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Danalynn Dominguez, Planning Associate
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April 1, 2021

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Torreyson Flynn Assn.
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

Re: **1501 Marlay Drive**
ZA-2017-2328 ZAD ZAA

Dear Ms. Dominguez:

The Hillside Federation, founded in 1952, represents 46 resident and homeowner associations with 250,000 constituents spanning the Santa Monica Mountains. Our mission is to encourage and 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 has always promulgated that buildings should be built to code with no deviations. At its March 16 meeting the Federation voted to oppose the project at 1501 Marlay Drive as proposed because it violates multiple ordinances.

Ordinances are written to assure that projects are built in such a manner that will be safe for the community, be in scale with the neighborhood, and minimize the impact on the terrain. The architect's drawing of the proposed project is a poster child for why these ordinances are necessary and should be respected. If ever there was a property that should not be built on, 1501 Marlay Drive is it.

The Project violates the Baseline Hillside Ordinance. The proposed project consists of three stories with a roof deck and an attached 2-car garage. The allowable SF for this site, per the Slope Band Analysis, is 1,218 SF. However, with the "basement and sub-basement", the actual livable area will be 3,100 SF, more than twice the allowable square footage.

The Project violates code regarding Retaining Walls in Hillside Areas. Instead of two retaining walls each with a maximum height of 10 feet as allowed by code, the applicant is requesting three retaining walls with heights ranging from 22 to 35 feet. The findings for approval require the applicant to:

1. *Describe how the project will enhance the built environment in the surrounding neighborhood or how it will perform a function or provide a service that is essential or beneficial to the community, city, or region.* The Project provides no benefit to the city.
2. *Explain how the project's location, size, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding health, welfare, and safety.* The massive grading required for the Project, undermines the footing of the residence above it.

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3. *Explain how the project substantially conforms with the purpose, intent, and provisions of the General Plan, the applicable community plan, and any applicable specific plan.* The project does not substantially conform to any plan.
4. *Describe the site characteristics or existing improvements which make strict adherence to the zoning regulations impractical or infeasible, and explain why the project nonetheless conforms with the intent of those regulations.* The applicant did not even attempt to respond to this finding.

The Project violates the Wildlife Pilot Study Area. The purpose of this study is to preserve vital wildlife habitat linkage. The Project overwhelms the lot, leaving no wildlife corridor whatsoever. Therefore it deserves special environmental consideration. Proposed development of this lot, whatever its nature, should not be deemed exempt from CEQA analysis.

Finally, the Project violates the principles of historic preservation and common sense by gnawing and tearing into the fragile and unstable hillside directly beneath Pierre Koenig's Case Study House #22, aka the Stahl House. Located on Woods Drive above the Marlay property, the Stahl House was built in 1959 and made famous by the photographer Julius Shulman. It is the most photographed house in the world, and one of the most famous. Should this mid-century modern masterpiece be damaged during the aggressive construction this challenging site and overly ambitious project would demand, a piece of Los Angeles' cultural and historic identity would be damaged, if not lost forever.

As pointed out at the beginning of this letter, ordinances and codes exist for a reason. The Federation urges Planning to require the applicant to redesign the Project so that it complies with all applicable codes and ordinances. In no event should the deviations from code requested in this application be granted. There is too much at stake. There is a reason why lots like this one were once considered "unbuildable." And this seems like a case where, even though modern engineering techniques may make it technically possible to build on this site, it would be the better part of wisdom to pass on that opportunity. Alternately, the Federation highly recommends that the applicant donate the property to the Mountains Recreation and Conservation Authority (MRCA) as open space so that he can receive a substantial tax deduction for the property.

Sincerely,

A handwritten signature in cursive script that reads "Charley Mims". The signature is written in dark ink and is positioned below the "Sincerely," text.

Charley Mims

cc: Councilmember Raman