



January 11, 2016

Submitted electronically

Hagu Solomon-Cary
City of Los Angeles
Department of City Planning, City Hall
200 N. Spring Street
Los Angeles, CA 90012
Email: hagu.solomoncary@lacity.org

523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

RE: Draft amendments to Baseline Mansionization and Hillside Ordinances BMO/BHO, Section 1. Section 12.03, Los Angeles Municipal Code

Dear Ms. Solomon-Cary,

On behalf of the Los Angeles Conservancy I am writing to submit comments on the City's proposed draft amendments to the Baseline Mansionization and Hillside Ordinances (BMO/BHO). We offer these comments to urge the City to pursue the strongest possible measures to address long-standing shortcomings in the current BMO/BHO policies. The City has eliminated some key loopholes in this draft and we believe some additional tweaks will tighten these ordinances even further.

Neighborhood conservation is of paramount concern to the Conservancy and our many supporters as older and historic neighborhoods throughout the city are being adversely impacted by needless demolition and incompatible and out-of-scale new residential development. Teardowns and mansionization is not a new or emerging trend in Los Angeles, but instead one that continues and ebbs and flows – in terms of its visibility and impacts -- with the ongoing health of the real estate market and overall economy.

The initial passage of the BMO/BHO was an important first step but now is the time to strengthen this tool, and ensure it is doing what it is intended to do in helping to maintain and conserve the City's important neighborhood character. If successfully implemented as an effective policy, we believe this can help balance the need for growth and development alongside with neighborhood conservation.



Even with the appropriate revisions in place, this ordinance will not stop teardowns as a practice as it may be the right approach for some neighborhoods. Yet for the many neighborhoods that are in need it will help reinforce existing neighborhood character and patterns that are important to maintain.

The Los Angeles Conservancy offers the following comments:

Maximum Residential Floor Area: Overall this reduces the residential floor area (RFA) ratio for various lot sizes throughout Los Angeles neighborhoods which we support. For a typical-sized residential lot in Los Angeles -- those 7,500 square feet or less -- only forty-five percent can be built upon. This is an improvement from the previous RFA and is more in keeping with the character and scale of older neighborhoods.

Proportional Stories Option: The reduced multi-floor bonus from seventy-five to sixty percent is a tighter limit. While this allows for an additional twenty percent (thirty percent for lots less than 5,000 square feet) of the maximum RFA, there needs to be further clarification to ensure subsequent stories are proportional and in scale. The Beverly Grove RFA offers a good model and precedent where the bonus is directly derived from the net footprint of the first floor. Rather than leave this up to interpretation, we suggest looking into this further and developing a metric that will clearly define the size of the first floor.

Required Covered Parking: We support the amendments to the required covered parking provision as it encourages detached garages which are a prevalent characteristic of many older Los Angeles neighborhoods. Further, this will help in providing an important buffer and separation between homes, allowing for greater privacy between neighbors. It addresses one of the core problems that currently exist with the Mansionization trend today.

Lattice Roof Porches, Patios, and Breezeways: We however do not support the removal and exemption of lattice roof porches, patios, and breezeways from counting as part of the overall floor area. These types of elements can still add bulk and without any oversight can be easily abused. We suggest the inclusion of these elements or at the very least setting a maximum threshold trigger.

Zoning Administrator's Authority, 10% Adjustments: This provision is a carry-over from the existing ordinances and in general we urge the City to remove. It is unclear why a separate "relief" mechanism (as opposed to the City's current variance process) is needed as a stand-alone process here. It would be helpful to better understand why this is needed, and whether or not it has been used effectively in the past. We suggest looking to specific examples to illustrate how this type discretionary approval has been applied and whether or not it is desired and needed going forward.



The Conservancy welcomes the opportunity to work closer with the City on these proposed draft amendments. As a neighborhood conservation issue, teardowns and mansionization most often impact older and historic neighborhoods. As much as this is about preservation it is also a larger issue of sustainability and the loss of affordable workforce housing.

Los Angeles cannot continue to throw away quality housing and needlessly generate tons of demolition debris annually when homes can be continued to be reused. For this reason we would recommend that the City explore **demolition debris provisions** as part of this amendment process or as a stand-alone ordinance. Other cities have effectively set percentage thresholds (for instance, Boulder, CO) for the amount of demolition debris that must be reused and recycled per project. Given the impacts of mansionization and tearing down existing housing and building new, we think there is a direct correlation with sustainability and the need to address this issue in a meaningful way.

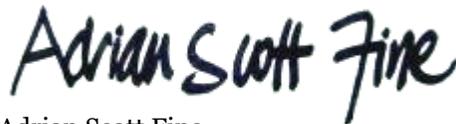
Solar access and sun has also been raised as an issue associated with mansionization that can be addressed through these revisions. In addition to privacy it is important for adjacent property owners to maintain access to sunlight where shade/shadow analysis may be necessary in certain circumstances. Or the City could establish a **solar plane threshold** to ensure this is adequately addressed.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions and if we can be of assistance.

Sincerely,



Adrian Scott Fine
Director of Advocacy

