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**To:** <barbara.greaves@lacity.org>  
**CC:** Diane Edwardson <diane.edwardson@earthlink.net>  
**Date:** 1/20/2009 10:14 AM  
**Subject:** APDE 2006-8787-ZC; VTT 62900-SL-2A  
**Attachments:** UD&PAC\_Letter\_to\_AA,\_Semi-Tropic\_Lots,\_12-11-2007.doc

RE: CF-09-0082 ←  
PLUM Hearing: February 3, 2009  
APDE 2006-8787-ZC  
VTT 62900-SL-2A  
CD 13

Dear Ms. Graves:

It is my understanding that the Silver Lake Neighborhood Council Governing Board letter of December 11, 2007 has not been included in the above mentioned case file by the time it was sent by mail in 2007.

Please, find a copy of the letter attached here, and I'll appreciate it if you place it into the case file for PLUM members' consideration during the upcoming public hearing on Feb. 3, 2009.

Please, confirm the receipt of this correspondence. Thank you.

Respectfully,

Elizabeth Bougart-Sharkov,  
Intl. Assoc. AIA, UIA

SLNC Gov. Board Member  
Chair Urban Design & Preservation  
Advisory Committee (UD&PAC)

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Michael S.Y. Young, Deputy Advisory Agency  
c/o Lateef Sholebo  
Dept of City Planning, Subdivisions  
200 N. Spring St., Rm. 750  
Los Angeles, CA 90012

December 11, 2007

**RE: VTT 62900-SL**  
APCE-20056-8787-ZC, ENV-2005-9337-MND  
2400 Allesandro, Semi Tropic Spiritualists' Tract  
**Public Comment extended to Dec. 14, 2007**

Dear Mr. Young:

Thank you for extending the public comment period to allow the Silver Lake and Echo Park neighborhood councils to comment on the proposed development.

The Silver Lake Neighborhood Council wants to balance the need for increased density with the unique opportunity to preserve and enhance areas where open space defines the character of the community. We have so few "greenfield" sites in the Silver Lake and Echo Park community that we feel compelled to focus on very specific measures to mitigate this proposed development.

We are extremely concerned that there were no reports from the Grading Division or Fire Dept. in the staff report. Nor were they represented at the Advisory Agency hearing on November 14, 2007. Considering Small Lot Subdivision is a new program from City Planning and hillsides in the Very High Fire Hazard Safety Zone (VHFHSZ) present unique challenges to development and public safety in existing urban neighborhoods: we don't want our community to become a disastrous experiment in city planning. Grading and fire safety were primary issues raised by stakeholders from the beginning.

**Silver Lake Neighborhood Council Involvement**

While the Semi-Tropic Spiritualists' Tract is in the Greater Echo Park Neighborhood Council area, it is within the viewshed of much of the Corralitas Red Car Neighborhood in Silver Lake. Corralitas Drive, Lake View Ave., Silver Ridge Ave. and to a lesser extent, Earl St and Loma Vista Staircase have views of the proposed development site. This Silver Lake neighborhood is surrounded by freeways, so the open space of the Semi-Tropic Tract helps mitigate the effects of living next to the freeways.

If this proposal is approved, it will set precedent for similar subdivisions of the large Silver Lake lots in the area like the Corralitas Red Car Property and the Menlo Property. These lots share a history of failed development with the Semi Tropic Lots.

Over the past 3 years, members of Silver Lake Neighborhood Council UD&PAC participated in large community meetings, as well as small meetings between Henry Nunez (the developer); community leaders from Silver Lake and Echo Park; and neighbors, all facilitated by CD13.

When UD&PAC was notified by a stakeholder that the public hearing was pending on November 14, 2007, we invited Mr. Nunez to present his proposal to our next committee meeting on Nov 14. He declined. Since the only significant change in Mr. Nunez's plan was the location of the driveway, we feel we can make comments based on his earlier presentations to community meetings.

The community meetings were very well attended; the most recent in January 2007 at Allesandro Elementary School. Approximately 100 neighbors attended. The sentiment was clear: the community wants to preserve the open space, preserve the Rim of the Valley Trail Corridor, and oppose the proposal as it would be too impactful on the hillside. The development is out of character with the existing fabric of the community and would create the appearance of two very large flat continuous rooftops on what is currently a green hillside in an RI zoned neighborhood.

**We submit the following as suggested modifications and mitigations for the proposed tentative tract:**

**“Open Space Lot”**

No zone change or subdivision of land should occur until the “open space lot” is donated or dedicated in perpetuity to a public park agency.

No subdivision of land should occur until a tax assessment (for instance, a Mello-Roos District) or other such annual on-going assessment is created on the new subdivision to pay for brush clearance on the “open space lot” in perpetuity.

The Environmental Review failed to evaluate the proposed development for the Rim of the Valley Trail Corridor as required under CEQA. Since the equestrian trail in the Silver Lake Echo Park Elysian Valley Community Plan never secured easements through the corridor, this is an opportunity to formalize the trail.

The project site falls within the Santa Monica Mountains Conservancy (SMMC) Rim of the Valley Trail Corridor. Please refer to the 1984 map filed by the SMMC with the Secretary of State pursuant to Section 33105.5 and 33204.5(b) of the Public Resources Code:

33105.5 (a) For purposes of providing a recreational trail corridor, the zone shall also include hiking and equestrian trail connections and accessways generally following the Rim of the Valley Trail as identified in the Equestrian and Hiking Trails Guide of the City of Los Angeles.  
and

33204.5 (b) The executive director of the conservancy shall file by June 30, 1983, with the Secretary of State and the City Council of the City of Los Angeles a map showing a feasible recreational trail corridor between El Pueblo de Los Angeles State Historic Park and Griffith Park.

The Rim of the Valley Trail Corridor includes the Semi Tropic Spiritualists' Tract, Corralitas Red Car Property and Menlo Property. This is a unique opportunity to create a more interesting development that would contribute to the community and the region by sustaining the link between Silver Lake and Echo Park in a more natural setting and eventually creating a link between Griffith and Elysian Parks and to the larger regional trail system.

**Public Access**

Establish public access to the "open space lot" via a public pedestrian easement through the development from Allesandro. A covenant should be attached to the land to protect the public pedestrian access to open space prior to final approval of the tentative tract.

Drop lots 7 & 8. The private driveway extends at least 50' beyond allowable standards of an "Access Roadway" of 300 feet. (An access roadway is also limited to 4 dwelling units per the Standard Street Dimensions from the Bureau of Engineering.) Dropping lots 7 & 8 would allow for public access to the open space lot through the development and reduce the need for grading and retaining walls on that portion of the site.

**Pedestrian Access**

Pedestrian access via the driveway from Allesandro should be fully ADA accessible with curb cuts and sidewalk.

There should be two means of pedestrian access to the site. Pedestrian access on the driveway should be fully ADA accessible with curb cuts and sidewalk. A bus stop is at the corner of Sunflower and Allesandro so there should be secondary pedestrian access from this corner.

**Driveway Issues:**

A driveway owned "in-common," where all the homeowners share ownership, tax burden, insurance and maintenance would be more appropriate for this development. Thus, indicating a need for a more standard Homeowners Association (HOA) rather than a fee-simple arrangement.

The private driveway should be constructed to Hillside Limited Street standards. Alternatively, create a public street easement and build to Hillside Limited standards with a sidewalk on at least one side of the road.

The proposed private "common-access" driveway will create additional problems for long-term maintenance. The largest burden for taxes, liability and maintenance cost would be on the owner of proposed Lot 1.

A maintenance plan for the driveway and other common areas, detailing responsibility for driveway, sidewalk and parkway maintenance should be created and included in the CC&Rs.

The common access driveway should be built to City standards to allow for curbside trash pick-up within the community. We do not want a row of 45 trash cans on Allesandro every week since development is so far removed from Allesandro.

A covenant restricting a gated community should be recorded and attached to the deed prior to final approval of the tract map. Gated communities do not contribute to the community. Instead, they encourage homeowners to withdraw from the community at large.

Document proving permission from CalTrans to cross their easement should be required for the driveway.

**Fire:**

We are very concerned that there was no report from the Fire Dept on the staff report. Nor was a representative from the LAFD present at the Advisory Agency hearing. Small Lot Subdivision presents unique difficulties and potential for disaster in hillside neighborhoods. Special attention should be paid to the issues of parking; street and driveway widths; and density when evaluating this ordinance in hillside areas, particularly in the Very High Fire Hazard Safety Zone (VHFHSZ).

The subject lot is a greenfield site in a very steep hillside community in the VHFHSZ as well as a Red Flag Day restricted parking neighborhood.

All LAFD requirements should be strictly enforced.

**Site Design -- Prevailing Setbacks:**

Match the prevailing setbacks for the multi-family zoned areas. Move the entire development downslope to the Cal Trans easement to bring it closer to Allessandro. Or, get the Cal Trans easement released and move the entire development down to Allessandro.

**Zone Change -- Q conditions should include:**

Restrictions on the zone change so that it is tied only to this Tentative Tract plan.

Height restriction to 36' as planned in this application.

**Soils & Grading:**

We are very concerned that no report from the Grading Division was included in the staff report. There were no representatives from the Building & Safety Dept. or the Grading Division present at the Advisory Agency hearing. Soils and grading should be scrutinized extra carefully, since the site and other large lots like it in the area around the 2 & 5 Freeway interchange were used as dump sites during freeway construction.

In 2005, SLNC sent a letter to Councilmember Garcetti opposing "any development that calls for massive grading and re-engineering of the hillside and construction of extensive retaining walls" on the Semi Tropic site. While the current proposal has reduced the amount of grading, we feel alternate massing of the structures or dropping several of the proposed lots would further reduce the grading.

Throughout the process, we have consistently requested cross-section drawings, which would illustrate the proposed fill and cut on the site. Mr. Nunez never submitted the requested soils report. The developer reported at the public hearing that over 6,150 cu yds of earth (a significant amount) would be exported under this plan. That statement does not indicate the true amount of cut into the hillside. It does not illustrate the picture in a professional manner; does not allow us to evaluate the cross-section cuts; and does not allow a reasonable evaluation of the project

We urge extra scrutiny of soils reports and grading plans.

Twice a day wetting is insufficient for PM10 dust control. Constant wetting should be employed during ALL earth moving activity. Added measures such as screening should be employed adjacent to homes.

**Site Design -- Fencing, Maintenance:**

Restrictions on solid fences on the Allessandro frontage should also be clearly stated in CC&Rs to avoid the fortress effect.

A combination of vegetation and non-solid fencing like wrought iron or other decorative fencing should be employed.

Graffiti proof paint type should be specified to limit abilities for creating a nuisance site. CC&Rs should also include the owner's responsibility for removing graffiti within 24 hours from all surfaces including, but not limited to: retaining walls, drainage benches, fences, walls, sidewalks on Allessandro.

**Trees and Landscaping:**

1:1 replacement ratio is insufficient for not only the protected native trees but also for the large size of the many mature trees that will be removed.

The parkway on Allessandro should be planted with appropriate trees for the power lines.

ALL retaining walls should be planted with vining plants or other such natural screening devices.

CC&Rs spelling out the owner's responsibility (in-common by the HOA or individually) for the maintenance of the parkway trees and landscaping in perpetuity, in addition to a replacement time frame should trees be cut down or die in the parkway. For instance, the owner has 3 months to replace a tree that dies.

**Building Design -- Rooftops:**

Rooftop equipment and ducting should be screened from the hillside views, not just the street level. Ideally, HVAC equipment should be placed in the rear or side yards.

Rooftops should be articulated. As proposed, they would create the effect of two large flat rooftops. Alternatively, consider altering the massing of structures and creative use of materials.

Consider green landscaped rooftops.

**Traffic:**

There was no report from the Dept. of Transportation in the staff report, nor was there a representative present at the hearing.

The intersection of El Moran and Allesandro is a blind intersection. Cars pulling out onto Allesandro from El Moran cannot see traffic travelling north (downhill) on Allesandro, typically at very high speeds. Consider additional stop signs on Allesandro at El Moran.

We urge you to strongly consider the aforementioned modifications and mitigations to the proposed Small Lot Subdivision for the Semi Tropic Spiritualists' Tract.

Thank you for your consideration on this matter.

Respectfully:

On behalf of the SLNC Gov. Board:

Elizabeth Bougart-Sharkov, Assoc. AIA

SLNC Gov. Board Member, Representative At-Large  
Chair Urban Design & Preservation Advisory Committee (UD&PAC)

Diane Edwardson

SLNC Stakeholder  
UD&PAC Member

Cc: Council President Eric Garcetti, CD 13  
SLRA  
SLIA  
GEPENC