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Councilmember Paul Koretz  
City Hall, Room 440  
200 N. Spring Street  
Los Angeles, CA 90012

September 12, 2011

Re: 1400 Linda Flora Drive, MND-2007-1030

Dear Councilmember Koretz:

The Federation of Hillside and Canyon Associations, representing 33 homeowner and residential associations spanning the Santa Monica Mountains, voted unanimously to support the Roscomare Valley Association and the Bel Air Beverly Crest Neighborhood Council in opposing the proposed development at 1400 Linda Flora Drive.

The project consists of a 43,000 square foot residence with accessory buildings, pool, spa, lit tennis court and two 10-foot high retaining walls that are each 1600 feet in length. In 2007, a Mitigated Negative Declaration, ENV-2007-1030, was prepared by the City of Los Angeles for this Project. This CEQA review was required under the City's Building Code because the project requires more than 20,000 cubic yards of grading on a project site with a steeper than 10% grade.

The Linda Flora project will have potentially significant environmental impacts that have not been subjected to CEQA mandated review or mitigation. Specifically, the Federation opposes the project due to its (1) potentially significant environmental impacts on Hoag Canyon, which is an environmentally sensitive area with blue line and tributary streams; (2) potentially significant environmental impacts on the community due to the diminution of the ridgeline, which is inconsistent with the Bel Air Beverly Crest Community Plan; (3) potentially significant impairment of wildlife habitat and connectivity; and (4) the failure to comply with Municipal Code Section 91.7006.8.2, which requires discretionary Tentative Tract Map approval from the Department of City Planning where, as here, the site area for grading involves more than 60,000 square feet and this requirement has not been waived.

### **Impacts to Hoag Canyon**

The proposed Linda Flora development project will require 75,000 cubic yards of grading, disturbance of at least three acres of ridgeline and hillside area and will direct all drainage to the western side of the property into Hoag Canyon. Hoag Canyon is an area of over 400 acres which encompasses thousands of feet of blue line streams and tributaries that support a "broad, oak-sycamore riparian woodland unparalleled in the eastern Santa Monica Mountains" (See attached letter to Mr. Joe Edmiston from former Councilman Jack Weiss). The previously prepared Mitigated Negative Declaration, however, did not disclose nor did it

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.  
Tarzana Property Owners Assn.  
Torreyson Flynn Assn.  
Upper Mandeville Canyon  
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provide mitigation measures for the project's potentially significant impacts to this biologically sensitive area.

### **Impacts to the Ridgeline are inconsistent with the Community Plan**

The construction of two 1600-foot long, 10-foot high retaining walls will replace the natural ridgeline. The removal of this ridgeline would negatively impact the hillside aesthetic for residents of the 35 homes that lie below the proposed development. This impact alone is "significant" and therefore requires, but has not received, consideration in a CEQA-mandated environmental review document.

The significance of this type of environmental impact is evidenced by an August 17, 2011, motion introduced by Councilmembers Paul Koretz and Jose Huizar, calling for the City to adopt a ridgeline protection ordinance. The motion states: "Over the years, we have seen the clean curvature of our pristine ridgelines transformed into jagged and unnatural profiles. As such, our ridgelines require protection from destruction and diminution that can result from inappropriate development." The Linda Flora project threatens precisely this type of environmental degradation, and the project is not even being subjected to environmental review of this impact, contrary to CEQA's mandate.

This project is also inconsistent with the Bel Air Beverly Crest Community Plan, which states:

Goal - Preservation and enhancement of the varied and distinctive residential character of the community.

- Need to minimize grading, limit land use intensity, and preserve natural topography in hillside areas.
- Need to protect environmentally sensitive areas and scenic views.
- Need to preserve open space and the natural character of mountainous areas.

The Linda Flora project is grossly inconsistent with the distinctive open and natural character of the Bel Air Beverly Crest Community. Most of the residences in the area range from 2,000 to 3,000 square feet, while the proposed development would be **20 times** the size of the existing residences in the area and would set a negative precedent for the future permitting of similar out of scale projects. The project thereby violates and, by virtue of precedent, threatens to nullify the Community Plan Goal of preserving and enhancing the existing character of the community.

### **Wildlife Impacts**

In addition to the aesthetic impacts of the 1,600-foot dual retaining walls, the 20-foot vertical drop would effectively sever east-west wildlife movement into and out of Hoag Canyon, part of a principal wildlife corridor in the eastern Santa Monica Mountains. Constructing this new barrier on a presently natural and vegetated ridgeline constitutes a significant impact to biological resources and threatens the continued flow of individuals and genetic material from source areas to dependent habitat blocks east of the 405 Freeway. The 2007 Initial Study did not adequately analyze these potential impacts nor make findings on the basis of substantial evidence. The incomplete and vague project description did not allow the public and trustee agencies to make informed comments to this effect.

Furthermore, the loss of 3.5 acres from a critical habitat area is a potentially significant impact and a disproportionate impact from a single residence. At a BABCNC Planning and Land Use Committee meeting, the applicant proposed adding a fruit orchard and/or vineyard to the project, leaving the total area of native habitat to be removed in flux. Any increase in project footprint would affect the findings of the 2007 Initial Study and necessitate the immediate vacation of the 2007 Mitigated Negative Declaration. No permits can be issued nor approvals granted using the 2007 environmental document if the project has changed in a significant way or expanded in size.

### **Tentative Tract Map Approval Required**

The project requires site grading of more than 60,000 square feet within a hillside area. Section 91.7006.8.2 of the City's Municipal Code provides that a Tentative Tract Map must be approved to authorize this scope of grading, unless the advisory agency waives the requirement after finding that a Tract Map is not required under

the code. Similarly, the City's Building Code requires Planning approval for hillside grading in excess of 60,000 square feet. Our review of the record indicates that no Tentative Tract Map approval has been granted, no waiver has been issued, and no Planning approval has been obtained.

**Conclusion**

The Federation requests that the City provide a public hearing and conduct the mandated environmental review. In the interim, the project cannot be approved. Finally, we request that the Federation be given notice of all hearing and other proceedings or determinations related to this project.

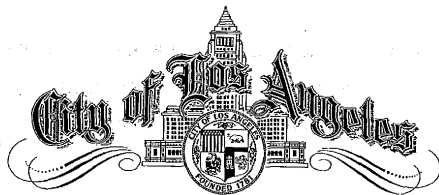
Sincerely,

*Marian Dodge*

Marian Dodge, President

cc: Roscomare Valley Association  
Bel Air Beverly Crest Neighborhood Council

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Councilmember, Fifth District

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July 9, 2007

Mr. Joe Edmiston  
Executive Director  
Santa Monica Mountains Conservancy  
5750 Ramirez Canyon  
Malibu, California 90265

Dear Mr. Edmiston:

With more than 400 acres of prime habitat, Hoag Canyon is the largest unprotected and undeveloped mountain property east of the Sepulveda Pass. Preservation of this property is very important to me, my constituents, and the environment.

Within the boundaries of Hoag Canyon, there are thousands of feet of perennial blue-line stream that support a broad, oak-sycamore riparian woodland unparalleled in the eastern Santa Monica Mountains. In the early 20<sup>th</sup> Century, there were 312 miles of intermittent streams and 148 miles of perennial streams running throughout the City of Los Angeles. Currently, in the Ballona Creek Watershed, there are less than 10 miles of open natural stream courses of which Hoag Canyon stream comprises 20% of the 10 miles. This watershed drains into Ballona Creek and ultimately discharges into the Santa Monica Bay near Playa Del Rey.

It is imperative that this core habitat east of the 405 freeway be protected to ensure that a viable wildlife corridor is maintained as far east as Griffith Park. Given the local and statewide significance of this property, I am requesting that the Santa Monica Mountains Conservancy undertake a full biological survey and analysis of Hoag Canyon for the purpose of documenting the significant resources of this iconic property that has long been a part of the Santa Monica Mountains Workprogram.

Sincerely,  
*Jack Weiss*  
JACK WEISS

