

**SANTA MONICA MOUNTAINS CONSERVANCY**

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June 27, 2016

Vince Bertoni, Director  
City Planning Department  
City of Los Angeles  
200 N. Spring Street  
Los Angeles, California 90012

**El Sereno - Eastern Avenue 42-Unit Small Lot Subdivision  
Mitigated Negative Declaration Comments  
Vesting Tentative Tract Map 73531**

Dear Mr. Bertoni:

The Santa Monica Mountains Conservancy opposes the proposed 42-unit Small Lot Subdivision project in the shadow of Ascot Hills. The Conservancy finds that the Mitigated Negative Declaration (MND) is deficient in its analysis of visual, biological, and land use impacts. The subject site is a unique open space area chocked with a topography of protected native and non-native trees. The 42-unit project would result in unavoidable significant biological and visual impacts. The significant public controversy over the proposed Zone Change and Variances warrant preparation of a focused Environmental Impact Report to analyze less damaging alternative projects mitigated with actual public benefits.

The City of Los Angeles is at a crossroads that it can never go back to if it makes the wrong turn. Over the last decade the Conservancy has made an unbending effort to protect existing, and to inject new, natural areas into the urban areas of the City. The creation of natural areas in urban areas on existing public lands requires significant public funding. The conversion of developed private land to natural uses is usually prohibitively expensive.

The protection of natural areas within more urban areas requires wise decision making. The proposed project protects zero natural land and offers zero onsite permanent public benefit. It also offers zero affordable or low income housing. The proposed project is totally antithetical to the retention and availability of open space in the subject North East Los Angeles area. Any entitlement on the subject 4.9 acres must include a minimum one acre contiguous protected natural area, nothing less. Natural land is irreplaceable.

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The proposed project totally eliminates a unique forested hilltop and exports the hilltop to some unknown location via a minimum of 2,500 dump truck trips and their associated green house gas contribution.

Part of the crossroads the City faces is to allow a raft of proposed Small Lot Subdivisions that are in the pike for the unique North East Los Angeles Hilltops system. The subject project appears to be the first through the gate. The trade off of putting density in unique natural areas that are marbled through diverse neighborhoods leaves the neighborhoods potentially forever changed and their inhabitants forever removed from close-by nature and green space.

The City has no obligation to make the above trade off. If the City goes in that direction it owes the public a substantial, onsite fee simple open space dedication from each project. It also owes the public an imbedded permanent revenue stream from the homeowner's association in the new development to maintain the safety and appearance of the open space dedication. Shy of obtaining such public benefits, the public is better served by private open space on the subject property. When will the loss of North East Los Angeles open space be a significant impact? The conclusion of the MND is that as long as it is not the last piece, it is not a significant public loss.

The project is inconsistent with Northeast Los Angeles Community Plan Policy 4-1.1 which states:

Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

The way the MND says the project is consistent with this policy is because it would be an extension of a existing single family residential neighborhood. Guess what? Every open space area in North East Los Angeles is an extension of an existing single family residential neighborhood, the logic of which means - why bother to protect anything?

The MND is deficient because it does not address the habitat connectivity between the Ascot Hills natural area and the subject project. Wildlife in the City routinely use movement

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routes that partially include City streets. The students of adjacent Farmdale Elementary school could benefit greatly to know their school is part of an existing wildlife corridor.

The MND Zoning Consistency analysis is flawed. It claims the project is consistent because it has all of the right setbacks and parking requirements. Why then does it require a Zone Change? The project is not an in fill project. It is a hillside project in a unique natural system. The MND is deficient for claiming that the project has high proximity to public transit but provides no evidence.

For a City seeking to protect urban open space, the carting off of a wooded hilltop with over 68 protected California black walnut trees is illogical. The City has the discretion to leave the site as is without a Zone Change. The project does not fit the land.

How can the public trust the City if it rewards an applicant who has cut down protected walnut trees with a Zone Change for expensive housing that increases the value of the land by tenfold. It is illogical. A 4:1 tree replacement ratio is abysmal. There is zero MND analysis on whether there is adequate space or conditions for walnuts to grow on the post project landscape. Walnuts are extremely sensitive to summer irrigation. Most likely additional walnuts will be threatened because the project grading will permanently affect their subsurface hydrologic regimes. The MND is further deficient.

A high density project must have some onsite stormwater infiltration. The project has none.

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and future correspondence.

Sincerely,

IRMA MUÑOZ  
Chairperson