

**SANTA MONICA MOUNTAINS CONSERVANCY**

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April 23, 2012

Department of Building and Safety  
Department of City Planning  
City of Los Angeles  
Los Angeles, California 90012

**20367 Delita Drive Proposed Parcel Map Subdivision  
Chalk Hills, Woodland Hills**

Dear Department of Planning and Building and Safety staffs:

The Santa Monica Mountains Conservancy Zone includes the subject portion of the Chalk Hills complex. The proposed project on 3.85 acres would directly abut the Mountains Recreation and Conservation Authority's (MRCA) 21-acre Chalk Hills open space acquired in 2004. The Chalk Hills are also visible from the dirt portion of the Mulholland Scenic Parkway, from the western portion of Marvin Braude Mulholland Gateway Park, and from the 101 Freeway. Any project approved on the subject property should be sensitive to these public viewsheds and the ecological capacity of Chalk Hills. Protection of this viewshed benefits ten of thousands of City residents daily.

We respectfully request that the City require a detailed viewshed analysis with all superimposed buildings, out buildings, and fencing for any and all submitted project applications. The viewshed analysis must also address the visual impacts of the Fire Department-required 200-foot brush clearance zone. That viewshed analysis should be circulated as part the appropriate CEQA environmental review document circulated for the subject subdivision proposal. That analysis should also include public viewpoints including the top of Chalk Hills and other existing well established informal trails on said parkland.

The Conservancy's primary concerns regard the potential visual impacts of any proposed development on any onsite ridgeline and any development within close proximity to MRCA parkland. Proposed development must respect the steep slope constraints to blend into the iconic Chalk Hills land form profile. Any not by-right degradation of this viewshed violates the public interest. The property was acquired with public funds to permanently protect viewsheds and open space.

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The applicant has managed to grade a large pad over the course of three to four years. Two story houses on key portions of this pad would have substantial negative visual impacts. Extended decks or houses over the steep east-facing slope would also have substantial visual impacts, including from the public spaces at Taft High School. The existing graded pad is large enough to exclude any need for development, other than landscaping, to be on the steep slopes.

The closer any proposed structures are sited to the public parkland, the more unsightly annual brush clearance that must be done. Any lighting near public parkland will also reduce its ecological value at night. These issues must be addressed in the CEQA document.

All of the above environmental impact concerns apply to a single-family development on the site. Those concerns are increased four-fold by a potential Parcel Map division of the property into four lots. More than two lots appear to precipitate the requirement for a Private Street application. The CEQA analysis must consider home site footprints and three dimensional building envelopes. In any case, it will require extensive detailed mitigation measures for any subdivision with houses not to result in unavoidable significant adverse visual impacts. For that reason, the minimum level of CEQA document to be circulated is a Mitigated Negative Declaration with an attached visual impact analysis from public viewsheds.

The City is under no obligation to approve home sites that would result in the unnecessary degradation of viewsheds. Modest square footage homes could be constructed on the existing pad with the remainder of the lots being ungraded hillside above and below. The public viewshed and general integrity of the Chalk Hills public parkland should trump any not absolute by-right development proposed by any applicant. The Conservancy staff is willing to work with the applicant on crafting a development project that fits with the site's formidable physical constraints.

Now that the applicant/owner has publically telegraphed his intent to file for a subdivision, the City should not issue any additional building or grading permits until a comprehensive

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CEQA analysis has occurred. Issuance of any such permits appears to constitute clear piecemeal development under CEQA.

Please address any questions and all future correspondence to Paul Edelman of our staff at the above letterhead address, by phone at (310) 589-3200 ext. 128, and by email at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov).

Sincerely,

ELIZABETH A. CHEADLE  
Chairperson