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Zoning Administrators Environmental Unit Planning Department

June 6, 2011

Re: 9118-9229 West Crescent Drive ZA-2010-0634(ZAD)(ZAA) ENV2010-635-MND

Dear Sirs:

The Federation of Hillside and Canyon Associations, representing thirty-three homeowner associations spanning the Santa Monica Mountains, has serious concerns regarding the proposed development at 9118-9229 West Crescent Drive at the top of Wonderland Avenue in Laurel Canyon.

First, Crescent Drive is a substandard dirt and gravel road ranging from nine to fourteen feet in width with a sheer drop off on one side. The topography of the area is steep hillside. The current weight limit of 6000 pounds would preclude use by construction trucks. There is no secondary access to the lots. If the applicant is to proceed with the described construction, he must be required to improve the road from the project all the way to the nearest improved 20-foot-wide road to meet the minimum 20' standard required by the Los Angeles Fire Department, including a turn around at its terminus as required by the Bureau of Engineering.

A similar request on a lot at 9100 W. Crescent Drive was denied (Wecker v. City of Los Angeles, 2009) because "The Deputy Advisory Agency found that the necessary street improvements would require extensive grading and 'extreme engineering and manipulation of the hillside' that would be inconsistent with the community plan objective." This type of road widening would would require a major feat of engineering. Such improvements to the street would disturb the natural terrain and ecological balance the Hollywood Community Plan seeks to sustain as recognized by the court.

Additionally, any retaining walls required for the project would have to conform to the requirements of the Hillside Ordinance for retaining walls.

Moreover, the proposed residence is 12,205 square feet. Most of the residences in the area range from 1,000 to 3,000 square feet. This new residence, at four times the size of the largest existing residence in the area, is out of scale and character with other homes in violation of the Community Plan. Permitting such an out-of-scale project on the street would set a dangerous precedent to permitting similar out-of-scale projects.

The massive scale of this proposed project and required improvements on this minuscule road surely trigger a full Environmental Impact Report. One must consider the cumulative impact of construction on all the lots on W. Crescent Drive. This is a public safety issue as well as a Community Plan issue. A Mitigated Negative Declaration for a project of this complexity is clearly the inappropriate document to meet CEQA requirements. The Hillside Federation requests a full EIR for the Crescent Drive project.

Sincerely,

Marían Dodge, President