

## Communication from Public

**Name:** Ellen Evans  
**Date Submitted:** 03/20/2025 02:03 PM  
**Council File No:** 24-1371  
**Comments for Public Posting:** Please see the attached letter from the Doheny Sunset Plaza Neighborhood Association. We represent the residents of Los Angeles in the hills about Sunset Strip.

March 20, 2025

Los Angeles City Council  
Planning and Land Use Management Committee  
Los Angeles City Council  
200 N. Spring Street, Room 415  
Los Angeles, CA 90012  
Re: 3003 Runyon Canyon Rd.' Council File 24-1371

Dear Committee Members;

The Doheny Sunset Plaza Neighborhood Association supports the appeals by the Santa Monica Mountains Conservancy, MRCA, and Hillside Federation of the project at 3003 Runyon Canyon Park. Each time a variance is given, our ability to enforce the rules that govern hillside development erodes along with our ability to prevent out-of-scale building in the hills.

In cases where the owner can claim a legitimate hardship, the trade-off may be necessary but we fail to see legitimate hardship here, especially since there is already a home on site, and there are opportunities to engage in additional building on the site in a much less impactful manner than the current proposal calls for. The substantial amount of grading requested combined with the need to build massive retaining walls alone should have resulted in a project that was denied.

Further, many homes of this size in our neighborhood do not have long-term tenants - they act as part-term residences or sit empty - so the contention that this project will add to existing housing stock should be viewed with skepticism until proven through facts and analysis.

Because of the potential impact of this law on regulation of hillside development in general, we respectfully request your support of this appeal.

Sincerely,



Ellen Evans  
President  
Doheny Sunset Plaza Neighborhood Association

## Communication from Public

**Name:** Garrett Weinstein

**Date Submitted:** 03/20/2025 12:27 PM

**Council File No:** 24-1371

**Comments for Public Posting:** Honorable Councilmembers, The staff of the Mountains Recreation and Conservation Authority has further analyzed the proposed project at 3003 Runyon Canyon Road (case no. APCSV-2016-4179-SPE-DRB-SPP-MSP-ZV-ZAD), and we respectfully submit the attached briefing figures. Thank you, Garrett Weinstein Mountains Recreation and Conservation Authority A local agency exercising joint powers of the Santa Monica Mountains Conservancy and the Conejo and Rancho Simi Recreation and Parks Districts 310-589-3230, ext. 124 garrett.weinstein@mrca.ca.gov



**Justification to Support Appeals**  
**3003 Runyon Canyon Road Mansion**

**Appellants**

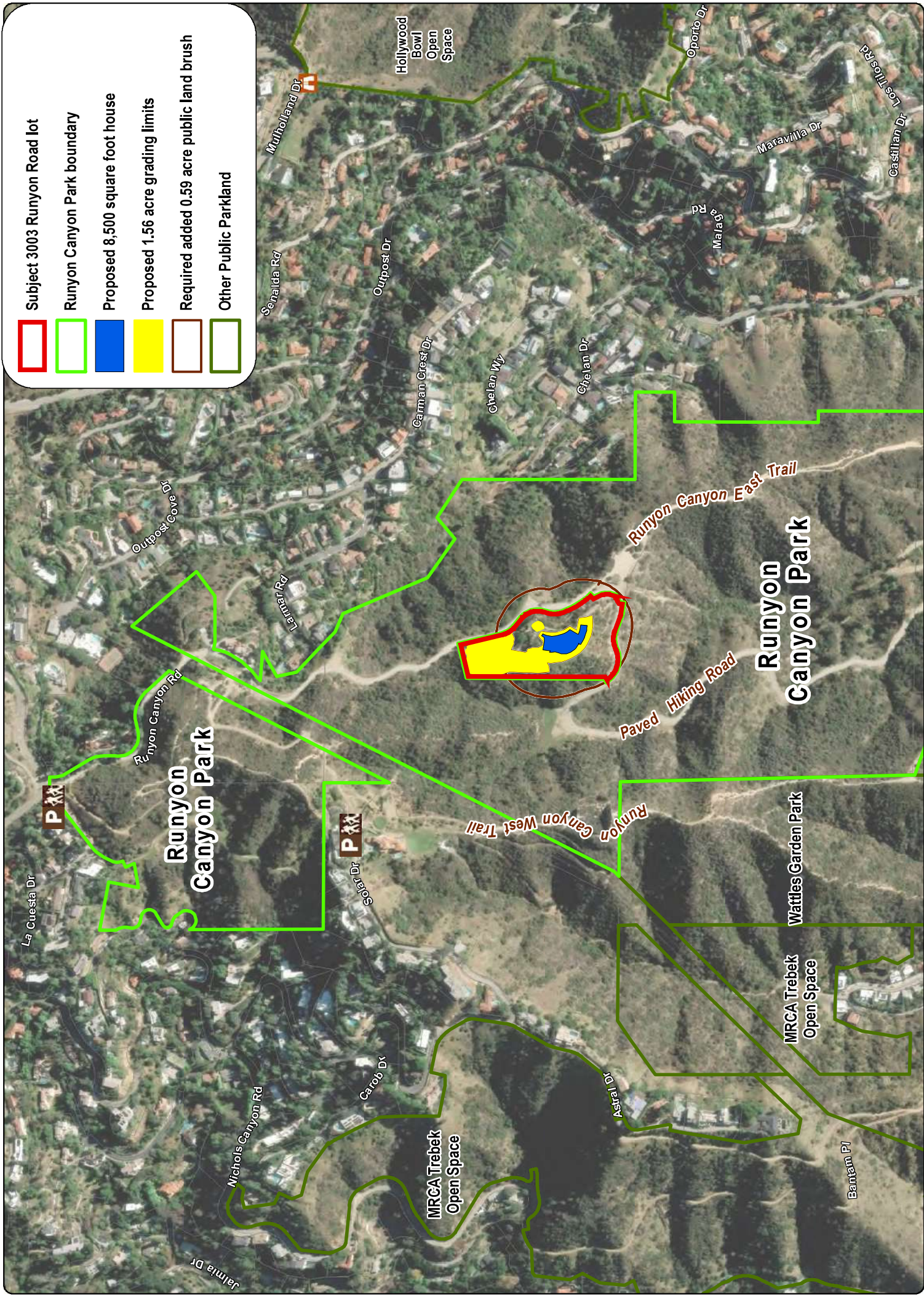
**Santa Monica Mountains Conservancy**

**Mountains Recreation and Conservation Authority**

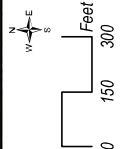
**Federation of Hillside and Canyon Homeowners**

**Seeking To Stop a Discretionary Mansion  
Project that Would Ruin Runyon Canyon Park!**

- **No Applicant Hardship Demonstrated.**
- **Sets Horrible precedent obviating all future hillside protection Ordinances going forward.**
- **Only ridiculous alternatives were considered in EIR.**
- **28 X more grading than allowed per Ordinance.**



- Subject 3003 Runyon Road lot
- Runyon Canyon Park boundary
- Proposed 8,500 square foot house
- Proposed 1.56 acre grading limits
- Required added 0.59 acre public land brush
- Other Public Parkland



Council File No. 24-1371, 3003 Runyon Canyon Road

## **3003 Runyon Canyon Road Facts**

### **Proposed Mansion inside Runyon Canyon Park**

**Council File No. 24-1371**

**Proposed Mansion Square-Footage: 8,500 square feet**

*Plus large pool and decks overlooking park trails.*

**Proposed Acres Graded: 1.56 acres**

**Proposed Grading Volume: 28,000 cubic yards (CY)**

*(28 x Times the amount allowed without Variances.)*

**Proposed Hillside Fill held up by 20-ft-tall Walls: 14,000 CY**

**Added In Perpetuity Parkland Brush Clearance: 0.59 acres**

**Requires a 410-Foot-Long – 20-Foot-Tall Retaining Wall for Fill**







**Number of Discretionary Variances Needed: Four Variances**

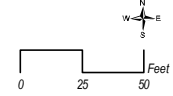
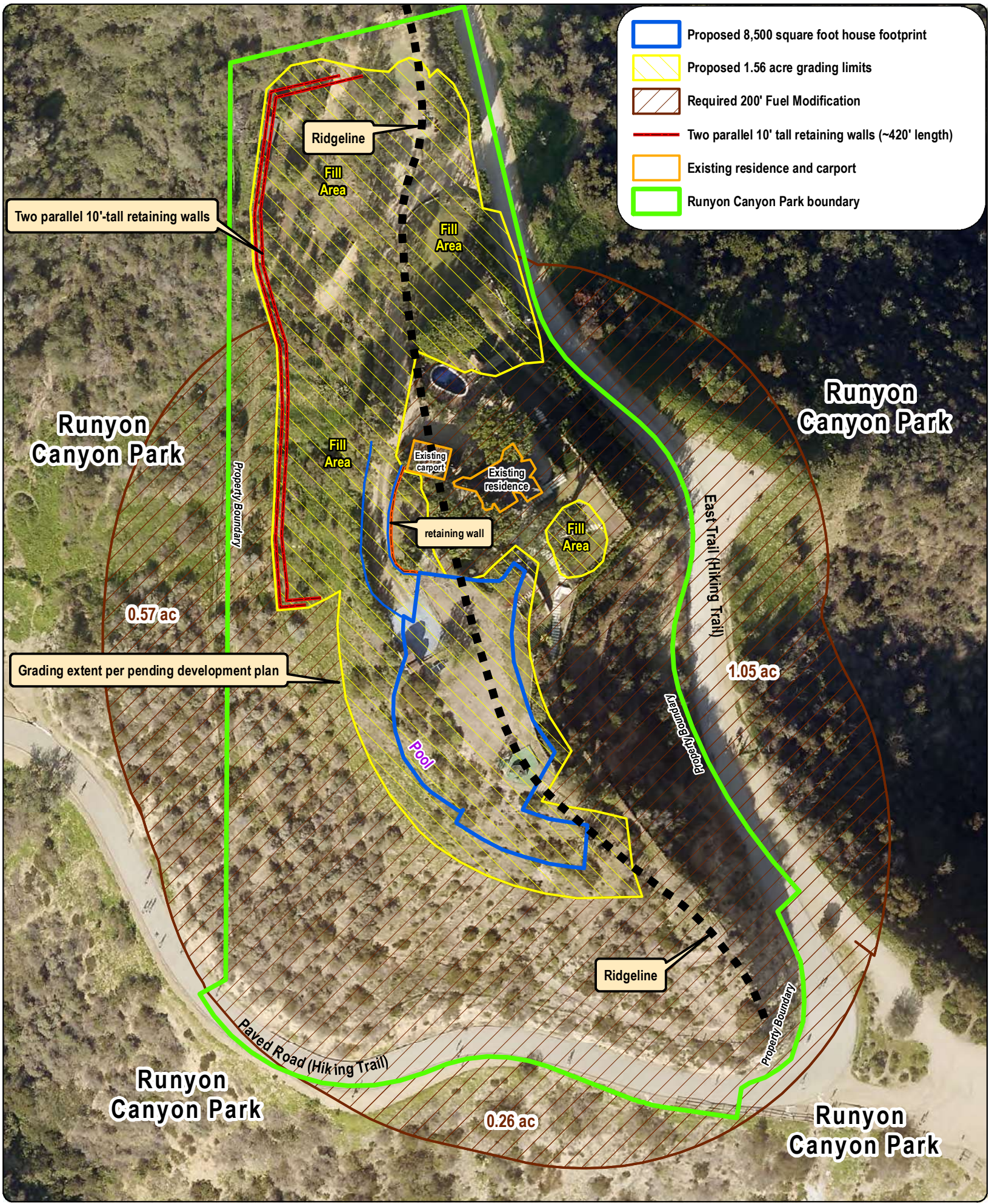
*Including a Specific Plan Exception*

**Mansion Size is Twice the Average of Homes around Park**

**Existing 2,018 SF house + 8,500 SF Mansion = 10,518 SF of Development**

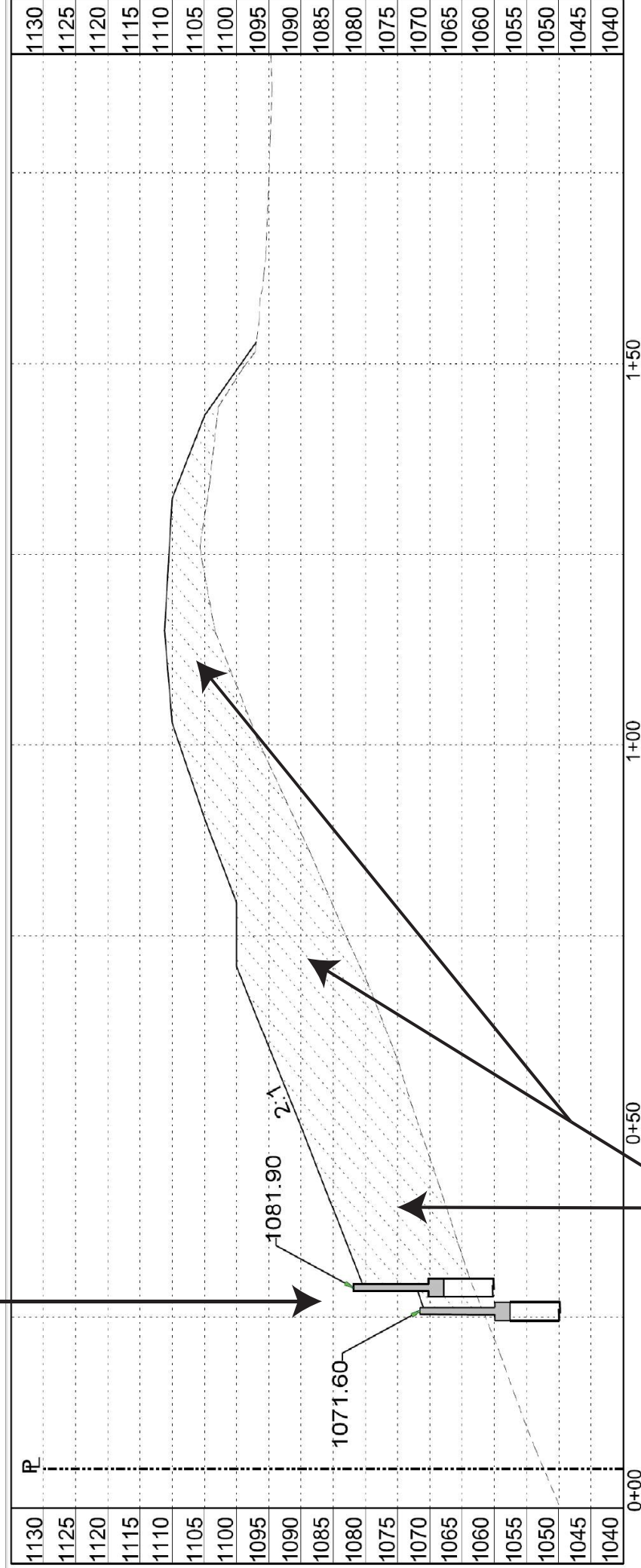
**No Applicant Hardship documented to justify Massive Ridgeline Development.**

-  Proposed 8,500 square foot house footprint
-  Proposed 1.56 acre grading limits
-  Required 200' Fuel Modification
-  Two parallel 10' tall retaining walls (~420' length)
-  Existing residence and carport
-  Runyon Canyon Park boundary



# Twenty-Foot-Tall Retaining Wall System to Hold 14,000 Cubic Yards of Fill on Slope

Two parallel 10' retaining walls ~420' long



Fill from excavated 3,000 square foot basement and house packed on west facing slope

## The Only EIR Alternatives Analyzed:

### **Alternative B: Reduced Project Alternative**

Alternative B: Alternative B would consist of a home that is reduced in size approximately 30% when compared to the Project, for approximately 5,670 square feet (not including the basement). Alternative B would be located in the same location on the Project Site as the Project, and each level of the home would be proportionately reduced when compared to the Project.

Alternative B is essentially the same 8,000 square-foot buried ridgeline project as the applicant's preferred project. No Exhibits or Figures were provided for Alternative B in either the Draft or Final EIR.

### **Alternative C: Alternate Placement Alternative**

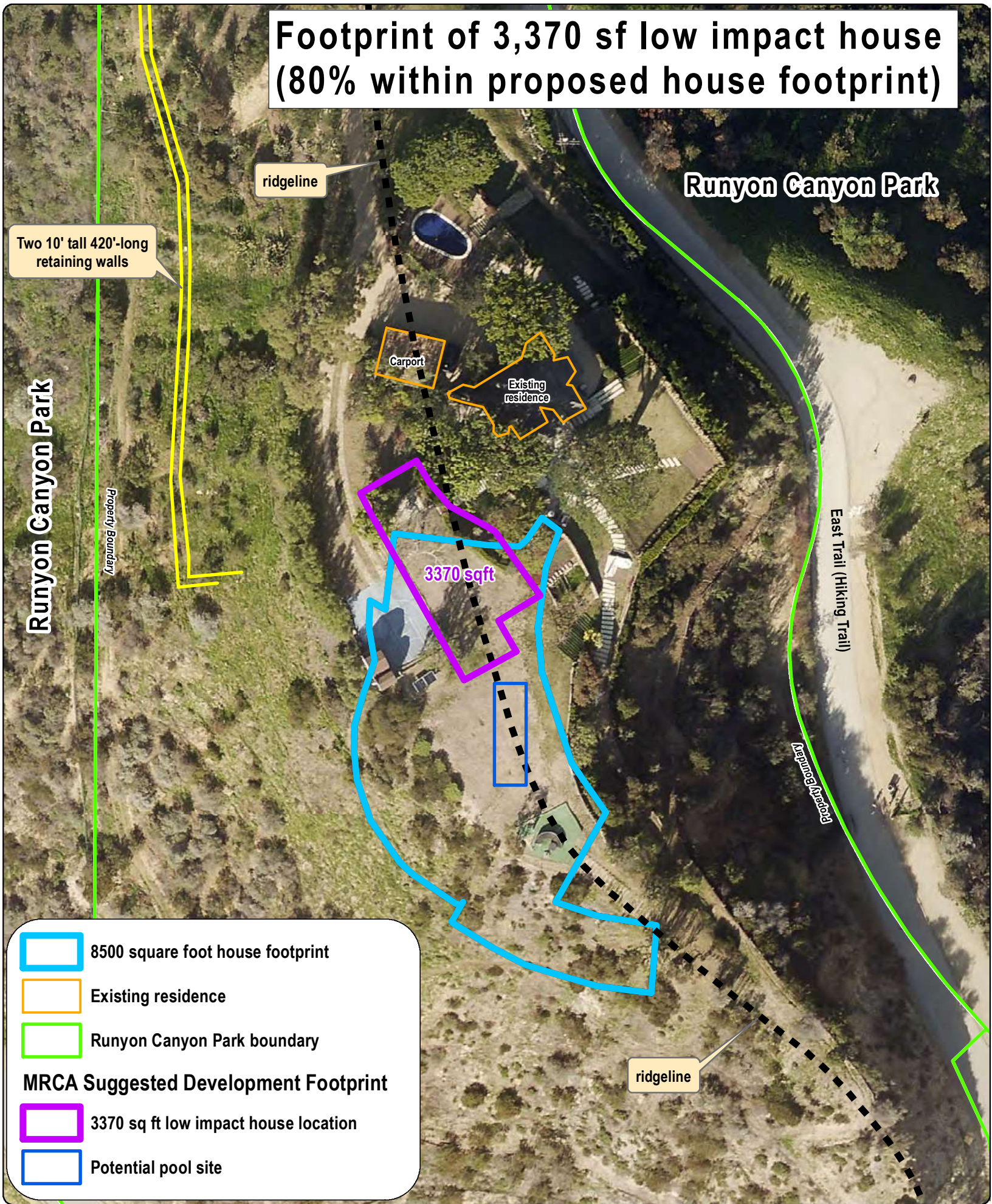


Existing 2018 SF  
House and Carport

Proposed 8,500 SF  
House Footprint

Low Impact Alternative  
3370 SF House Location

# Footprint of 3,370 sf low impact house (80% within proposed house footprint)



# 3,370 sq.ft. House Option

ridgeline

Runyon Canyon Park

Runyon Canyon Park

Property Boundary

Carport







Existing residence

3370 sqft

East Trail (Hiking Trail)

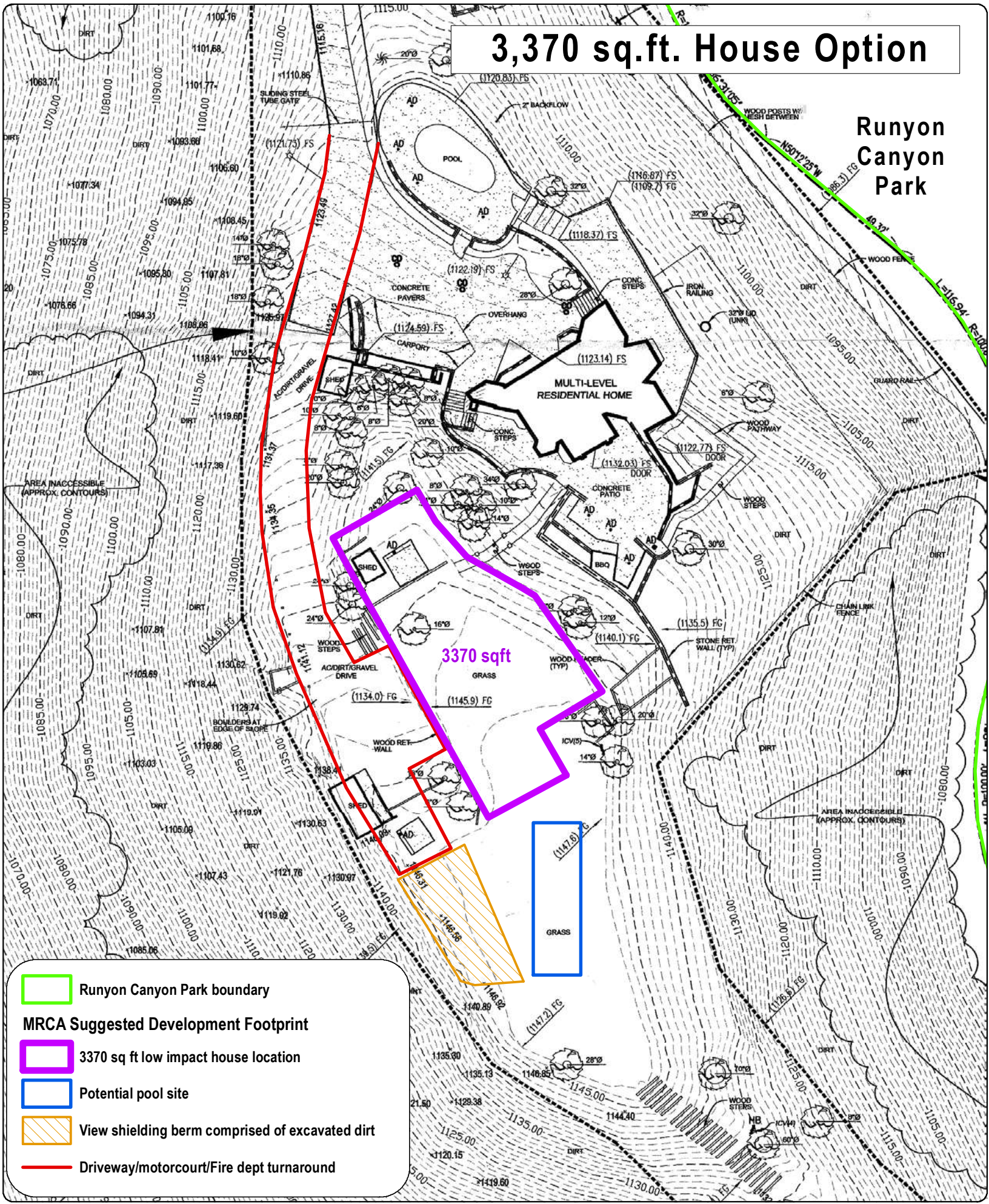
Runyon Canyon Park

ridgeline

-  Existing residence
-  Runyon Canyon Park boundary
- MRCA Suggested Development Footprint**
-  3370 sq ft low impact house location
-  Potential pool site
-  View shielding berm comprised of excavated dirt
-  Driveway/motorcourt/Fire dept turnaround

# 3,370 sq.ft. House Option

Runyon Canyon Park



- Runyon Canyon Park boundary
- MRCA Suggested Development Footprint**
- 3370 sq ft low impact house location
- Potential pool site
- View shielding berm comprised of excavated dirt
- Driveway/motorcourt/Fire dept turnaround

# Applicant Cherry Picked Homes for Neighborhood House Size Compatibility.

The Mulholland Design Review Board was misled with three select 9,000 sq. ft. estates, but the real average is 3,200 sq. ft.

Below table and map excerpted from applicant’s submittal packets to Mulholland Design Review Board, hearings for June 5, and July 20, 2022.



**3003 RUNYON CANYON  
NEIGHBORHOOD COMPS**

### 3003 Runyon Canyon – Neighborhood Compatibility

Property Address	Building Sq. Ft.	Lot Sq. Ft.	Floor Area Ratio
1. 2450 Solar Dr.	9,811	702,956	1.4%
2. 2463 Solar Dr.+	5,900*	11,116	53.1%
3. 2457 Solar Dr.	3,576	10,168	35.2%
4. 2674 Larmar Rd	3,013	12,338	24.4%
5. 3050 Runyon Cyn	3,493	28,765	12.1%
6. 2291 Chelan	2,632	40,382	6.5%
7. 2275 Chelan	1,680	24,700	6.8%
8. 7171 Chelan	4,954	53,074	9.3%
9. 2617 Larmar Rd	2,975	45,655	6.5%
10. 2625 Larmar Rd	3,219	45,018	7.2%
<b>Avg. (10 Properties)</b>	<b>4,125</b>	<b>62,269</b>	<b>16.25%</b>

### NEARBY ESTATES

Property Address	Building Sq. Ft.	Lot Sq. Ft.	Floor Area Ratio
11. 1900 Vista St.+	10,026	447,557	2.2%
12. 2003 La Brea Ter.+	9,700	286,694	3.4%
13. 2005 La Brea Ter.+	7,103	185,286	3.8%
<b>Avg. (3 Properties)</b>	<b>8,943</b>	<b>306,512</b>	<b>3.1%</b>

### Subject Property

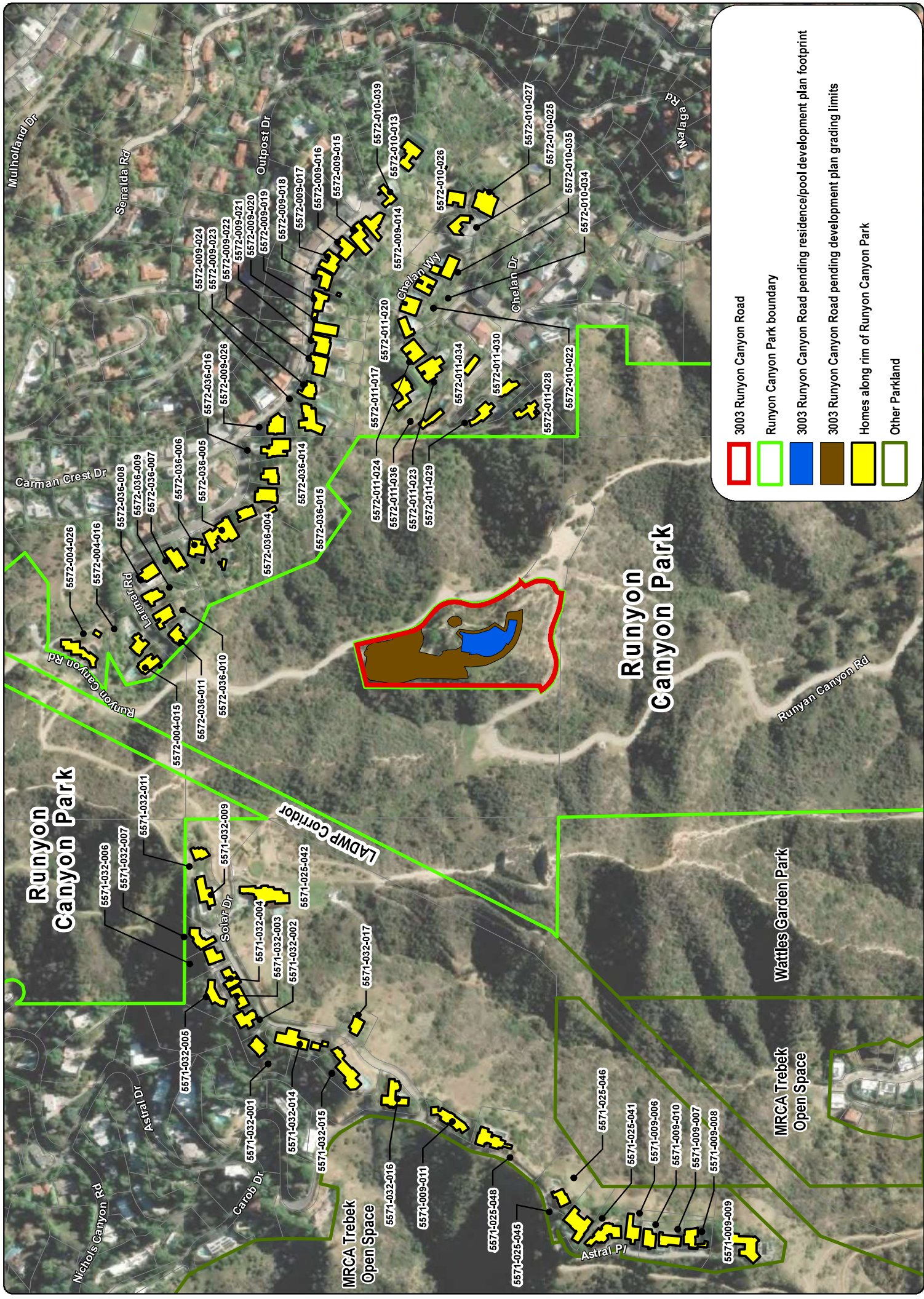
Existing	2,018	197,435	1.0%
Proposed New	8,481	197,435	4.3%
<b>Proposed Grand Total+</b>	<b>10,499</b>	<b>197,435</b>	<b>5.3%</b>

\* Approved by MDRB

+ House plus guest house

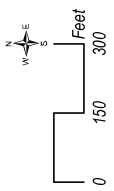
Attached Map and Data show average residence square-footage on rim of Runyon Canyon Park to be 3,200 square feet. That is three times less than proposed 8,500 sq. ft. house and existing 2,000 sq. ft. house.

See attached map and data from L.A. County Assessor and Zimas.



**Legend:**

- 3003 Runyon Canyon Road
- Runyon Canyon Park boundary
- 3003 Runyon Canyon Road pending residence/pool development plan footprint
- 3003 Runyon Canyon Road pending development plan grading limits
- Homes along rim of Runyon Canyon Park
- Other Parkland



Council File No. 24-1371, 3003 Runyon Canyon Road

**3003 Runyon Canyon Road - Neighborhood Compatibility (Mulholland Scenic Parkway Specific Plan Area)**

**Council File No. 24-1371, APCS-2016-4179-SPE-DRB-SPP-MSP-ZV-ZAD**

Compiled by MRCA staff, 2/27/2025. Data sourced from Los Angeles County Assessor.

**Nearby Single-Family Residences (refer to APNs on accompanying aerial map):**

<u>APN</u>	<u>Site Address</u>	<u>Year Built</u>	<u>Residence Square- Footage</u>	<u>Lot Square- Footage</u>	<u>Percentage Lot Coverage (%)</u>
5571-009-006	2224 ASTRAL PL	1964	2274	16665.16	13.645%
5571-009-007	2220 ASTRAL	1960	2734	8455.87	32.333%
5571-009-008	2210 ASTRAL DR	1995	5582	9985.82	55.899%
5571-009-009	2200 ASTRAL PL	1954	3297	53245.88	6.192%
5571-009-010	2222 ASTRAL DR	2007	3877	20050.26	19.336%
5571-009-011	2366 ASTRAL DR	1954	2638	13471.30	19.582%
5571-025-041	2250 ASTRAL DR	1978	4381	55460.44	7.899%
5571-025-045	2270 ASTRAL DR	1978	3704	26697.32	13.874%
5571-025-046	2300 ASTRAL DR	1978	2783	30724.64	9.058%
5571-025-048	2346 ASTRAL DR	2003	5474	55660.98	9.835%
5571-032-001	2425 SOLAR DR	1963	1986	17954.15	11.062%
5571-032-002	2427 SOLAR DR	1960	2098	10018.72	20.941%
5571-032-003	2433 SOLAR DR	1961	1452	5599.60	25.930%
5571-032-004	2443 SOLAR DR	1962	2246	5600.22	40.106%
5571-032-005	2447 SOLAR DR	1964	2023	20138.49	10.045%
5571-032-006	2451 SOLAR DR	1980	1677	11939.38	14.046%
5571-032-007	2457 SOLAR DR	1987	3576	10169.14	35.165%
5571-032-009	2463 SOLAR DR	1958	5777	11116.66	51.967%
5571-032-014	2419 SOLAR DR	1958	3666	18025.39	20.338%
5571-032-015	2421 SOLAR DR	1959	3024	26908.68	11.238%
5571-032-016	2405 SOLAR DR	1964	4554	15601.59	29.189%
5571-032-017	2434 SOLAR DR	1959	1617	10043.78	16.100%
5572-004-015	2674 LARMAR RD	1976	3013	12338.37	24.420%
5572-004-016	2668 LARMAR RD	1977	2977	23494.67	12.671%
5572-004-026	3050 RUNYON CANYON RD	1951	3493	28762.15	12.144%
5572-009-014	2407 CARMAN CREST DR	1954	2429	22387.92	10.850%
5572-009-015	2415 CARMAN CREST DR	1955	4093	14937.56	27.401%
5572-009-016	2423 CARMAN CREST DR	1954	1543	12803.96	12.051%
5572-009-017	2431 CARMAN CREST DR	1955	2240	13778.01	16.258%
5572-009-018	2439 CARMAN CREST DR	1954	2732	13411.47	20.371%
5572-009-019	2445 CARMAN CREST DR	1955	2180	13526.80	16.116%
5572-009-020	2505 CARMAN CREST DR	1955	1892	14561.79	12.993%
5572-009-021	2511 N CARMAN CREST DR	2014	4928	14095.84	34.961%
5572-009-022	2519 CARMAN CREST DR	1955	3471	15786.36	21.987%
5572-009-023	2525 CARMAN CREST DR	1990	3587	23099.62	15.528%
5572-009-024	2535 CARMAN CREST DR	1955	3439	21239.03	16.192%
5572-009-026	2541 CARMAN CREST DR	1953	5777	10984.80	52.591%
5572-010-013	2402 N CARMAN CREST DR	1958	2631	58566.12	4.492%
5572-010-022	7179 CHELAN WAY	1962	2309	18506.55	12.477%
5572-010-025	7204 CHELAN WAY	1959	1902	12417.48	15.317%
5572-010-026	7182 CHELAN WAY	1962	3517	57798.36	6.085%
5572-010-027	7206 CHELAN WAY	1962	4307	15621.17	27.572%
5572-010-034	7181 CHELAN WAY	1962	1989	17440.13	11.405%
5572-010-035	7183 CHELAN WAY	1962	1920	28655.55	6.700%
5572-010-039	2400 CARMAN CREST DR	1958	2165	9519.54	22.743%
5572-011-017	7171 CHELAN WAY	1978	4236	53074.86	7.981%
5572-011-020	7177 CHELAN WAY	1961	2044	26437.05	7.732%
5572-011-023	7173 CHELAN WAY	1962	3389	22665.81	14.952%
5572-011-024	7175 CHELAN WAY	1962	2343	14153.85	16.554%
5572-011-028	2291 CHELAN DR	1971	2632	40382.48	6.518%



**SANTA MONICA MOUNTAINS CONSERVANCY**

LOS ANGELES RIVER CENTER & GARDENS  
570 WEST AVENUE TWENTY-SIX, SUITE 100  
LOS ANGELES, CALIFORNIA 90065  
PHONE (323) 221-8900  
FAX (323) 221-9001  
WWW.SMMC.CA.GOV



May 16, 2022

Ms. Erin Strelch  
Major Projects Section  
Department of City Planning  
City of Los Angeles  
200 North Spring Street, Room 1350  
Los Angeles, California 90012

**ENV-2016-4180-EIR, SCH no. 2018041016, 3003 Runyon Canyon Road**

Dear Ms. Strelch:

The Santa Monica Mountains Conservancy (Conservancy) provides comments and recommendations on the Final Environmental Impact Report (FEIR) for the subject proposed project at 3003 Runyon Canyon Road (ENV-2016-4180-EIR), located half a mile interior to Runyon Canyon Park. The Conservancy is a California Environmental Quality Act (CEQA) Trustee Agency for projects potentially affecting natural resources in the precisely-mapped Santa Monica Mountains Zone, per the Conservancy Act (Public Resources Code Section 33000, et seq). The Conservancy is also the principal State planning agency in the Santa Monica Mountains Zone, which includes Runyon Canyon Park where the subject property is located as a private in-holding.

The Conservancy previously submitted comments and recommendations on the Draft Environmental Impact Report (DEIR) for the subject project in our letter dated September 23, 2019. This letter is intended to complement that 2019 DEIR letter.

The FEIR remains deficient and fatally flawed under CEQA in multiple respects and should not be certified. The deficiencies and flaws in the FEIR should pose questions as to whether each of the requested Discretionary Actions, especially the Specific Plan Exception (SPE) to allow construction within 50 feet of a prominent ridge in the Mulholland Scenic Parkway, are necessary for the property owner to attain the full use of the already developed subject property.

As currently proposed, the significant adverse impacts from the subject project, even if mitigated, would result in offsite damage to public resources within Runyon Canyon Park. These damages would result from the aesthetic/visual impacts both from the

visibility of the project itself, and additional Fire Department-required fuel modification (brush clearance) on the surrounding parkland. Damages to biological resources would result from brush clearance on parkland, nighttime lighting impacts from the use of the additional residence on the subject property, and increased usage of Runyon Canyon Drive to access the subject property during and after construction. Damage to visual and biological resources within Runyon Canyon Park also equate to damage to recreational resources in the one of the City's most popular hiking locations. Why would the City grant discretionary approvals to a project that would damage the resources of one of its most iconic public parks?

### **Misleading Project Description Due to False Basement**

The project plans for the proposed 5,511 square-foot "basement" clearly depict a section of floor-to-ceiling windows which would be visible exterior to the residence. This false basement makes the subject proposed project a three-story residence, and the 5,511 square-footage of the bottom-most floor is not included in the square-footage for project provided in the Description. This omission makes the Project Description in the FEIR wholly deficient for falsely describing the project as a two-story residence with 6,982 square-feet of living space.

### **Inadequate Range of Feasible Alternative Projects**

The FEIR, like the DEIR, makes the misleading claim that Alternative B: Reduced Size Project, described as the "Environmentally Superior Alternative", would result in the same environmental impacts as the primary Project, despite reducing the square-footage of the residence by 30 percent. Alternative B remains a disingenuous feign of an attempt to provide decision makers with the appearance of a less damaging project. The 30 percent size reduction still only applies to the 8,990 square-foot residence and does not address reductions to the proposed 6,454 square-feet of covered patio area, 2,475 square-foot of mechanical/electrical area, and 5,207 square-feet of basement. Nor does it address the approximately one-acre fill slope and its parallel 300-foot-long and ten-foot-tall retaining walls.

What the FEIR continues to fail to address is whether a reduced size project could be located elsewhere within the subject property so as to 1) eliminate construction activities within 50 feet of the prominent ridgeline, and/or 2) eliminate the need for the three retaining walls requested as a Zoning Administrator's Determination (ZAD).

A true reduced-size project with alternate siting that conforms to the topography of the subject property could reduce the damages that would result to public resources in

Runyon Canyon Park from brush clearance, lighting impacts, increased usage of Runyon Canyon Road, and visual impacts from the proposed residence itself. The burden of proof that such a project alternative would not reduce these adverse impacts and limit damages to public parkland lies squarely with the applicant. The FEIR is deficient for omitting any consideration of a true reduced-size project with alternative siting.

In the response to the Conservancy's 2019 letter on the DEIR (Response to Comment A3-6), the FEIR attempts to deflect from this responsibility by claiming that the two project alternatives (B and C) analyzed in the DEIR represent a reasonable range of project alternatives. (Alternative A: The "No Project" Alternative, is simply the standard perfunctory analysis of not implementing any project on the subject property that is common to all Environmental Impact Reports.) A truly reasonable range of feasible alternative projects for an already developed property that is interior to public parkland within the City's premier Scenic Corridor (Mulholland) would include an alternative that avoids construction and soil work impacts within 50 feet of a prominent ridgeline and limits the number of required retaining walls.

If there is no feasible alternative that could meet those requirements, this must be demonstrated by detailed analysis in the FEIR. By omitting this analysis, the FEIR has failed to demonstrate that a less damaging project with reduced square-footage is not feasible.

#### **Inadequate Drainage Plans and Unanalyzed Significant Impacts**

The FEIR remains flawed because there is still no analysis of how the project's drainage and runoff will be handled when it contacts public parkland. There are multiple potential biological, geological, recreational, and visual impacts that could result from the handling of onsite runoff, and the full extent of the damage to public parkland from additional run-off cannot be gauged without this analysis. This was a major omission in the DEIR, and it is a critical deficiency in the FEIR.

In the Responses to Comments (B1-67), the FEIR provides only the vague answer that the project will comply with City requirements for drainage after the final engineering for the project is complete. If the City determines that drainage structures such as concrete V-ditches or energy dissipaters are required where run-off from the approximately one-acre fill slope contacts parkland, these are potentially significant adverse impacts that must be addressed in the FEIR.

**Significant Impacts to Public Parkland from Lighting and Increased Road Usage**

Both the subject proposed project and Alternative B would introduce a substantially greater total amount of light into the Runyon Canyon Park habitat area no matter how well a project of that size is mitigated shy of having no windows. In addition, cars and delivery vehicles potentially using high beams would use the public road through the park at night. There are no vehicle trip number or time limitations in either the day or nighttime. Although the park is closed at night, it is a public resource, and by permission, researchers and groups can take night hikes in the park. An area that is now quite dark would experience substantial irreversible change in night illumination and thus result in substantial dark sky impacts and nighttime enjoyment of the park. For the above reasons both the proposed project and all its development alternatives would result in unavoidable significant adverse visual impacts.

The FEIR remains deficient because it continues to base multiple impact analyses, including analysis of nighttime lighting impacts, on the premise that just one couple (the current owners) will permanently occupy both residences. The FEIR analysis on traffic relative to biological, visual, and recreation impacts does not address the probable scenario that the house will host larger families and large parties in the near term. All the mitigation measures and analyses in the FEIR that address impacts from lighting and traffic are flawed because the traffic and visitor volumes cannot be controlled or enforced by the lead agency. Some limits must be established to make impact analysis conclusions.

To ensure that North Runyon Canyon Road is never lit, the FEIR must include a mitigation measure that prohibits lighting of the road to benefit the proposed project property. Though no lighting of North Runyon Canyon Road is currently proposed, there would otherwise be no restrictions preventing future owners of the subject property from installing their own lighting fixtures without the need for permits or future discretionary actions by the City.

To reduce the adverse impacts of increased use of North Runyon Canyon, the Conservancy recommends that the FEIR include a mitigation measure limiting the total number of permanent residents permitted to live in the existing and subject proposed residences at 3003 Runyon Canyon Road.

Please send all correspondence regarding this project, including hearing notices, to the attention of Paul Edelman, Deputy Director of Natural Resources and Planning, at 26800 Mulholland Highway, Calabasas, California 91302, or by e-mail to

ENV-2016-4180-EIR, SCH no. 2018041016, 3003 Runyon Canyon Road  
May 16, 2022  
Page 5

edelman@smmc.ca.gov. Conservancy staff may submit additional comments on the FEIR to decision-makers in advance of future public hearings.

Sincerely,

A handwritten signature in black ink that reads "Linda Parks". The signature is written in a cursive style with a large initial "L" and a long, sweeping underline.

LINDA PARKS  
Chairperson

## Communication from Public

**Name:** Gerry Hans

**Date Submitted:** 03/20/2025 01:10 PM

**Council File No:** 24-1371

**Comments for Public Posting:** The appeals on record by Santa Monica Mountains Conservancy, The Hillside Federation, and the Mountains Recreation and Conservation Authority present logical and valid arguments. I support these appeals. I am in opposition to residential monstrosities being constructed anywhere, let alone next to an iconic public park, owned and managed by the City itself! The City should have the public's best interest in mind, in particular when discretionary variances and exceptions are obligatory, with irrefutable justification. To allow discretionary actions to slip through in the name of "hardship," based on someone's "dream" being fulfilled, is shocking and unconscionable. The preparation of an EIR does not, in itself, support even the smallest of projects, and in this case is faulty and inadequate on various counts. As suggested in two of the filed appeals, legitimate alternatives, not fake ones, must be considered in an EIR. This is reason enough to decertify the EIR and send the project back to the drawing board.  
38-year hillside resident

## Communication from Public

**Name:** Joan Cashel

**Date Submitted:** 03/20/2025 02:19 PM

**Council File No:** 24-1371

**Comments for Public Posting:** I am writing in opposition of the proposed project at 3003 Runyon Canyon Rd. and fully support the SMMC, MRCA and the Hillside Federation's cogent appeal documents. I don't need to add to their detailed arguments, I want to focus on the overriding concern - the applicant is asking for SIX rules to be changed for the project to proceed. Yes, the applicant has a right to build on private property but this MUST be done within the rules and regulations the rest of the City of Los Angeles is required to follow under the long-standing Building Codes. Why does this applicant get a pass on following rules? Why should the applicant receive exemptions that others not so well-positioned have to follow? This is not about changing a set-back from 5 ft. , these exemptions go to the core of laws that have been followed for decades. If these exemptions/variances are given, why have rules at all? One applicant would set a major precedent for future building for the entire City of Los Angeles. This is not ok, and I urge you to deny any exemptions/variances on this project.