

City of Los Angeles
 City Planning Commission
 200 N. Spring Street
 Los Angeles, CA 90012
NeighborhoodConservation@lacity.org, Sent Via Electronic mail

Re: CPC-2016-2110-CA, ENV-2016-2111-ND, R1 variation zones, code amendment (8/25/16)

Dear Ms. Shannon Ryan and the City Planning Commission

10/1/2016

I'm writing this letter in opposition to the R1H variation zone code amendment (Update 8/25/16). I am a concerned Laurel Canyon resident and a member of the PLU for the Laurel Canyon Association and the Bel Air Beverly Crest Neighborhood Council.

Three concerns regarding R1H variation zone code amendment:

1. Why increase floor area ratio (FAR) with R1H1? The amounts should be written to reduce FAR in hillsides.
2. The code amendment needs to be clearly written to describe who can get this variation zone.
3. The code needs to be written on the criteria for R1H₁, R1H₂, and R1H₃,

Concern #1

The new code changes to the FAR in BHO were created to eliminate out of scale development. The R1H variation zone code amendment would significantly increase the size of new houses in hillside areas. Below I have listed an example of a house (built under 2011 BHO) and the resultant allowable FAR, if these proposed R1H variations become amended to the code. Example: Allowable FAR on a 6180 SF lot with a slope of 60 to 99.99 %:


Under 2011 BHO would allow a 1854 SF house per slope band (6180 x .30 = 1854)

Proposed R1H new variation zone allows a 2904.6 SF house per slope band (6180 x .47= 2904.6)

2904.6 – 1854 SF = 1050.6 SF increase, note some houses in Laurel Canyon are 1000 SF or less.

In this example of a typical hillside site, the proposed R1H variation zones will increase the house size on a small steep lots by 1050.6 SF. The soon to be eliminated R1 bonuses of 20% had benefits to neighborhoods like green building, proportional stories, or low grading. In my example using R1H, there is 56% increase to square footage from 2011 BHO, with no benefits and only increased impacts to the hillside neighborhoods.

R1H, HILLSIDE (designated Hillside Areas)



Slope (%)	R1H Revised	R1H New	R1H2	R1H3
0 - 14.99	0.20	.25	0.45	0.40
15 - 24.99	0.25	.30	0.45	0.35
25 - 34.99	0.30	.35	0.40	0.30
35 - 44.99	0.35	.40	0.35	0.25
45 - 54.99	0.40	.45	0.30	0.20
55 - 64.99	0.45	.50	0.25	0.15
65 - 74.99	0.50	.55	0.20	0.10
75 - 84.99	0.55	.60	0.15	0.05
85 - 94.99	0.60	.65	0.10	0.00
95 - 99.99	0.65	.70	0.05	0.00
100+	0.70	.75	0.00	0.00

On Page 21 Revised FAR for R1H1

Concern #2

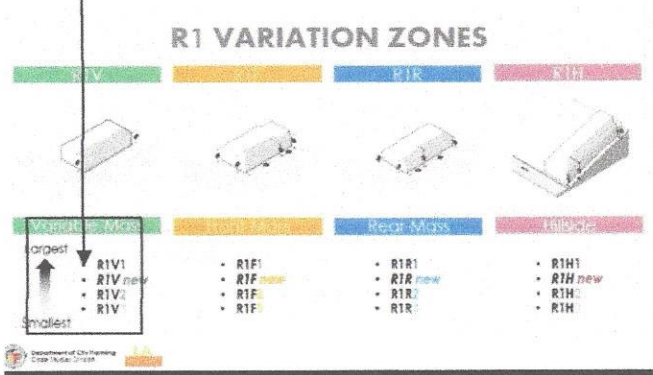
The page 7 of the Q&A (below) mentions how the code amendment would be implemented per neighborhood by City Council to rezone neighborhoods. There is no detailed information in the code draft to explain who can get this variation zone. My concern is with the increased complexity of the codes from the 2011 BHO to the new BHO will add confusion to applicants. An applicant may confuse R1 and R1H, and the result would be a significant increase to FAR. Perhaps Planning could miss such an error. It is foreseeable that errors like this could happen. The language of the code must be explicit, like **R1H1 per Zone Change by City Council.**

How would this Code amendment effect my property or my project?

The Code amendment creates 12 new zones and the Rear Detached Garage District and makes them available for implementation through a zone change. The Code amendment itself does not propose any rezoning or implementation of the zones. However, there is an initiative (pending adoption of Code amendment by City Council) to rezone several R1 neighborhoods to one of the new R1 Variation Zones. Once a zone change occurs, projects filed after the effective date of the zone change would be subject to the new regulations. Any projects for which a plan check fee has been paid prior to the effective date of the zone change would be subject to the regulations in effect at the time the fee was paid (as detailed in Zoning Code Section 12.26).

Concern #3

The R1H zones are divided into R1H₁, R1H₂, and R1H₃, yet there is no description as to their differences. Page 5 of the R1 variation zones, code amendment (8/25/16), below states "largest to smallest", needs clarification since the corresponding floor area ratio (FAR) varies greatly between 1 and 3



In conclusion, the elimination of the R1 bonus in the new BHO alone curtails overdevelopment. The proposed R1 variations zones suggest that they "are tailored to the varying character of the R1 neighborhoods", not so they just allow more FAR in the hills. The point of reducing FAR with the changes to the BHO was to address over development, and eliminate over built houses on small lots. The proposed R1 variation zones that relate to BMO (R1V1, R1F1, & R1R1) have made considerable reductions to the FAR, why the opposite for BHO?

Thank you for your consideration of my letter.

Stephanie Savage, PLU - Laurel Canyon Association & Bel Air Beverly Crest Neighborhood Council