

# LUNA & GLUSHON

A Professional Corporation

DENNIS R. LUNA  
(1946-2016)

16255 VENTURA BOULEVARD, SUITE 950  
ENCINO, CALIFORNIA 91436  
TEL: (818) 907-8755  
FAX: (818) 907-8760

Century City Office  
1801 Century Park East, Suite 2400  
Los Angeles, CA 90067

May 21, 2018

VIA PERSONAL DELIVERY

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012

BY EGC CITY CLERK  
PLS PROPERTY  
2018 MAY 21 PM 4:42  
CITY CLERK

Re: DIR-2017-1001-DRB-SPP/3314 N. Lugano Place  
City Council File 18-0249

Honorable Councilmembers:

Our law firm represents Wrenn Chais and an association of surrounding neighbors ("Appellants") who have appealed the Planning Department's determination to adopt a Categorical Exemption from the California Environmental Quality Act ("CEQA") for the construction, use and maintenance of a new single-family residence at 3314 N. Lugano Place ("Project"). Our clients will be the most impacted, both directly and negatively, if the Project, as proposed, is approved without adequate environmental review.<sup>1</sup>

For all of the reasons forth hereinbelow the Categorical Exemption was issued in error and the Council should grant the within appeal.

1. The Project will cause a substantial adverse change in the significance of a historical resource, the Historic District in Hollywoodland.

Pursuant to CEQA Guidelines §15300.2(f), a categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

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<sup>1</sup> Appellants purchased their properties in reliance on the Hollywoodland Specific Plan and the Department of City Planning's obligation to enforce its requirements.

SurveyLA recognizes the Historic District in Hollywoodland and recognizes its nearby individual resources. Such designation acknowledges the historical residential community in Hollywood, planned in the early 1920's as a custom home, single-family subdivision with a "European Village" character. This reasoning is specifically set forth in the Specific Plan. [See section 2.A<sup>2</sup>].

Indeed, as set forth by Architects Offenhauser Mekeel, all of the individual resources within Hollywoodland, including the residences surrounding the Project site, make up the historic aesthetic of the area. The Secretary of the Interior Standards specifically provide that the setting of a property is significant and must be considered in evaluating the impact of an infill project.<sup>3</sup> [Exhibit 1].

The cul-de-sac within which the Project is proposed is also of specific historic value. The significance of the historic granite wall on Lugano (home address 6311 Heather) is specifically referenced in the Specific Plan (see Section 4). Granite walls were constructed in 1923 at the time of the original Hollywoodland Tract subdivision and make the cul-de-sac particularly unique to Hollywoodland character. The cul-de-sac open space has been unchanged for almost 100 years.

The introduction of a modern home, such as the one proposed here, into the Hollywoodland Tract and this cul-de-sac in particular would cause a substantial adverse change in the significance of the Hollywoodland Historic District in that it will introduce an element which takes away from the protected aesthetics of the historic resource. It will set a precedent for future non-Specific Plan compliant development, permanently altering the protected, historic nature of Hollywoodland.

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<sup>2</sup> One of the main purposes of the Hollywoodland Specific Plan is to *protect Hollywoodland*, a unique and *historical* residential community in Hollywood, planned in the early 1920's as a custom home, single family subdivision with a "European Village" character.

<sup>3</sup> As set forth below, CEQA does not bind the hands of the City to "official registers" in making a determination regarding whether a structure, neighborhood or district qualifies as a historic resource. This is because many historic resources simply have not yet been nominated. Typically, structures in excess of 50 years meet the threshold for listing as a historic resource under a variety of State and Federal designations. Accordingly, the streets and infrastructure of Hollywoodland are all historic, even though they may not all be yet designated as individual historic resources.

The applicant has submitted a “rebuttal” letter, arguing that because the site of the proposed Project is not listed in a historic register and the Historic District in Hollywoodland is a mile away, CEQA Guideline §15300.2(f) is inapplicable. The applicant is wrong. Not only is this narrow interpretation inconsistent with the Hollywoodland Specific Plan which specifically requires preservation of the entirety of the unique and historical residential community in Hollywoodland, it is also inconsistent with the CEQA mandates. CEQA prescribes that whether or not a particular environmental effect meets a CEQA threshold cannot be used as an automatic determinant that its effects are not significant. In other words, the use of the Guidelines’ thresholds does not necessarily equate to compliance with CEQA. *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-09. To the contrary, once identified, *all* environmental impacts must be evaluated and mitigated; they cannot be ignored. *Woodward Park Homeowners’ Association v. City of Fresno* (2007) 150 Cal.App.4th 683, 728. Indeed, the Public Resources Code specifically provides that the City is not bound by official registers in making a determination regarding whether a structure qualifies as a historic resource.

What’s more, the applicant’s “rebuttal” letter includes a map that shows “Historic Places LA - in Hollywoodland (7 places total)” with 7 markers. This map is used to make the point that there is supposedly very little historicity in Hollywoodland. This is *wildly* incorrect. In fact, based on SurveyLA there are 34 Individual Identified Historic Resources in the Hollywoodland Historic District and 88 Individual Identified Historic Resources in Hollywoodland. Based on built LA, there are 205 historic houses built between 1920 and 1945. [Exhibit 2].

Again, as set forth by Architects Offenhauser Mekeel, the historic nature of Hollywoodland derives its historic character from the overall comprehensive design of the neighborhood. Every single lot is a piece of the overall aesthetic vision. [Exhibit 1]. The introduction of the modern Project will introduce an element which is inconsistent with this protected aesthetic and which will therefore cause a substantial adverse change in the significance of a historical resource.

Therefore, the Project will have a substantial effect on a historic resource and a Categorical Exemption is not appropriate.

2. The Project will degrade the existing visual character of the site and its surroundings.

Pursuant to CEQA Guidelines § 15300.2(c), 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. The “unusual circumstances” exception is established with evidence that the project will have a significant environmental effect. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086.

Here, as set forth hereinabove, the “European Village” aesthetics of the Project location and surrounding neighborhood are specifically protected by the Specific Plan which sets forth, as its purpose and intent to:

*Protect Hollywoodland, a unique and historical residential community in Hollywood, planned in the early 1920's as a custom home, single family subdivision with a "European Village" character [see Section 2.A].*

*Preserve and build upon the community's natural environment, unique history and architectural character [see Section 2.C].*

*Ensure that new development on the currently 220 vacant lots and redevelopment of the 525 existing homes, particularly those built in the 1960's and 1970's, enhances the character of the community rather than compromises its integrity [see Section 2.D].*

*Protect Hollywoodland as it was in the early decades of the Hollywoodland Tract, when the initial deed restrictions and design review process produced a series of architectural styles consisting of Mediterranean, English, French and other traditional cottages and villas having uniformly high quality design and construction [see Section 2.G].*

*Permit and facilitate new development as long as it is compatible with and enhances the character and quality of the existing community [see Section 2.H]*

The introduction of this modern residence violates such protections. Accordingly, if this home is built it will degrade the visual character of the

Project location and of Hollywoodland by introducing an aesthetic element against which the Specific Plan is supposed to protect. All such aesthetic impacts were testified to by Hollywoodland residents, including Appellants. **Indeed, this is the reason that the Design Review Board voted 5-1 to recommend disapproval of the Project, and the reason that the Hollywoodland Homeowners' Association supports the within appeal.** [Exhibit 3].

Therefore, a Categorical Exemption is inappropriate under CEQA Guidelines § 15300.2(c).

3. **The Cumulative Impact of the Project makes a Categorical Exemption inappropriate.**

Pursuant to CEQA Guidelines § 15300.2(b), all exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

One of the basic and vital informational functions required by CEQA is a thorough analysis of whether the impacts of the Project, in connection with other related projects, are cumulatively considerable. *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal App.4th 1209. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.<sup>4</sup> *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184; *CEQA Guidelines* §15355. Proper cumulative impact analysis is vital under CEQA because the full environmental impact of a proposed project cannot be gauged in a vacuum. Indeed, one of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually but assume threatening dimensions when considered collectively with other sources with which they interact. *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184; *Gentry v City of Murrieta* (1995) 36 Cal.App.4th 1359, 1414.

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<sup>4</sup> "Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

Currently, the majority of the homes in the Hollywoodland tract are of the “European Village” aesthetic. [Exhibit 4]. The only few which are not have been recently built. [Exhibit 5]. The introduction of such residences has been altering the protected aesthetic of Hollywoodland without review or analysis. As further set forth hereinabove and in the information submitted by Offenhauser Mekeel [see Exhibit 1], the Project will add to this permanent aesthetic alteration. Such effects fall squarely within the definitions of cumulative impacts which must be evaluated under CEQA.

Both the Specific Plan and CEQA cumulative impact requirements mandate that review of proposed projects include review of what will ultimately be built (foreseeable projects). Under the Specific Plan, the empty lots in Hollywoodland will be improved with “European Village” style homes, creating and further fortifying a predominantly “European Village” style aesthetic, as required and protected by the Hollywoodland Tract. [Exhibit 6]. The impact of this modern residence must be reviewed in such context.

Therefore, a Categorical Exemption is inappropriate under CEQA Guidelines § 15300.2(b).

4. **The Project will likely significantly impact wildlife and wildlife access.**

Again, pursuant to CEQA Guidelines § 15300.2(c), 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.

This site is located in a unique ecological area where wildlife is frequently sighted on property (bobcat, deer, coyote, etc.) and wildlife corridors exist. [See Exhibit 7 - a log of wildlife crossings on the property between 12/15/17 and 2/9/18]. Indeed, this condition has been documented by the Santa Monica Mountains Conservancy since at least the 1990’s. [Exhibit 8]. This is precisely the reason that the Hollywoodland Wildlife Group supports the within appeal. [Exhibit 9].

Simply stated, it is clear that construction of the Project will significantly impact such wildlife and wildlife access in this Property. What’s more, it will contribute, along with other new houses on undeveloped lots in Hollywoodland, on the cumulative erosion of wildlife corridors. Accordingly, the Project does not qualify for a Categorical Exemption.

This Committee will note that the within appeal was filed on 3/21, giving express notice to the applicant of the within issue. Notwithstanding this notice, the applicant has fenced the Property - cutting off the wildlife corridor and removing a motion camera which documents the daily presence of such wildlife. In addition, and again with full knowledge of the pending CEQA appeal, the applicant had commenced construction and removed a significant portion of the hillside - all leading to the issuance of a Stop Work Order from the Los Angeles Department of Building and Safety. Such actions were taken for the purpose of depriving Appellants and the public of due process to have the City and the Courts determine the impact on wildlife.

5. **All of the impacts identified in ENV-2006-9426-MND need to be evaluated.**

In 2007, the City denied a similar single-family project on this same site, identifying numerous environmental impacts which required mitigation, as set forth in ENV-2006-9426-MND.<sup>5</sup>

To ignore all of these impacts now is not just willful ignorance, it is a failure to comply with CEQA.

6. **The Project does not qualify for a Class 32 categorical exemption.**

In order for a Class 32 categorical exemption to be applicable, a proposed project consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

Here, as set forth above, the Project is inconsistent with the Hollywood Specific Plan.

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<sup>5</sup> It is ironic that the applicants claim that they chose this site because they believed there was a high likelihood a Project would qualify for a categorical exemption when a simple ZIMAS review reveals that an MND was adopted in 2006 [ENV-2006-9426-MND]. The very same MND was used again in 2008 for another project [DIR-2008-3227-SPP-DRB]. Indeed, applicants, who claim to have 25 years' experience building on the City's hillsides, were fully aware of the aesthetic the Specific Plan requires and have designed a house which bears no relation to the unique character of Hollywoodland the Specific Plan was established to preserve. If the City required MND's in 2006 and 2008, they should again in 2018.

Similarly, a Class 32 categorical exemption may only be used where the Project site has no value as habitat for endangered, rare or threatened species.

It is impossible to say whether the proposed Project site has value for endangered, rare or threatened species because no such analysis has been completed. Indeed, the City, in granting the applicant a "hall pass" from CEQA review, is ignoring all of the biological consequences of this Project, including the wildlife corridors.

For all of these reasons, we ask that the City Council grant the within Appeal and require adequate environmental review in connection with the Project.

Very truly yours,

LUNA & GLUSHON  
A Professional Corporation

A handwritten signature in black ink, appearing to read "Rob Glushon", written in a cursive style.

ROBERT L. GLUSHON



# OFFENHAUSER / MEKEEL



## ARCHITECTS

February 19, 2018

Central Area Planning Commission  
200 North Spring Street, Room 532  
Los Angeles, CA 90012

RE: Appeal of DIR-2017-1001-DIR-SPP  
3314 North Lugano Place

Honorable Commissioners:

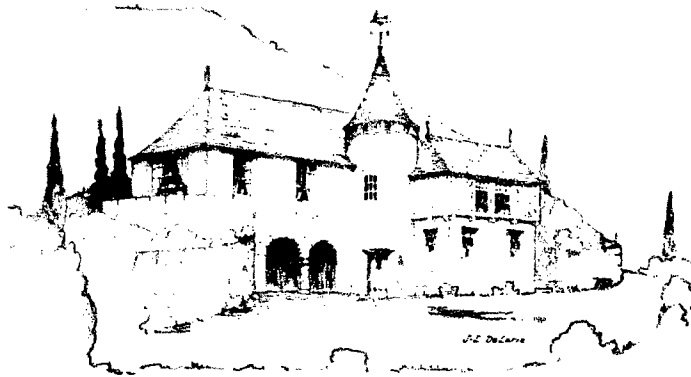
I urge you to support this Appeal. **This project should not have been granted a Project Design Approval because it is not consistent with the character of Hollywoodland.**

I am an Architect specializing in compatible hillside infill projects with 45 years of experience working primarily in the Hollywood Hills. I also have served twice on the Hollywoodland Specific Plan Design Review Advisory Board and was Chairman of the Whitley Heights HPOZ Design Review Board. I am also a real estate developer who has designed and built a house in Hollywoodland under the Specific Plan that is completely consistent with the character of Hollywoodland. I am currently designing and building two more houses in this community because the unique and historical quality of Hollywoodland creates value. I am deeply concerned that developers and homeowners cannot any more count on the Director of Planning to enforce clearly stated rules that govern design in the Specific Plan area. The erosion of the character of Hollywoodland as represented by this project will detract from the home values of homeowners and the value of my real estate investment.

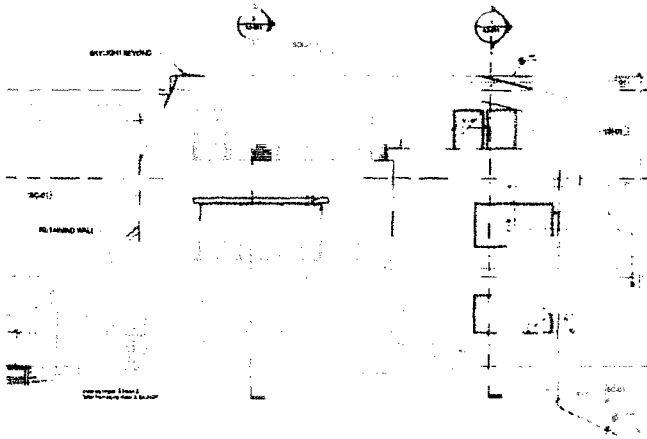
***A. This Project fails to conform to Section 9.A of the Hollywoodland Specific Plan because a Project Design Approval shall only be issued for a Project that is consistent with the character of Hollywoodland.***

The character of Hollywoodland was established by the design controls that were established in deed restrictions and enforced in the decades after the Tract was developed. These design controls required that houses be designed in one of four Revival styles: Mediterranean, Spanish Colonial, Tudor or Norman. After the deed restrictions expired the quality of new houses deteriorated, and the Specific Plan was established to reverse this trend.

Here is an example of an original Norman Revival house built on Westshire Drive:



By contrast, here is the view of this proposed project at the same scale, as seen from the historic house at 3267 Ledgewood:



The proposed house makes no attempt to relate to the surrounding original Period houses, let alone express the character of an authentic Period Revival house. The surrounding Period houses are typically either one story or two stories with a prominent pitched roofscape to reduce the apparent height of the house. The massing of the surrounding Period Revival houses is based on a straight or cross gable massing with Period detailing at the windows, doors, roof edges and with traditional elements such as tall vertical chimneys to create visual interest.

The proposed house is three stories high with the massing of a shoe box, a flat roof, cheap aluminum windows and doors and a total lack of details to lend it visual interest. It is not consistent with the character of Hollywoodland.

There is a precedent for rejecting this contemporary design. In 2008 DIR-2006-9425-SPP-DRB the Director of Planning **DENIED** a Project Design Approval for a single-family residence on this same lot and the adjacent lot (3314 and 3320 Lugano) because "the large facades and roof massing of the project diminish the European Village character that the Specific Plan was intended to protect." This description applies

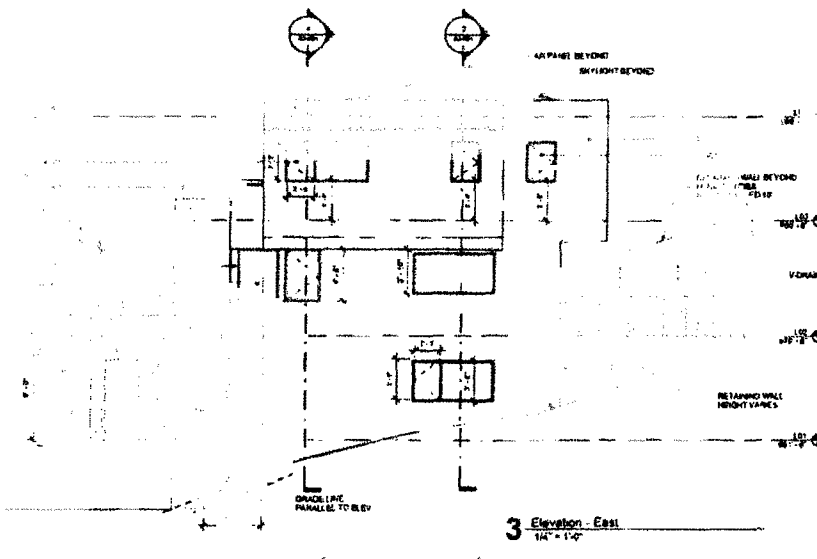
equally to this project where the massing, roof and details are not compatible with the character of the existing community.

**B. This Project fails to conform to Section 2E of the Hollywoodland Specific Plan the intent of which is to protect Hollywoodland from overly massive buildings which are out of scale with existing buildings.**

This project is a three story, 33 foot high building with a flat roof that is designed to use the maximum allowable floor area allowance under the OLD Baseline Hillside Ordinance which does not apply to this project. The NEW Baseline Hillside Ordinance reduces the allowed floor area. The floor area exceeds the average floor area of all houses in a 500 foot radius. All surrounding houses have pitched roofs which reduce the appearance of size and keep the house at a human scale.

There is a precedent for rejecting this massive design. In 2008, the director of Planning **DENIED** a Project Design Approval (DIR-2006-9425-SPP-DRB) based on this Section of the Specific Plan for a 4,911 square foot single-family residence on 3314 and 3320 Lugano, which tied the two vacant lots to create a single 19,166 square foot lot. The justification for the denial was that the house on **TWO LOTS** exceeded the average floor area of the existing houses within 500 foot radius which was 2,437 square feet and typically on one lot. The currently proposed single family residence at 2,710 square feet also exceeds the average floor area of houses within 500 feet and furthermore is on only **ONE LOT**.

This is a view of the proposed project from 3279 Ledgewood showing the massive design:

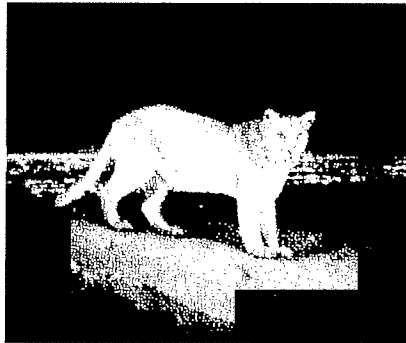


**C. The Categorical Exemption was issued in error. This project does not qualify for a Class 32 Categorical Exemption based on CA Code of Regulations Section 15332 because it does not satisfy three of the five possible criteria for Exemption.**

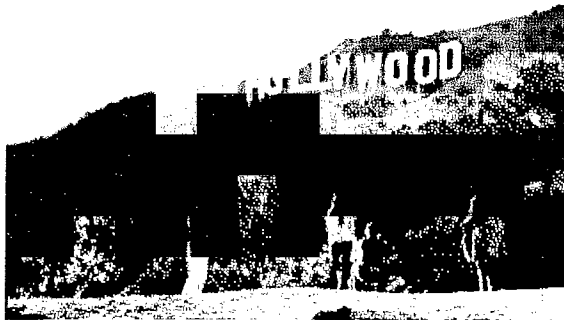
1. This project is not consistent with the applicable Community Plan policies which encourage the preservation and enhancement of well defined residential neighborhoods in Hollywood and encourage the preservation and enhancement of the varied and distinctive residential character of the Community. This project does not preserve this well defined residential neighborhood which is characterized by the original Period Revival houses.



2. This site has value as a habitat for endangered species. The mountain lion P-22 has been sighted traversing Hollywoodland and all vacant lots are part of the wildlife pathways.



3. This project will have an impact on traffic. Recently the traffic has increased dramatically due to the tourists attempting to access the Hollywood sign based on Google Maps.

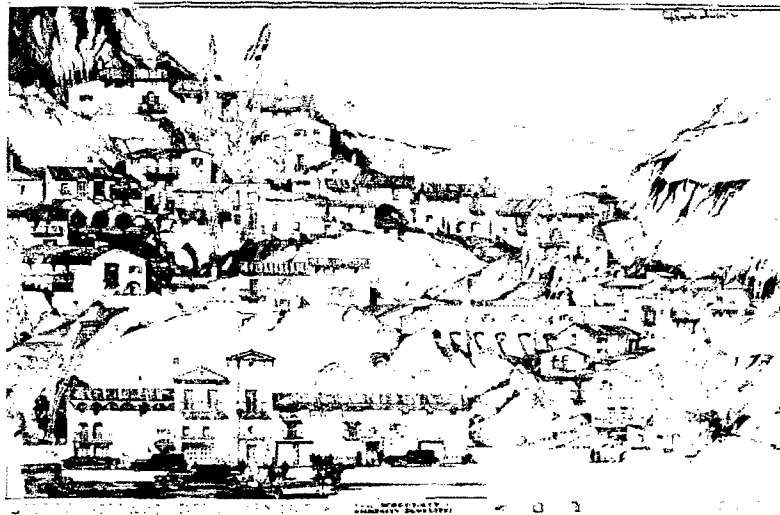


***D. The Categorical Exemption was issued in error because this project will result in a substantial adverse change to the historic character of Hollywoodland.***

Individual sites cannot be seen in isolation. The historic character of Hollywoodland derives from the overall and comprehensive design of the neighborhood as envisioned by the original developers of the Tract. Every lot is a piece of the overall vision and one incompatible house erodes the character of the entire neighborhood. The SurveyLA has identified the Village of Hollywoodland as an historic district. There are also numerous identified historic resources and historic non-parcel resources throughout Hollywoodland. Every project is an opportunity to complete the vision of Hollywoodland as a unique and historical community in Hollywoodland, planned in the early 1920's as a custom home, single family subdivision with a "European Village character."

***E. The Categorical Exemption was issued in error because this project will result in a cumulative adverse change to the historic character of Hollywoodland.***

Many of the projects built since the Specific Plan was adopted are incompatible with the character of Hollywoodland due to the failure of the Planning Department to enforce the purposes of the Specific Plan. Each additional incompatible project further erodes the character of Hollywood. Homeowners have purchased houses and developers have built houses on the assurance that the Planning Department would enforce the design criteria in the Specific Plan. Once again, the Planning Department has approved an incompatible house and has not protected and Hollywoodland as required by the first Purpose of the Hollywoodland Specific Plan.



Sincerely

Michael Mekeel  
MFTT LLC

OFFENHAUSER / MEKEEL  
■  
ARCHITECTS

May 18, 2018

VIA EMAIL and PERSONAL DELIVERY

Los Angeles City Council  
Planning and Land Use Management Committee  
200 North Spring Street  
Los Angeles, CA 90012

RE: DIR-2017-1001-DRB-SPP/3314 N. Lugano Place

Honorable Councilmembers:

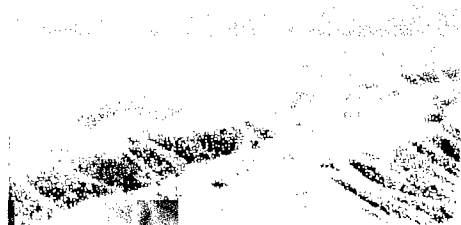
I have been asked by the Appellants in this case to provide an expert opinion in support of Item 2 of this Appeal which is that the Project will degrade the existing visual character of the site and its surroundings.

I am an architect and developer with 35 years of experience in designing and developing hillside houses in the Hollywood Hills. I am also intimately familiar with Hollywoodland in particular, having developed a compatible house in Hollywoodland with modern construction and meeting all code requirements.

A. "The Supreme Achievement of Community Building"

It is important to understand that Hollywoodland is a unique neighborhood in the City of Los Angeles in that it was advertised as "The Supreme Achievement in Community Building". It was not a typical Tract but was conceived by the original developers, including Los Angeles Times publisher Harry Chandler, with a total vision of a neighborhood with the visual character of a "European Village". This was accomplished with 3 highly controlled visual tools: #1 the layout of the streets, #2 the design of the infrastructure, and #3 the design of the houses themselves.

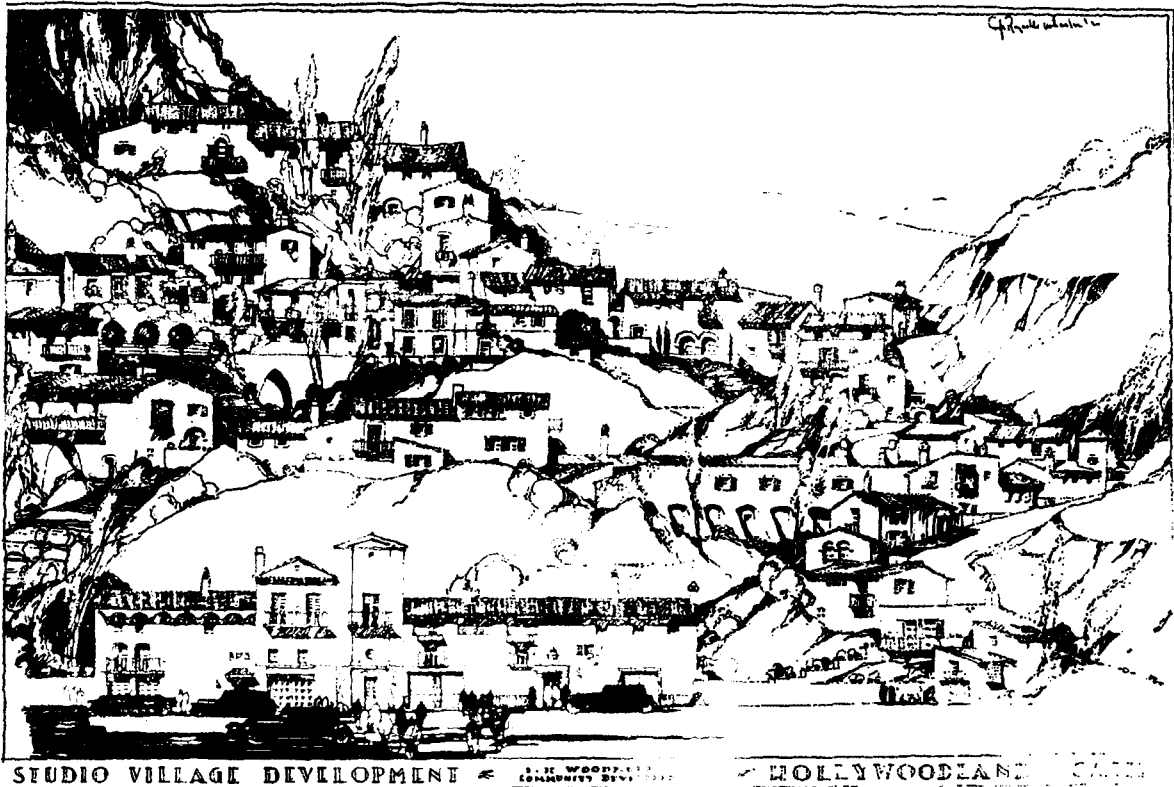
1. The streets were designed to follow the contours of the hills on each side of the Beachwood canyon to create the feel of a village that had evolved over time like a European village without the advantage of modern grading equipment.



2. The infrastructure reinforced the concept of the European Village. Granite walls were built along the cut slopes to evoke the "old world" feel of Italian hillside villages built into the hills. Stairs were built to connect streets to encourage walking to the neighborhood village market and bus stop. The entrance to Hollywoodland was marked by a pair of huge granite gate towers

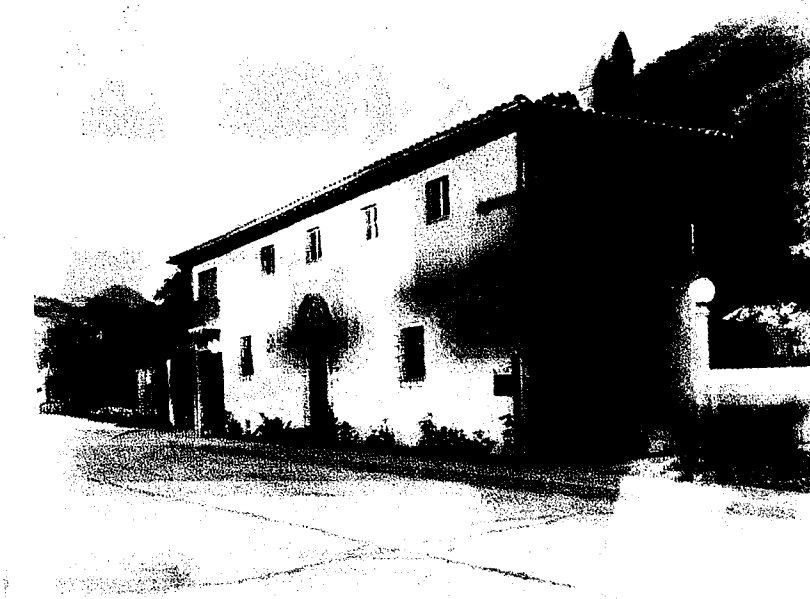


3. The houses were envisioned to be designed in European Revival styles. A sketch prepared by architect John Delario envisioned a hillside community of picturesque Mediterranean houses based on views of Italian towns such as Perugia.



Ultimately the house styles were restricted by Deed to four Revival styles:

Mediterranean,



Spanish,





Norman



— A FINE HOME FOR DR. L. L. HOBBS —  
AND L. DE LAKE AND JAMES F. HUNTER — ARCHITECTS — 2122 S. BROADWAY DRIVE — HOLLYWOOD, CALIF.

Tudor.



## B. History

The streets and the infrastructure consisting of granite walls and stairs were completed in the original subdivision and exist today as the setting for the houses. The walls and the granite stairs throughout the neighborhood have been restored and are protected as Cultural Historic Monuments.

The original Period Revival houses were built throughout the community as people purchased unique lots and had distinguished architects design custom houses for them. A preponderance of the original houses were built in the Village Center and on the upper view lots. The village houses were more modest but some of the houses on the surrounding ridgelines were substantial and spectacular such as the famous Castillo del Lago and Wolf's Lair.



The Great Depression and then WW II halted the construction of houses. House construction resumed in the 1950's and 1960's by which time the original Tract Deed Design Controls had expired. The economy and the new Modernist aesthetic resulted in the construction of "Midcentury Modern" houses, some set capably on large wooded lots. But by the 1970's and 1980's all the new houses had devolved into a cheap builder's aesthetic with no setbacks and looming and clumsy massing on less desirable downslope lots. By the late 1980's the residents of Hollywoodland realized that the character of their neighborhood was eroding. They worked with the City to enact the Specific Plan with the express intent of protecting the original character of Hollywoodland as it was intended in the vision of the original developers and as it was originally built out within the unique setting of streets and granite walls and steps, and to assure that the development of the remaining lots was compatible with the original vision of the community.

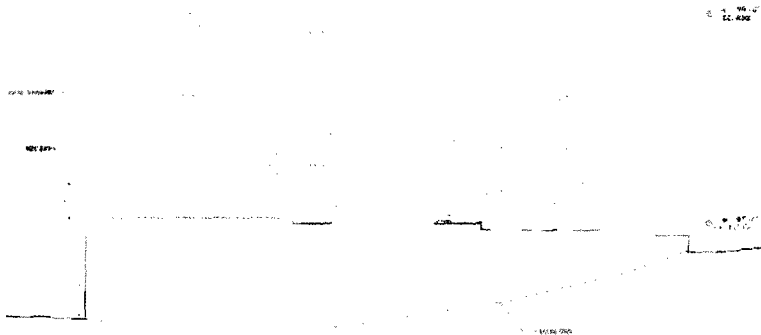
### C. The Specific Plan:

Under the Specific Plan, applicants have been encouraged to design houses that are compatible with the original vision of Hollywoodland. Numerous houses have been built since the Specific Plan was adopted which complement the unique area and are completely modern in current construction techniques and meet all code requirements.

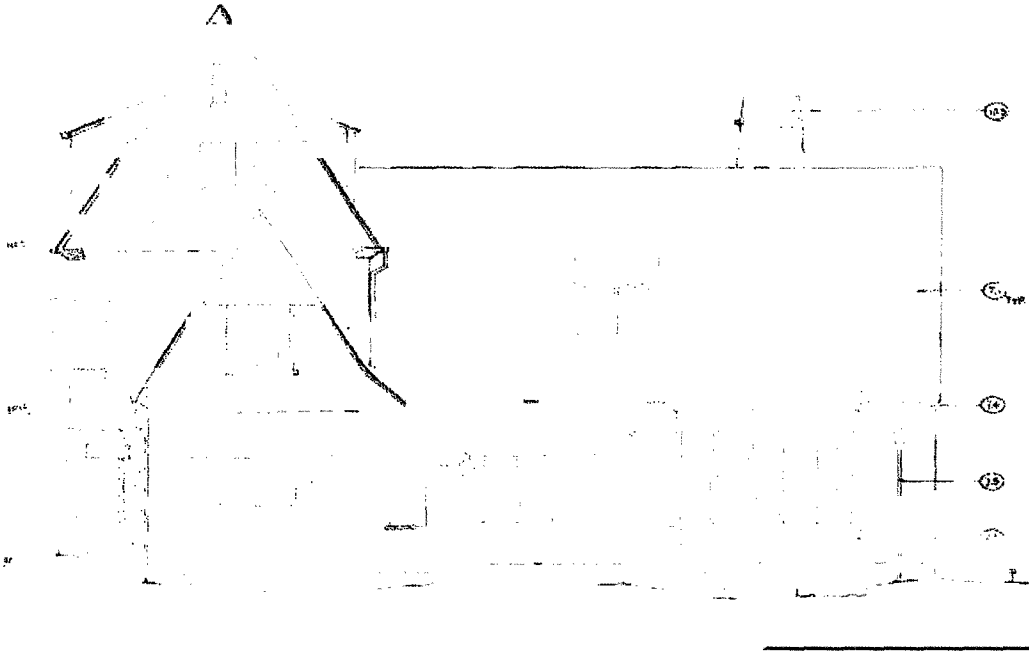


Clearly the most compatible house design is a Period Revival style, but the underlying principles of traditional house design are what ultimately make a house compatible with the neighborhood. These are:

- Massing consisting of simple volumes of a size compatible with traditional framing spans with gable or hip roofs arranged in simple or more complex cross gabled designs.
- Traditional wood or steel windows and doors with authentic divided glass lights
- Detailing of roof edges, window and door surrounds, chimneys, dormers and entrance doors with appropriate moldings
- Roofing materials appropriate to the style: Red clay mission tiles for Mediterranean and Spanish designs, slate for Norman and Tudor designs, for instance.
- Authentic wall materials such as hand troweled plaster, brick, half timbering and wood siding appropriate to the style of the house.
- Fixtures and hardware that is delicate and traditional in appearance.
- Natural colors derived from earth materials.
- Exterior paving materials that are handmade, handset and traditional
- Landscaping consisting of native plants and trees such as native oaks and sycamores.



A house designed in accordance with these principles will fit into the existing setting of steep, winding hillside streets and infrastructure and complement the existing houses to become another piece of the original vision of Hollywoodland.



However, a single incompatible house has a significant negative effect on the neighborhood precisely because the character of the neighborhood is made up of the totality of setting, infrastructure and houses. The design of a house cannot be seen in isolation of the design of the neighborhood.

In most other neighborhoods only the street façade of a house is seen and the view out of a house is primarily of the street and the back yard; in Hollywoodland, however, due to the steepness of the hillsides and the winding streets, all sides of a house, including the roof, are visible from many other houses above or across the canyon from a subject house.

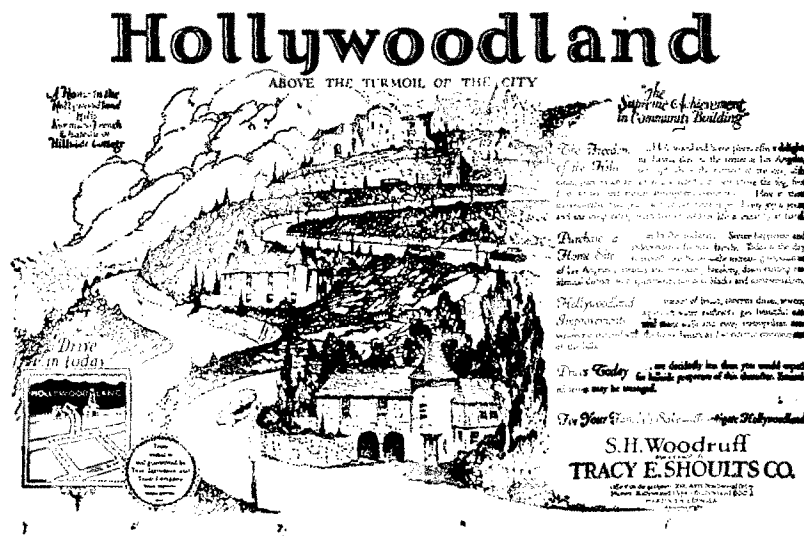


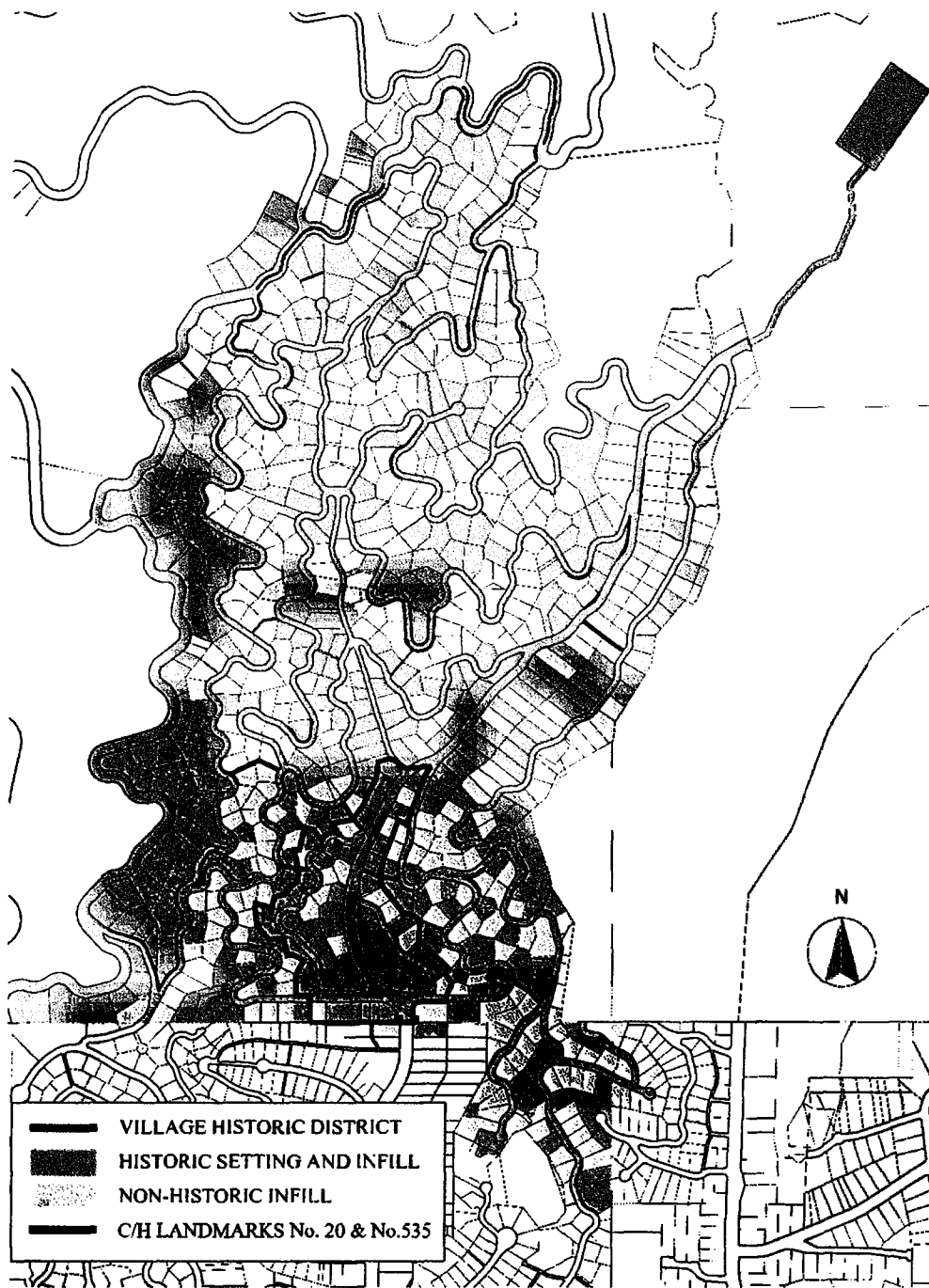
## D. The Hollywoodland Setting of the Subject Property:

As stated above, the historic setting of Hollywoodland is intact and substantial.

- The original winding historic streets with concrete curbs and historic streetlights exist today as they did in 1923 and establish the "European Village" character of Hollywoodland.
- The granite walls that were built to support the streets when the steep grade required it are designated as a Cultural Historic Monument (#535).
- The granite retaining walls in the median of the historic Mulholland Highway that created a grade-separated highway at the top of Hollywoodland are also designated a Cultural Historic Monument (#535).
- The historic granite steps that connect hillside streets are designated a Cultural Historic Monument (#535).
- The historic granite gateway towers at the entrance to Hollywoodland are designated a Cultural Historic Monument (#20).
- The Village is a designated The Hollywoodland Historic District.
- Most of the original Period Revival houses remain and many of them are designated Individual Historic Resources.
- Numerous infill houses built since the Specific Plan was enacted in 1992 were required to be compatible with the historic character of Hollywoodland.
- The remaining lots will be developed under the Specific Plan requirements and will be required to be compatible with the historic character of Hollywoodland.

The sum of these elements is the visual setting for the subject property and this setting is illustrated in orange on the map on the following page.





**HISTORIC SETTING AND INFILL  
HOLLYWOODLAND SPECIFIC PLAN**

**E. The Immediate Setting of the Subject Property:**

The subject property takes access from a historic cul de sac, carefully designed by the original developer to minimize grading and nestle into a small valley. One side of the short access street has an historic granite wall supporting the hillside. One block away on Ledgewood Drive a larger historic granite wall supports the intersection of two streets.

The subject property is surrounded by historic Period Revival houses.

- Across from the entrance to the cul de sac at 6310 Heather sits an historic 1920's Spanish Revival house.



- On the left side of the entrance to the cul de sac at 6311 Heather high up on the lot sits an historic 1920's Tudor house, listed as an individual Resource in SurveyLA.



- On the right side of the entrance to the cul de sac at 6305 Heather sits an original Spanish Revival house.



- On the hill overlooking the cul de sac at 6182 Mulholland Highway sits an original 1920's Spanish Revival house.



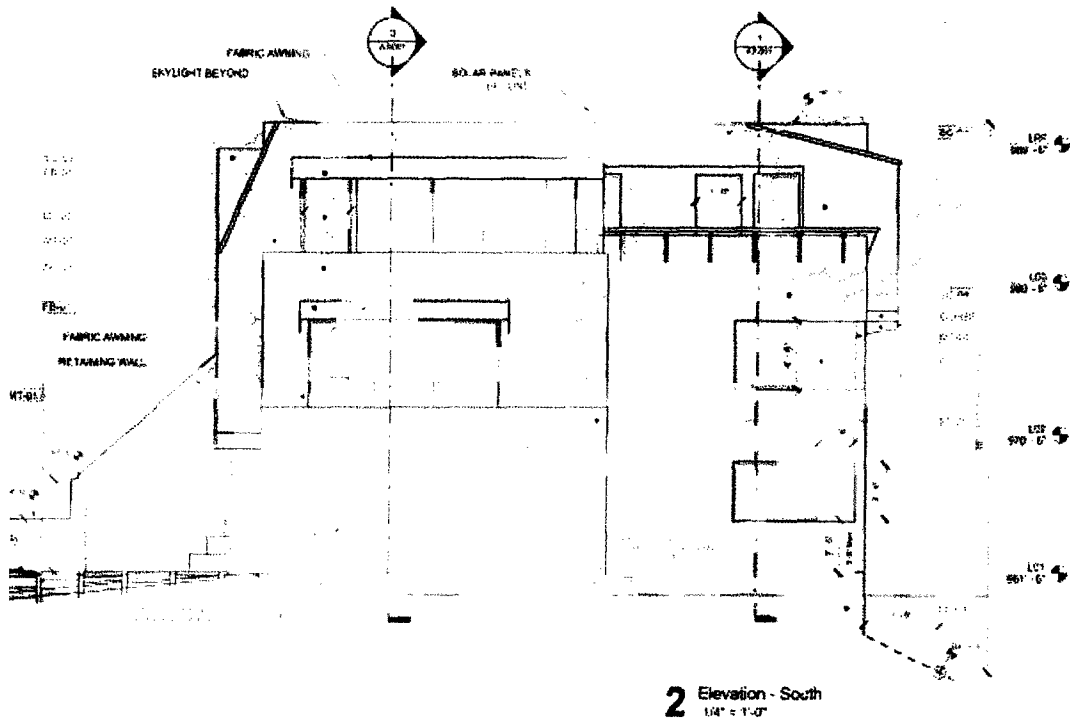
- Two lots away at 3311 Ledgewood sits an original 1920's Spanish Revival house





## F. Proposed Project Design:


The proposed Project satisfies none of the design criteria established in Section C and will significantly erode the character of the Hollywoodland and, in particular, of the immediate surroundings.



- The massing does not have a traditional structure; the roof consists primarily of a flat roof with a steep mansard roof attached to the front and a shallow shed roof attached to the rear.
- Windows and sliding glass doors are bronze metal box frame single light and are of widely varying proportions.
- Roof edges, window and door surrounds and building edges have no detail or moldings.
- Roofing materials are charcoal grey built-up roofing with slate grey smooth clay shingles which are modern with no relationship to traditional workmanship.
- Wall material is dove grey smooth modern plaster and fiber cement siding with no relationship to traditional workmanship
- Fixtures and hardware are not illustrated but can be assumed to be abstract and modern.
- The driveway is treated as a graphic design with large modern concrete pavers whereas the historic Hollywoodland houses have understated poured concrete driveways.
- Aside from two new oak trees all the new landscaping materials are non-native and foreign to the native flora of Hollywoodland.

In summary, the proposed Project should not have been granted a Categorical Exemption because the Project will degrade the existing visual character of the site and its surroundings.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Mekeel". The signature is written in a cursive, slightly slanted style.

Michael Mekeel  
Offenhauser/Mekeel Architects

## Comments on Applicant's Rebuttal to Item 2:

1. Historical Resource Assessment: The Applicant has missed the pertinent CEQA code section which is:

"CCR 15064.5(a)(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1."

Furthermore, in reference to the Secretary of the Interior Standards for the Treatment of Historic Properties and in particular Preservation Brief 14, the setting of a property is significant and must be considered in evaluating the impact of an infill project. See map in Section E.

2. Architectural Style Analysis: As documented above, the subject site is surrounded by historic houses in Period Revival styles in prominent locations. While there may be a variety of houses styles within a 300-foot radius, this simply reinforces the Specific Plan requirements that any additional infill houses adhere to the original vision of Hollywoodland so as not to further erode the visual character of Hollywoodland. It is precisely because of the erosion in the 1950's through 1980's of the original visual character of Hollywoodland that the Specific Plan was enacted to protect this visual character and discourage modern, incompatible design of which this project is an example.
3. Final Design: The Applicant's response to input from the Design Review Board was to add a mansard roof to the front of the building and a shed roof to the rear. This design in no conceivable way "reflects the European Village character" as described above. The statement that the "desired look of a European Village" is at odds with current regulations is not correct as documented by the houses built under the Specific Plan and the fact that 99% of houses being built in the United States today are built in a traditional style.

4. Compatibility with Existing Neighbor: The proposed house is NOT compatible with the Appellant's House and the juxtaposition of the entire front elevation of the Proposed Project with a portion of the Applicant's House is very misleading.
  - a. The "rusticated base" of the Appellant's House is a pair of single traditional wood garage doors with delicately detailed wood posts between the doors and on each side appropriate to a Spanish Revival house. The "rusticated base" of the Proposed Project is an abstract, asymmetrical mass of applied stone with a double sectional modern garage door of horizontal proportions of indeterminate material with four horizontal sections giving it a modern, abstract appearance.
  - b. The "Simple Windows" may be an apt description of the Proposed Project's metal windows, but the Applicant's House has a consistent language of vertically proportioned wood windows with similarly sized glass lights, delicately detailed muntins, window frames and wall detailing appropriate to a Spanish Revival house.
  - c. The "Stucco Finish" on the Proposed Project is smooth and abstract while the exterior plaster on the Applicant's House is purposefully uneven to give the appearance of an adobe wall appropriate to a Spanish Revival House.
  - d. The "Tile Roof" of the Proposed Project is only on a small, steep mansard roof facing the street and a small shed roof facing east both roofed with a flat grey clay tile. The entire tile roof of the Applicant's House consists of authentic red clay Mission tiles which not only provide a visual treat to all the houses looking down on this house but create a delicate detail along the eaves, rakes and ridges.
  - e. The "Stepped Massing" of the Proposed Project is abstract and asymmetrical without any relationship to the simple massing that characterizes the original houses on Hollywoodland. By contrast, the massing of the Applicant's House consists of a cross gable at the north end and a simple cranked gabled wing on the south side.
  
5. Neighbor on Lugano Place: The neighboring house on Lugano Place, while not an outstanding example of compatibility with the Hollywoodland character, at least was designed with a traditional gable facing the street and a cross gable presenting an eave to the cul de sac. The windows have a consistent vertical articulation which is more compatible with Hollywoodland than the random window sizes of the Proposed Project.

2700 N. Beachwood Dr.		2700 N. Beachwood Dr.	2701 N. Beachwood Dr.
2706 N. Beachwood Dr.		2706 N. Beachwood Dr.	2707 N. Beachwood Dr.
			2714 N. Beachwood Dr.
2721 N. Beachwood Dr.		2721 N. Beachwood Dr.	2722 N. Beachwood Dr.
			2724 N. Beachwood Dr.
2731 N. Beachwood Dr.		2731 N. Beachwood Dr.	2732 N. Beachwood Dr.
			2734 N. Beachwood Dr.
2740 N. Beachwood Dr.		2740 N. Beachwood Dr.	2740 N. Beachwood Dr.
2747 N. Beachwood Dr.		2747 N. Beachwood Dr.	2747 N. Beachwood Dr.
2750 N. Beachwood Dr.		2750 N. Beachwood Dr.	2750 N. Beachwood Dr.
2753 N. Beachwood Dr.		2753 N. Beachwood Dr.	2753 N. Beachwood Dr.
2761 N. Beachwood Dr.		2761 N. Beachwood Dr.	2761 N. Beachwood Dr.
2800 N. Beachwood Dr.		2800 N. Beachwood Dr.	2800 N. Beachwood Dr.
2810 N. Beachwood Dr.		2810 N. Beachwood Dr.	2810 N. Beachwood Dr.
2815 N. Beachwood Dr.		2815 N. Beachwood Dr.	2815 N. Beachwood Dr.
2820 N. Beachwood Dr.		2820 N. Beachwood Dr.	2820 N. Beachwood Dr.
2829 N. Beachwood Dr.		2829 N. Beachwood Dr.	2829 N. Beachwood Dr.
2836 N. Beachwood Dr.		2836 N. Beachwood Dr.	2836 N. Beachwood Dr.
2837 N. Beachwood Dr.		2837 N. Beachwood Dr.	2837 N. Beachwood Dr.
			2845 N. Beachwood Dr.
			2851 N. Beachwood Dr.
			2852 N. Beachwood Dr.
			2861 N. Beachwood Dr.
		2904 N. Beachwood Dr.	2905 N. Beachwood Dr.
			2905 N. Beachwood Dr.
		2910 N. Beachwood Dr.	2910 N. Beachwood Dr.
		2915 N. Beachwood Dr.	2915 N. Beachwood Dr.
			2922 N. Beachwood Dr.
		2925 N. Beachwood Dr.	2926 N. Beachwood Dr.
			2933 N. Beachwood Dr.
			2934 N. Beachwood Dr.
			2946 N. Beachwood Dr.
			2953 N. Beachwood Dr.
		2958 N. Beachwood Dr.	2959 N. Beachwood Dr.
			3004 N. Beachwood Dr.
			3008 N. Beachwood Dr.
			3009 N. Beachwood Dr.
		3015 N. Beachwood Dr.	3016 N. Beachwood Dr.
			3025 N. Beachwood Dr.
		3036 N. Beachwood Dr.	3037 N. Beachwood Dr.

			3061 N. Beachwood Dr.
		3064 N. Beachwood Dr.	3065 N. Beachwood Dr.
			3094 N. Beachwood Dr.
2699 Belden Dr.		2699 Belden Dr.	2700 Belden Dr.
		2765 Belden Dr.	2766 Belden Dr.
			2701 Belden Dr.
			2707 Belden Dr.
			2711 Belden Dr.
			2713 Belden Dr.
2699 Belden Dr.		2699 Belden Dr.	2700 Belden Dr.
			2727 Belden Dr.
			2746 Belden Dr.
		2765 Belden Dr.	2766 Belden Dr.
			2769 Belden Dr.
			2771 Belden Dr.
		2801 Belden Dr.	2802 Belden Dr.
			2866 Belden Dr.
			2872 Belden Dr.
		2966 Belden Dr.	2967 Belden Dr.
			2910 Belden Dr.
			2925 Belden Dr.
			2931 Belden Dr.
			2933 Belden Dr.
			2946 Belden Dr.
			2950 Belden Dr.
			2980 Belden Dr.
			2995 Belden Dr.
			2996 Belden Dr.
			2986 Belden Dr.
			3007 Belden Dr.
			3060 Belden Dr.
		3072 Belden Dr.	3073 Belden Dr.
			3078 Belden Dr.
			3124 Belden Dr.
		3206 Deronda Dr.	3206 Deronda Dr.
		3259 Deronda Dr.	3259 Deronda Dr.
		3332 Deronda Dr.	3332 Deronda Dr.
		3351 Deronda Dr.	3351 Deronda Dr.
		3358 Deronda Dr.	3358 Deronda Dr.
			6102 Dorcas Ct.
			6108 Dorcas Ct.
			6123 Dorcas Ct.
			6121 Dorcas Ct.
		2861 Durand Dr.	2862 Durand Dr.
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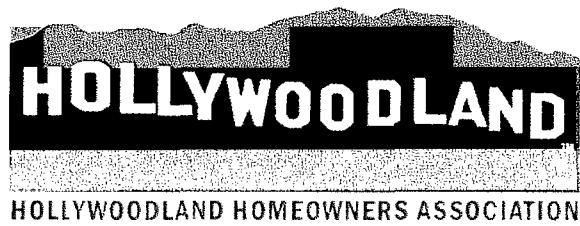
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	3123 Durand Dr.		3123 Durand Dr.
	3129 Durand Dr.		3129 Durand Dr.
	3135 Durand Dr.		3135 Durand Dr.
	3141 Durand Dr.		3141 Durand Dr.
	3145 Durand Dr.		3145 Durand Dr.
	3154 Durand Dr.		3154 Durand Dr.
	3158 Durand Dr.		3158 Durand Dr.
	3340 Durand Dr.		3340 Durand Dr.
	3141 Durand Dr.		3141 Durand Dr.
	3145 Durand Dr.		3145 Durand Dr.
	3180 Durand Dr.		3180 Durand Dr.
	3185 Durand Dr.		3185 Durand Dr.
	3200 Durand Dr.		3200 Durand Dr.
	3206 Durand Dr.		3206 Durand Dr.
	3224 Durand Dr.		3224 Durand Dr.
	3311 Durand Dr.		3311 Durand Dr.
	3323 Durand Dr.		3323 Durand Dr.
	3345 Durand Dr.		3345 Durand Dr.
			6310 Heather Dr.
	6311 Heather Dr.		6312 Heather Dr.
			2841 Hollyridge Dr.
			2875 Hollyridge Dr.
			2886 Hollyridge Dr.
			2913 Hollyridge Dr.
			2934 Hollyridge Dr.
	2955 Hollyridge Dr.		2955 Hollyridge Dr.
			3001 Hollyridge Dr.
			3039 Hollyridge Dr.
			3045 Hollyridge Dr.
			3051 Hollyridge Dr.
	3062 Hollyridge Dr.		3062 Hollyridge Dr.
			3068 Hollyridge Dr.
			3119 Hollyridge Dr.
			6010 Lechner Dr.
			2917 Ledgewood Dr.
			3001 Ledgewood Dr.
			3011 Ledgewood Dr.
			3035 Ledgewood Dr.
			3105 Ledgewood Dr.
			3267 Ledgewood Dr.
			3311 Ledgewood Dr.
			3323 Ledgewood Dr.
			3345 :Ledgewood Dr.
	3370 Ledgewood Dr.		3370 Ledgewood Dr.
	3378 Ledgewood Dr.		3378 Ledgewood Dr.

			6139 Mulholland Hwy.
			6182 Mulholland Hwy.
			6208 Mulholland Hwy.
		6233 Mulholland Hwy.	6234 Mulholland Hwy.
			6241 Mulholland Hwy.
			6233 Mulholland Hwy.
			6200 Mulholland Hwy.
			6310 Mulholland Hwy.
			6311 Mulholland Hwy.
			6316 Mulholland Hwy.
			6322 Mulholland Hwy.
			6342 Mulholland Hwy.
			6338 Mulholland Hwy.
			6141 Rockcliff Dr.
		6171 Rockcliff Dr.	6172 Rockcliff Dr.
			6217 Rockcliff Dr.
			6218 Rockcliff Dr.
			6219 Rockcliff Dr.
		6024 Rodgerton Dr.	6024 Rodgerton Dr.
			6030 Rodgerton Dr.
			6046 Rodgerton Dr.
			6145 Rodgerton Dr.
			6165 Rodgerton Dr.
			6201 Rodgerton Dr.
			6209 Rodgerton Dr.
		6231 Rodgerton Dr.	6231 Rodgerton Dr.
			6248 Rodgerton Dr.
		6285 Rodgerton Dr.	6285 Rodgerton Dr.
		6310 Rodgerton Dr.	6310 Rodgerton Dr.
			6318 Rodgerton Dr.
			6385 Rodgerton Dr.
			6404 Rodgerton Dr.
			6446 Rodgerton Dr.
			6473 Rodgerton Dr.
			2724 N. Westshire Dr.
			2729 N. Westshire Dr.
			2731 N. Westshire Dr.
			2735 N. Westshire Dr.
			2748 N. Westshire Dr.
			2769 N. Westshire Dr..
			2789 N. Westshire Dr.
			2811 N. Westshire Dr..
			2817 N. Westshire Dr.
			2829 N. Westshire Dr.
			2831 N. Westshire Dr.
			2835 N. Westshire Dr.
			2841 N. Westshire Dr.



	2846 N. Westshire Dr.		2847 N. Westshire Dr.
			2872 N. Westshire Dr.
			2888 N. Westshire Dr.
			2890 N. Westshire Dr.
			2916 N. Westshire Dr.
			2741 N. Woodshire Dr.
			2756 N. Woodshire Dr.
			2769 N. Woodshire Dr.
2716 N. Woodhaven Dr.	2716 N. Woodhaven Dr.		2716 N. Woodhaven Dr.
2720 N. Woodhaven Dr.	2720 N. Woodhaven Dr.		2720 N. Woodhaven Dr.
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			2731 N. Woodhaven Dr.
2740 N. Woodhaven Dr.	2740 N. Woodhaven Dr.		2740 N. Woodhaven Dr.
2741 N. Woodhaven Dr.	2741 N. Woodhaven Dr.		2741 N. Woodhaven Dr.
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2731 Woodshire Dr.	2731 Woodshire Dr.		2731 Woodshire Dr.
2738 Woodshire Dr.	2738 Woodshire Dr.		2738 Woodshire Dr.
			2741 Woodshire Dr.
2746 Woodshire Dr.	2746 Woodshire Dr.		2746 Woodshire Dr.
2754 Woodshire Dr.	2754 Woodshire Dr.		2754 Woodshire Dr.
2755 Woodshire Dr.	2755 Woodshire Dr.		2755 Woodshire Dr.
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2759 Woodshire Dr.	2759 Woodshire Dr.		2759 Woodshire Dr.
2762 Woodshire Dr.	2762 Woodshire Dr.		2762 Woodshire Dr.
			2769 Woodshire Dr.
2777 Woodshire Dr.	2777 Woodshire Dr.		2777 Woodshire Dr.
2805 Woodshire Dr.	2805 Woodshire Dr.		2805 Woodshire Dr.
2810 Woodshire Dr.	2810 Woodshire Dr.		2810 Woodshire Dr.

Number of Individual Historic Resources in Historic District		34
Number of Individual Historic Resources in Hollywoodland		88
Number of Historic Houses in Hollywoodland 1920 to 1945		205



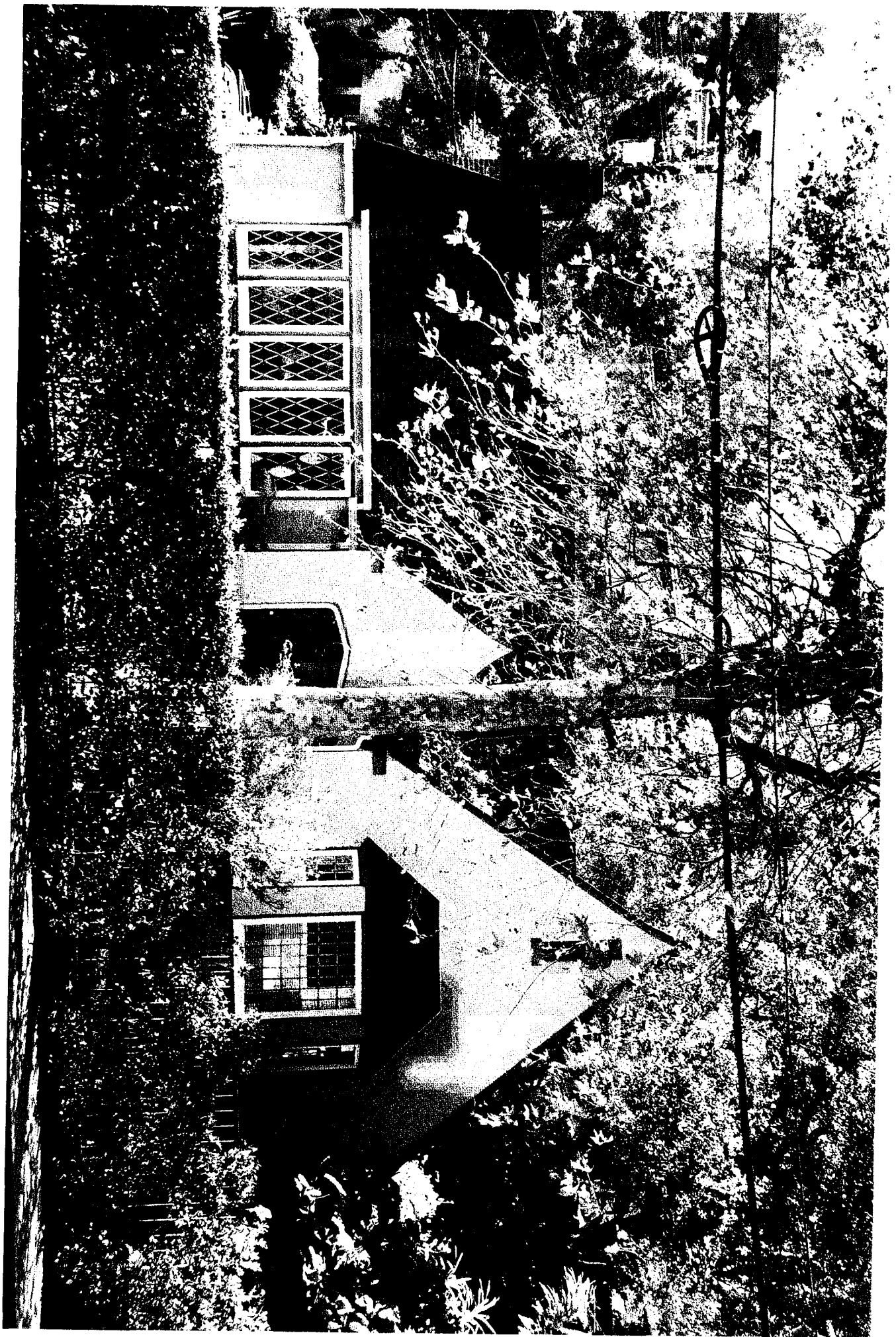
May 9, 2018

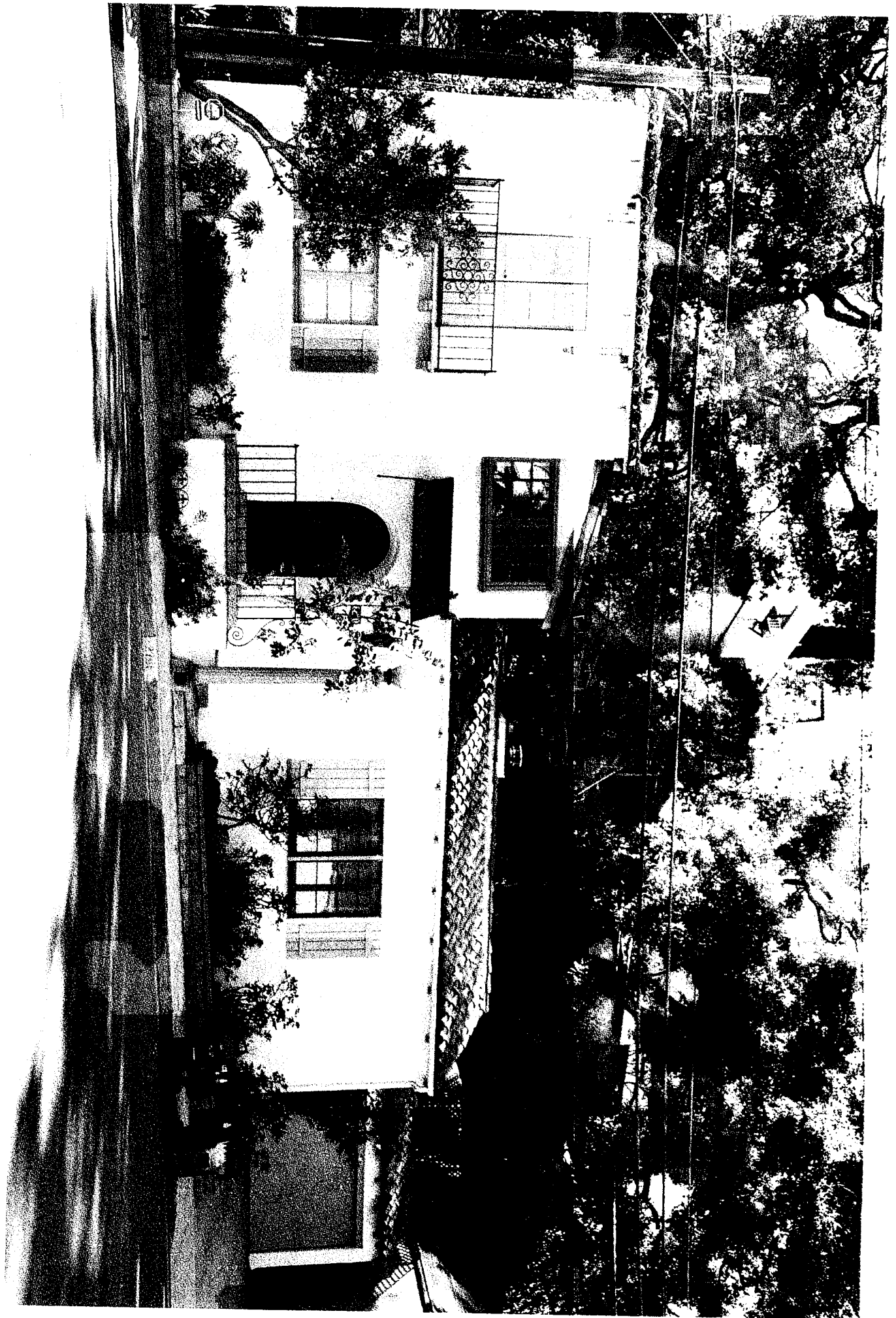
The Hollywood Homeowners' Association makes the following findings:

- Hollywoodland is a unique residential community in Hollywood, planned in the early 1920's as a custom home, single-family subdivision with a "European Village" character and aesthetic.
- The Hollywoodland Specific Plan protects the "European Village" character and aesthetic of Hollywoodland.
- In recent years, several new residences have been constructed in Hollywoodland that did not conform to the requisite "European Village" character and aesthetic.
- The introduction of non-"European Village" architecture is changing the aesthetic character of Hollywoodland.
- The proposed Project at 3314 N. Lugano Place is inconsistent with the "European Village" character and aesthetic protected by the Hollywoodland Specific Plan.
- If the 3314 N. Lugano Project is constructed, as proposed, it will further degrade the aesthetic character of Hollywoodland.
- The cumulative aesthetic effects of the 3314 N. Lugano Project must be analyzed.

Therefore, the Hollywood Homeowners' Association moves to support the California Environmental Quality Act appeal pending before the City Council. A Categorical Exemption is not appropriate for the proposed Project at 3314 N. Lugano Place because of its adverse aesthetic impacts and cumulative impacts.

Hollywoodland Homeowners Association

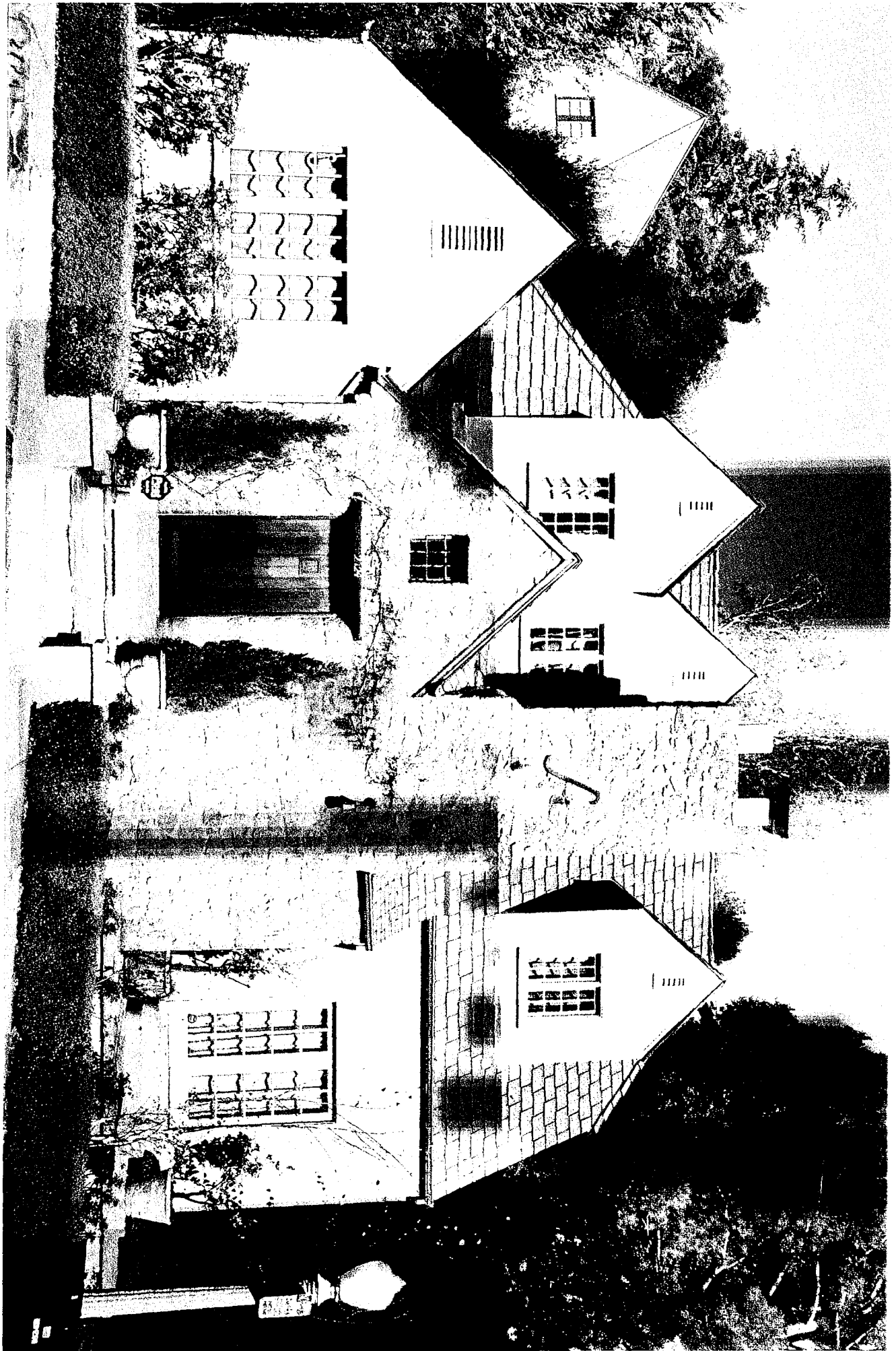






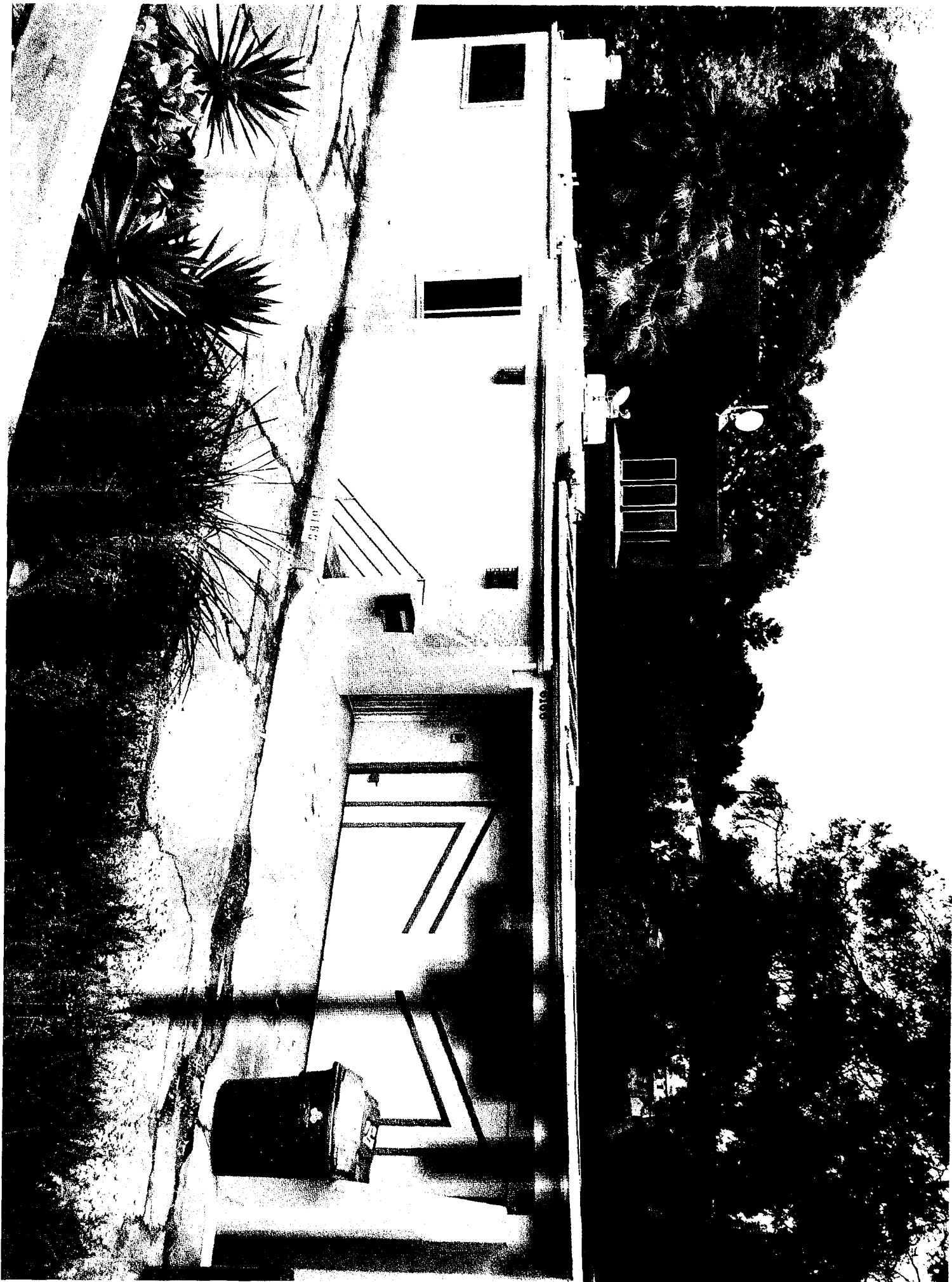


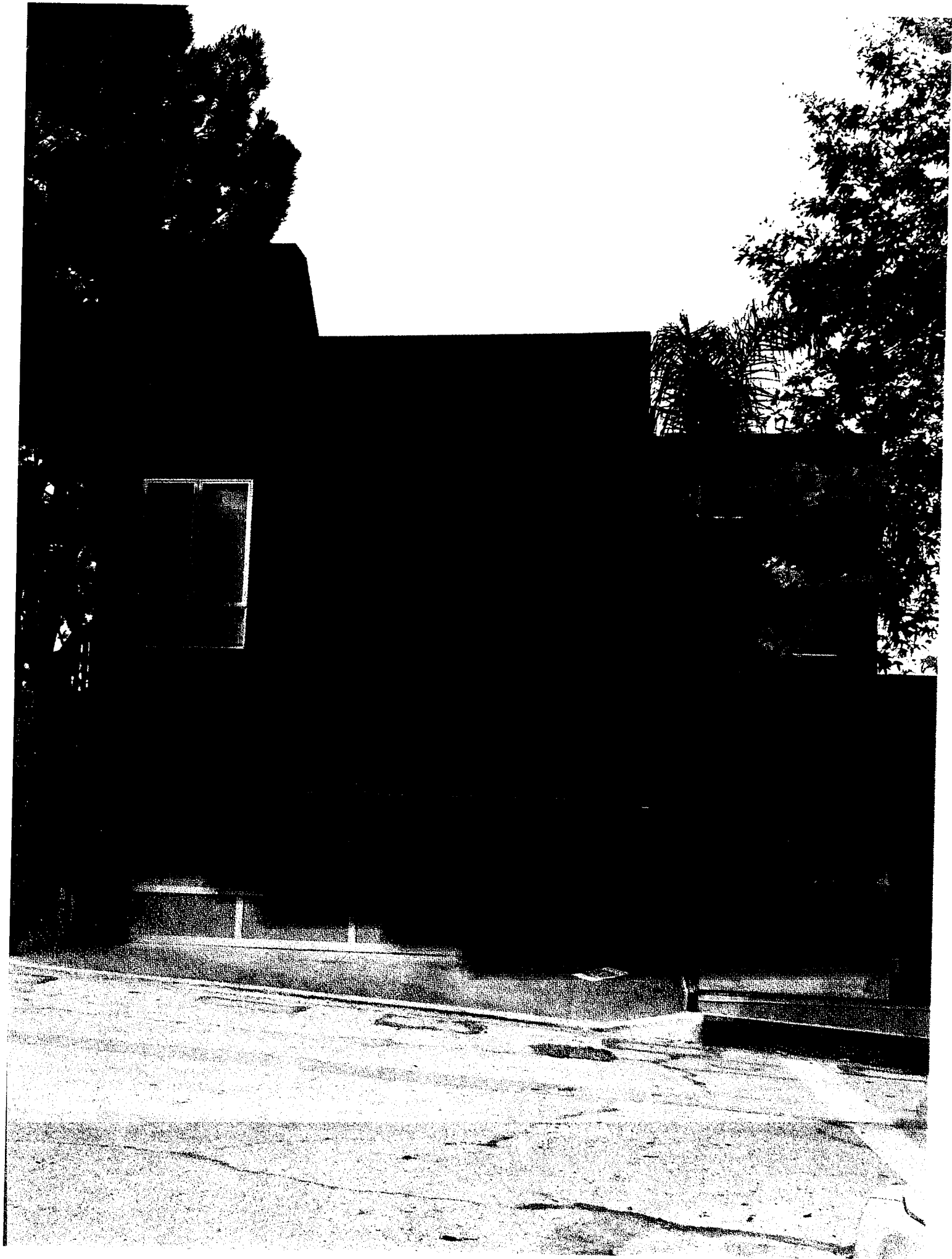


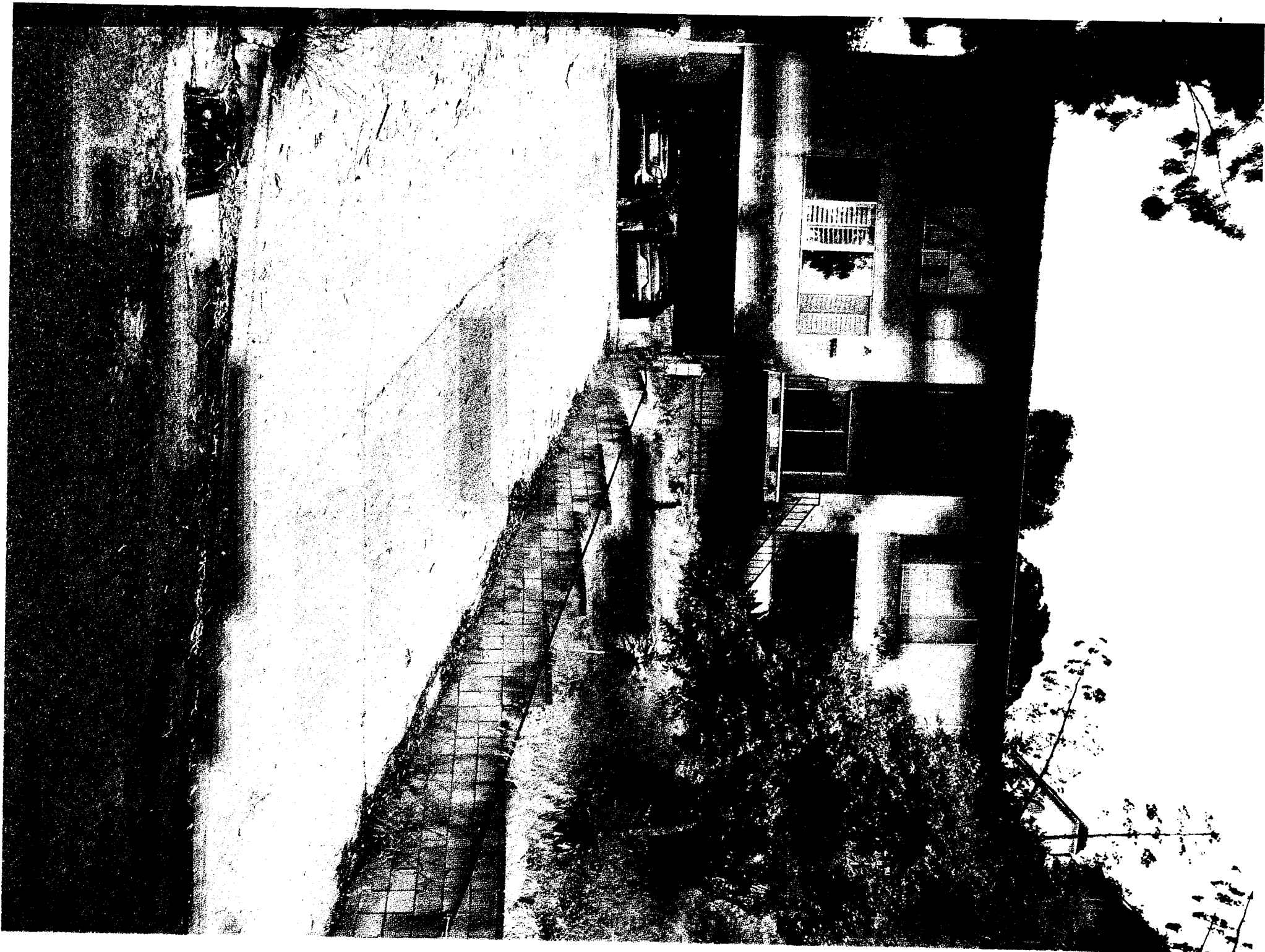


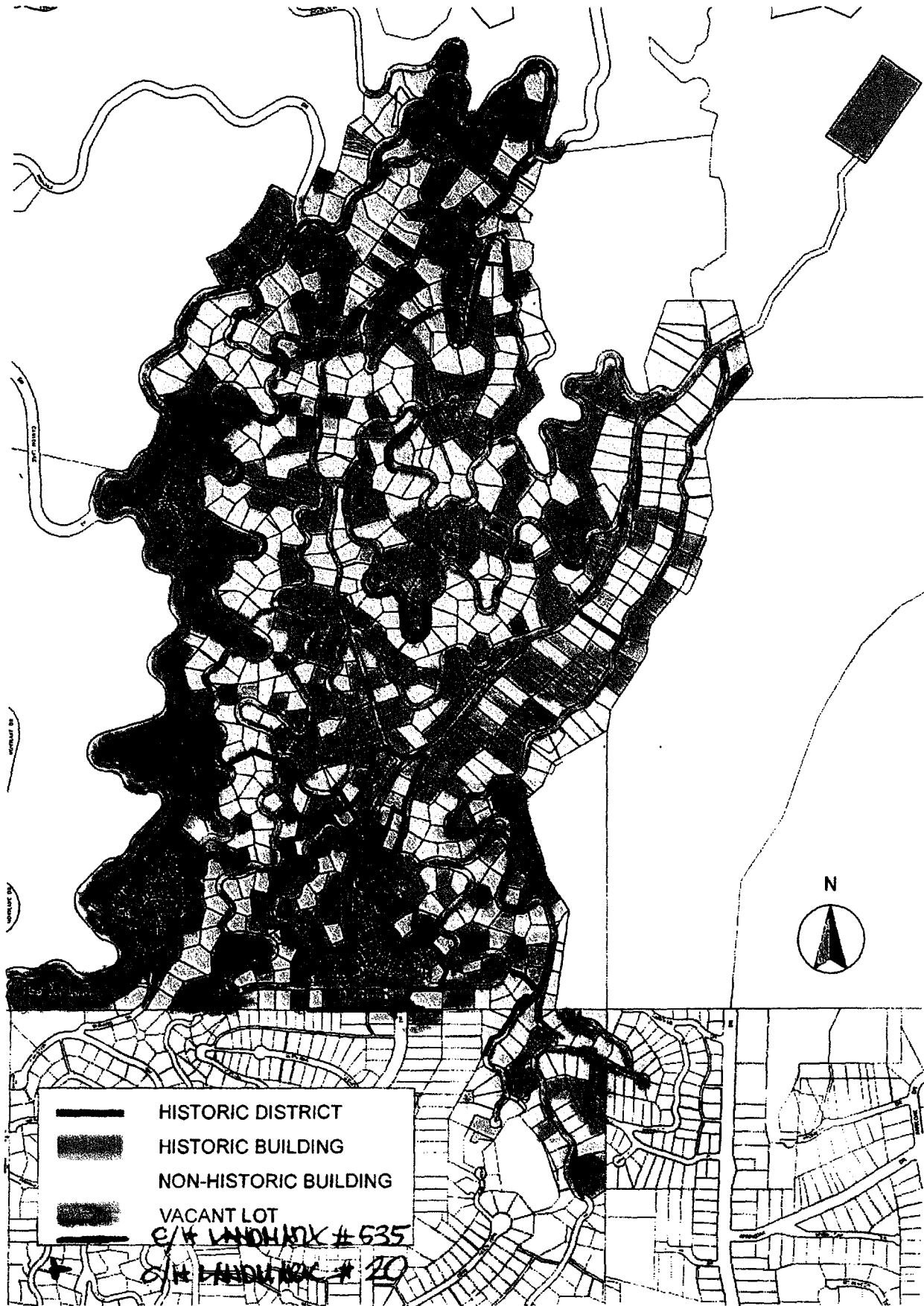




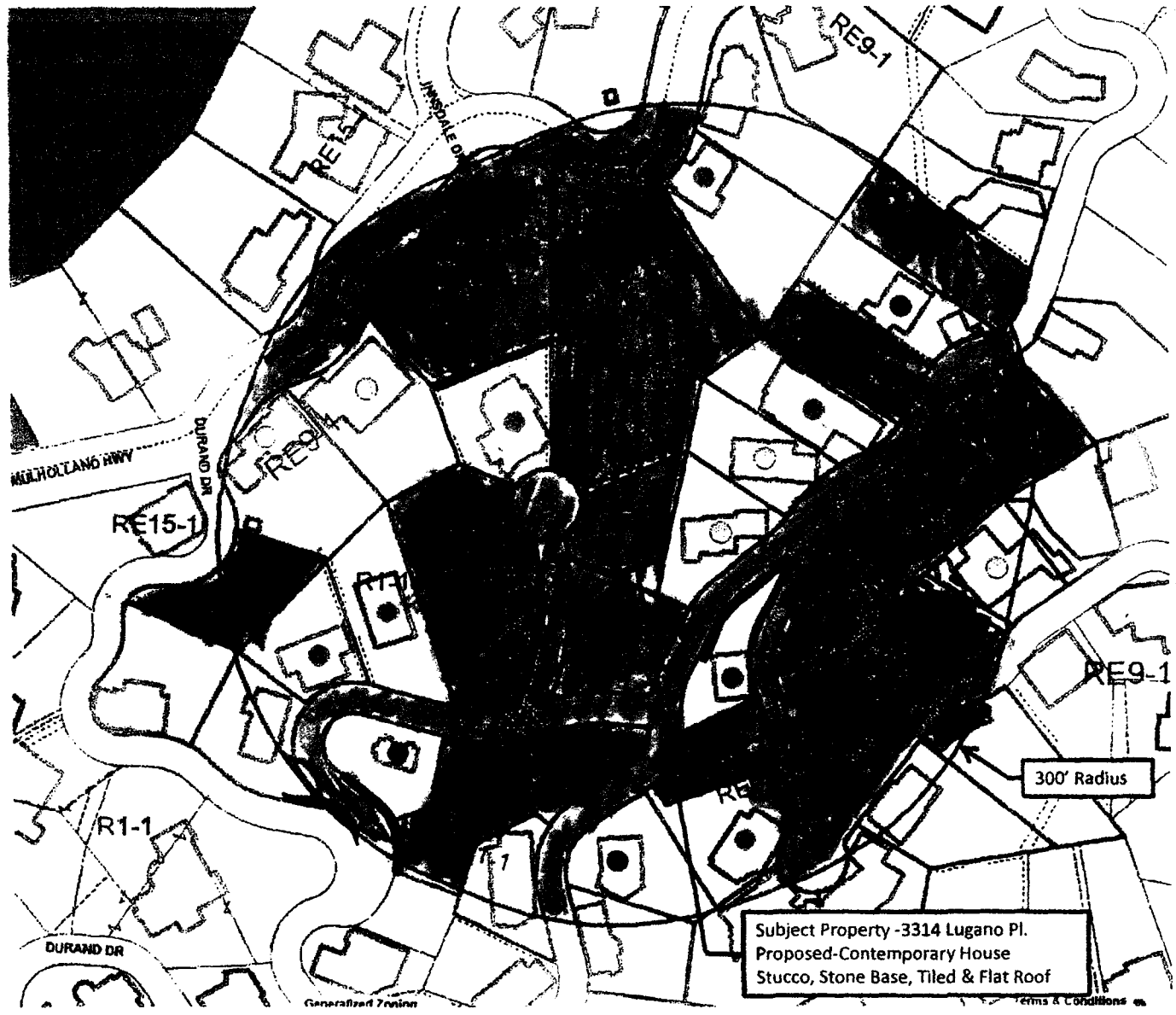








HOLLYWOODLAND SPECIFIC PLAN



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

"HISTORIC" (50 YEAR OLD)  
 HOUSES & INFRASTRUCTURE  
 PLUS LOTS WHICH ARE  
 PROTECTED BY THE  
 SPECIFIC PLAN

— CULTURAL/HISTORIC  
 LANDMARK # 535  
 GRANITE WALLS

Exhibit E – Architectural Style Analysis Surrounding the Site

Date	Time	Animal
12/15/2017	4:00 AM	Coyote
12/17/2017	5:52 AM	Coyote
12/17/2017	7:40 AM	Coyote (2)
12/19/2017	5:36 PM	Coyote
12/20/2017	8:05 PM	Coyote (3)
12/21/2017	6:53 AM	Coyote (2)
12/21/2017	8:02 AM	Coyote
12/22/2017	4:15 AM	Coyote
12/22/2017	4:26 AM	Coyote
12/22/2017	8:04 AM	Coyote
12/22/2017	10:50 PM	Coyote (2)
12/23/2017	8:16 AM	Coyote (2)
12/24/2017	12:54 AM	Coyote (2)
12/24/2017	8:20 AM	Coyote (2)
12/24/2017	9:04 PM	Raccoon
12/25/2017	6:26 AM	Coyote (2)
12/25/2017	6:35 AM	Coyote
12/25/2017	6:08 PM	Coyote
12/25/2017	7:30 PM	Coyote (4)
12/25/2017	8:38 PM	Bobcat
12/26/2017	5:49 AM	Coyote
12/26/2017	7:44 AM	Coyote (2)
12/27/2017	6:37 AM	Coyote (4)
12/28/2017	1:08 AM	Coyote (2)
12/28/2017	11:24 AM	Coyote
12/30/2017	4:16 AM	Coyote (5)

12/31/2017 No Camera

1/1/2017 No Camera

1/2/2017 No Camera

1/3/2018 11:03 PM Coyote

1/4/2018 12:18 PM Coyote (2)

1/5/2018 6:05 AM Coyote (3)

1/6/2018 3:40 AM Coyote

1/7-11/18 No Camera

1/12/2018 6:29 PM Deer

1/12/2018 8:05 PM Coyote (3)

1/13/2018 7:22 AM Coyote (2)

1/13/2018 11:10 PM Coyote  
1/14/2018 8:58 PM Coyote (3)  
1/15/2018 2:12 AM Coyote (3)  
1/16/2018 7:41 AM Coyote (2)  
1/17/2018 8:09 AM Coyote (2)  
1/17/2018 11:37 PM Coyote (4)  
1/18/2018 12:49 AM Coyote (2)  
1/18/2018 12:57 AM Coyote (3)  
1/18/2018 1:13 AM Coyote

1/19-31/18 No Camera

2/1/2018 5:04 AM Coyote (3)  
2/1/2018 8:19 PM Coyote  
2/5/2018 2:35 AM Coyote (2)  
2/7/2018 10:37 PM Coyote  
2/7/2018 11:16 PM Deer  
2/7/2018 11:23 PM Deer  
2/8/2018 10:29 PM Coyote (4)  
2/9/2018 12:38 AM Skunk



**SANTA MONICA MOUNTAINS CONSERVANCY**

SOLSTICE CANYON PARK  
3700 SOLSTICE CANYON ROAD  
MALIBU, CA 90265  
(213) 456-5046

1/19/1990

Environmental  
issues  
Lambert

429



January 19, 1990

Planning and Land Use Management Committee  
Council of the City of Los Angeles  
City Hall 200 N. Spring Street, Room 340  
Los Angeles, CA 90012

Re: Planning and Land Use Case Nos. 89-027, 89-028, 89-029

Dear Planning and Land Use Management Committee:

On Wednesday, December 13, 1989, at the request of Hollywoodland Homeowner's Association, I inspected the site of single family residences proposed at 2855, 2864 and 2865 Lambert Drive (Planning and Land Use Case Numbers 89-027, 89-028 and 89-029). Having made a visual inspection of the site and conceptual plans, including elevations for the project, as well as a thorough inspection of the actual site itself, I wish to call your attention to several important points.

The proposed project will adversely impact the park view shed as well as impact views from the trail that leads to the park.

In addition, the proposed project would require altering an historic use of a sixty seven (67) year old trail that abuts and enters Griffith Park. The project will destroy and remove this undisturbed path, which has become historically used as a trail by its continuous use for sixty seven (67) years, and which still remains in current use by the area's residents. The project will obliterate and eliminate this trail and not mitigate or provide an alternative for it, as access to the Park will be lost entirely.

The project's "hammerhead" turnaround poses further problems and issues that the City will have to address.

The hammerhead turnaround is exactly contiguous to the Park Boundary, which is a very steep slope and will require a retaining wall and encroachment to approximately 10 feet into the Park Land, which will require an encroachment permit from the City. This is an issue the City must address, as the development will be encroaching into the Park Land. In addition, substantial grading will be required along this contiguous Park Boundary, presenting similar problems and raising similar encroachment issues.

The westerly portion of the project site (lot 6) is a steep canyon slope which appears to be composed of uncompacted fill, apparently graded and pushed over the hill as Hollyridge Drive was cut and bulldozed by the original subdivider in 1923.

This composition of the slope (uncompacted fill) is verifiable through the visual movement of the landscape as well as the pronounced lack of indigenous vegetation - as compared with adjoining neighboring slopes - caused by the continuous erosion and movement of the land, which, as uncompacted fill, is soft. Erosion and movement of the land is apparent in other parts of the canyon. Recent movement is confirmed by a 14" diameter live oak tree which is growing diagonally.

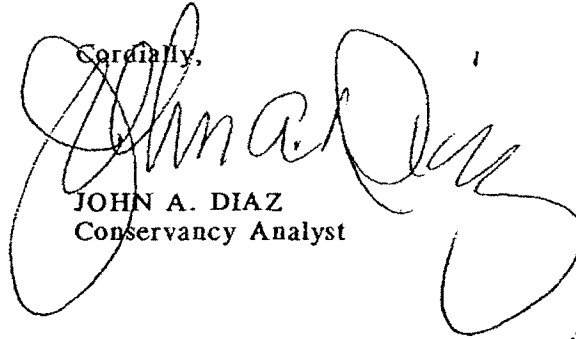
There is a great deal of sloughing and sliding on other slopes which lie within the project site. All of these present problems of erosion, flood control, hillside stability and drainage.

Page 2  
January 19, 1990  
89-027, 89-028 & 89-029

Finally, the obliteration of the trail and canyon will destroy a vital wildlife corridor in the area, as the canyon contains active deer trails which would be displaced and eliminated by the project.

The Santa Monica Mountains Conservancy, established by the California State Legislature, mandates the conservation and protection of public rights of way in the Santa Monica Mountains Zone.

Cordially,

A large, stylized handwritten signature in black ink, appearing to read "John A. Diaz". The signature is written over the typed name and title.

JOHN A. DIAZ  
Conservancy Analyst

cc. Councilman Michael Woo, Planning & Land Use Management Committee  
Councilman Hal Bernson, Planning & Land Use Management Committee  
Councilman Robert Farrell, Planning & Land Use Management Committee  
Councilman John Ferraro, President, Los Angeles City Council  
William Luddy, Los Angeles City Planning Commission  
James Hadaway, Department of Recreation and Parks  
J. Stanley Sanders, Board of Recreation & Park Commissioners  
Sheldon Jensen, Dept of Recreation and Parks, Griffith Region  
Christine O'Brien, Hollywood Homeowner's Association

JD/njh

**The Hollywoodland Wildlife Group** makes the following findings to support the California Environmental Quality Act appeal pending before the City Council: A Categorical Exemption is not appropriate for the proposed Project at 3314 N. Lugano Place, because of its adverse of *uninvestigated* and undetermined environmental impacts.

The law states:

A Summary of the California Environmental Quality Act (CEQA) (California Public Resources Code, Sections 21000 - 21178, and Title 14 CCR, Section 753, and Chapter 3, Sections 15000 - 15387)

The California Environmental Quality Act (CEQA) is California's broadest environmental law.

CEQA helps to guide the Department during issuance of permits and approval of projects. Courts have interpreted CEQA to afford the fullest protection of the environment within the reasonable scope of the statutes. CEQA applies to all discretionary projects proposed to be conducted or approved by a California public agency, including private projects requiring discretionary government approval.

The purpose of CEQA is to:

- Disclose to the public the significant environmental effects of a proposed discretionary project, through the preparation of an Initial Study (IS), Negative Declaration (ND), or Environmental Impact Report (EIR).
- Prevent or minimize damage to the environment through development of project alternatives, mitigation measures, and mitigation monitoring.
- Disclose to the public the agency decision making process utilized to approve discretionary projects through findings and statements of overriding consideration.
- Enhance public participation in the environmental review process through scoping meetings, public notice, public review, hearings, and the judicial process.
- Improve interagency coordination through early consultations, scoping meetings, notices of preparation, and State Clearinghouse review.

HollywoodLand is a declared sensitive ecological area for plants, animals, birds; reptiles - in a dangerous high fire area.

Yet, the proposed Project at 3314 N. Lugano Place has not been given ANY GUIDANCE BY CEQA. This negligence exists despite the fact that we have documented evidence that this site in particular is crucial for wildlife that also utilize Griffith Park. Existing wildlife corridors have also been determined.

Therefore, the Hollywoodland Wildlife Group supports the California Environmental Quality Act appeal pending before the City Council. A Categorical Exemption is not appropriate for the proposed Project at 3314 N. Lugano Place.