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Zoning Administrator

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N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Oaks Homeowners Assn.
Outpost Estates Homeowners
Residents of Beverly Glen
Save Coldwater Canyon!
Save Sunset Blvd.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

Re: ZA 2017-838 ZAA-ZAD,
6443 & 6459 Innsdale Drive
ENV-2011-2940-MND-REC1

Dear Zoning Administrator:

The Federation of Hillside and Canyon Associations, founded in 1952, represents 42 resident and homeowner associations with approximately 250,000 constituents 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. The Federation considered the project at 6443 & 6459 Innsdale Drive at its July meeting and voted to oppose the project as currently proposed.

Although the applicant has reduced the size of the project somewhat from his previously proposed project, it still requires many deviations from code and will have a tremendous impact on the topography.

The project would obliterate a prominent ridgeline that is highly visible to the public. The ridgeline is visible to all motorists on the Hollywood freeway. The ridgeline provides the foreground for the iconic view of the Hollywood Sign.

The applicant is requesting an obscene amount of grading far beyond that permitted by code. According to the applicant's representative the project requests "the graded slopes to be 1:1 in lieu of the required 2:1." That is *twice* as steep as allowed by code.

Additionally, the applicant requests "an additional 39,850 cu. yards of cut and 39,850 cubic yards of fill for a total of 79,800 cu. yards instead of the maximum of 3,300 cubic yards in the RE 40 zone." The applicant requests *ten* times the amount of excavation! This shows the project is not in substantial conformance with the General Plan and local zoning requirements, as claimed by the applicant. The applicant should redesign his project so that the grading conforms with the limits established by the Baseline Hillside Ordinance.

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The applicant's plan is to dump the excavated earth into a ravine on the property. This would cause a major change in the topography of the eastern end of the Santa Monica Mountains. The ravine is the site of a blue-line stream that is identified on both Bureau of Engineering maps and on United States Geological Survey maps. It is extremely important to retain these intermittent streams for the habitat they provide.

The Environmental Report notes that the applicant requests "additional grading of 37,408 cu. yards of cut with 37,409 cu. yards of exempted fill to be used for a required animal keeping area." Noncommercial "animal keeping" is permitted in conjunction with residential use on an RE40-1-H lot (see LAMC § 12.07.01.A(3)(a)), but is not a *requirement*.

The findings state "site characteristics or existing improvements make strict adherence to the zoning regulations impractical or infeasible." Therefore, isn't the logical conclusion that the project should not be built?

At that time, then-CD 4 Planning Deputy Renee Weitzer explained that the applicant could build his house at a lower elevation on his site to greatly reduce the amount of grading and the environmental impact of the project. However the applicant chose to ignore her suggestion.

The applicant is requesting to use the previously submitted MND. "Reconsideration of the MND is appropriate because the current application does not result in significant changes to the Project initially analyzed in the MND." Since according to the applicant, there are no significant changes to the 2014 project, then surely the decision of the ZA must be the same – to deny the project.

A project of this size and scope requires a full EIR. The EIR must include a detailed biological assessment of the impact on the flora and fauna on the property as well as downstream and along wildlife corridors. The blue-line stream provides a rich riparian habitat including Coast Live Oaks and California Sycamores attractive to wildlife. Mountain lion P-22 entered Griffith Park in 2012 near the site of this project and regularly returns to the area because it is relatively remote to human contact.

It is critically important that habitat and wildlife connectivity be maintained in our hillsides to protect the unique feature of a mountain range in a large urban environment. The urban wilderness of the Santa Monica Mountains is a cherished attribute of the City of Los Angeles.

The Hillside Federation urges you to require a full EIR for this project and to deny this project as it is currently proposed.

Sincerely,

Charley Mims
Charley Mims

cc: Councilmember David Ryu
Hollywood United Neighborhood Council