

Appeal Rebuttal - ENV-2017-2449-CE, Council File-18-0249

Background Information on site and case filing:

Mike and I each have 25 years of experience in the field of Architecture, and most of our work has involved hillside residential design and construction in Los Angeles. Our proposed 2710 sf house at 3314 Lugano Place was designed for us and based on our needs. We purchased this site based on its potential for minimal impacts and the ability to design a house on the site without a variance. Our house will be the smallest of all houses that abut Lugano Place. The small footprint of our house allows for wider front and side yards setbacks and the compact foundation reduces the amount of grading and the quantity of concrete. Through our extensive experience with hillsides, we understand the differences in sites that would require either a CE or an MND. We chose this site because of the high probability that it would be considered for a CE. Our filing was an EAF which is a detailed assessment of the project to help determine if it will meet the criteria for a class 32 in-fill project. After a four month review, our project was converted to a CE and an NOE was issued.

Appeal Point 1-CEQA Guidelines Section 15300.2. Exceptions

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

CEQA Guidelines Section 15332 In-fill Development Projects

(c) The project site has no value as habitat for endangered, rare or threatened species.

As seen in **(Exhibit A)** we have located our site on the most recent habitat maps for the Santa Monica Mountains Conservancy. No linkages are noted on our site and our site is in the center of a developed neighborhood surrounded with single-family residences. Our property is not located in a significant ecological area. The site has no known value as a habitat for endangered, rare or threatened species. Our site has not been designated or mapped or officially adopted by any federal, state or local agency. Griffith Park surrounds the north end of the Hollywoodland boundary. The only noted linkages within this map are the linkages to allow passage across the 101 freeway. The closest point of our property line is 470' away from a corner of Griffith Park (habitat areas 39B).

Griffith Park covers 4,310 acres of open land. Our lot is .15 acres (6,832 sf) and is insignificant in comparison. Our site will not have a significant effect on the environment or passage of wildlife due to these factors:

- A wildlife corridor does not exist on the site due to lack of connectivity. We have a survey of the existing barriers, including fences, walls, and houses surrounding our property (**Exhibit B1**) and photographs of the immediate surrounding fences (**Exhibit B2**).
- We will have no fencing on our property. The appellant has fences surrounding her entire property.
- There are at least 2 barriers in all directions that surround our property.
- We have no protected trees and no live trees will be removed. Due to no tree removal, there will be no impact on any nesting birds on our site.

Additional information will be provided by Dan Cooper, a biologist who has studied our site; He has done extensive research in Griffith Park.

Appeal Point 2-CEQA Guidelines Section 15300.2. Exceptions

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

CEQA has five requirements for Historical Resource Assessment and none apply to our site. Our vacant site is not listed by:

- The National Register of Historic Places.
- The California Register of Historic Places
- The Los Angeles Historical-Cultural Monuments Register
- Historic Places LA.
- Survey LA

Survey LA recognizes "Hollywoodland Historical District" however our vacant site is .4 miles away and therefore not within the district. **(Exhibit D)** shows the delineation of the Historical District in relation to our site.

The Hollywoodland is not a historical resource and the Specific plan is not a requirement of CEQA. Hollywoodland is not an HPOZ. The Specific plan does not dictate any specific architectural style instead requires a point system and design guidelines and regulations. In **(Exhibit E)**, we provided a survey of 27 houses within 300' radius from our site showing six different architectural styles. Our approved design is a contemporary interpretation of Hollywoodland's architecture and is compatible in scale, material, massing and detailing that are characteristic of the neighborhood **(Exhibit F)**. To show compatibility, we have provided a comparison of our front elevation and the appellants house **(Exhibit G1)** as well as the existing house in the cul-se sac **(Exhibit G2)**. We have not ignored or been insensitive to the compliance with the Specific plan, and have designed within the BHO. Our 2710 sf stucco and stone house will not "have significant impacts on the aesthetic and cultural resources".

In conclusion, we believe that the appellant has not provided any evidence to substantiate unusual circumstances of either the existence of a unique ecological area (wildlife corridor) or impact on a historical resource. We do not believe this appeal is about the application of these CEQA issues; We believe this appeal is about trying to stop us from building our house. Our justification is that there is one modern house under construction less than 500' to the south of her house (3217 Ledgewood Drive DIR-2016-1229-DRB) if our neighbor is really concerned with these CEQA issues, she would have appealed that one as well. We believe this CEQA appeal is because of the proximity to her property. The Categorical Exemption is an appropriate filing for our project.



-Stephanie Savage & Michael Swischuk (Applicant/Owner/Architect)

Exhibits to follow:

Exhibit A-Habitat Linkage Map

Exhibit B1& Exhibit B2- Diagram of Barriers & Photos of Barriers

Exhibit C- Site Photos

Exhibit D-CEQA Historical Resource Requirement

Exhibit E- Architectural Style Analysis Surrounding the Site

Exhibit F- Renderings of Final Project Design

Exhibit G1 & G2- Character and Compatibility- Comparison Studies of Nearby Residences

3314 LUGANO PLACE CEQA Appeal

Applicant Rebuttal

ENV-2017-2449-CE – (Case no. DIR-2017-1001-DRB-SPP)
PLUM – Council File 18-0249

Appellant's Appeal point #1:

Argument





"The unusual circumstances exception applies here because the Project site is located in a unique ecological area where wildlife is frequently sighted on property (bobcat, deer, coyote, etc.) and wildlife corridors exist. The construction of the Project will likely significantly impact wildlife and wildlife access. In addition, the construction of new houses on undeveloped lots will have a cumulative impact on the erosion of wildlife corridors."

The following diagrams show that our site is **NOT** located in a unique ecological area and that it is impossible for a wildlife corridor to exist.

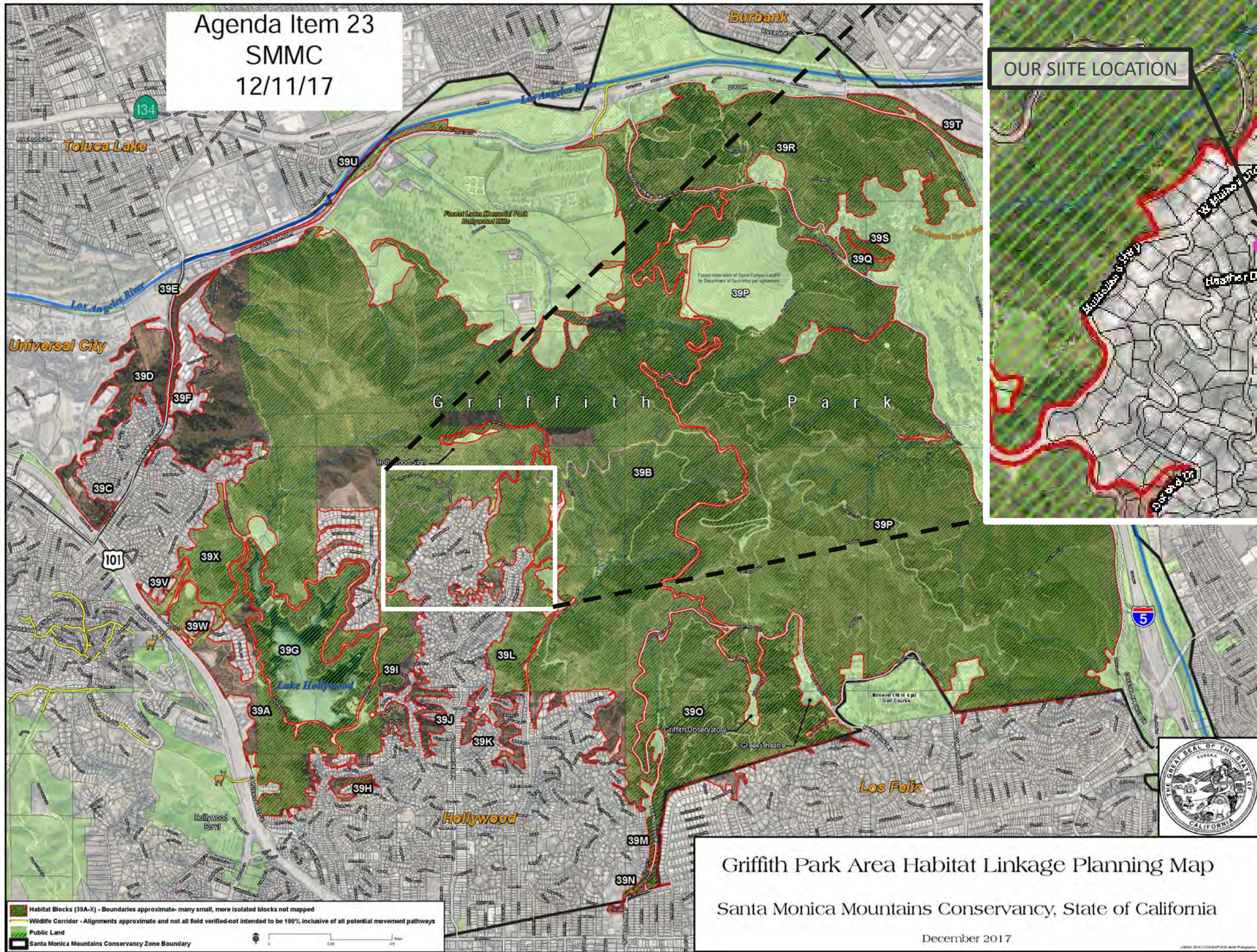
Page 3: Santa Monica Mountains Linkage Map

Page 4: Habitat Barriers Diagram

Page 5: Site Photos

-  Habitat Blocks (39A-X) - Boundaries approximate- many small, more isolated blocks not mapped
-  Wildlife Corridor - Alignments approximate and not all field verified-not intended to be 100% inclusive of all potential movement pathways
-  Public Land
-  Santa Monica Mountains Conservancy Zone Boundary

Agenda Item 23
SMMC
12/11/17



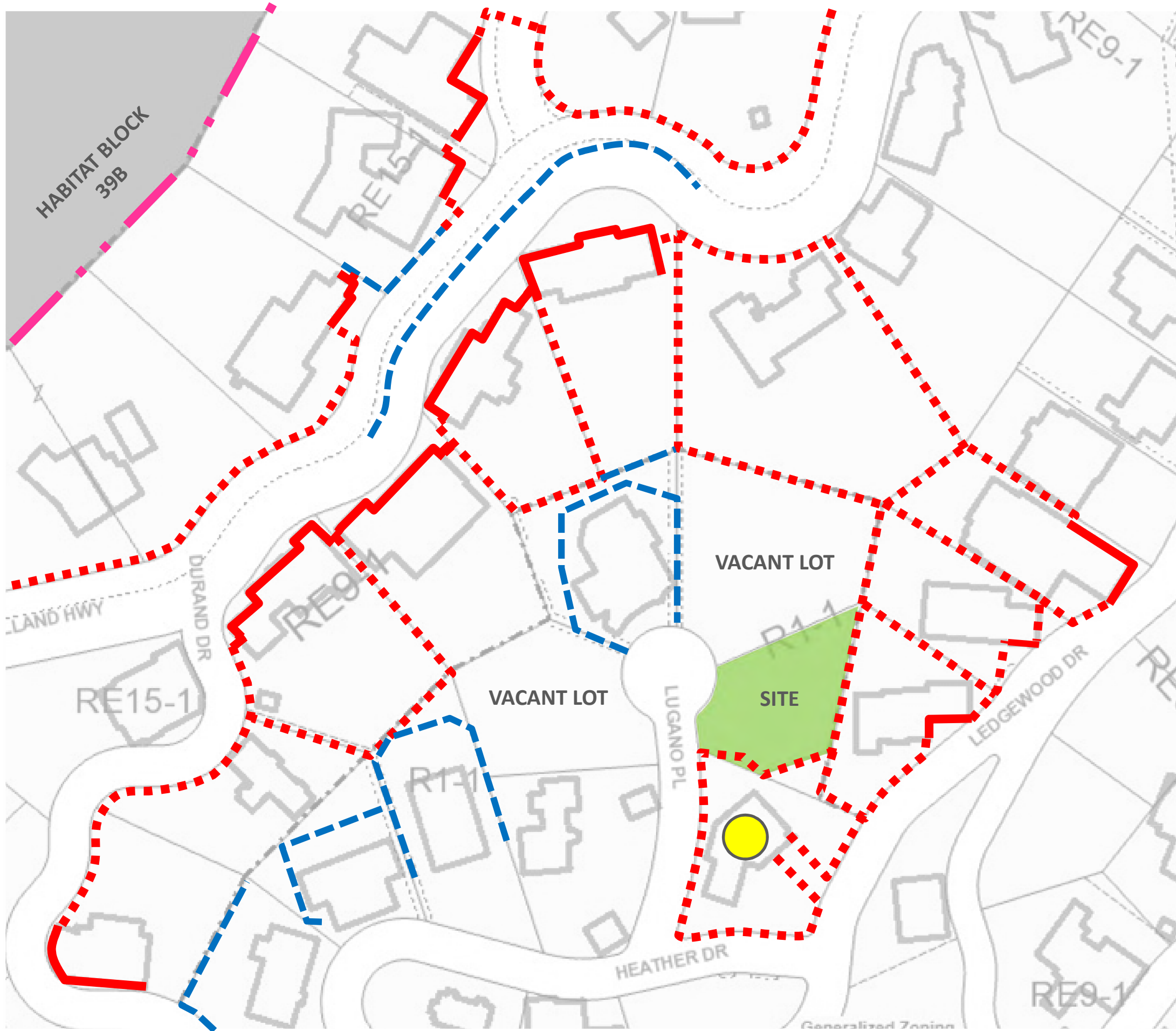
OUR SIITE LOCATION

Griffith Park Area Habitat Linkage Planning Map
Santa Monica Mountains Conservancy, State of California

December 2017






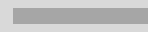

The Santa Monica Mountains Conservancy provides maps that show habitat areas and the linkages between them. Hollywoodland is flanked by habitat areas 39B, I & L. There are no linkages located anywhere within the boundaries of Hollywoodland.

The enlarged map shows the site location within Hollywoodland which is located well within a non-habitat area. The majority of the surrounding properties are developed with single-family residences and the property is not located in a significant ecological area. It has **no value as a habitat for endangered, rare or threatened species.**



Project Site Description

- The site is located on a cul-de-sac at the end of Lugano Place with a vacant lot to the north that has 38' of frontage and another vacant lot across the street.
- There are existing fences on neighboring properties surrounding the site with the only wildlife access to the site coming from the south on Lugano Place.
- In most instances, there are at least 2 barriers surrounding the properties at the end of Lugano Place
- A wildlife corridor is impossible based on the survey of the existing barriers due to lack of connectivity.

	PROJECT SITE
	APPELLANTS HOUSE
	HABITAT BOUNDRY
	FENCE BARRIER
	EXIST'G HOUSE BARRIER
	EXISTING HOUSE OUTLINE
	RETAINING WALLS





- The site is primarily cleared of any vegetation other than some seasonal grasses, and an Acacia tree towards the back of the site.
- There is a vacant lot to the north of the site with 38' of frontage on the cul-de-sac and a vacant lot across from our site.

Aerial From South



View North

Appellant's Appeal point #2:

Argument

"The unusual circumstances exception further applies because the Project will likely have significant impacts on aesthetic and cultural resources in the Hollywoodland community and the concentration of historic houses in the immediate vicinity. SurveyLA recognizes the Historic District in Hollywoodland and recognizes Individual Resources. The purposes of the Hollywoodland Specific Plan clearly state an intention that new construction be compatible with the village character and aesthetics of Hollywoodland."

The following diagrams show that our site is **NOT** a historical resource or exists in one and that it is compatible with the neighborhood character.

Page 8: CEQA Historical Resources Requirements

Page 9: Architectural Style Analysis

Page 10: Final Design

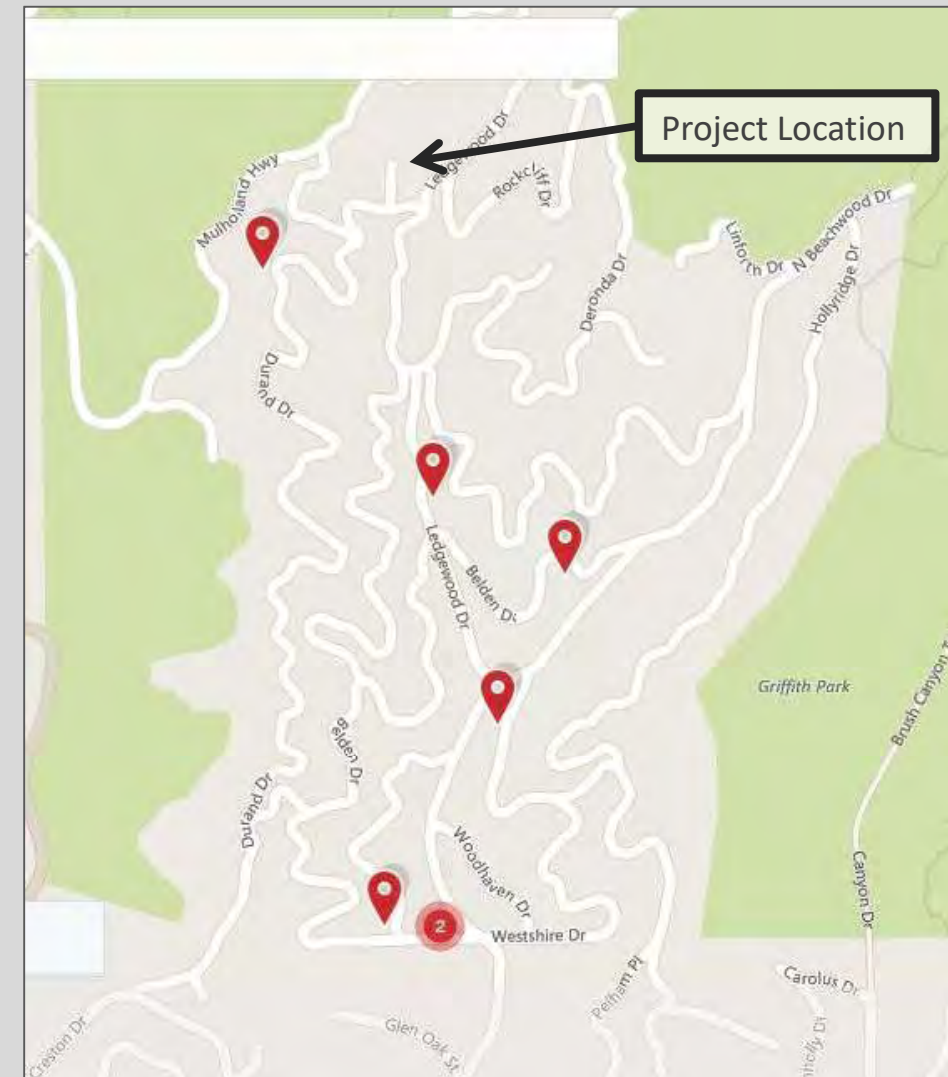
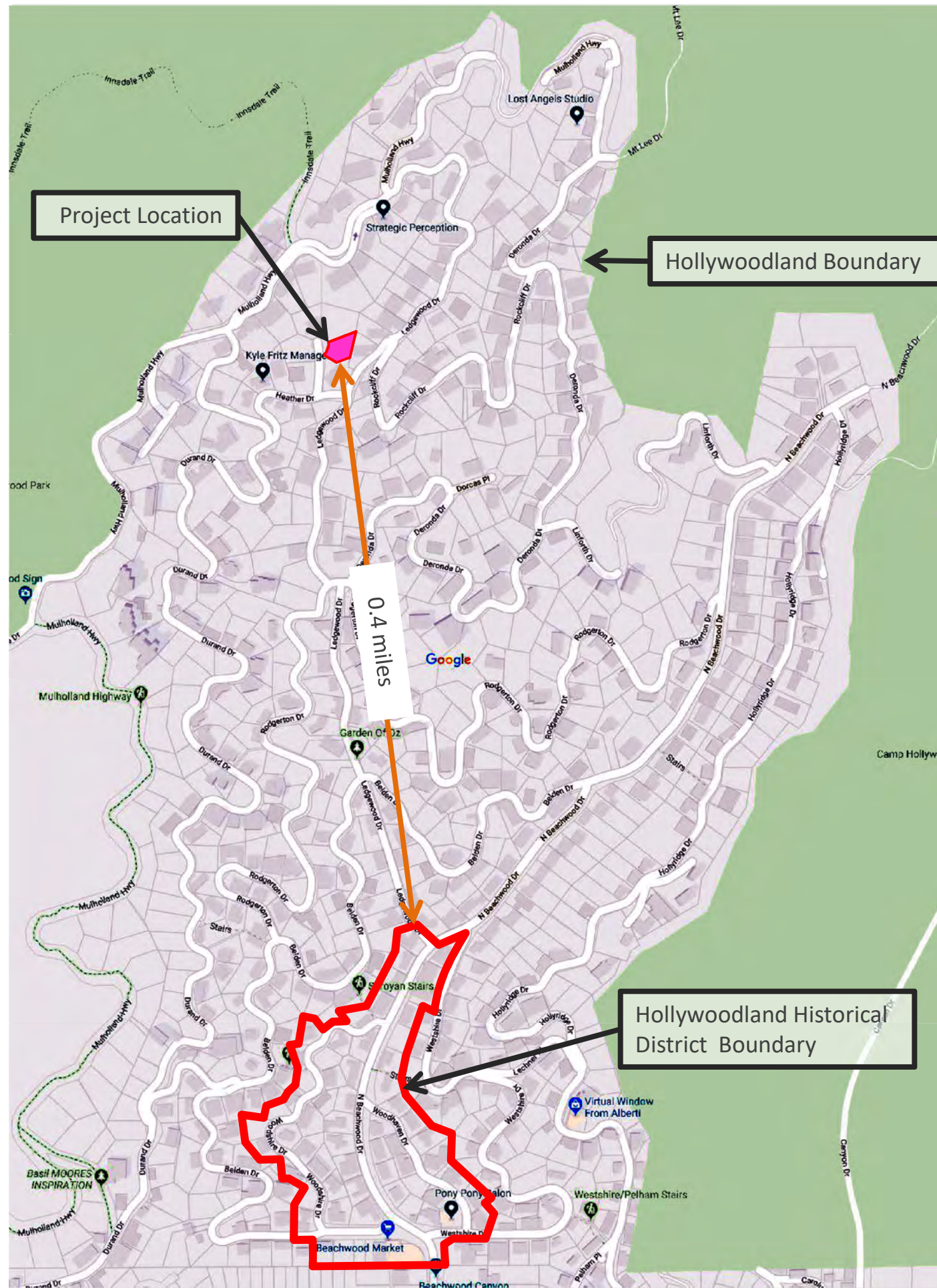
Page 11: Compatibility with Existing Neighbor (Appellant)

Page 12: Compatibility of Existing Modern House on Lugano Place

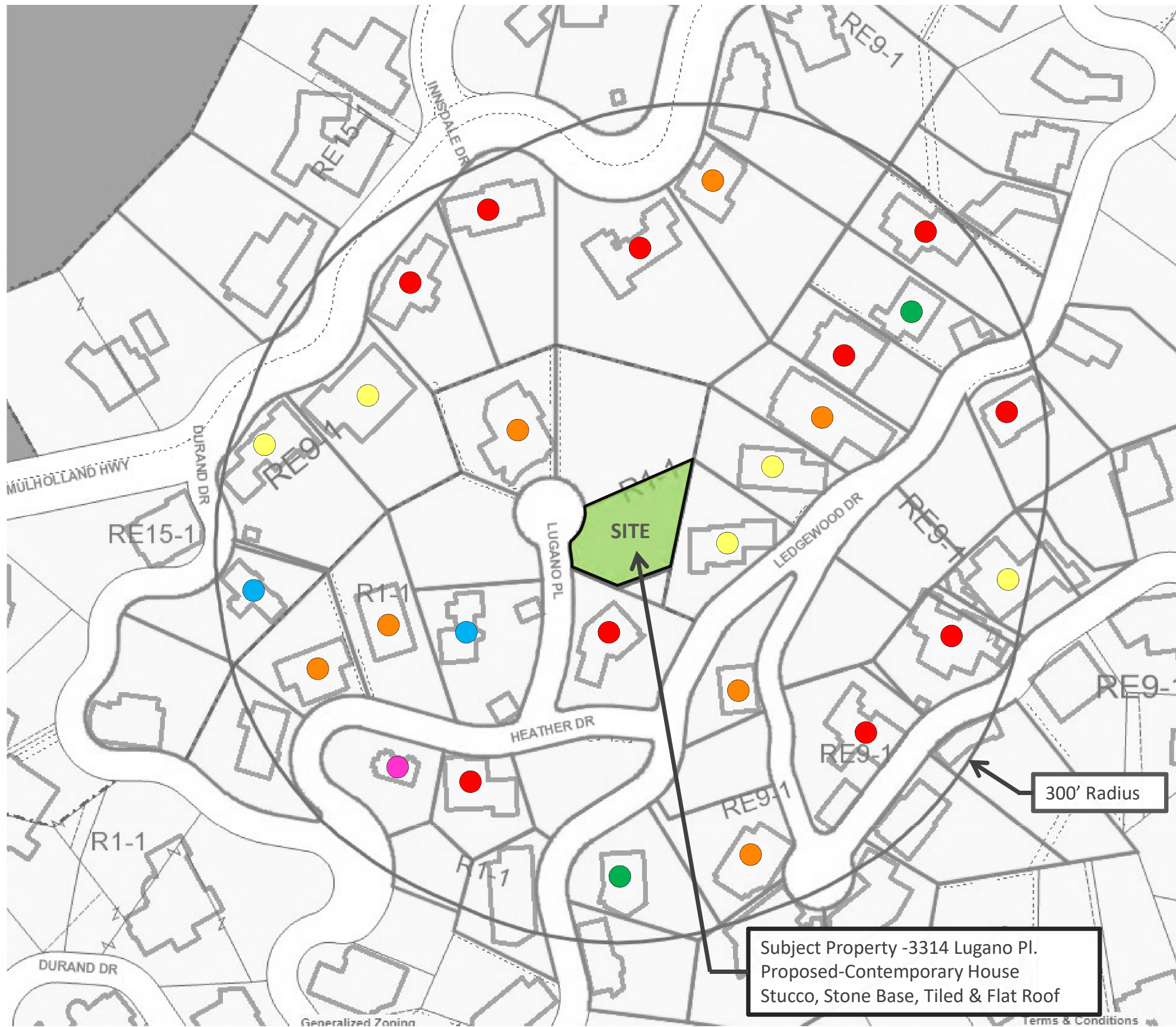
CEQA has 5 requirements for Historical Resource Assessment

1. Listed with the National Register of Historic Places - The site/area is **NOT**
2. Listed with the California Register of Historic Places - The site/area is **NOT**
3. Listed with the Los Angeles Historical-Cultural Monuments Register - The site is **NOT**
4. Listed with Historic Places LA - The site/area is **NOT**
5. In a historical area recognized by Survey LA - The Site location is **NOT**

- Hollywoodland is **NOT** a historical resource.
- The project is **0.4 miles away** from Hollywoodland Historical District recognized by Survey LA
- Issues Relative to the Specific plan for the area are not a requirement of CEQA and were decided on by The Central Area Planning Commission in a previous appeal. The only thing unusual about the specific plan is that it's intention is not specific so it can not be applied objectively.



Historic Places LA – In Hollywoodland (7 places total)



An Analysis of 27 house within a 300' radius of the site documents the variety of styles that exist around the property

The following house styles were found:

- 10 Spanish (Stucco with Tile Roof)
- 8 Modern-Contemporary (various eras)
- 5 Ranch (Stucco with Hip Roof)
- 1 Style – Not Specific
- 2 Tudor Style
- 1 Colonial Style



Front View from Lugano Place



Back Elevation Aerial

The design has come about by working with the design review board for Hollywoodland to achieve a design that reflects the European village character, yet conforms to the current regulations. The desired look of the European village and current regulations are at odds with each other so the design reflects the mediation of the two in a contemporary version of the historic area.



Proposed Project

Stepped Massing

Tile roof

Stucco Finish

Simple Windows

Rusticated Base



Appellants House

The design of the proposed house is intended to be compatible with the surrounding neighborhood by incorporating elements of like kind, scale, massing and materials



Neighbor on Lugano Place

The neighboring house at the end of Lugano Place is a contemporary design that was designed and built under the Specific plan between 1998 – 2001. It was designed under the same specific plan guidelines that we followed. Again elements of like kind, scale, massing and materials have been incorporated. When this house was sold to the current neighbor the realtors description read as follows “A modern celebration of early 20th century Arts and Crafts era.”



Proposed Project