

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



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Hagu Solomon-Cary
Department of City Planning
City Hall, 5th floor
200 N. Spring Street
Los Angeles, CA 90012

January 9, 2016

Re: **Baseline Hillside Ordinance Amendments**
CPC-2015-3484-CA
CPC-2015-4197-EAF

Dear Ms. Solomon:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 resident and homeowner associations with approximately 250,000 constituents spanning the Santa Monica Mountains. At its November 4, 2015 meeting, the Federation voted to support the proposed amendments to the Baseline Hillside Ordinance (BHO), as well as recommend the following additional amendments.

- 1)The City of Los Angeles should map all hillsides with a 1:1 or greater slope in hillside areas; and,
- 2)The City of Los Angeles should prohibit development of 1:1 or greater slopes unless a Zoning Administrator's Determination is obtained.

The spirit and intent of the BHO was to use natural hillside terrain to determine the appropriate scope of development on hillside parcels. Unfortunately, loopholes in the original ordinance allowed the effective floor area of hillside residential properties to be dramatically increased through the construction of habitable basements that are largely or entirely exempt from both FAR and grading calculations. Section 14 of the proposed ordinance helps to close this loophole. Closing the grading exemption loophole will substantially reduce the hillside grading activities that destroy the City's hillsides, reduces wildlife connectivity, and causes dangerous construction traffic on our City's often substandard hillside roadways.

In addition, engineering and construction improvements that did not exist when the BHO was first passed now allow development on "extreme slopes" (slopes with natural or manufactured grades of 1:1 or greater). Many homes developed on such extreme slopes are properly characterized as "McMansions" and now dominate many ridgelines and prominent hillsides. Beyond the common sense amendments proposed, there should be another level of review to be undertaken by the Department of City Planning via Zoning Administrators Determination allowing for additional scrutiny of these challenging areas.

The Department of City Planning possesses the technology to map all hillside areas of 1:1 slopes or greater. With the mapping of these areas, the definition of a 1:1 slope or greater will be settled once and for all. An inventory of these slopes is critical to the infrastructure, environmental and cumulative impacts, and impacts to our wildlife habitats and connectivity.

The Federation thanks the Department of City Planning for hearing the concerns of the hillside communities in crafting these common sense amendments to the BHO, and urges the passage of the proposed ordinance with our additional amendments to ensure that the purpose and intent of the BHO is upheld.

Sincerely,

Marian Dodge
Marian Dodge

cc: Mayor Garcetti
Council President Herb Wesson
Councilmember Paul Koretz
Councilmember David Ryu
Councilmember Jose Huizar
Councilmember Mitch Englander
Councilmember Gilbert Cedillo
Councilmember Mike Bonin
Councilmember Paul Krekorian