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Mary Richardson
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Nov. 7, 2011

Dear Ms. Richardson:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents thirty-four homeowner and residents associations spanning the Santa Monica Mountains, from Pacific Palisades to Mt. Washington. The Federation's mission is to protect the property and the quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live.

The Hillside Federation supports policies that conform to the adopted Baseline Hillside Ordinance; however there is no mention of this Ordinance in the hillside section of the Land Use element of the Hollywood Community Plan. This must be corrected. The strong implementation of the Baseline Hillside Ordinance should be adhered to in order to avoid any ambiguity.

In addition, on Page 68 of the Draft Hollywood Community Plan, there are several references to programs and policies which have already been implemented (LU. 1.28; LU1.29 in BHO) but there are *no* references or mention of the programs, policies or future ordinances such as the Ridgeline Protection Ordinance and the revision of the Retaining Wall Ordinance which are critical to our hillside areas. This must be corrected and updated before this plan moves forward.

The Hillside Federation opposes the weakening of any of the programs and policies stated in the current Hollywood Community Plan. Several positive elements seem to be missing from the Draft Hollywood Community Plan text (July, 2010) and must be reinstated before this Plan moves forward to insure a clear and concise framework for the future of the hillsides contained within the new Hollywood Community Plan.

Features:

"It is the intent of this Plan that all natural slopes generally in excess of 15% be limited to the minimum density range." However, the Draft Hollywood Community Plan states: "Policy LU.1.30: Limit density in areas with an average slope of 15% to that of minimum density land use regulation (equivalent to RE 40 zone)." The wording must be consistent with the current plan and should read: "*It is the intent of this Plan* that all natural slopes in excess of 15% be limited to the minimum density range (equivalent to RE 40 zone)." to eliminate any ambiguity about this policy.

Objectives of the current Plan:

- Minimize grading so as to retain the natural terrain and ecological balance.
- Provide a standard of land use intensity and population density which will be

Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Bel Air Ridge Association
Benedict Canyon Association
Brentwood Residents Coalition
Canyon Back Alliance
Crests Neighborhood Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland Homeowners
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Laurel Canyon Assn.
Lookout Mountain Alliance
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Outpost Estates Homeowners
Pacific Palisades Residents Assn.
Residents of Beverly Glen
Roscomare Valley Assn.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Whitley Heights Civic Assn.

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compatible with street capacity, public service facilities and utilities, and topography and in co-ordination with the development with the remainder of the City.

These policies must be reinstated to be accurate and to provide a clear understanding of the Plan objectives because the current Draft does not.

Current Policies:

"The Plan encourages the preservation of lower density residential areas and the conservation of open space lands." This does not appear in the current language of the Draft Plan

Housing Standards and Criteria:

The intensity of residential land use in the Plan and the density of the population which can be accommodated thereon, shall be limited in accordance with the following criteria:

"3) The steepness of the topography of the various parts of the area and the suitability of the geology of the area for development." This does not appear in the current language of the Draft Plan.

The Community Plan language regarding sites with more than 15% slope is further supported by the framers of the Plan with other hillside provisions including:

- 1) Retain an ecological balance
- 2) Carefully proportional land use intensity with street capacity and topography
- 3) Steepness of the topography
- 4) Suitability of the geology for development
- 5) Preserve natural character

Furthermore, the Hillside Federation opposes any changes to the language in the Hollywood Community Plan regarding slope density calculation which has been mentioned by a developer who is attempting to subdivide a parcel in the Sunset/Doheny area of the city. It would be improper to formulate a planning policy to address an individual property or project that would not only negatively impact the stakeholders in and around the area, but have potentially devastating impacts on all the hillsides in the Hollywood Community Plan area, if adopted. Similarly, the reference to Granito Drive in LU1.34.1 on p. 68 should be removed entirely.

Finally, many of our member associations are concerned that the final draft of the current 222-page document will not be available for review until November 23rd. The City Planning Commission hearing regarding the HCP is scheduled for December 8th. That is less than 2 weeks of vetting for a huge Plan that will impact an entire area for over 20 years. While it is understood that the revisions and up-dating of the HCP have been on-going over 8 years, the input and contribution of the stakeholders must be considered and implemented to insure transparency and process. Allowing such a short time for the community to review such an important document is unconscionable. The Federation requests that the Plan not be heard by the City Planning Commission until January, 2012, so that the community has adequate time to review the document.

Sincerely,

Marian Dodge

Marian Dodge, President

cc: Councilmember Tom LaBonge
Renee Weitzer