

SANTA MONICA MOUNTAINS CONSERVANCY

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May 21, 2018

Erin Strellich
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, California 90012

**3003 Runyon Canyon
Notice of Preparation Comments
ENV-2016-4180-EIR**

Dear Ms. Strellich:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Notice of Preparation for 3003 Runyon Canyon. Given both the ecological and visual sensitivity of Runyon Canyon Park, the Draft Environmental Impact Report (DEIR) must include alternatives with combined development locations and designs that, to a maximum extent possible, minimize the project's visibility from all public view locations and minimize direct and indirect biological impacts. Without question it is in the public interest to minimize the size of the development footprint and to pull it northward as close to the existing house as possible. The DEIR should also address impacts to recreation given the extensive public trail use on the proposed narrow paved access road. Those potential recreation impacts include construction impacts.

The DEIR visual analysis must include a constraints envelope that shows where a single story (18-foot-tall) house can best be sited to minimize its visibility from public view areas including the Mulholland Scenic Parkway and the Jerome C. Daniel - Hollywood Bowl Overlook. On some road sections, many Italian stone pines in the road rights-of-ways partially obscure the site's visibility from Mulholland Drive. The life span and health of those trees must be considered in the analysis.

The potential visual impacts of the project include annual Fire Department-required brush clearance (fuel modification). Fire burns faster moving uphill. The whole of the project area is on a ridge line. With the proposed project, the required 200-foot-wide fuel modification zone would require the permanent alteration of every square foot of native vegetation on the site and some offsite on City parkland. It appears that the proposed project would result in approximately two acres of permanently disturbed chaparral adjacent to one of the City's most popular hiking trails. The more the proposed structure

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is moved northward towards the existing house, the less the amount of permanently required fuel modification. It also appears that moving the structure northward would reduce the structure's visibility.

The nighttime visibility of the project and every DEIR alternative must be thoroughly addressed in the DEIR. The project includes both indoor lighting and outdoor lighting. It may also include driveway lighting. Both the visual impact analysis and the biological impact analysis must address how all of the potential indoor and outdoor lighting could adversely impact night viewsheds and wildlife well being for the largest native mammals to birds and key native insects. The subject property is surrounded by parkland that comprises a 353-acre habitat block (Habitat Block No. 42 on the Santa Monica Mountains Conservancy's *Eastern Santa Monica Mountains Habitat Linkage Planning Map*). The project lighting impacts would radiate 365 degrees into the largest south slope habitat block between the Stone Canyon Reservoir and Griffith Park. Twenty-four hour vehicle use on the approximately 1500-foot-long drive would also potentially disrupt wildlife at night and early morning hours.

The site already has a house with protected historic status. The DEIR must address if it is a taking to not allow an additional house or a major house expansion based on the fact that the Mulholland Scenic Parkway Specific Plan requires an exception to allow construction located within 50 feet of a prominent ridge as specified in the Specific Plan. Why would the City take any discretionary action to allow a private residence to mar a prominent ridge visible from the world famous Mulholland Scenic Parkway and that is an integral to a hugely popular City natural park?

The baseline condition for this project is the presence of an existing house with no occupants and minimal traffic. Has the applicant demonstrated that the existing house cannot be renovated to be habitable? The less development and less lighting on the site provides the greatest long-term public benefit and least direct and indirect environmental impact.

In the DEIR discussion of land use and its selection of alternatives must address how the Mulholland Scenic Parkway Specific Plan Guidelines require the Planning Director to make

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five specific findings to allow any development or grading within 200 feet of parkland. The whole site is within 200 feet of City parkland. Those findings require a project to minimize impacts to said parkland. The current owner bought the land with the Specific Plan and its guidelines in place. The Specific Plan limits grading on prominent ridges to 1,000 cubic yards. How is it that the proposed project requires 28,012 cubic yards of grading with the majority of the project on a prominent ridge?

The DEIR alternatives must include a project with no more than a 3,000-square-foot single family house and three car garage.

The DEIR alternatives must include a project that does not require a Specific Plan Exception, a Zone Variance, or any Zoning Administrator Determinations.

Why would the proposed house not require a twenty-foot-wide driveway?

The DEIR must address the City's recent additions to Runyon Canyon Park and how the proposed project is visible from those new parkland areas.

Please address all questions and correspondence to Paul Edelman of our staff at the above letterhead address and by email at edelman@smmc.ca.gov.

Sincerely,

CRAIG SAP
Chairperson