



FLOOR AREA RATIO

1. Zoning Administrator's Authority of 10% should be a discretionary process.
2. R-1 to include a FAR not to exceed .50, no bonus options, 60% second story, and articulated front wall of house.
3. A FAR of .50 on R1 lots up to 7,500 square feet, NO BONUSES and a 28 foot height limit.
4. Requirement that every home be measured upon construction by Building and Safety.
5. Mandate the reduction of FAR of upper stories, articulate front facade, and lower the maximum height.
6. The decrease in FAR in overall building and proportional stories reduced to 60 percent will result in small house for families.
7. Reduce lots smaller than 7500 to a .35 FAR and lots greater than 7500 to a .30.
8. Zoning Administrator adjustment of 10 percent should still be granted.
9. Zoning Administrator adjustment should be a discretionary action.
10. Zoning Administrator should not grant any additional adjustment related to home size.
11. Count attached garages as FAR.
12. Relying on floor area to address massing is a mistake.
13. The inclusion of attached garages and reduction of the 2nd story to 60% results in an overall 26% net reduction in RFA for the entire structure.

EXEMPTIONS

1. Detached garage should count towards floor area.
2. Attached garages should not count towards floor area.
3. Open and lattice roofs, porches and patios should not be exempt (from floor area).
4. Uncovered patio, breezeways, and balconies should be counted as floor space since they can be enclosed after construction.
5. Count balconies and other open areas (as floor space) which can be easily enclosed after construction or be placed on 2nd floors where their enclosures add to the overall density.
6. Do not remove 400 sq. ft. attached garage exemption.
7. The square footage area of a basement that exceeds 50% of the area of the floor above shall be counted in the total allowable FAR for the project.
8. Disallowing basements from exemptions allows for accurate square footage count and will assist the city in assessing and collecting accurate property taxes.
9. Do not eliminate the 100sf that is not counted to the RFA for Over-In-Height Ceilings. On hillside projects, higher ceilings allow for a needed visual connection between floors
10. Do not eliminate the 250sf that is not counted to the RFA for covered porches, patios, breezeways. Architects will inevitably have to eliminate architectural features (overhangs, etc) that give scale and proportion to buildings.



11. Include basements in FAR for purposes of calculations of structural size, total land use, and taxation.
12. The exempt square feet for lattice roof porches, patios and breezeways should be limited to 250 square feet and should be open on three sides.
13. Retain "lattice roof" patios, breezeways and balconies exemption.
14. The exemptions give opportunity to articulate the mass of the building because of the extra allowable square footage for design features.
15. Exemptions for garages should be eliminated and allowances should be increased accordingly.

BONUSES

1. Bonus options should be eliminated completely and FAR should not be reduced
2. Proposed remaining bonus options are not sufficient.
3. Proportional story bonus calculation should not include gross square footage and should be based on the net square footage.
4. Proportional stories bonus should have an open public process and the calculation should be based on the net footprint of the first floor, which excludes any exempt floor space.
5. Bonuses should be subject to public review.
6. No bonuses, mandate front wall step back for mass articulation.
7. Strongly disagree with keeping the 20% Proportional Stories bonus.
8. Design should not be associated with granting bonus square footage rather it should be mandatory.
9. Bonuses should be a discretionary action.
10. 60 percent second story will encourage a larger first floor which results in a decrease in outdoor garden spaces.

GRADING / HAULING (HILLSIDE AREAS)

1. Grading under a structure should remain exempt.
2. Grading exemptions should include more volume.
3. Grading quantities should be based on Lot Size, not zone.
4. On-site balancing/dirt movement should not be limited under the import/export amounts.
5. Removing the under the footprint grading exemption for hillside properties will extremely limit the overall grading allowable and will be financially disastrous to resale values.
6. Calculating pile and grade beam grading quantities should remain exempt.
7. Grading is good for hillsides- it makes less landslides. Hauling is temporary- and most hillside properties should be developed. More developable lots create better management of street width though dedications resulting in safer streets.



8. The Bel-Air import/export provisions of the ICO should be included in the BHO amendments.
9. Any grading over 1,000 cubic yards, should be required to obtain a Zoning Administrator's Variance ("ZAV").
10. The maximum amount of off-site hauling shall be limited to 6,000 cubic yards.
11. The definition of "Grade" should be consistent for all projects in the hillside area, including projects consisting of a Parcel Map, and a Tentative Tract Map.
12. Support proposed revision that remedial grading under the footprint of the main structure to be exported shall be counted in the total amount of the grading calculation. (i.e.: not exempt).
13. A blanket approach for hillside grading will not work, every lot is unique.
14. Please look into the fee increases in hauling safety inspectors, flagmen, and hauling hours to improve the safety versus crippling property development rights.
15. Propose that the first 600 cubic yards removed from under the footprint of the structure be exempt; quantities beyond that would count toward the allowable grading quantities.
16. Removal of grading exemption in Hillside areas will have adverse visual impacts.

SUBSTANDARD LOTS

1. Small/substandard lots are most harshly affected by the proposed regulations because the houses cannot access the remaining bonuses in the non-hillside neighborhoods, and the houses built on small lots are not generating oversized houses to begin with.
2. For non-hillside areas, add a provision that limit house size to no less than 1,200 sf. to ensure the development of small/substandard lots.
3. The Base Floor definition should not be applied to small lots. The 40% or any reduction from BASE of upper & lower levels area does not work when base plan is mostly garage.
4. Please review small lots for this revised code & make revisions to ensure small lots under 4,000 square feet are buildable.
5. The goal of this ordinance is to target the large 30,000 SF+ construction projects, but smaller hillside lots are adversely affected as many of them would become unbuildable or financially unfeasible when taking into account foundations and piles for even modest homes.

ECONOMICS / STUDIES

1. The economic impacts of reduced FAR and other proposed changes should be studied on all affected zones.
2. Conduct a study to calculate the floor area loss and decreased developable property to vacant property owners.
3. Conduct economic study on city tax implications.



4. Conduct a study to understand the loss of street improvements and lost opportunities to widen and create turnarounds for neighborhoods due to the new economic barriers to develop land.
5. Conduct a study to evaluate the potential loss of great hillside architecture.
6. Conduct a study of real lots and designs as examples of proposal and distribute to the community.
7. Conduct a study on the reduction of hillside safety caused by these code revisions.
8. Loss of tax revenue and revenue to various industry trades and professionals.
9. By restricted square footage as opposed to the methods of reducing mansionization, the city is limiting revenue in the form of taxes, fees, sales transactions, etc.
10. With reduced area for building, developers will not have to pay as much for properties.

DESIGN / CHARACTER / PARKING

1. Attached garages eliminate the buffer provided by a driveway.
2. Detached or not, garages are structural components that encourages its use as an outbuilding and takes away from native landscaping, increases development footprint and fuel modification, and contributes to the increase of impervious surfaces. Same impacts are derived by multiple stories option.
3. Lower maximum building height.
4. Ceiling height threshold of 14ft should be revised to 12 ft.
5. Attic ceiling height threshold should be revised from 7ft to 5ft in order to preclude small habitable space from being constructed.
6. For garages allowed in the Front Yard Setback, a minimum of a 5ft setback should be required in addition to any required Street Dedication.
7. Maximum height of a basement shall be 12ft.
8. Homes with more than four bedrooms should be required to provide additional on-site parking spaces (but not located in the front).
9. Height restrictions should take into effect whether the lot is descending or ascending from the street. A descending lot should be allowed more height if not visible from the street.
10. Detached garages will incentivize garages to be located in the rear of the house at a distance of 20ft as it is necessary for accessory buildings with a different fire rating.
11. Remove “or 3,375 square feet, whichever is greater” from page 9, with the additional 20% allotted to a builder, this would result in a house over 4000 square feet on a 7500 size lot.
12. The current ICOs result in home designs that look like boxes while the original BMO allowed for more square footage, and resulted in more articulated architecture which is a benefit to the communities in which they were built.
13. Design standards can and should be implemented to mitigate the worst characteristics of out-of-scale development.



14. Since out-of-scale development leave no room for a backyard, rooftop decks are becoming the new trend of outdoor space.
15. Regulate roof top decks on sound, views, privacy towards neighbors, and hours of operation.
16. Parapets should count towards overall height of dwelling structure.
17. Setbacks should be included and calculated based on subterranean slope gradient.
18. Revise maximum height limit to 28 feet.
19. Architectural guidelines and requirements could govern development within each neighborhood.
20. Add regulation for no more than 25% hardscape/driveway in front of homes.
21. Where the roof is not sloped or articulated (flat), the height limit should be restricted to 30 feet at the top plate.
22. When you have 30-40% slope in hillside, outdoor space needs to be in balconies and patios.
23. Low sloped roof (3 inches -12 inches) is the norm because of 33' height limitation. There should be a small percent of height deviation the further you are.
24. The front yard articulation bonus gave architects an incentive to make interesting front facades rather than the flat front boxes of past generations. It creates more dynamic streets with a variety of green spaces and home facades at streets which should be a goal of the city.
25. Garage should be located in the rear only when property has alley access.
26. Basements can serve as useful square footage that is embedded in the ground in comparison to above grade massing that has visual impacts to the neighbors.
27. Development that is over-scaled for historically low rise areas deprives neighbors' access to sunlight and limits privacy.
28. Driveways by the side of the house, including porte-cocheres add light and air to existing homes by separating them from their neighbors.
29. Second story balconies should not be allowed to reduce the loss of privacy for neighbors.
30. Allow neighbor who has lost homeowner privacy to build or plant a buffer that exceeds the fence/hedge height limitations.
31. Require upper story setbacks/step-back to prevent loss of privacy for the neighbor.
32. Rules that protect backyard privacy should be added.
33. Propose that required parking be reduced to 1 minimum off-street parking.
34. If city still requires off-street parking then there should be an exemption for the cut and/or fill needed to provide those spaces.
35. For homes on sub-standard streets with very little street parking there probably should be in increase of garage allowable exempt area for 3-4 cars in lieu of 400sf.

SUSTAINABILITY / SITE DESIGN



1. Removing the green tier 1 incentives is significantly less “green” than the standard green code.
2. New attached garages are resulting in the elimination of mature street trees.
3. Amend CEQA guidelines to trigger elevated environmental review for SFD projects greater than 10,000 square feet. Consider impacts on air quality, erosion control, storm water quality, geotechnical stability, and traffic, both from the instant project and cumulatively considering all permits requested in an area.
4. Tree preservation ordinance to include trees over a certain age and located within the 25ft front setback.
5. The scale of development near public parkland and open space is of additional concern due to the requirements of fuel modification (brush clearance) for fire prevention.
6. When solar panels are placed on top of trellis roofs does it become a covered roof?
7. If a front side garage is approved for a property, the owner must be required to replace all the trees which were removed in order to provide an adequate garage opening. Tree replacement should not be at the discretion of the owner.
8. The removal of the Green Building bonus is a drastic affront to eco-friendly building practices and a step back for modern society.
9. There is an energy cost (both monetary and environmental) of having such large dwellings.
10. There is a rise in energy cost of the houses around large dwellings causing them to lose sunlight (passive heating) and the loss of vegetation which can help provide much needed clean air.

PERMITTING PROCESS / CODE ENFORCEMENT

1. Newly constructed houses should not be permitted under a remodel license.
2. There should be an appeal process before permits are issued.
3. No grading permit should be allowed until a permit is issued for a project.
4. Any Single Family Dwellings (“SFD”) exceeding 10,000 square feet should be required to obtain a Zoning Administrator’s Determination (“ZAD.”) and require a public hearing process similar to the conditional use permit for a commercial project.
5. All new SFD, and remodels to existing SFD that exceed 50% of the original house perimeter (i.e. “major remodels”), in the hillside area, shall be required to submit a construction staging plan prior to the issuance of a building permit.
6. A watch-dog organization should ensure enforcement of regulations.
7. Require roof top decks to have a public hearing process.
8. LA Department of Building and Safety may not be the agency who has responsibility for compliance issues created by permitting and toxics rules but approves the building permits. This ordinance needs to reflect clearance issues by the agency legally responsible for compliance.
9. Slope percentage needs to be accompanied by soils and geology clearances.
10. City needs to include CEQA identifying measures in granting permits in the hillsides.



11. The zoning codes are not being enforced.
12. Bonuses should be subject to public review.
- 13.

GENERAL COMMENTS

1. No allowances should be granted for new, completely remodeled, and expanded homes.
2. [§ 12.21 C.10.(i)(3) should be made an administrative approval not a public hearing.
3. Has a study been done to evaluate if the cultural monuments such as the Lovell house by Neutra could be built under these changes?
4. Strong agreement with removing the 5ft distance from the envelope height.
5. The new proposed and existing code fails to communicate the public the difference between “exemption” and “incentive to make better architecture”. The result in the choice of words pushes the public to see “exemption” as a loophole rather than a goal to encourage better buildings.
6. In terms of what provisions shall prevail over an area, the more restrictive should apply.
7. Eliminate the authority for Charter Sec 245 motions in the city council whereby council members overrule the planning department and LADBS.
8. Mansionization affects affordability in single family neighborhoods.
9. Having a blanket citywide ordinance doesn't make sense because each area and neighborhood has many different needs, historic characteristics, and in some cases, local oversights that are already in place.
10. I urge the city to remove the BHO from the BMO ordinance, so (1) the BMO ordinance doesn't fail because it's attached to an unpopular BHO, and (2) so the Hillside people have their fair chance to participate in the discussion.
11. For communities with CC&Rs, new regulations could interfere with community specific restrictions resulting in more discretionary requests to the City, such as variances.
12. If the idea is to restrict very large homes which are out of proportion with their neighborhoods and which cover too much of the natural landscape, would this not be better accomplished by restricting lot coverage, setting greater setbacks and implementing stepped setbacks rather than limiting square footage?
13. A hydro-geological study prior to plan check should be required in canyon areas due to above-ground permanent, intermittent, and subterranean stream flows.
14. New regulations prevents owners from building homes need for growing families.
15. No air conditioning units on anything over one story.
16. The second story calculation can be based on an inflated number, the Beverly grove RFA provides precedent.
17. Define what constitutes a remodel and include the explanation in the permit application.
18. Improved homes help the neighborhood and property values.
19. New rules should be made tougher and percentages of lot size should be made smaller.



20. A thoughtful and intelligent program to reduce the effects of traffic should be negotiated between the residence and developers with the aid of the City Council and their staff.
21. Concern around density from too many condos and apartments. The shift to new, attractive and larger homes doesn't seem destructive to the spirit of charming neighborhoods.
22. The timeline for the implementation for this code change over a few months primarily during holiday season is unacceptable.
23. Housing codes should at least be reviewed on a regular basis, whether it be every decade or every other decade.
24. For areas governed by CC&Rs, the proposed amendments should not apply.
25. The proposal is very reasonable and won't have a very big impact on the developers who want to build in residential neighborhoods.
26. Dept. of Building Safety needs strong oversight and City Planning should have more decision/enforcement power.
27. See that once BMO/BHO amendments are adopted, ICO neighborhoods will be subject to either their ICO or the BMO/BHO, whichever is more restrictive.
28. BMO amendments should be to make it easier for LADBS inspectors to verify compliance and for neighbors to have a clear understanding of what is and is not permitted
29. A public advocate office should be established to mediate and educate neighbors and builders alike, or a new set of rules should be drafted to require direct communication between entities undertaking construction with the neighborhood in which they are working.
30. Instead of these Citywide BMO amendments, we need balanced, studied, architectural design solutions in the form of neighborhood-specific R1 zoning standards. A solid understanding of urban design and building form principles must be the foundation of those zoning standards.
31. Support for an ordinances that promote good design practices, articulation on all four facades, avoid large boxes, and increase upper floor setbacks and at the same time limit large continuous walls even on the first floor side-yards.