

Stop Mansionization! BMO/BHO Amendments, Council File #14-0656 1 message

Tori <snoopvsnach@vahoo.com>

Tue, May 24, 2016 at 8:38 AM

Reply-To: Tori <snoopysnach@yahoo.com> To: "councilmember.wesson@lacity.org" <councilmember.wesson@lacity.org>, "paul.koretz@lacity.org" <paul.koretz@lacity.org>, "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>, "tom.rothmann@lacity.org" <tom.rothmann@lacity.org>, "ken.bernstein@lacity.org" <ken.bernstein@lacity.org>, "craig.weber@lacity.org" <craig.weber@lacity.org>, "nicholas.maricich@lacity.org" <nicholas.maricich@lacity.org", "roadle.city.org", "phyllis.nathanson@lacity.org", "niall.huffman@lacity.org" <niall.huffman@lacity.org>, "councilmember.huizar@lacity.org" <councilmember.huizar@lacity.org>, "councilmember.harris-dawson@lacity.org" <councilmember.harris-dawson@lacity.org>, "councilmember.englander@lacity.org" <councilmember.fuentes@lacity.org", "councilmember.cedillo@lacity.org", <councilmember.cedillo@lacity.org>, "councilmember.fuentes@lacity.org" <councilmember.fuentes@lacity.org", "sharon.dickinson@lacity.org" <elizabeth.carlin@lacity.org>, "jordan.beroukhim@lacity.org" <jordan.beroukhim@lacity.org>, "faisal.alseri@lacity.org" <faisal.alseri@lacity.org>, "john.darnell@lacity.org" <john.darnell@lacity.org>

Please help before it is too late. Our city is being destroyed! Endearing streets such as La Brea are being demolished and rebuilt in an Arizona large scale mini mall decor. Sweetzer and Beverly is Ground Zero. Please help stop it before they hit they Carthay's. I love my neighborhood, the character and the beautiful original houses.

Our historic neighborhoods are being destroyed and replaced with HUGE concrete bunker style homes. The homes to each side are being dwarfed. Lots are being split into 2 or 3 and building single family dwellings with no yards. Just on top of each other. In my neighborhood 2 homes were torn down and 9 were built. How does that make sense?? And now on an empty lot 60 homes are being built. How about a park?? We don't need any more live work HUGE buildings that house thousands of people. Causing more traffic and eyes sores on every corner. Every time I see a new empty lot on a main street my stomach sinks because I know what is to follow. We are not NY. We are Los Angeles. We need to have our own identity. We are losing our character. We are losing our soul. I am 3rd generation Los Angeles. Please let my children able to see the Los Angeles that has been so special for generations.

Thank you!!

Dear City Council members and Planning Staff,

The first draft of amendments to the BMO/BHO made a good start. By almost 4 to 1, residents' responses supported the meaningful BMO reform outlined in Councilmember Koretz's original motion.

But the latest draft takes a wrong turn by a) preserving loopholes (exemptions and bonuses) that undermined the ordinance in the first place, and b) borrowing elements from re:Code

LA that make the ordinance more difficult to understand and enforce.

While the process gets off track and falls behind, mansionization is spoiling neighborhoods all over LA. People who feel that developers are calling the shots at City Hall – and there are a lot of them – see this as further proof.

Councilmember Koretz's motion (and the first draft of proposed amendments) provided the blueprint for a simple, effective, and reasonable fix that would allow renovations, expansions and new construction, while protecting our treasured neighborhoods from being ravaged by unchecked, short-term real estate speculation and reckless development.

Please, support *and champion* the intent of Councilmember Koretz's original motion. Ensure that the ordinance does not retain (or create new) harmful loopholes – or get so filled with technobabble that it becomes impossible to understand or enforce.

Your voices carry great weight in this matter. You have a wonderful opportunity to show that you have been listening to stakeholders across the city, and that you care about LA's precious residential neighborhoods. It's time for Los Angeles to put stable, sustainable communities ahead of real estate speculation, political pressure, and the almighty dollar.

Sincerely,

Tori



May 24, 2016

Tom Rothman - Principal City Planner, Department of City Planning Vince Bertoni, AICP – Planning Director, Department of City Planning City of Los Angeles 200 N. Spring Street, Room 701 Los Angeles, CA 90012

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

Dear Mr. Rothman & Mr. Bertoni:

As the Director of Government & Public Affairs for the Los Angeles Chapter of The American Institute of Architects (AIAILA), I am writing to share our members' professional concerns about the current draft of the Baseline Mansionization/ Baseline Hillside (BMO/BHO) Code Amendment, which will establish new regulations for all single-family residential properties in RA, RE, RS, and R1 Zones.

Attached please find specific recommendations for how to improve the proposed BMO/BHO amendment and better ensure that it is pro-actively crafted to stabilize the conflict of out-of-scale homes and the negative impact of heavy grading on neighborhoods. It is our professional opinion that if these recommendations are not integrated into the final draft, that the BMO/BHO will adversely impact neighborhoods with the unintended consequences of bad design.

We formally request that we schedule two or three working-group sessions with leadership from your department and identify the best mechanisms to integrate the attached recommendations into the final draft of the ordinance.

Please let me know if these recommendations to improve the ordinance can be received favorably. We have a steering committee of over a dozen architects that are all passionate about ensuring that this effort improves the quality of life for all Angelenos and facilitates the design of world-renowned architecture.

Very truly yours,

Will Wright Director, Government & Public Affairs AIA Los Angeles

Cc:

Councilmember Paul Koretz Councilmember Mike Bonin Councilmember Felipe Fuentes



AIAILA Recommendations to Improve the BMO/BHO Code Amendment

The Los Angeles Chapter of The American Institute of Architects represents 3500+ architects and designers passionate about making Los Angeles a safer, healthier, equitable and more beautiful place. Our membership has a wealth of residential design experience practicing in the Los Angeles area. Numerous AIA members implement the complex requirements of the BMO/BHO on a daily basis in our dedicated work for our clients, and understand what each requirement means in terms of potential design. We have a working knowledge of the precise implications (and unintended consequences) that these requirements will have for the design of our clients' homes and for the character of their neighborhoods.

It is our professional concern that many of the proposed changes (and the rationale driving them forward) will unintentionally deliver flawed solutions and counter-productive consequences to otherwise very real problems with the code. We have prepared constructive recommendations to improve the proposed code amendments, which will better ensure an outcome that delivers greater clarity to architects, developers and to the greater community.

In our professional experience and analysis, to ensure the most beneficial result for the property owners and the general public, we urge you to consider the following comments:

Floor Area, Residential (Section 1. Section 12.03):

The "Floor Area, Residential" definition should be strengthened to be clearly distinct from "Floor Area" in so much as it is geared toward massing goals.

Floor area is a poor proxy for massing and any attempts to use it toward that end will not be effective unless such proxy use is specifically targeted toward design strategies that directly affect massing. Departmental staff has been applying conventional "Floor Area" definition rules and interpretations to "Floor Area, Residential" with negative effects on reduced massing. Many of the proposed changes work against this goal and should be revisited.

Covered Porches, Patios and Breezeways (Sub Par. 3):

The code should exclude covered porches, patios and breezeways from RFA entirely, instead of limiting their size.

These elements as defined (open on at least two sides) are vital design tools to the reduction of apparent mass. Their discouragement will only lead to boxier designs, especially on lots less than 7500sf where their use will be avoided due to scarce available floor area. Any future un-permitted enclosure of such open features is already in violation of Municipal Code and should simply be more aggressively regulated.



Over-In-Height Ceilings (Sub Par. 5.):

The code should not deter high ceilings of greater than 14' feet.

The elimination of this exemption fails to recognize design benefits of such spaces. Its complete elimination detrimentally affects hillside sites where such spaces are vital to cohesive interior volumes and for which the allowance should be retained. And, if strategies are used to reduce mass via other means, (see below) over-in-height ceilings become irrelevant to the excessive massing concerns and should not be counted twice at all.

Additionally, we feel the following further clarifications of RFA are warranted to further massing reduction goals:

Overhanging living spaces:

The code should not count the outdoor area beneath overhanging living spaces as RFA.

Cantilevering living space over open (used or unused) space is an important tool for reducing apparent mass. It is also essential to allow a moderate increase in floor area on smaller existing homes, especially on hillside sites. Current interpretation of RFA by department staff using Building (rather than Zoning) code definitions of floor area penalizes this useful tool by counting area under these cantilevers as floor area. Such areas should be explicitly exempt from RFA, especially on sites smaller than 7,500sf and hillside sites.

Maximum Residential Floor Area (Sec. 2 Sub 5):

The code should be crafted to more carefully prevent oversize massing of larger homes.

To help reduce the mass of larger developments we recommend adopting a limit to second story size based on lot size rather than as a bonus source. We recommend the second story RFA be limited to "43% of the total allowable Residential Floor Area, including any garage allowance and gained bonus area." This would restrict the second story of a home designed to maximize its area development potential (eg: developer build) while smaller homes, especially existing ones, (owner occupied homes) would not be penalized for their smaller footprint and be able to add a usable second story, resulting in a smaller two story home without loss of precious yard space.

Side Yards [Sec 5, 12.08.C.2(a)]:

Re-write this section of the to better clarify objectives and intent.

Controlling facades is a very effective tool to reducing apparent mass and we encourage such address in the code. However, as written, this proposed change will only lead to significant misinterpretation and confusion. The wording suggests the step back is only



required above 14', The image shows it for the full height of the building. The wording refers to side "wall" but appears to mean "facade." The 5' step does not account for narrow lots and will be an excessive restriction in many cases. The requirement does not coordinate with those of par (b). The ten-foot requirement appears arbitrary and bears no proportional relation to building length. The requirement appears to require the step even where the side encroachment plane (or stepped facades as we propose) would already address side yard massing concerns. With such limited and unforgiving restriction, this change will only encourage uniformity of side yard facade designs exactly like the diagram across the R1 zone building fabric. As such, we cannot support the proposed change.

Instead, we recommend a more creatively liberal requirement that side yard facades taller than 14' be required to have at least 20% of contiguous facade area (at either or both stories) set back from the rest of the side facade at least 50% of the required single story side yard (5' or 10%) Greater facade setbacks should be encouraged through incentives under "Bonus Floor Area Incentives" below.

Additionally, with such or similar side yard set back requirement, 12.08.C.2(b) becomes confusing, conflicting, irrelevant and as such should be deleted.

Driveways [Sec. 9, 12.21.A.5.(f)]:

Revise wording of the additional paragraph adding "greater than the minimum required" after "driveway width" to assure minimal required driveway width is not legally precluded on very narrow lots.

Bonus Floor Area Incentives [Sec. 2, 3, 4, 5, 16: Subdivision 5, Subsection C, 12.07, 12.07.01, 12.07.1, 12.08, 12.21.C.10(b)]:

The code should incentivize the utilization of features that promote design excellence.

Elimination of the "bonus" options for R1 properties is counter-productive. It will only encourage more boxy designs by failing to incentivize more varied facades and massing via uncontrolled "filling" of the proposed constrictions of the buildable envelope. Allowing the single large bonus for second story proportionality will likewise be of little effect unless targeted toward areas (front, sides) of most concern for excessive apparent mass.

In lieu of both of those proposed changes, we feel that in combination with the proposed "Encroachment Plane" a variety of RFA bonus incentives, each with smaller bonus gains to be used to encourage a greater variety in designs all geared toward massing reduction. This will simultaneously allow for greater development when necessary AND encourage de-massed design in the process:

Proportionality:

Providing bonus area exclusively for proportional stories, and then without targeting such proportionality to where it is most apparent will not address any



issues with apparent mass. As written it only encourages poorly proportioned buildings, and on lots smaller than 7,500sf forces homes to have excessively large first floors and tiny yards to gain even a moderate 2 bedroom second floor. We recommend elimination of the proportional story bonus entirely in lieu of the overall RFA second story limit proposed above (see "Maximum RFA" section). Any incentive for proportionality in apparent massing should be handled separately (see "Facades".)

Facades:

Variation of facades is a vital design tool for reducing mass where it is most apparent. In its current form, the facade bonus does not provide for such variety. Furthermore, its proposed elimination as an incentive in the R1 zone would lead to more boxy designs, and homes with large imposing front facades as floor area is maximized and facade stepping occurs on the back where it is most useful for rear yard appreciation. We propose instead, that the facade method be not only retained, but enhanced to be the prime incentive used to target massing reduction in a variety of ways that encourage reduced mass where it is most apparent (front and sides.) This will allow more flexibility to designers to make use of the strategies in a variety of ways, and better accommodate the preservation of existing footprint setbacks on the first floor:

a) On the first floor, a 1% bonus to be earned for every 5% of contiguous facade width set back from the remaining front facade a distance at least 15% of the minimum required (or if relevant, prevailing) front yard setback, whichever is greater, cumulatively gained and limited to 10% bonus gain. Additionally the bonus should be limited to allow no more than 50% of the front width to be set back to gain bonus except when maintaining an existing first floor facade condition exceeding a 50% width set back, in which case the full bonus would apply as for a 50% set back.

b) On the second floor, a 3% bonus to be earned for every 50% of contiguous facade width set back from the front-most first story facade at least 15% of the minimum required (or if relevant, prevailing) front yard setback, whichever is greater and an additional 6% bonus gained for the entire second story facade set back a distance at least 30% of the same front yard setback.

c) For buildings taller than 14', a bonus of 2% to be gained for an additional 20% of contiguous facade area at (either or both stories) set back from the already required set back facade a depth at least 50% of the required single story side yard.

d) To qualify, setback(s) must be open to the yard and un-roofed with exception for overhangs/protrusions per established code. Required railings and parapet walls should not be considered enclosures of an open face if limited to 42" above finished floor or "visually permeable." Setbacks need not align between stories. Setbacks earning bonus on the first story need not be contiguous in aggregate, only insomuch as



necessary to reach the % of facade width required to earn an increment of bonus. Setbacks earning bonus on one yard may earn bonus on another if so qualifying.

Height:

Reduction in building height can be utilized to reduce building mass and should be incentivized, not just maximally limited. To incentivize less massive structures, an RFA incentive bonus of 0.5% for every 1 vertical foot of maximal two-story structure height less than maximum allowable height (to a maximum of 5%) should be added.

"Green" building:

One of the first strategies in sustainable building is the reduction of built work. Providing additional floor area for use of sustainable building practice is counterproductive to both goals. The "green" bonus is in our view rightly eliminated. However, since sustainable building is a laudable goal on its own merits and it encourages reduced building size (hence mass), other incentives should be explored and pursued to encourage its pursuit via Title 24 Part 6 Tier 1 or Tier 2 compliance (eg: expedited permitting, permit fee reduction, property tax reductions, etc.)

Substandard lot sizes in R1 [12.08.C.5.5]:

To more gradually allow accommodation for the restrictive nature of substandard lots, the substandard bonus increase should instead be re-written to be "an increase of earned bonuses by the lesser of 1.5 or the proportion of 5,000sf divided by the site area."

Existing substandard lots in the R-1 are especially hindered by a strict FAR for an even modestly sized home. An incentive bonus increase for substandard (less than 5,000sf) lots should be retained. However, as written, it allows a drastic increase in RFA at the cut-off size. This has the perverse effect of allowing much bigger homes on lots imperceptibly smaller than their standard lot neighbors.

Encroachment Plane [Sec 7: 12.08.C.6, Sec 18: 12.21.C.10(d)(1)(ii)]:

This section of the code needs to be fundamentally reconsidered in order for the ordinance to achieve its intended objectives.

We do not support the Encroachment Plane change as proposed, but rather the additional provisions we propose to assure and encourage design variation in demassing strategies on second stories and front and side facades.

Without incentives to encourage design variation, the proposed change risks only encouraging buildings uniformly proportioned to strict 45 degree steps, or worse, 45 degree sloped facades. Additionally, the angle is excessively steep for massing needs on side yards especially for any viable second story development on smaller lots, both better and more effectively handled in other ways (see above.) On smaller lots it will



force uniform, symmetric "wedding cake" designs with little to no design variety. The sloped-top envelope provides no accommodation for dormers or gables, forcing unbroken hipped-roof designs as the ONLY massing solution for buildings on smaller lots.

When combined with other pre-existing code sections (eg: lot coverage) it would render many hillside lots, especially those that are of sub-standard width and depth, unfeasible for development. It would encourage more grading and site work to achieve the same amount of allowable RFA via deeper digging or greater footprint, increasing grading quantities and reducing available area for environmentally-friendly landscaping. It also is redundant for most structures on sloping sites already reducing their physical mass with 6'-8' side yards (assuming an envelope height of 28'-33' and a lot width of 40'-0").

For all these reasons, this new addition to the code is redundant, overly-restrictive and less effective compared to other methods (see above) and should be removed from the final draft, and, ideally replaced with a more effective approach.

Projecting Decks & Balconies [Sec. 20: 12.21.C.(d).6]:

For downslope lots, restore the ability to have cantilevered balconies.

The proposed elimination of this sub-paragraph is excessively burdensome to smaller lots that rely on such balconies to supplement their limited living space, and is effectively unnecessary on down-slope lots. We recommend instead, that the paragraph add a restriction to limit it to downslope lots and on upslope lots only allow visually permeable railings to project beyond the maximum envelope height.

Hillside cut/fill exemption for basements [Sec 23: 12.21.C.10(f)]:

Grading impacts can be more effectively mitigated with construction and roadway-use permits, not the zoning code.

The "infinite basements" possible under the current code language can create significant issues on larger hillsides sites. However, since the primary issue is soil removal and the burden it imposes on local streets and neighborhoods, this impact can best be controlled on the permit and fee level as a highway use issue, not zoning. The basement is also one of the only ways smaller hillside sites can be developed or renovated at all to provide even small homes.

The various proposed doubling of as-of-right grading quantities may address the need for basements with the (3)(i) basement exception deleted, but actually double the potential quantity of soils that could be moving off-site. To control excessive off-site soils movement but still allow moderate basements where they are most needed, we propose leaving the (3)(i) basement exception and grading quantities as currently drafted, and instead revise the (3)(i) basement cut and fill exemption to read "as long as the cut and/or fill is not imported or exported off the site; and conforms with Table 12.21 C.10-6."



Hillside "remodels" [Sec. 10 & Sec. 11: 12.21 C.10 and 12.21 C.10(a)]:

Ensure existing homes on hillside lots smaller than 7,500 SF are not prohibited from sustainable improvements.

The inclusion of "remodels" is an excessive and counter-productive penalization of smaller hillside lots when compliance with the current provisions of that section are sometimes impossible given existing development or lot size. We suggest exempting sites smaller than 7,500 SF to allow smaller hillside lots with substandard conditions to be brought more up to current environmental performance and design standards.

HOAs, Civic and Local ordinances:

Encourage Department of City Planning Staff to more readily embrace design innovation that is locally tailored to the unique conditions of Los Angeles.

The Los Angeles area has a burgeoning localized regulation of issues addressed in the BHO/BMO. Applying the proposed changes without accommodation of this local variety and citizen civic investment will be callously detrimental to their unique and locally, legally accepted character. Such accommodation should be allowed administratively with clear directives to encourage Departmental staff deference to locally driven and legally established solutions. A host of legal challenges and variance requests that may otherwise result could also be so avoided.

In Summary:

We feel the above recommendations will address the areas of greatest concern with the current BMO/BHO. Taken in whole, the above recommendations allow for a judicious limiting of residential floor area while also providing incentives for the use of design strategies that help reduce negative massing impacts on local neighborhood scale and character. We feel that all stakeholders involved will benefit from the implementation of these recommendations and encourage you to consider their integration into the final draft of the ordinance.

Design excellence and high environmental performance remain our chief priorities and we encourage the Department of City Planning to implement a BMO/BHO ordinance that can best achieve these goals for the shared benefit of all Angelenos.

For more information, please contact: Will Wright, Hon. AIAILA Director, Government & Public Affairs American Institute of Architects/Los Angeles Chapter 3780 Wilshire Blvd, Suite 800 Los Angeles, CA 90010 (o) (213) 639-0764 (m) (310) 309-9580 will@aialosangeles.org www.aialosangeles.org



BMO/BHO Amendments, Council File #14-0656

1 message

Ruth <Scribsiers@ca.rr.com>

Mon, May 30, 2016 at 9:54 PM

To: councilmember.wesson@lacity.org, paul.koretz@lacity.org, vince.bertoni@lacity.org, tom.rothmann@lacity.org, ken.bernstein@lacity.org, neighborhoodconservation@lacity.org, councilmember.huizar@lacity.org, councilmember.huizar@lacity.org, councilmember.huizar@lacity.org, councilmember.huizar@lacity.org, councilmember.huizar@lacity.org, councilmember.cedillo@lacity.org, councilmember.fuentes@lacity.org, sharon.dickinson@lacity.org

Cc: elizabeth.carlin@lacity.org, jordan.beroukhim@lacity.org, faisal.alserri@lacity.org, john.darnell@lacity.org, jasmine.shamolian@lacity.org

Dear City Council members and Planning Staff,

As you know, Los Angelenos have for years pleaded for relief from mansionization, one of the most destructive trends eroding the very fabric of our city. You also know that the 2008 Baseline Mansionization Ordinance, riddled with loopholes and exemptions, failed miserably.

Councilmember Koretz's motion to amend the BMO provided the blueprint for a simple, effective fix that would allow renovations, expansions and new construction while protecting treasured neighborhoods from being ravaged by unchecked, short-term real estate speculation and reckless development.

The first draft of BMO/BHO amendments made a good start. By almost 4 to 1, residents' responses supported the meaningful reform outlined in Councilmember Koretz's original motion.

But the latest draft takes a wrong turn by a) preserving loopholes that undermined the BMO in the first place, and b) borrowing elements from re:Code LA that make the ordinance more difficult to understand and enforce.

While the process gets off track and falls behind, mansionization is spoiling neighborhoods all over LA. People who feel that developers are calling the shots at City Hall – and there are a lot of them – see this as further proof.

Please, *champion* the intent of Councilmember Koretz's original motion, and ensure that the amended ordinance does not retain (or create new) harmful loopholes or get so filled with technobabble that it becomes impossible to understand or enforce.

Two specific requests:

1) Eliminate the attached garage exemption (COUNT attached garages as FAR).

This doesn't prevent developers/owners from building attached garages; it simply means that garages' square footage should count toward the floor area ratio when part of the house.

2) Eliminate the zoning administrator's discretionary 10 percent "adjustment."

Given our concerns regarding the current lack of transparency, we don't need yet another adjustment that gets approved behind closed doors. As the city has existing *public* processes for seeking variances, this discretionary provision should be eliminated.

Your voices carry great weight in this matter. You have a wonderful opportunity to show that you have been listening to your constituents as well as stakeholders across the city, and that you care about LA's precious residential neighborhoods. It's time for Los Angeles to put stable, sustainable communities ahead of real estate speculation, political pressure, and the almighty dollar.

Sincerely,

Ruth Scribner Wilshire Vista Council District 10



PACIFIC PALISADES COMMUNITY COUNCIL

May 28, 2016

Hon. Councilmember Mike Bonin, Council District 11, <u>mike.bonin@lacity.org</u> Hon. Councilmember Paul Koretz, Council District 5, <u>paul.koretz@lacity.org</u> Vince Bertoni, Director of Planning, Dept. of City Planning, <u>vince.bertoni@lacity.org</u> Tom Rothmann, Principal City Planner, Dept. of City Planning, <u>tom.rothmann@lacity.org</u> Niall Huffman, Planning Assistant, Dept. of City Planning, <u>NeighborhoodConservation@lacity.org</u> Los Angeles City Hall 200 North Spring Street Los Angeles, CA 90012 <u>Via email</u>

Re: <u>OPPOSITION to Council File #14-0656; CPC-2015-3484-CA; CPC-2015-4197-EAF;</u> <u>Baseline Mansionization/Baseline Hillside (BMO/BHO) Code Amendment; Proposed</u> Zoning Code Amendment to Modify Single Family Zone Regulation

Dear Councilmembers Bonin and Koretz and Mssrs. Bertoni, Rothman and Huffman:

Pacific Palisades Community Council (PPCC) is the most broad-based community organization in Pacific Palisades and has been the voice of the community since 1973. PPCC is one of the oldest continuously operating councils of its type in Los Angeles and served as a model for many current neighborhood councils. PPCC holds open elections for 9 board seats representing all Palisades residents and businesses, and includes in its membership all significant community organizations. PPCC conducts open, public board meetings and serves the same function as a neighborhood council: to provide a forum for the discussion of issues and to advise government on matters of community concern.

PPCC has held three public forums on the BMO/BHO Code Amendment. At its regularly scheduled public board meeting on May 26, 2016, after extensive discussion the PPCC Board unanimously passed the following motion:

"PPCC opposes the Los Angeles City Planning Department BMO/BHO April 2016 code changes draft (BMO/BHO Code Amendment) with regard to R1 zoned properties because, as currently drafted, it fails to take into account the unique aspects and character of our community with particular respect to design, grading and effect on property values."

PPCC's position is consistent with the following position expressed by the American Institute of Architects, Los Angeles, in its letter of May 24, 2016 to Mssrs. Bertoni and Rothmann (AIA Letter):

"Encourage Department of City Planning Staff to more readily embrace design innovation that is locally tailored to the unique conditions of Los Angeles. The Los Angeles area has a burgeoning localized regulation of issues addressed in the BHO/BMO. Applying the proposed changes without accommodation of this local variety and citizen civic investment will be callously detrimental to their unique and locally, legally accepted character. Such accommodation should be allowed administratively with clear directives to encourage Departmental staff deference to locally driven and legally established solutions. A host of legal challenges and variance requests that may otherwise result could also be so avoided." (AIA Letter, p. 8)

PPCC urges the City Council and Planning Department to take into account the unique aspects and character of Pacific Palisades and further revise the proposed BMO/BHO Code Amendment in order to accommodate our community's particular needs and concerns.

Thank you for your courtesy and anticipated cooperation.

Sincerely,

Christina Spitz President Pacific Palisades Community Council

cc (via email): Sharon.Dickinson, Legislative Assistant, PLUM Committee, <u>sharon.dickinson@lacity.org</u> (Request for filing in CF 14-0656)