

**SANTA MONICA MOUNTAINS CONSERVANCY**

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January 11, 2016

Mr. Hagu Solomon-Cary  
Department of City Planning  
City of Los Angeles  
200 North Spring Street, Room 701  
Los Angeles, California 90012

**Support for Proposed Amendment to Baseline Hillside Ordinance,  
CPC-2015-3484-CA, Council File No. 14-0656**

Dear Mr. Solomon-Cary:

The Santa Monica Mountains Conservancy (Conservancy) supports the proposed amendment to the City's Baseline Mansionization and Baseline Hillside Ordinance (BHO). Many of the neighborhoods affected by the BHO include public lands and resources covered by the Conservancy's mission. Exclusions and loopholes in the existing BHO have allowed out-of-scale development in hillside neighborhoods, which in turn has resulted in increased impacts to the biological resources and public viewsheds of sensitive public parklands and open space, particularly within the Mulholland Scenic Corridor and Hollywood Hills areas.

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. Homes with less Floor Area have a smaller radius of Fire Department-required fuel modification.

The existing BHO does not restrict the size of basements in new single-family homes, which has led to increased grading of hillsides by developers circumventing the restrictions on Floor Area Ratio. The exclusion in the existing BHO for up to 400 square-feet of attached garage space has also contributed to out-of-scale development in hillside neighborhoods. The existing unnecessary, and self-defeating, bonuses to Floor Area Ratio for use of "green" building materials and "proportional" second stories further contribute to this problem.

As currently proposed, the draft amendment would remedy the above-described faults with the existing BHO. However, the Conservancy recommends that the City further revise the BHO to eliminate the possibility of the Ordinance being circumvented and Floor Area Ratio being increased up to ten percent through Zoning Administrator Adjustments. The widespread use of Zoning Administrator Adjustments to increase allowed house size

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undermines the effectiveness and purpose of the BHO.

Should you have any questions or clarifications, please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128, or by e-mail at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov). Thank you for your consideration and the opportunity to comment.

Sincerely,

LINDA PARKS  
Chairperson

CC: Hon. Paul Koretz, Council District 5