

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



May 22, 2017

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

**El Sereno - Eastern Avenue 42-Unit Small Lot Subdivision  
Revised Mitigated Negative Declaration Comments ENV-2015-1918-MND  
Vesting Tentative Tract Map 73531 – APCE 2015-2048-ZC-ZAD**

Dear Mr. Bertoni:

The Santa Monica Mountains Conservancy reaffirms its opposition to the redesigned 42-unit Small Lot Subdivision project in the shadow of Ascot Hills adjacent an elementary school, recreation center and senior center. The Conservancy finds that the proposed Mitigated Negative Declaration (MND) remains deficient in its analysis of visual, biological, and land use impacts. The subject site is a unique hilltop 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. These comments are additive to the Conservancy's June 27, 2016 letter.

The City needs both more housing and more public open space. In exchange for a significant up zoning, the proposed project provides no public or protected natural open space. The need to chop thirty feet (three stories) off of a standalone hilltop, eliminate scores of mature trees, and hold it all together with scores of retaining walls means the project is incongruous with the constraints of the site. This one of a kind five-acre property is not a site on which to jam 42 single family residences via a discretionary Small Lot Subdivision and permanently rob the residents of El Sereno of forested natural area. This a property where the zoning should remain as it currently is and any development should be consistent with the zoning. Any development-given the breadth of the site—should also avoid the removal of protected California black walnut trees. The subject natural land form

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and its natural resource values located in an urban area is not the location to address the housing shortage by leveling a large forested knoll in perfect proximity to public facilities and public access.

The City has no obligation to approve a cookie cutter subdivision on a hilltop. As contained in the Small Lot Subdivision Ordinance; however, if the City goes in that approval direction, it owes the public a substantial, onsite fee simple open space dedication from this project and future small lot subdivisions. It also owes the public an imbedded permanent revenue stream from the homeowner's association in the new development to assist in maintaining 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 in the eyes of the City Planning Department? The conclusion of the MND, inaccurately arrived at, is that as long as it is not the last piece of open space, 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.

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