

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



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Erin Strelch
Major Projects Section
Department of City Planning
221 N. Figueroa Street
Los Angeles, CA 9012

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July 15, 2022

Re: ENV-2016-4180-EIR - OPPOSE
3003 Runyon Canyon Road

Dear Ms. Strelch:

The Federation of Hillside and Canyon Associations (“Federation”) founded in 1952 represents 46 resident and homeowner associations spanning the Santa Monica Mountains. The mission of the Federation is to promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles. At its June 21, 2022 meeting, the Federation received a presentation on the revised proposed project at 3003 Runyon Canyon Road. The presentation showed a proposed development of a significantly reduced project with an exceptional architectural design. The project, however, needs to comply with the Mulholland Scenic Parkway Specific Plan and with the Baseline Hillside Ordinance.

The currently proposed project is not in compliance by requesting:

- 1 - Specific Plan Exception (SPE) to allow construction of a new Single-Family Dwelling to be located within 50 feet of a prominent ridge as specified in the Mulholland Scenic Parkway Specific Plan;
- 2 - Mulholland Specific Plan Project Permit Compliance (SPP) for the Mulholland Scenic Parkway Specific Plan (MSP);
- 3 - Zoning Administrator Determination (ZAD) to allow three (3) retaining walls instead of the allowed two (2) retaining walls of up to ten (10) feet in height.

Since May 2015, the Federation has written letters to the Mulholland Design Review Board and LA City Planning Department opposing any deviations from the Mulholland Scenic Parkway Specific Plan that are requested to benefit 3003 Runyon Canyon Road. Deviations from the Scenic Plan establish precedents that erode the integrity of the Specific Plan. Ignoring the Specific Plan, the applicant sited the proposed house at the top of a prominent ridge which requires a Specific Plan Exception. The very purpose of the Specific Plan is to “minimize grading and assure that graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains” and to “preserve the natural topographic variation within the Inner and Outer Corridors of the Specific Plan area. Once you approve exceptions, the purpose of the plan is defeated.

The analysis of alternative projects is non-existent. Little effort appears to have been made to design a residence that complies with the Mulholland Scenic Plan and the Baseline Hillside Ordinance. Furthermore, this proposed project never considered a project further from the ridgeline which would obviously reduce the need for grading, the need for hauling routes and/or the three retaining walls – another Zoning Administrator Determination (ZAD) request. Additionally, it is still oversized with a 3,000 sq ft basement which is obviously living space.

The FEIR and the proposed project does not adequately address the impact of the project on hikers. The only project access is via a paved fire road/trail in Runyon Canyon Park (“Park”). “An easement for road purposes to be used in common with others” was granted in January, 1945. That trail provides the only access for hikers entering the Park from Mulholland Dr. That is the road that construction vehicles will have to use. With a larger house on the site, one can anticipate much more traffic permanently on the shared road which will make the trail more dangerous for hikers. How will the applicant assure that hikers will still have safe access to their Park?

Further, the City requires that new developments be on parcels that abut a public street. Runyon Canyon Road is a fire road, closed to motor vehicles, and not a public street. The FEIR fails to adequately address this conflict.

The FEIR did not fully analyze the air quality during the multi-year construction. The grading of 28,012 cubic yards of dirt will raise huge amount of particulate matter. This will have a detrimental effect on the health of the average of 5,000 hikers a day on the west trail and the east trail. Since both trails are steep hikers are not casually walking along, but breathing heavily and inhaling a lot of particulate matter. Additionally, the noise of the heavy equipment will disturb hikers’ peaceful enjoyment of the park.

The FEIR fails to recognize the importance of Runyon Canyon Park to wildlife connectivity. As the hillsides continue to be developed it is more important than ever that we preserve connectivity from one open space to another. This project will bring more vehicles and more light pollution to the area. The three retaining walls would create an additional barrier to wildlife connectivity.

The basic issue here is the problem of having a private residence in the middle of a City Park. There is already one residence there – the problem should not be compounded by building a second residence. The most appropriate Alternative Project is No Project. A private residence in the middle of a City park is awkward at best. The best alternative would be for the applicant to either donate or sell the property to the City to be incorporated into Runyon Canyon Park. Bottom line: the project still does not comply with either the Mulholland Scenic Parkway Specific Plan and with the Baseline Hillside Ordinance – any deviations are a dangerous precedent that will erode the hillside protections.

The Hillside Federation urges the City to deny the project and make every effort to acquire the property to expand the open space in Runyon Canyon Park.

Sincerely,



Charley Mims, President