

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



April 28, 2014

Mr. Kevin Golden
Department of City Planning
City of Los Angeles
200 North Spring Street, 7th Floor
Los Angeles, CA 90012

**Proposed 8-Unit Subdivision - Route 134 Scenic Corridor
TT-71245 / ENV-2010-482-MND, 5370 Mount Royal Drive, Eagle Rock**

Dear Mr. Golden:

The Sant Monica Mountains Conservancy (Conservancy), offers the following comments and recommendations on the above-referenced proposed project, located on the south slope of the San Rafael Hills. The subject 1.6-acre hillside property, is an integral part of the 134 Freeway's scenic corridor between Eagle Rock and the San Rafael Hills, and lies firmly in the viewshed of the City-owned Eagle Rock Hillside Park. The subject property is also part of a long, narrow habitat block which is accessible to wildlife from the open space north of the 134 Freeway by means of the underpass located approximately one-half mile to the east at Arbor Dell Road. Development on this site has the potential to severely restrict wildlife movement through this corridor.

The subject proposed eight-lot single family subdivision, with its proposed 18-foot high retaining walls, and 14-foot high walls and fences, would result in significant adverse impacts to both the public viewshed and wildlife movement in this area. The subject Mitigated Negative Declaration and Initial Study (MND) are deficient for not adequately addressing these unmitigated significant impacts.

The MND does not address in any way, the adverse aesthetic impacts of the subject project to the viewshed from nearby public land and a State highway. An eight-home project on this hillside lot, which would require up to 14 retaining walls, each up to 18 feet in height, is out of scope and scale with development on the surrounding properties. The requested Zoning Administrator's Determination (ZAD) for these additional retaining walls of extraordinary height would not be necessary for a smaller project consistent with the surrounding land uses. The MND does not provide analysis of alternative, lower impact projects at this site. The requested ZAD for the over-height walls and fences is simply an unnecessary, and unmitigated adverse impact, completely out of character with the surrounding neighborhood aesthetic.

Mr. Kevin Golden, Department of City Planning
City of Los Angeles
TT-71245 / ENV-2010-482-MND, 5370 Mount Royal Drive, Northeast Los Angeles
April 28, 2014
Page 2

The MND fails to address the adverse impacts to wildlife movement that an eight-home project with 14-foot high fences and walls, and 18-foot high retaining walls would have on this area. The long, narrow habitat block, of which the subject property is an integral part, connects westward to strands of habitat at the interchange of the 134 and 3 Freeways that in turn connects to a series of open spaces in the northwest corner of Eagle Rock. The value of this habitat-to-habitat connection requires further analysis not provided in the MND. The construction of eight residences on the subject property, with the requested number of retaining walls, and over-height walls and fences would irrevocably degrade the quality of the described habitat south of the 134 Freeway, and create a significant barrier to wildlife movement through this specific area.

The Conservancy recommends that the City deny the subject requested Zoning Administrator's Determination. The Conservancy further recommends that the City deny the subject subdivision as currently proposed. Any development on the subject property should conform to existing zoning regulations.

Please address any future correspondence related to this project to Paul Edelman of our staff at the above address or by phone at (310) 589-3200 ext. 128. Thank you for your consideration.

Sincerely,

LINDA PARKS
Chairperson