



September 17, 2016

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

To Whom It May Concern:

Based on the newly published proposed code revisions, in addition to my previous recommendations, I recommend the following additional revisions to better assure the intent of the changes is met without the potential for negative effects on design excellence in our community.

Section 1: Floor Area, Residential definition, Section 12.03

Covered porches and over-in-height ceilings are useful design tools used create indoor/outdoor transitions and shape spaces in creative and interesting ways. Excluding only some of their floor area may be rational where there is no direct massing control, however, in the R1 zone's encroachment plane their discouragement is not only no longer necessary but actually detrimental to design excellence and variety in home designs. In the R1 zone, with the encroachment plane introduced, open porches and double-counting of over-in-height areas can, and in the interest of better design should be excluded entirely from RFA.

Section 12: Subdivision 1 of Subsection C of Section 12.08:

The added language for front facade modulation is the same language from the current code already shown to be ineffective as interpreted by LADBS Staff to preclude variations in the setback across stories. Greater design flexibility can be introduced while still providing for massing control by relying on a home's cumulative *facade area* rather than building width: "The cumulative aggregate area of the exterior walls facing the front lot line, equal to a minimum of 25 percent of the front facade area, shall be stepped back . . ."

Additionally, tying the degree of setback to building depth unnecessarily penalizes narrow lots that require longer buildings to achieve the same building area, while also ignoring the overall neighborhood street façade context which may be negatively affected by too deep a building facade setback. There is no rational reason a building on a 40' wide lot should have a deeper faced setback than the same area building on a 50' or 60' wide lot directly adjacent to it, and to require this by code will only encourage disjointed and oddly proportioned street facades. A more contextual and rational determinant of front facade setback would be the front yard depth: ". . . shall be stepped back a distance of at least 20 percent of the required front yard setback, (up to 20 percent of the building depth) from a plane parallel to the lot width . . ."

I believe the above recommendations would help encourage design excellence without detrimental impact to the intent of the revisions and urge you to consider their incorporation into the ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read "MP", with a long horizontal line extending to the right.

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