

P.O. Box 27404  
Los Angeles, CA 90027  
[www.hillsidefederation.org](http://www.hillsidefederation.org)



PRESIDENT  
Charley Mims  
CHAIRMAN  
Marian Dodge  
VICE PRESIDENTS  
Mark Stratton  
John Given  
SECRETARY  
Stephen Benson  
TREASURER  
Don Andres

Ms. Erin Strelch  
Major Projects Section  
Department of City Planning  
221 N. Figueroa Street, Suite 1350  
Los Angeles, CA 90012

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.  
Doheny-Sunset Plaza NA  
Franklin Ave./Hollywood Bl. West  
Franklin Hills Residents Assn.  
Highlands Owners Assn.  
Hollywood Dell Civic Assn.  
Hollywood Heights Assn.  
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  
Residents of Beverly Glen  
Save Coldwater 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.

September 23, 2019

Re: **ENV-2016-4180-EIR, SCH 2018041016**  
**3003 Runyon Canyon Road**

Dear Ms. Strelch,

The Federation of Hillside and Canyon Associations (“Federation”) founded in 1952 represents 42 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 September 17 meeting the Federation voted unanimously to oppose the proposed project at 3003 Runyon Canyon Road. The project is compliant with neither the Mulholland Scenic Parkway Specific Plan nor with the Baseline Hillside Ordinance.

In May, 2015, the Federation wrote a letter to the Mulholland Design Review Board 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. Notwithstanding the Specific Plan, the roofline of the proposed house is located at the top of a prominent ridge and requires a Specific Plan Exception.

In addition, the location and proposed size of the project requires 14,000 cubic yards of grading and the creation of three retaining walls. These proposed project features require a second Specific Plan Exception as well as a retaining wall variance. It is apparent that little, if any, attention has been paid to designing a project that conforms to the natural topography of the land, which is required by the Specific Plan. (Specific Plan, section 6.C pp. 14-15.) 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. (Specific Plan, section 2, p. 3 [emphasis added].)

CHAIRS EMERITI  
Shirley Cohen  
Jerome C. Daniel  
Patricia Bell Hearst  
Alan Kishbaugh  
Steve Twining  
CHAIRS IN MEMORIAM  
Brian Moore  
Gordon Murley  
Polly Ward

In determining the project's square footage, the applicant claims the square footage of the basement doesn't count. Project drawings clearly show, however, that the 5,207 square foot "basement" includes a long line of floor-to-ceiling glass, open to daylight. The applicant explained that the basement will contain a theater, gym, and a bedroom, obviously all habitable space. Including all that habitable space makes this a three-story project with an actual square footage of 13,306 square feet, much larger than is disclosed in the project description. CEQA requires an accurate project description. ([stopthemillenniumhollywood.com](http://stopthemillenniumhollywood.com) v. City of Los Angeles. (2019) 39 Cal.App.5th 1, 16) The additional mechanical/electrical space at 2,375 sq. ft. is larger than many homes.

The analysis of alternative projects is inadequate. Little effort appears to have been made to design a residence that complies with the Mulholland Scenic Plan or the Baseline Hillside Ordinance. In 1995 an application to build a large home on this site was correctly denied by the City. The Mulholland Design Review Board asked the applicant to come back with a smaller project; he did not. Nor did he consider a project further from the ridge line.

The DEIR does not adequately address the impact of the project on hikers. The only project access is via a paved fire road/trail in the 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 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 DEIR fails to adequately address the conflict.

Nor does the DEIR adequately address the impact on hiker views. The project will be highly visible to hikers using the west trail through Runyon Canyon Park.

The DEIR did not fully analyze the air quality during the multi-year construction. The grading of 14,000 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 DEIR 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 project proposes three acres of *permanent* brush clearance. This removes valuable habitat for animals and birds. When native plants are removed, non-native grasses tend to replace them. The brush clearance leaves that area subject to erosion which would wash soil down into Runyon Canyon Park. The DEIR fails to provide appropriate mitigation to address expected soil erosion.

What will be the impact on the Headley-Handley House, City of Los Angeles Historic-Cultural Monument #563? The applicant described removing the kitchen. Why? The plan is to designate the Lloyd Wright-designed residence an Accessory Dwelling Unit to enable the applicant to build his much larger residence on the property. Removal of the kitchen would diminish the historic and cultural value of the Headley/Handley House.

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 DEIR Historic Report describes a 1964 attempt by then-property owner Hartford to give his Runyon Canyon property to the City for use as a park. The city rejected his offer and had to purchase the property

twenty years later to create Runyon Canyon Park. The City could have purchased the remaining property when Handley died in 1990; again the City declined to do so. That was a lost opportunity.

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.

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

Sincerely,

A handwritten signature in black ink that reads "Charley Mims". The signature is written in a cursive, flowing style.

Charley Mims

cc: Councilmember David Ryu