Substandard Lots

To allow development of homes on substandard lots to a size in keeping with surrounding context and allow a base minimum sized home in the R1 zone, FAR ought to increase proportional to the degree of a lot's substandard size relative to a standard lot. 12.08.C.5 could accommodate this by adding a clause "For lots less than 5,000 sf, the Residential Floor Area shall not exceed 50% of the Lot Area times the proportion of 5000/lot size" or similar language.

Encroachment plane height

20' encroachment plane height is insufficient to allow a typical 2-story construction on raised floor foundation (most all of LA's existing R1 fabric) with side walls on the setback line (see diagram 2 section.) This amounts to a default increase in setback for two story structures on all proposed zones (except R1V1). Such increase becomes excessively restrictive on 50' or narrower lots, and then particularly so on those with existing homes with raised floors and a foundation line on or near the standard yard setback.. Most existing homes faced with this increased setback for a second story typically would incur significant added costs for a new foundation line within the existing finished structure. 22' is a more reasonable encroachment plane height to allow full-height second-story additions to existing structures.

Side yard

The offset/plane break proposed for Section 12.08.C.2.(a) needs to allow for the degree to which a fixed 5' setback becomes excessively deep on lots 50' wide or less. On a 40' wide lot, with 4' side yards each subject to the added 1' of 12.08.C.2.(b) and a 5' plane break leaves an excessively restrictive build-able width of 25'. In lieu of the "one size fits all" offset proposed, an offset of *"at least 5% of the site width or 5'*

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*whichever is less*" or similar language would achieve the same intent without excessively restricting narrower lots.

Encroachment Plane protrusion allowances

No allowance for even limited protrusion through the sloped planes of the encroachment plane is extremely detrimental to stylistic variety and excellence in design. Attached diagrams 1 – 4 illustrate but a few examples using a 50' wide lot.

A two-story Colonial style home design (with a ridge parallel to the street) would not be possible on a 50' wide lot without such accommodation unless the home width is reduced by 16' to a mere 24' wide with 13' side yards. The designs of Craftsman, Victorian or Cape Cod style homes where side gables and dormers are predominant would be severely hampered to the point of encouraging bad design. And when attempting to lower the roof top plate to avoid the maximum height, useable spaces are not possible without dormers the encroachment plane precludes. Even the design of flat-roofed contemporary homes (which the "preservation" bent of this change seem to be directed to discourage) would be negatively affected on the typical 50' and narrower lots forcing completely and consistently symmetrical "wedding cake" designs for a reasonable width second story.

Allowance for limited protrusions through the sloped planes would allow for greater variety in design, asymmetries and details on which design excellence of most home design depends. Such accommodation would also not significantly impact the light and space intent of the sloped planes, especially with more traditional designs. Pacific Palisades Tract 9300 has developed language to accommodate just such an allowance and I recommend similar allowances be incorporated into this revision.

I believe the above recommendations would help avoid some unintended consequences of the proposed changes as drafted. I further feel that the recommended allowances would help encourage design excellence without detrimental impact to the intent of the revisions. I feel that all stakeholders involved will benefit from their implementation and urge you to consider their incorporation into the ordinance.

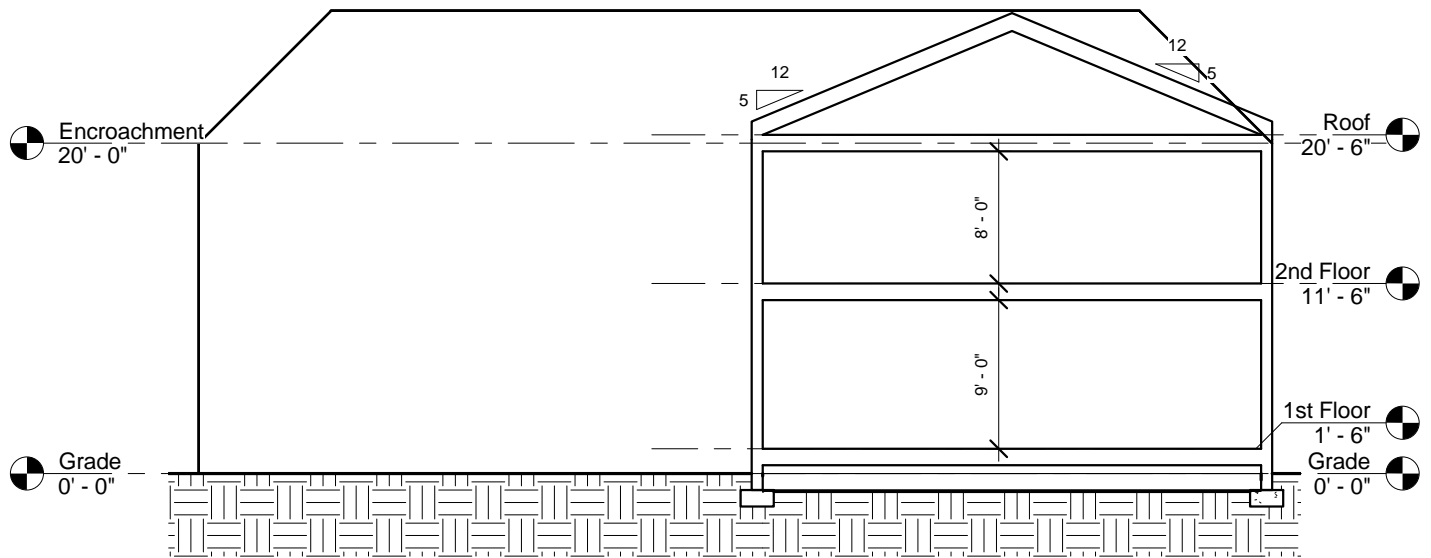
Sincerely,



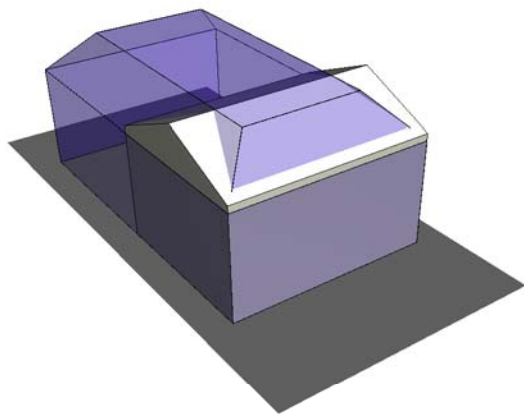
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Michael Poloukhine, NCARB AIA LEEDAP  
*dba ReSquare Architecture*

enc.

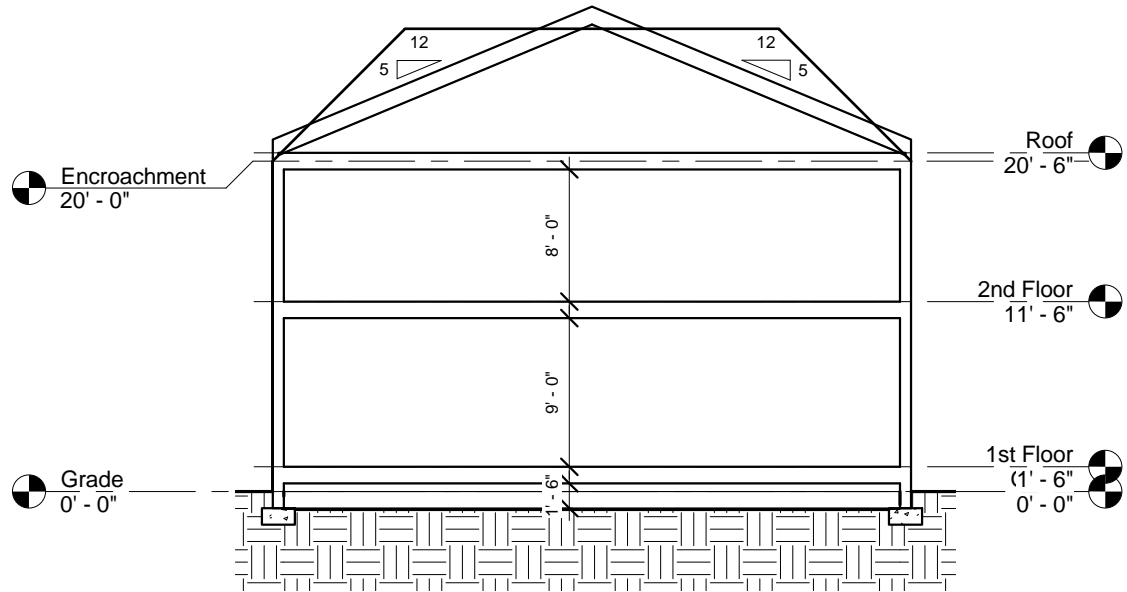


① Section 1  
1/8" = 1'-0"

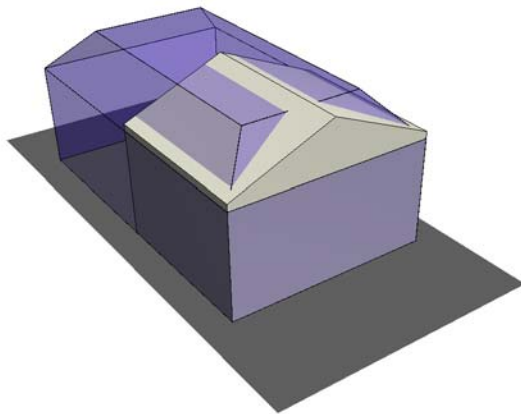


② 3D View 1

Simple home with  
raised floor per code,  
5:12 sloped roof

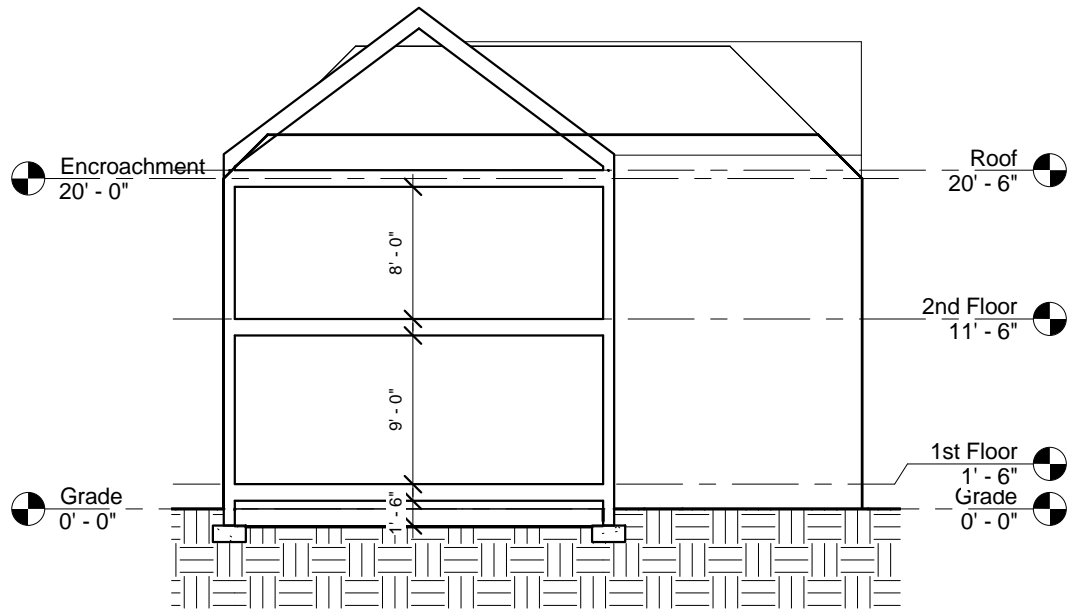


① Section 2  
1/8" = 1'-0"

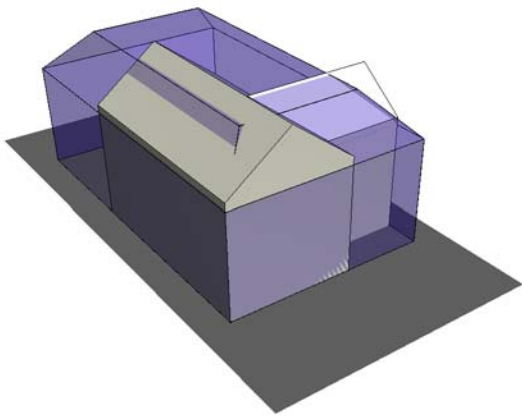


Simple home with  
raised floor per code,  
5:12 sloped roof

② 3D View 2

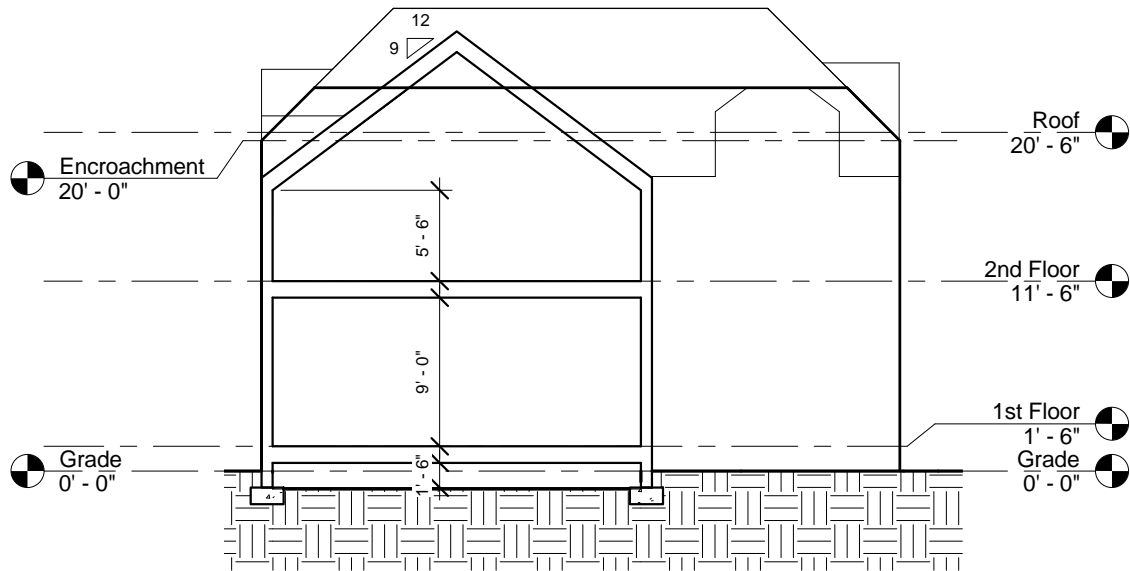


① Section 3  
1/8" = 1'-0"

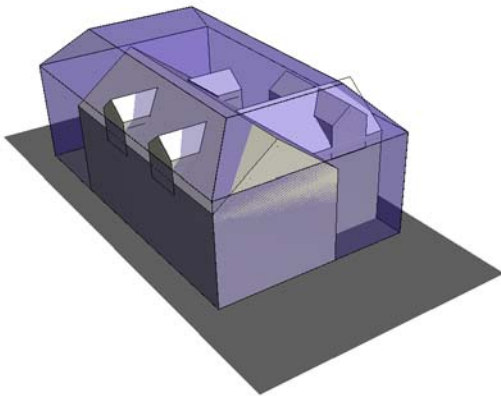


More articulated home  
with raised floor per  
code, 9:12 sloped roof

③ 3D View 3



① Section 4  
1/8" = 1'-0"



More articulated home with raised floor per code, 9:12 sloped roof lowered to avoid height restriction, dormers added for second story usability.

② 3D View 4