

## Communication from Public

**Name:** Andrew Solmssen

**Date Submitted:** 02/03/2025 11:25 PM

**Council File No:** 24-1371

**Comments for Public Posting:** My name is Andrew Solmssen and I am a dedicated daily user of Runyon Canyon Park. I love Runyon Canyon. Walking at Runyon Canyon has literally saved me from almost certain death, helping me to lose over 350 pounds and add years to my life. What Mr. Valencia proposes, despite his attempts to minimize both the real and perceived impact of the project, would fundamentally change the character of the park during the period of construction and after. Despite the sightline renderings shown in the application, it would deeply affect one of the most prominent ridgelines in the park. It would dominate almost every approach to the top of the canyon from the paved road and the West Ridge trail as you ascend from the Vista gate. It would overlook the East Ridge trail and be front and center in the view of the park from Inspiration Point. Additionally, any noise from the hillside he's building into would echo through the park. The period of construction would add considerably to the burden of noise the park already carries, and after construction any noise on the patios would become the park's noise as well. It would change what is now a respite from a relentless world into yet another reminder of it. And now, the construction itself is a large imposition on park users now unable to use the Wattles and West Ridge trail and adds insult to the injury Runyon has already just suffered. Every part of the plan that I've reviewed makes it clear that this is an enormous project coming at a time when the park is trying to heal itself from the recent fire, and simply too much to bear for this space and the many people who depend on it for their health and peace of mind. I don't make this complaint lightly. It's his property. He'd like to build there. I get that. It's an accident of history that there is a private residence in the park, but owning that residence must come with a public trust. It comes with certain responsibilities to the park itself and to the thing it's there for, for the pleasure, recreation, and sanity of its many users, not just the owner of this particular small piece of it. This project does not meet that responsibility. His architect and his campaign in his favor argue otherwise. But I walk that park every day. I look at and take sustenance from those hills every day. And in the end, what he's proposing would turn every Runyon Canyon parkgoer's walk into a slog through his front yard, and that's just not right. The park is a public trust, and I'm counting on the Council members to

maintain that trust for all its users. Thank you for your time.

## Communication from Public

**Name:** Sheri Bonstelle  
**Date Submitted:** 02/03/2025 07:38 PM  
**Council File No:** 24-1371  
**Comments for Public Posting:** See attached letter from the Applicant.

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February 1, 2025

**VIA E-MAIL**

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Los Angeles City Hall  
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Los Angeles, CA 90012  
Attn: City Clerk  
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Re: 3003 N. Runyon Canyon Road (Council File No. 24-1371)  
APCSV-2015-4179-SPE-DRB-SPP-MSP-ZV-ZAD  
ENV-2016-4180-EIR (Sch. No. 2018041016)  
PLUM Committee Hearing Date: February 11, 2025

Dear President Harris-Dawson and Members of the Los Angeles City Council:

Our office represents Manny Valencia and his family, (the "Owner", "Valencia Family") the owners of the property at 3003 Runyon Canyon Road. (the "Property") The Valencia Family has owned and lived on the Property for more than ten years, and has dreamed of constructing a sustainable organic home that is integrated into the native landscape. They applied for entitlements in 2016 and have worked tirelessly for nine years to redesign the project to respond to comments from the neighbors and the Mulholland Design Review Board ("DRB"). The Valencia Family prepared a full EIR to evaluate any potential impact, and prepared numerous additional studies on biology, habitat, noise, and wildlife. The EIR concluded that the 5,700 square foot two-story home that is buried underneath the ridgeline (the "Project") would have no significant impact on the environment.

The Mulholland DRB unanimously approved the Project in 2022, and the South Valley Area Planning Commission ("APC") also unanimously approved the Project in 2024 over opposition from a neighborhood group. The APC did not find any merit in their claims of any impacts, including to wildlife, biology, or fire safety. The Valencia Family did significant outreach to their neighbors and community, including more than 25 community meetings, and more than 150 support letters were submitted by individuals and families who live in the area.

The Federation of Hillside and Canyon Association (the "Hillside Federation"), the Mountains Recreation and Conservation Authority ("MRCA"), and the Santa Monica Mountains Conservancy ("SMMC") appealed the South Valley APC project approval (collectively, the

"Appeals"), and merely resubmitted the same letters and opposition claims that were reviewed and rejected by the South Valley APC as being without merit. MRCA and SMMC submitted identical appeals with identical claims and supporting letters. These claims are all fully addressed and refuted in the South Valley APC Letter of Determination, dated October 3, 2024, and are again disproved in this letter, the Final EIR, the South Valley APC Recommendation Report, dated August 8, 2024, and the letters by JMBM to the South Valley APC, dated July 26, 2024 and August 7, 2024, incorporated herein by reference.

We request that the City Council honor the decision of the South Valley APC, uphold the Project approvals, and deny the Appeal.

1. **Summary**

(a) ***Project Description***

The Project entails the construction of a 5,700 square foot two-story residence that is partially embedded into the existing disturbed ridgeline, covered with native plant landscaping, and shaped to match the natural hillside contours. (See Exhibit 5) The design ensures that only two levels of horizontal glazing are visible from the west, rendering the house invisible from Mulholland Drive. Designed to be sustainable, the home features solar powers to supplement its energy needs and utilizes earth-sheltered principles for natural cooling, benefitting from the surrounding soil's thermal properties. The planted roof supports native vegetation, reducing heat gain and allowing the structure to blend seamlessly into the environment.

At the core of the main level, a sunken interior courtyard, open to the sky, sits below the ridgeline. This planted courtyard is enclosed by glazing, creating a thermal buffer zone that enhances passive cooling by promoting natural airflow and ventilation. The courtyard helps regulate indoor temperatures by allowing warm air to rise and exit, drawing cooler air through the surrounding spaces. Additionally, it introduces natural daylight into the heart of the home, reducing dependence on artificial lighting while maintaining privacy since it is completely hidden from external views.

The home's elongated north-south orientation optimizes energy efficiency, with Low-E energy' efficiency glazing facing west and 5 foot deep overhangs mitigating solar heat gain. The project minimizes its footprint, preserving the majority of the 4.5-acre property as native landscaping and open space. Additionally, a 3,000-square-foot basement—which does not daylight—is excluded from the residential floor area calculation. The project achieves zero runoff due to the living roof's ability to absorb rainwater, functioning as natural soil and eliminating the need for extensive drainage infrastructure. Since the home occupies only a small portion of the 4.5-acre site, the remaining land remains undisturbed, supporting native ecosystems and groundwater retention.

The project utilizes the existing driveway to connect to the new home, following the site's natural contours to minimize environmental disturbance and maintain the landscape's integrity.

The existing 2,000 single family house (Headley/Handley house) is historic cultural monument No. 563 ("HCM") designed by Lloyd Wright as a stable, and will be retained and preserved as an accessory structure. The Project was reviewed and approved by the Office of Historic Resources. The HCM designation applies only to the exterior of the house, and not to the interiors or the remainder of the Property.

(b) ***Project Zoning and Approvals***

The Property is zoned RE40-1-H with a Minimum Residential land use designation, which permits residential development. In 1984, producer Alan Handley sold 133 acres of his estate to the City for use as a public park (now Runyon Canyon Park), but retained a portion of land with the Lloyd Wright residence for private residential use. It also includes access to Runyon Canyon Road, a deemed-approved private street, which was accessible to only two residences (See Exhibit 2). The zoning permits residential development significantly larger than the 5,700 square foot house and 2,000 square foot accessory structure.

The Property is located within the Outer Corridor of the Mulholland Scenic Parkway Specific Plan. Therefore, the Project required approval for building within 50 feet of a Prominent Ridgeline, even though the ridgeline had been previously graded. The Mulholland DRB preferred that the house be located under the ridge, where it was minimally visible (See Exhibit 5), rather than at the bottom of the hill, where it would be visible to the hikers in Runyon Canyon Park. This design also required grading of 14,000 cy of dirt, which would be placed on site, and covered with native plants. The South Valley APC approved the entitlements for the Project, including the Specific Plan Exception for a location within 50 feet of a Prominent Ridgeline; Zoning Administrator's Determinations for 14,000 cy of cut and fill on site, and for an additional retaining wall; and a variance to allow the existing modern kitchen to remain in the accessory structure.

The South Valley APC also certified the Environmental Impact Report, which included a full evaluation of aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation, tribal and cultural resources, and wildfires. The EIR concluded that the Project would not result in any significant impacts to the environment that could not be mitigated during construction or operation, including cumulative impacts. The wildlife studies concluded that the wildlife corridor existed to the north of the Property near Mulholland Drive, and only deer and smaller animals were on the Property. It concluded that no fences would be added by the Project, and so wildlife would still be able to freely cross the Property. The fire safety analysis concluded that the Project would make the area safer by adding a fourth fire hydrant at the bottom of the driveway with a volume of 4,000 gallons per minute. The Project would also increase the fuel modification area by .59 acres for a total of 3.3 acres. LAFD has already approved the Project's Fire Hydrant and Access Plan. (See Exhibit 4) A detailed summary of the EIR studies is set forth below.

(c) *Appeal Issues*

The following is a summary of the issues stated in the Appeals. None of these claims have merit, and all were specifically analyzed and rejected by the South Valley APC when it approved the Project. The Owner provided, and the City certified, an Environmental Impact Report ("EIR") that fully analyzed all potential impacts to light, noise, biology, wildlife, historic, and fire safety, among other issues, and determined that the Project has no significant impacts. The Appeal responses are listed here, and described in more detail in this letter.

(i) State Minimum Fire Safe Regulations. The Hillside Federation Appeal claims that SB901 mandated an expansion of fire safe regulations to Very High Fire Hazard Severity Zones ("VHFHSZ") in Los Angeles, and the Board of Forestry adopted State Minimum Fire Safe Regulations that prohibit projects on streets less than 20 feet in width. The South Valley APC determined that this provision of these regulations does not apply to the Project, because the limit only applies to new or expanded streets, only applies to streets with 4 or more residences (Runyon Canyon Road has only 2 residences), and does not apply to roads that were part of a parcel map adopted prior to 1991 (Runyon Canyon Road was a deemed-approved prior street and part of a parcel map prior to this date). As set forth below, the Project complies with all State and local fire regulations, and will increase the fire safety of the Property. It will add a fourth fire hydrant to the bottom of the driveway where LAFD may utilize it, maintain the required water pressure of 4,000 gallons per minute, and increase the existing 3.88 acre fuel modification area by .59 acres. The LAFD has already reviewed and approved the fire safety plan for the Project (See Exhibit 4). The Appeal claims that access to the new house was not approved by the original parcel map; however, the new building is located at the end of the existing driveway, which was part of the approved parcel map prior to 1991. The MRCA Appeal claims that a 3-acre fuel modification scar would "stick out like a sore thumb;" however, this 3.3 acre fuel modification area already exists today and MRCA did not even notice it.

(ii) Accessory Living Quarters. The Hillside Federation Appeal claims that the Headley/Handley house is too large to be an Accessory Living Quarters ("ALQ"). However, there are no maximum floor area requirements for ALQs, and the Project's total floor area is significantly less than the maximum floor area permitted for the 4.5 acre Property in the RE40-1-H zone. Here, the Headley/Handley house was originally the stables and storeroom, and was converted to a residence in 1948 when a kitchen was added. The kitchen is small and modern, and the interiors are not part of the historic cultural monument designation.

The Headley/Handley house does qualify as an ALQ, which is defined as "An accessory building used solely as the temporary dwelling of guests of the occupants of the premises; such dwelling having no kitchen facilities and not rented or otherwise used as a separate dwelling unit." (LAMC § 12.03) The ALQ will be used by the Valencia Family and not rented out. The South Valley APC approved the variance for a kitchen to remain in the ALQ. If the City Council, on appeal, does not approve the variance for the second kitchen, the Valencia Family will remove it in compliance with the ALQ definition. As previously stated, the Valencia Family intends to live

in the new house, and has lived on the property for the past ten years without incident. It will not be a party house. The Appeal tries to conflate the State law regarding Accessory Dwelling Units, or ADUs, which is not applicable to this Project.

(iii) Alternatives. The Appeal claims that the alternatives analysis was inadequate because the Owner failed to consider locations further from the disturbed ridgeline, and failed to consider alternatives with less grading. This is blatantly false. The Owner provided multiple designs to the Mulholland DRB in seven hearings over seven years, including locating the house at the top of the ridge, underneath the ridge, and at the bottom of the graded hillside. The Mulholland DRB selected the current location because the house was not visible from Mulholland Drive and was minimally visible from the trails in Runyon Canyon Park. This version does require additional grading over other alternatives, such as locating the Project at the bottom of the hill, but Mulholland DRB rejected this alternative location because the house would be entirely visible from Runyon Canyon Park. The EIR evaluated a reasonable range of alternatives in compliance with CEQA, including (1) a 30% reduced project, (2) an alternative placement project, locating the house at the bottom of the hill, and (3) a no project alternative, and discussed reasons for rejecting the various alternatives based on the objectives of the Project. (See EIR, Section V, Alternatives, pages V1-52) The approved design of the Project was similar to Alternative B, the 30% reduced project, which was identified as the Environmentally Superior Alternative in the EIR (other than the no project alternative). The Mulholland DRB had rejected Alternative C, the Alternative Placement Alternative.

(iv) Public Access. The Appeals claim that there will not be sufficient access for hikers from Mulholland Drive during construction. This is false. The Project includes a Construction Monitoring Program ("CMP") and a Construction Traffic Management Plan ("CTMP") (See Exhibit 1), which significantly limits the number of vehicles permitted on Runyon Canyon Road during construction. All workers will be shuttled to the Property from an off-site lot; all construction vehicles will park on the Property and will not idle or park on Runyon Canyon Road; there will be no off-site hauling; all material delivery will be during off-peak hours, and the access to hikers will remain open at all times that Runyon Canyon Park is open. The CMP and CTMP are described in detail below.

(v) Air Quality. The Appeals claim, without any detail, that the EIR failed to evaluate the air quality during construction of the Project, which will have a negative impact on hikers. This is false. The EIR fully evaluated the air quality impacts during construction and operation of the Project. The analysis is set forth in the EIR, Section IV.B (Air Quality), Exhibit D (Air Quality and Greenhouse Gas Emissions Technical Modeling, DKA Planning, July 2018) and Final EIR pages 3-42 to 3-44, Exhibits D-1 and D-2, Air Quality memo and modeling). The EIR determined that the Project would not result in any emissions during either construction or operation that exceed the South Coast Air Quality Management District's (SCAQMD) thresholds of significance. In addition, during construction, the Project would be required to minimize particulate emissions through best practices required by SCAQMD Rule 403 (Fugitive Dust).



(vi) Wildlife Connectivity. The Appeals claim, without any detail, that the Project will disturb wildlife connectivity. As set forth below, the EIR includes wildlife corridor studies that conclude the existing wildlife corridor is located near Mulholland Drive to the north of the Property, and that most wildlife did not cross the Property due to its proximity to Runyon Canyon Park with its large number of hikers. The only large wildlife on the Property are deer, and the Project does not add any fencing or other barriers that would limit access of wildlife to the Property. The wildlife studies are described in detail below.

(vii) Light and Noise. The Appeals claim, without any detail, that the Project will create light and noise impacts that will disturb wildlife. The EIR concluded that the Project will not cause a significant impact of light or noise.

The EIR concluded that no significant increase in lighting would be associated with the Project following construction, as it consists of a single-family residence. All exterior lighting would be directed downward and would be positioned such that it does not illuminate adjacent native habitats. There would be no ornamental landscape lighting outside of the development area to preserve the natural status of the Property. The building would also use low-E glass windows and five foot overhangs to reduce glare. (AES-PDF-1) The house is buried under the hill, and so any light inside the house will only be visible from the southwest.

The EIR found no sound impacts, because there will be no change in the number of occupants. The supplemental noise memo in the EIR concluded that there would be no audible increase in ambient noise levels at all of the receptors around the Property, and so there would be no significant impacts (See Draft EIR Section IV.K, Final EIR Appendix C). The analysis uses the SoundPLAN model that assigns a penalty for the evening and night hours to reflect the increased sensitivity of people to sound during evening and night hours. The Project will include a project design feature that prohibits the use of outside amplified noise on the Property. (NOI-PDF-1). The Valencia Family will continue to live on the Property, and will not rent out the house or the accessory living quarters for events or otherwise; therefore, claims that the Project will be a party house are without merit. The Valencia Family has lived on the Property for ten years without any complaints about light and noise, and without most hikers even knowing that they lived there.

(viii) Erroneous Appeal Claims. The Appeals includes prior letters to the City from the Appellants that describe claimed impacts from prior larger versions of the Project that are no longer relevant. For instance, the letters from MRCA, dated May 16, 2022, and from SMMC, dated May 16, 2022, erroneously state that the Project includes more than a 5,000 sf basement, 6,400 sf covered patio, and 2,400 sf mechanical area. The Project was modified multiple times before 2022 to eliminate or significantly reduce these areas at the request of the Mulholland DRB, and so the claims are not valid. MRCA's subsequent letter to the City, dated August 5, 2024, merely makes a general statement that even with the reduced size project, the FEIR remains deficient under CEQA, without providing any specific claims for the City to evaluate. The Appeals also falsely claim that the FEIR fails to evaluate the impact of large parties on traffic, biology, visual and recreational uses. However, the Valencia Family will continue to live on the Property,

and will not host any larger parties than what currently exists and is permitted by local ordinance. Therefore, the erroneous claims do not provide any substantial evidence of any significant impacts, and are just conjecture.

## 2. **The Project**

The Project proposes the construction of a new home that is buried under the existing ridgeline covered with native plant landscaping and shaped to match the contours of the hillside. The project is solar powered and naturally cooled by the surrounding soil with a planted green roof. The project is 5,500 square feet on two levels with a 600 square foot garage that is all completely surrounded by the hillside, and a 3,000 square foot fully underground basement (the “Project”). The total Residential Floor Area (“RFA”) is 5,700 square feet with a maximum height of 29 feet (but not taller than the existing ridge) on a 197,435 square foot lot (4.53 acres). The Project also requires 14,000 cubic yards each of cut and fill on site, which will be supported by three retaining walls, and fully landscaped with native plants. There will be no hauling off-site. The Property also has an existing 2,018 square foot single-family dwelling, known as the Headley/Handley House, designed by Lloyd Wright. The structure has been designated a Historic Cultural Monument (No. 563) and will be preserved. This house is located on the north side of the Property and separated from the new house by a connecting passageway to the existing patio.

## 3. **The History of the Property**

The property was originally 160 acres, and included what is currently Runyon Canyon Park. The owner initially offered it to the City as a donation in 1964, which the City rejected, and later sold it to the City for park use in 1984, but retained the Property lot for residential use. The City was offered, but declined to purchase, the remaining Property in 1990. So, it is currently residentially zoned private property on a deemed-approved private street, Runyon Canyon Road, which is utilized by only one other property. (See Exhibit 2) Any claims that the Property is part of the Park or required to be parkland or open space are false.

In brief, George Huntington Hartford II, the A&P supermarket heir, purchased the 160-acre property in 1942, and lived in a mansion at the base of the canyon. He deeded a portion of the property on the ridgeline to George Headley, who hired Lloyd Wright to construct a home, garage and stable on the Property in 1945. (See Historic Resource Report- Headley/Handley House, by GPA, dated October 2018) Headley ran out of funds, and only constructed the garage, storage and stable, which were eventually converted to living space in 1948, and is now known as the Headley/Handley House.

Hartford intended to construct a hillside resort on the remaining estate over several years, but eventually abandoned the plans, and attempted to give the land to the City as a park in 1964. But, the City rejected his offer and the property was sold. In 1951, TV producer Alan Handley purchased both the house and the entire property, and hired Lloyd Wright to add a pool, carport and additional living space between 1959 and 1966. It is believed that either Headley or Handley

graded the ridge in anticipation of constructing a larger home on what is now a flattened area on top of the ridge. In 1984, Handley sold 133+ acres of the estate to the City for use as a public park (now Runyon Canyon Park), but retained a portion of land with the residence, the Property, as private property. Handley lived on the Property with his sons until his death in 1990. The City then declined to purchase the Property to incorporate into Runyon Canyon Park, and the Property remains private residential property in a residential zone. The HCM designation includes only the Headley/Handley House and not any of the surrounding land or other structures.

The Property is located on Runyon Canyon Road, a private street utilized by two homes that is accessed from Mulholland Drive to the north, and is used by hikers to access Runyon Canyon Park from the north. (See Exhibit 2) The Property is zoned RE40-1-H with a general plan land use designation of Minimum Residential. The Property includes a long driveway that leads to a carport adjacent to the Headley/Handley house. There is a swimming pool in the front of the house to the north, and a terrace to the south. There is also a low previously graded ridge to the southwest of the terrace, approximately 165 feet from the existing residence. The remainder of the Property is a natural landscape with a low fence.

#### **4. Environmental Review**

The Project had full environmental review through the preparation of an Environmental Impact Report (“EIR”), which included multiple studies. (State Clearinghouse No. 2018041016) The Owner submitted an application packet, including an Environmental Assessment Form, in November 2016. The City circulated the Notice of Preparation on April 3, 2018, and held a scoping meeting, and circulated the Draft EIR on August 22, 2019. The City prepared responses to comments and published the Final EIR on March 18, 2022. The Mulholland DRB reviewed and approved the EIR in June 2022. The Final EIR included the Mitigation Monitoring Program (“MMP”), which identified all of the project design features and mitigation measures and is attached as Exhibit 1. The South Valley APC approved and certified the EIR on August 8, 2024.

The EIR included evaluation of aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation, tribal and cultural resources, and wildfires. The EIR concluded that the Project would not result in any significant impacts to the environment that could not be mitigated during construction or operation, including cumulative impacts.

Since preparation of the Draft EIR, the Owner has agreed to significantly reduce the scope and floor area of the home. The Owner originally proposed a residence with 8,099 square feet (not including basement/mechanical) and then reduced it to 6,982 square feet (excluding basement), that also included approximately 2,475 square feet of mechanical/electrical area, approximately 7,769 square feet of covered patio area, and an attached four-car garage. The final revised Project has a further reduced RFA of 5,700 square feet that no longer includes the large covered patio, but includes 200 square feet of the garage. The revised design is fully evaluated in the Draft EIR and

Final EIR, because it is significantly smaller and therefore has less potential impacts than the original evaluated project. The revised Project (5,500 square feet, not including the basement, but including the mechanical/electrical areas) is slightly smaller than Alternative B (5,670 square feet, not including the basement or mechanical/electrical areas) and also smaller than the Original Project (8,099 square feet, not including the basement or mechanical/electrical areas). Based on the reduced size of the revised Project, the revised Project would result in slightly reduced impacts with respect to air quality, greenhouse gas emissions, energy demand, and erosion when compared to both Alternative B and the Original Project.

The following is a summary of key analyses in the EIR.

(a) ***Fire Safety***

The Project will fully comply with all State and local fire regulations. The Project will make the area safer during a fire, because it will add a fire hydrant at the foot of the driveway, where it will be accessible to LAFD. There are three existing fire hydrants on the perimeter, and the project will add a fourth hydrant located at the bottom of the driveway, and maintain the LAFD requirement of 4,000 gallons per minute. The property already requires 2.88 acres of brush clearance in fuel modification areas, and will add .59 acres of additional fuel modification (including part of the road), which consists primarily of mixed chaparral, disturbed chaparral.

As part of the EIR, the LAFD reviewed and approved the Fire Hydrant and Access Plan, and required a new fire hydrant near the driveway (FIR-PDF-1) (See Exhibit 4). Fire Protection was fully evaluated in the Draft EIR Section IV.1, and the Project has no project or cumulative impacts related to fire protection services. For building permitting, LADBS will require compliance with the LA Fire Code and Title 24 related to fire protection services.

The Hillside Federation Appeal claims that the Board of Forestry Fire Safety Guidelines require all roads in a VHFHSZ to be 20 feet in width, and there can be no construction on properties where the roads are less than 20 feet. The South Valley APC found that these regulations do not apply to the Project based on analysis provided by City planner Blake Lamb at the hearing. The regulation states “(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping.” (Cal. Code Regs Tit. 14, § 1273.01 – Width). For driveways, the code states: “(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13’ 6”).” (Cal. Code Regs Tit. 14, § 1273.01)

First, the City found that the phrase “shall be constructed” means that it applies to construction of new roads, and not retrofitting existing roads. Because Runyon Canyon Road is an existing deemed approved private street, the new regulations do not apply. (See audio of South Valley APC hearing, June \_\_, 2024 (at approximately 1:32): [https://planning.lacity.gov/plndoc/Audio/South-Valley/2024/08-08-2024/5\\_APCSV\\_.mp3](https://planning.lacity.gov/plndoc/Audio/South-Valley/2024/08-08-2024/5_APCSV_.mp3))

Second, the term “road” is defined in the code as “(y) *Road: A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy.*” (Cal. Code Regs Tit. 14, § 1270.01(y)). Because Runyon Canyon Road only provides access to two Residential units, it does not qualify as a road for these provisions. Runyon Canyon Road does meet the width requirements for a driveway under the code.

Third, the regulations do not apply to projects with parcel maps prior to 1991. The code states: “*Subchapter 2 does not apply where an application for a Building permit is filed after January 1, 1991 for Building construction on a parcel that was formed from a parcel map or tentative map (if the final map for the tentative map is approved within the time prescribed by the local ordinance) approved prior to January 1, 1991, to the extent that conditions relating to the perimeters and access to the Buildings were imposed by the parcel map or final tentative map approved prior to January 1, 1991.*” (Cal. Code Regs Tit. 14, § 1270.03(b)). Because Runyon Canyon road was created by parcel maps prior to 1991 (and was a deemed approved road prior to this date), Runyon Canyon road is exempt from these regulations (See Exhibit 2).

**(b) *Project Mitigation Monitoring Program and Construction Traffic Management Plan***

In summary, the Project includes a Mitigation Monitoring Program (See Exhibit 1) that will ensure access by hikers from Mulholland Drive to Runyon Canyon Park at all times during construction. There will be no off-site hauling, all trucks will park on site and not idle on Runyon Canyon Road, and all workers will be shuttled to the site from an off-site lot. Runyon Canyon Road is a deemed approved private street (See Exhibit 2), and became park access after the City purchased part of the estate property in 1984. Only the Property and one other home utilize Runyon Canyon Road for access.

The EIR includes a requirement to prepare a Construction Traffic Management Plan (“CTMP”) to minimize the effect of the construction on the neighbors, patrons of Runyon Canyon Park, and wildlife (TR-PDF-1). It also requires that all construction material deliveries occur during off peak hours (TR-PDF-2). All construction workers will park off-site and be transported by shuttle to the site. There will be no construction vehicle or other vehicle parking or idling on Runyon Canyon Road, and the road will be kept clear at all times to allow use by Park patrons. Therefore, all construction activities will be limited to the Property.

Prior to the start of construction, the Owner must prepare a detailed CTMP including street closure information, detour plans, haul routes (if required), and staging plans, and submit it to LADOT for review and approval. The CTMP shall include a Worksite Traffic Control Plan (“WTCP”), which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The CTMP and WTCP shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:



- (i) Maintain access for land uses in the vicinity of the Project Site during construction;
- (ii) Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- (iii) Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- (iv) Provide advance notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- (v) Prohibit construction worker or equipment parking on adjacent streets;
- (vi) Provide temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities to ensure traffic safety on public rights of way. These controls shall include flag people trained in pedestrian and bicycle safety;
- (vii) Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- (viii) Contain construction activity within the Project Site boundaries to the extent feasible;
- (ix) Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- (x) Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- (xi) Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or
- (xii) Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site. (if necessary)

(c) ***Biology***

In summary, the EIR included biological surveys, updated over several years, that concluded that there are no native protected tree species on-site, no special-status plants, and no City protected trees or shrubs on or near the Property that would be impacted by the Project. The EIR also proposed increasing the fuel modification area by .59 acres to a total of 3.3 acres, and included three mitigation measures, including requiring landscaping with only native plants.

The biological analysis included three biological surveys in June 11, June 12, and June 26, 2018. These studies included general vegetation mapping and biological surveys, wildlife surveys, plant habitat assessments, habitat assessments for special-status animals and general wildlife, and focused special-status bat surveys. (See Draft EIR Section IV.C. Appendices E1 and E2, Final EIR Appendices H, J, and M1, M2, and M3) The studies found there were no native protected tree

species on-site, and no special-status plants, including state or federally listed species. There are a total of 96 non-protected significant trees, of which 17 are proposed for removal.

The entire 4.5-acre property, as well as surrounding areas associated with the Project, were subject to vegetation mapping and general biological surveys, in order to include the entire fuel modification zone. The proposed area for increased fuel modification (.59 acres) consists primarily of mixed chaparral, disturbed chaparral, and existing fuel modification zones (total 3.3 acres). Also included in this expansion is a non-native grassland, a disturbed ruderal area, and patches of sugar bush and toyon individuals. None of the state and federal special-status habitats occur within the development area.

On September 15, 2021, the Tree Resource prepared an updated analysis letter in response to the new ordinance passed in December 2020 (Ordinance No. 186873), which adds Toyon (*Heteromeles arbutifolia*) and Mexican elderberry (*Sambucus mexicana*) shrubs in the class of protected trees and shrubs (See Final EIR Appendix M-1). According to this letter, there are no City of Los Angeles protected trees or shrubs on or near the Property that would be impacted by the Project. There are individual toyon located in the fuel modification area, but these are not large enough to meet the protected criteria of 4 inches in cumulative diameter.

The Project includes project design features to protect biological resources, including: (i) flagging the walnut tree within 100 feet of the Project grading limits (BIO-PDF-1); (ii) prohibiting exterior construction work after dusk (BIO-PDF-2); and (iii) limiting landscaping provided as part of the Project to native plantings. (BIO-PDF-3).

(d) ***Wildlife***

In summary, the EIR fully evaluated wildlife movement, including a memorandum analyzing Potential Impacts to Wildlife Movement, by Glenn Lukos, dated December 1, 2020, (App. J) and a Wildlife Movement Map (App. H). The study identified primarily deer on the Property, and concluded that the primary wildlife corridor was located to the north of the site, and the steep slopes discourage wildlife from crossing the Property directly. The Project does not include any fencing that would block wildlife passage, and most of the 4.5 acres is open to wildlife.

In the wildlife study, Cooper Ecological Monitoring determined that the Property does not function as a natural part of a wildlife movement path, because of the steep elevation change and dense residential development to the south. (Final EIR, Appendix B). The wildlife path exists to the east and west of the Property. In the wildlife study, the wildlife movement map depicts a direct path of travel for medium and large mammals between Habitat Block 38 and Habitat Block 35 along the northernmost portion of Runyon Canyon Park using the Mulholland Drive corridor, which is separated from the Property by development. Therefore, the potential for wildlife movement between these habitat blocks across the Property would be an extremely rare occurrence.

The special-status wildlife habitat assessment determined that the development area on the Property supports habitat of low to moderate suitability two special-status reptile species: coast horned lizard and coastal western whiptail. The CDFW letter also identified the hoary bat and the Southern California rufous-crowned sparrow. The focused bat studies found no evidence of bats roosting on the Property.

The general wildlife surveys found no evidence of wildlife movement within the Property, in part because the proposed residence is located near the dirt road that is a popular hiking location with off-leash dogs. The wildlife connectivity assessment by Cooper Ecological Monitoring found that mule deer occasionally forage on the ornamental vegetation on site. There are no special status habitats within the development area of the Property. As discussed in a memorandum prepared by Glenn Lukos Associates, dated December 1, 2020 (Final EIR, Appendix J) the Project is not expected to have a substantial adverse impact on wildlife movement, including mountain lions, as the new development will generally occupy the same development footprint that an existing structure and landscaping currently occupies. The existing fencing does not surround the Property and will not be expanded or modified by the Project, thus allowing the same access for wildlife use and movement that it currently provides.

The EIR includes mitigation measures to protect nesting birds during construction, including compliance with MBTA and California Fish and Game Code Sections 3503.5, 3503, and 3513. These require that removal of vegetation not occur during the nesting season (typically March 15 to August 31), or if necessary that it be removed at this time, it must be surveyed by a biologist prior to removal. (BIO-MM-1)

The City is in the process of preparing a Wildlife Ordinance, which has not yet been reviewed and adopted by the City Council and so is not applicable to the Project. (CF 14-0518) However, the Project complies with the general stated intent and many of the provisions of the proposed ordinance, including: (i) minimizing development footprint and land disturbance, allowing for vegetation and habitat to remain intact, (ii) promoting native biodiversity (e.g., trees, vegetation and landscaping); and (iii) facilitating wildlife movement and minimizing injury to wildlife.

(e) ***Historic***

In summary, Headley/Handley House is a designated Historic Cultural Monument (HCM No. 563) that was designed by Lloyd Wright and constructed in 1945 with additions to convert the building to a residence between 1959 and 1966. (See Draft EIR, Section IV.D) The HCM designation specifically includes only the building, and not the land or any other structures on the Property. The Historic Assessment concludes that the addition of a new residence on the Property does not cause a significant impact to the HCM, because it still retains its designation in compliance with the Secretary of the Interior's Standards. The new residence is accessed by an extension of the driveway to the south of the HCM and the entry to the new residence faces southwest on the other side of the existing graded ridge. Therefore, the new residence is not visible



from the HCM, because it will be shielded by the existing hillside and vegetation. There is a passageway that connects the HCM patio to the new residence. The EIR includes project design features to protect the HCM and cultural resources, including: (i) requiring that the siting and design of the proposed new residence will be in a manner that preserves the integrity of the setting of the Headley/Handley House (CUL-PDF-1), (ii) providing cultural resource regulations to the contractor, and requiring work to stop if archaeological resources are exposed (CUL-PDF-2), and (iii) requiring review of construction and landscape plans by a qualified historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for architectural history or historic architecture (CUL-PDF-3). The Owner met with numerous historic groups, including Hollywood Heritage and the Office of Historic Resources, regarding preserving the Headley/Handley House.

(f) ***Light and Noise***

The EIR concluded that no significant increase in lighting would be associated with the Project following construction, as it consists of a single-family residence. All exterior lighting would be directed downward and would be positioned such that it does not illuminate adjacent native habitats. There would be no ornamental landscape lighting outside of the development area to preserve the natural status of the Property. The building would also use low-E glass windows and five foot overhangs to reduce glare (AES-PDF-1).

The supplemental noise memo in the EIR concluded that there would be no audible increase in ambient noise levels at all of the receptors around the Property, and so there would be no significant impacts (See Draft EIR Section IV.K, Final EIR Appendix C). The analysis uses the SoundPLAN model that assigns a penalty for the evening and night hours to reflect the increased sensitivity of people to sound during evening and night hours. The Project will include a project design feature that prohibits the use of outside amplified noise on the Property. (NOI-PDF-1).

(g) ***No Haul Route***

The Project requires grading in excess of that allowed by-right, because it is located beneath the hillside. However, no off-site hauling or haul route is required, because the grading will all be replaced on site. As stated, construction on top of the ridge was opposed by the Mulholland DRB, because the house would be visible from Mulholland Drive, and construction at the bottom of the hill was rejected because the house would be visible from the Runyon Canyon Park trails. By locating the house beneath the ridge, the Mulholland DRB determined that the Project is the least visible and is organically integrated into the landscape. Therefore, any claims of impacts from haul trucks is not valid.

5. **Entitlements**

The Property is located within the Mulholland Scenic Highway Specific Plan ("Mulholland Specific Plan"), which requires review by the Mulholland Design Review Board ("DRB"). The

Mulholland DRB and the South Valley APC determined that the Project met each of the required entitlement findings set forth below.

- (a) Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.7 F, a **Specific Plan Exception** to allow construction within 50 feet of a prominent ridgeline under Mulholland Specific Plan Section 5.B.1.

A Prominent Ridge, as identified by the Mulholland Specific Plan, bisects the Property slightly west and terminating approximately 165 feet south of the existing residence. The Owner originally provided various options for the new residence to the Mulholland DRB, including locating the residence (i) on top of the ridge, (ii) closer to the bottom of the hill (more than 50 feet from the ridgeline) or (iii) under the ridgeline. The Mulholland DRB overwhelmingly preferred to locate the residence under the existing ridgeline, because it would integrate with the landscape and be the least visible from Runyon Canyon Park, and not at all visible from Mulholland Drive. The first option, on top of the ridge, would be visible from Mulholland Drive, and the least preferable option. The third option would not require a Specific Plan Exception, but would be visible at all times from the primary hiking trail in Runyon Canyon Park. The South Valley APC approved the Specific Plan Exception to allow the house within 50 feet of the Prominent Ridge because (1) it is not visible from Mulholland Drive, (2) it will not impact the visibility of the entire ridge, which will remain, and (3) it will be constructed under the ridge (which was previously disturbed) and within the hill so that it is only visible from the west, and this visibility is minimized by the native plantings and landscape.

- (b) Pursuant to LAMC Sections 11.5.7 C and 16.50 a **Specific Plan Project Permit Compliance and Design Review** as required by the Mulholland Scenic Parkway Specific Plan (Ordinance No. 167,943)

The Mulholland DRB and South Valley APC found that the Project complied with the findings for a Project Permit Compliance with the Mulholland Specific Plan.

- (c) Pursuant to LAMC Section 12.27 D, a **Zone Variance** to allow a second kitchen to be built within the new single-family dwelling without the removal of the existing kitchen in the existing historical single-family dwelling, for relief from LAMC Section 12.07.01 A.1.

The Mulholland DRB and South Valley APC approved the variance to allow an accessory living quarters to maintain an existing kitchen in the Headley/Handley house.

- (d) Pursuant to LAMC Section 12.24 X.26, a **Zoning Administrator's Determination** to permit three retaining walls instead of two retaining walls of up to 10 feet in height pursuant to LAMC Section 12.21 C.8 (a).

The Project requires the excavation and grading of approximately 14,000 cy of dirt for construction of the new residence and the required utilities and fire suppression system. The dirt

will be replaced on the hillside (to enclose the home) and throughout the Property, and replanted with extensive native landscaping. The slope will be maintained at 2:1 (horizontal: vertical), which is required by code. The Project will require three 10-foot retaining walls to support the slope, which will be fully planted so that the walls integrate with the landscape. By maintaining the grading on the Property, no hauling will be required on Runyon Canyon Road. The South Valley APC approved the ZAD, so no haul route or off-site grading is required.

- (e) Pursuant to LAMC Section 12.24 X.28 (a)(5), a **Zoning Administrator's Determination** to allow 28,012 cubic yards of grading to occur on-site in lieu of the maximum "by-right" grading quantities as delineated in 12.21 C.10 (f)(1) and (2).

As described above, the Project requires approximately 14,000 cubic yards of cut and the same cubic yards of fill on-site in order to construct the residence under the ridgeline. The development area of the Property is limited to the area around the hill in order to preserve the natural existing landscape of most of the 4.5-acre site. Therefore, the Project requires a combined cut/fill of 28,012 cubic yards of grading.

## 6. Community Outreach

The Valencia Family did outreach personally to their neighbors with their proposed house design, and the ongoing changes to the description. It was important to them that the construction of the Project has a minimal effect on their neighbors' daily lives, and that the neighbors feel that they are informed and protected. The Project has more than 150 supporters that live within a two-mile radius of the Property. Copies of the supporter letters have been separately provided to the City Council (See Exhibit 3, List of Support Letters and Map). The supporters stated that they appreciated the thoughtfulness of Manny Valencia in creating a design that is respectful of the neighbors, the park, and the hikers that use Runyon Canyon. Tracey Pence noted that prior to his ownership, the hillside was eroding, but Manny Valencia's considerate stewardship kept the property maintained and improved the environment, and stated she was sure he will maintain this type of respect for his property and the park in development of the house. Mani Perezcarro, who works for a neighbor, stated that the Valencia Family have shown great sensitivity and respect for protecting the ecological and historic value of Runyon Canyon Park, and he has personally informed the neighbors of any progress with the project. He praised Manny's dedication to design a house that was respectful to the environment and the Park's natural landscape.

The Project team also met with over 25 Hillside neighborhood groups, including the Hillside Federation on June 21, 2022, which represents over 40 Hillside neighborhood groups and HOAs in the Mulholland corridor and hillside area. The Hillside Federation praised the redesigned smaller project, but declined to reconsider its vote to oppose the original larger project. The Project team also presented to the Hollywood Hills West Neighborhood Council: Land Use Committee on June 29, 2022, who appreciated the significant work and revisions, but did not vote to support the project. The Project team reached out to MRCA on June 24, 2022 to meet and submitted the revised

plans, but MRCA declined the invitation. The Project team also reach out consistently with Project updates and information to the District 4 Council Office. The Valencia Family and their consultants will continue this outreach during the construction of the Project to quickly identify and resolve and issues and concerns.

## **7. Similar Project Approvals**

Since 2020, the South Valley APC and Mulholland DRB have approved larger residential projects in the Mulholland DRB area near parkland that have more impacts because they are visible from Mulholland Drive. Therefore, the Project is consistent with, and has less impact than, other projects approved by the City in the area.

On April 21, 2023, the South Valley APC approved construction of a new, 9,999 square foot, three-story, 52-foot high, single-family dwelling with a 4,487 square foot basement, 701 square foot garage, and multiple covered patios with two pools on a 65,860 square foot (1.48 acre site) lot at 13375 Mulholland Drive. (APCSV-2018-5294-SPE-ZAA-ZAD-DRB-SPP-MSP). This project is visible downslope from Mulholland Drive, is within 200 feet of parkland, and proposes to haul 2,391 cubic yards of grading off-site. This project also includes three 10-foot retaining walls in the front yard and six retaining walls to support the house. In contrast, the proposed Project is not visible from the Mulholland Drive, is located underneath the hill, has no hauling off-site, and has a total of three retaining walls to support the fill on site. The City approved a CEQA exemption.

On February 6, 2020, the South Valley APC approved construction of a 3,296 square foot addition to an existing two-story, 22-foot high, 9,480 square foot single family residence with an 821 square foot garage at 2859 Coldwater Canyon Drive. (APCSV-2016-4960-SPE-ZAA-ZAD-DRB-SPP-MSP). This project also includes an existing 907-square-foot accessory living quarter, pool, tennis court and retaining wall. The structure totals 13,719 square feet of residential floor area. It is located downslope and visible from Mulholland Drive on top of a prominent ridge and is within 200 feet of public parkland. In contrast, the proposed Project is not visible from Mulholland Drive, is located underneath and not on top of a ridge, and is only 5,700 square feet of residential floor area. The City approved a CEQA exemption.

## **8. Conclusion**

In conclusion, the new home will provide a thoughtful, elegant, sustainable design that fully incorporates and embraces the native landscape. The Valencia Family has worked tirelessly with their neighbors and the Mulholland DRB over the past nine years to reduce the scale of the residence to complement the natural terrain, and to obtain significant support. The appellants have not provided any substantial evidence in the record of any significant impacts that were not fully evaluated in the EIR and fully mitigated. The proposed Project will increase the fire safety on the Property and in Runyon Canyon Park by increasing the fuel modification area and adding another

fire hydrant. The Valencia Family has always taken specific care to maintain the brush in the fuel modification area in compliance with LAFD law and policy to ensure fire safety at all times.

We respectfully request that the City Council deny the appeals and uphold the South Valley APC's unanimous approval of the Project's entitlements and EIR certification.

Sincerely,



SHERI L. BONSTELLE for  
Jeffer Mangels Butler & Mitchell LLP

SLB

- Exhibit 1: Mitigation Monitoring Program
- Exhibit 2: Private Street Approval
- Exhibit 3: Supporter List and Map
- Exhibit 4: LAFD Fire Hydrant and Access Plan Approval
- Exhibit 5: Rendering

cc: Councilmember Nithya Raman, CD4 ([nithya.raman@lacity.org](mailto:nithya.raman@lacity.org))  
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## Communication from Public

**Name:** Sheri Bonstelle

**Date Submitted:** 02/03/2025 07:40 PM

**Council File No:** 24-1371

**Comments for Public Posting:** Attached are the Exhibits to the Letter from the Applicant.

## 4. Mitigation Monitoring Program

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### 1. Introduction

This Mitigation Monitoring Program (“MMP”) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts in the EIR takes into consideration the project design features (PDF) and applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

### 2. Purpose

It is the intent of this MMP to:

1. Verify compliance with the project design features and mitigation measures identified in the EIR;
2. Provide a framework to document implementation of the identified project design features and mitigation measures;
3. Provide a record of mitigation requirements;
4. Identify monitoring and enforcing agencies;
5. Establish and clarify administrative procedures for the clearance or project design features and mitigation measures;
6. Establish the frequency and duration of monitoring; and

7. Utilize the existing agency review processes wherever feasible.

### **3. Organization**

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency : the frequency at which the PDF or MM shall be monitored.
- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

### **4. Administrative Procedures and Enforcement**

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.



## 5. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

## 6. Mitigation Monitoring Program

### A. Aesthetics

#### Project Design Feature

**AES-PDF-1** The Project has been designed to be built into the hillside, and would include the following design elements:

- Siting within the bluff (physically buried) so that the only face of the residence that is visible is on the western elevation;
  - Rooflines designed to blend in with the natural topography;
  - Five to ten-foot roof overhangs over the windows and patios; and
  - Use of low-E glass windows.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once, at plan check
- **Action Indicating Compliance:** Plan approval

#### Mitigation Measures

None required.

### **C. Biological Resources**

#### Project Design Features

**BIO-PDF-1** Although no impacts to protected trees are anticipated as a result of the Project, the walnut tree within 100 feet of the Project grading limits shall be flagged. Flagging shall be installed under the supervision by the Project Biologist prior to the start of grading and be maintained until completion of construction activity to ensure that the walnut tree is not impacted by any construction activities.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; Board of Public Works Urban Forestry Division
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; Board of Public Works Urban Forestry Division
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at plan check; once at field inspection
- **Action Indicating Compliance:** Plan approval; field inspection sign-off

**BIO-PDF-2** Exterior construction work will be prohibited after dusk.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspection
- **Action Indicating Compliance:** Field inspection sign-off

**BIO-PDF-3** Landscaping provided as part of the Project will be limited to native plantings.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, at plan check
- **Action Indicating Compliance:** Plan approval

#### Mitigation Measure

**BIO-MM-1** The following requirements under the MBTA and California Fish and Game Code Sections 3503.5, 3503, and 3513 are to be implemented to ensure that nesting birds are not harmed during Project construction. It should be noted that raptor species are not expected to nest within the Development Area due to a lack of suitable habitat:

1. If feasible, the removal of vegetation should occur outside of the nesting season, generally recognized as March 15 to August 31 (potentially earlier for raptors). If vegetation removal must occur during the nesting season, then a qualified biologist shall conduct a nesting bird survey prior to any vegetation removal. If active nests are identified, the biologist shall flag vegetation containing active nests. The biologist shall establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers will be based on the species identified, but generally will consist of 50 feet for non-raptors and 300 feet for raptors.
2. If for some reason it is not possible to remove all vegetation during the non-nesting season, then vegetation to be removed during the nesting season must be surveyed by a qualified biologist no more than three days prior to removal. If no nesting birds are found, the vegetation can be removed. If nesting birds are detected, then removal must be postponed until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Furthermore, the biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Prior to issuance of grading permit
- **Monitoring Frequency:** Once, at plan check
- **Action Indicating Compliance:** Issuance of grading permit

## D. Cultural Resources

### Project Design Features

**CUL-PDF-1** The siting and design of the proposed new residence will be in a manner that preserves the integrity of the setting of the Headley/Handley House.

- **Enforcement Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, at plan check
- **Action Indicating Compliance:** Plan approval

**CUL-PDF-2** Prior to the start of Project construction, the prime contractor and any subcontractor(s) will be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project Site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find will stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However, construction activities could continue in other areas of the Project Site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Prior to issuance of grading permit; again if materials are encountered

- **Action Indicating Compliance:** Field inspection sign-off; submittal of compliance documentation prepared by Construction Monitor and/or qualified archaeologist

**CUL-PDF-3** Prior to the issuance of any building permits, the Applicant will retain a qualified historic preservation professional (“professional”), meeting the Secretary of the Interior’s Professional Qualifications Standards for architectural history or historic architecture, to review construction and landscape plans related to the alterations to the Headley/Handley House and its setting. The plans will be reviewed by this professional for compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards). If the construction and landscape plans do not comply with the Standards, the professional will make recommendations for changes to the plans to comply with the Standards. The review will be summarized in a memorandum, and submitted to the Office of Historic Resources (OHR) for concurrence. Building permits may be issued after the OHR has concurred that the plans comply with the Standards. Once the plans have been approved by the professional and OHR, the Applicant will transmit a copy to the Department of City Planning for the case file.

After the memorandum has been approved by the OHR, the professional meeting the qualifications described above will monitor the construction of the project as it relates to the Headley/Handley House. The professional will meet with the contractor on site before construction begins to review the requirements of this PDF and provide guidance on appropriate treatments to protect the historic property from damage during construction. The professional will monitor construction during any demolition and grading activities that have the potential to affect the historic property and will meet with the contractor at regular intervals during construction. The intervals will include 10 percent, 30 percent, 50 percent, 90 percent, and 100 percent construction. Within five days after each of these meetings, the professional will prepare a memorandum summarizing the findings, making recommendations as necessary to ensure compliance with the Standards, and documenting construction with digital photographs. The memorandum will be submitted to OHR for concurrence. In the event OHR does not concur, all activities should cease until conformance with the Standards is resolved and concurrence is obtained. Once the plans have been approved by the professional and OHR, the Applicant will transmit a copy to the Department of City Planning for the case file.

- **Enforcement Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Agency:** City of Los Angeles Department of City Planning, Office of Historic Resources
- **Monitoring Phase:** Prior to issuance of building permits; construction

- **Monitoring Frequency:** Once, prior to issuance of building permits; periodic field inspection
- **Action Indicating Compliance:** Issuance of building permits; field inspection sign-off

#### Mitigation Measures

None required.

### **F. Geology and Soils**

#### Project Design Features

None provided.

#### Mitigation Measure

**GEO-MM-1** During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor, who shall be responsible for coordinating with a certified paleontologist to implement and enforce the following:

1. If any paleontological materials are encountered during the course of Project development, the Construction Monitor, in accordance with GEO-MM-1 shall coordinate with the services of a paleontologist, and all further development activity shall halt and the following shall be undertaken:
  - a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology-USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum-who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
  - b. In the event of a discovery, or when requested by the Project paleontologist, the contractor shall divert, direct, or temporarily halt ground disturbing activities in an area in order to evaluate potentially significant paleontological resources. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. The Construction Monitor shall also prepare and submit documentation of the Applicant's compliance with Mitigation Measure GEO-MM-1 during construction every 30 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance

Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the mitigation measure within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the Construction Monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

2. The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
  3. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
  4. At the conclusion of monitoring activities, the Project paleontologist shall prepare a signed statement indicating the first and last dates monitoring activities took place, and submit it to the Department of City Planning, for retention in the administrative file for Case No. ENV-2016-4180-EIR. Copies of the paleontological survey, study, or report shall also be submitted to the Los Angeles County Natural History Museum.
  5. Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, paleontological reports, have been submitted, or a statement indicating that no material was discovered.
- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
  - **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
  - **Monitoring Phase:** Construction
  - **Monitoring Frequency:** Prior to issuance of grading permit; again if materials are encountered
  - **Action Indicating Compliance:** Field inspection sign-off; submittal of compliance documentation prepared by Construction Monitor and/or qualified paleontologist

## G. Greenhouse Gas Emissions

### Project Design Feature

**GHG-PDF-1** The design of the Project shall include, but not be limited to, the following sustainability features:

- Inclusion of green roofs that are planted with grass.
- Water-efficient plantings with drought-tolerant species.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at plan check; once during field inspection
- **Action Indicating Compliance:** Plan approval; field inspection sign-off

Mitigation Measures

None required.

**K. Noise**

Project Design Feature

**NOI-PDF-1** The use of outside amplified noise will be prohibited at the Project Site.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** If notified of a violation
- **Action Indicating Compliance:** Field inspection sign-off

Mitigation Measures

None required.

**L. Public Services (Fire Protection)**

Project Design Feature

**FIR-PDF-1** A new fire hydrant is proposed as part of the Project and shall be installed as shown on the approved fire hydrant and access map, stamped as approved on August 9, 2018.

- **Enforcement Agency:** City of Los Angeles Fire Department



- **Monitoring Agency:** City of Los Angeles Fire Department
- **Monitoring Phase:** Pre-construction
- **Monitoring Frequency:** Once, at plan check
- **Action Indicating Compliance:** Plan approval

#### Mitigation Measures

None required.

### **M. Traffic**

#### Project Design Features

**TR-PDF-1 Construction Traffic Management Plan.** Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes (if required), and staging plans, and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Provide advance notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibit construction worker or equipment parking on adjacent streets;

- Provide temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities to ensure traffic safety on public rights of way. These controls shall include flag people trained in pedestrian and bicycle safety;
- Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Contain construction activity within the Project Site boundaries to the extent feasible;
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.
- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at plan check; periodic field inspection
- **Action Indicating Compliance:** Plan approval; field inspection sign-off

**TR-PDF-2** All construction material deliveries will occur during off-peak hours.

- **Enforcement Agency:** City of Los Angeles Department of Transportation
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at plan check; periodic field inspection
- **Action Indicating Compliance:** Plan approval; field inspection sign-off

*Mitigation Measures*

None required.



RICHARD J. RIORDAN  
MAYOR

CON HOWE  
DIRECTOR

FRANKLIN P. EBERHARD  
DEPUTY DIRECTOR  
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MELANIE S. FALLON  
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PRESIDENT  
LES HAMASAKI  
VICE-PRESIDENT  
ROBERT L. SCOTT  
SHELLY S. SUZUKI  
ANTHONY N. R. ZAMORA

RAMONA HARO  
SECRETARY

(213) 485-5071

October 13, 1993

Larry G. Gray, Vice President  
Spindler Engineering  
16823 Saticoy Street  
Van Nuys, CA 91406

Dear Mr. Gray:

RE: APPROVAL OF DEEMED APPROVED PRIVATE STREET

In response to your letter of September 16, 1993 staff have reviewed the documents that you submitted relative to property located at 3003 Runyon Canyon Road (Private). Your contention is that this property qualifies as a deemed approved Private Street within the meaning of Section 18.00C of the Los Angeles Municipal Code.

At a meeting in my office attended by yourself and Gary Ward, the property owner, it appeared evident from the documents provided that the site has the status of a deemed approved private street and procedures require that the Advisory Agency make the determination as to the deemed approved status of the subject property.

Section 18.00C of the Municipal Code states that "When a developed residential lot or building site has its access driveway located within a private road easement and the dwelling and access driveway existed prior to September 6, 1961, said private road easement shall be deemed to have been approved in accordance with the provisions of this article and may be continued. Further, on such a lot or building site, additions and alterations may be erected on said lot if no additional dwelling units or guest rooms are created."

You have provided the following:

1. A grant deed for property located at 3003 Runyon Canyon Road with a legal description including an easement for road purposes, with said easement having been recorded on March 16, 1945.
2. Further substantiation of the easement showing its having been recorded and included in the above mentioned grant deed recorded on March 16, 1945.
3. Recorded grant deed 91-1788491 containing a legal description matching that of grant deed dated March 16, 1945.



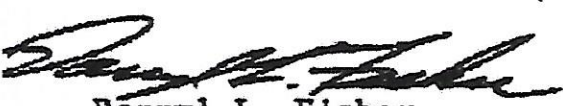
4. Building and other permits for property located at 3003 Runyon Canyon Road bearing a legal description which is the same as that which is shown in the above recorded documents and indicating the existence of single family residence on or before 1949.

Taken in the aggregate, the documents provided are sufficient to conclude that:

- a. A dwelling existed on the subject site according to both City and County records prior to 1961;
- b. The access easement to the site was also of record prior to 1961;
- c. Therefore, requirements for a deemed approved private street have been established and additions or alterations may be made to the dwelling on this site. Further, a new dwelling may be constructed on the site but the Certificate of Occupancy may not be issued before the existing dwelling is converted to an accessory structure through removal of the kitchen.

Very truly yours

CON HOWE  
Advisory Agency

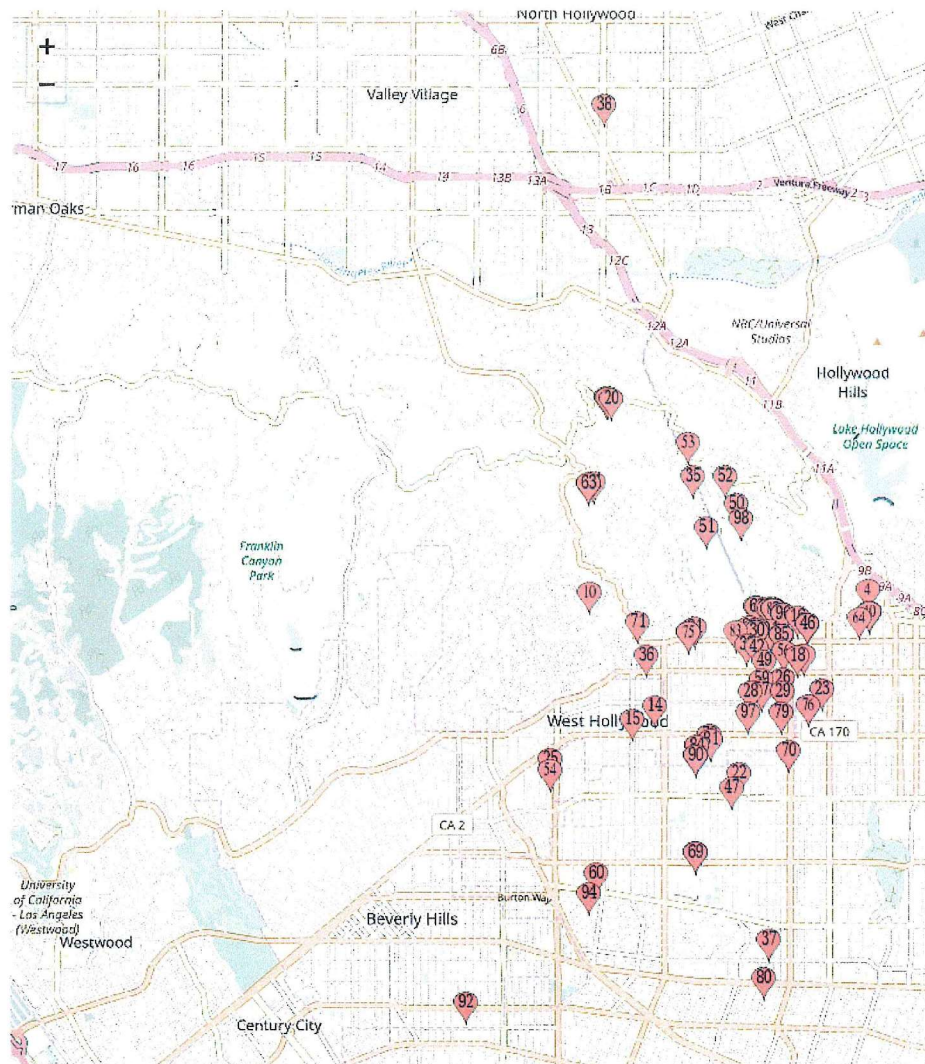


Darryl L. Fisher  
Deputy Advisory Agency

DLF:mjd



# EXHIBIT 3



Leaflet (<https://leafletjs.com/>) | Map data © OpenStreetMap (<https://www.openstreetmap.org/>) contributors, ODbL (<https://opendatacommons.org/licenses/odbl/1.0/>)

Save Bulk Entry

## Location

## Description

- 1 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 2 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 3 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 4 1969, Whitley Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90068, United States of America
- 5 1720, North Fuller Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 6 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 7 Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 8 7029, Lanewood Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States
- 9 Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 10 8245, Kirkwood Drive, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 11 1865, North Fuller Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America

- 12 7813, Torreyson Drive, Universal City, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 13 7813, Torreyson Drive, Universal City, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 14 1260, North Hayworth Avenue, West Hollywood, Los Angeles County, California, 90046, United States of America
- 15 North Crescent Heights Boulevard, West Hollywood, Los Angeles County, California, 90046, United States of America
- 16 1784, North Sycamore Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States
- 17 7809, Torreyson Drive, Universal City, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 18 7056, Lanewood Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States
- 19 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 20 7820, Torreyson Drive, Universal City, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 21 7235, Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 22 813, North Martel Avenue, West Hollywood, Los Angeles County, California, 90046, United States of America
- 23 1326, North Citrus Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States
- 24 Sunset Boulevard, Little Armenia, Hollywood, Los Angeles, Los Angeles County, California, 90027-5517, United States of America
- 25 888, West Knoll Drive, West Hollywood, Los Angeles County, California, 90069, United States of America
- 26 1425, North Detroit Street, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States of America
- 27 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 28 1333, North Fuller Avenue, West Hollywood, Los Angeles County, California, 90046, United States of America






- 29 1335, North Detroit Street, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States
- 30 1720, North Fuller Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 31 1735, Courtney Avenue, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 32 1745, North Orange Drive, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States of America
- 33 1635, North Martel Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States of America
- 34 Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 35 2745, Nichols Canyon Road, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 36 1560, North Laurel Avenue, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 37 424, South Cochran Avenue, Hancock Park, Hollywood, Los Angeles, Los Angeles County, California, 90036, United States
- 38 Hesby Street, NoHo, North Hollywood, Los Angeles, Los Angeles County, California, 91601, United States of America
- 39 1850, Whitley Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States of America
- 40 1850, Whitley Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States of America
- 41 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 42 1616, North Fuller Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 43 1701, Nichols Canyon Road, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 44 Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 45 930, North Spaulding Avenue, West Hollywood, Los Angeles County, California, 90046, United States



- 46 1745, North Orange Drive, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States of America
- 47 715, North Vista Street, West Hollywood, Los Angeles County, California, 90046, United States of America
- 48 357, Cornwell Street, Brooklyn Heights, Boyle Heights, Los Angeles, Los Angeles County, California, 90033, United States of America
- 49 1530, North Poinsettia Place, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States of America
- 50 3050, Runyon Canyon Road, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 51 2410, Solar Drive, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 52 7301, Mulholland Drive, Universal City, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 53 7472, Mulholland Drive, Universal City, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 54 838, West Knoll Drive, West Hollywood, Los Angeles County, California, 90069, United States of America
- 55 7245, Hillside Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 56 7120, Hawthorn Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States of America
- 57 1340, North Poinsettia Place, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States of America
- 58 1701, Nichols Canyon Road, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 59 1414, North Poinsettia Place, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States of America
- 60 118, South Flores Street, Carthay Circle, Century City, Los Angeles, Los Angeles County, California, 90048, United States
- 61 8024, Willow Glen Road, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 62 8051, Willow Glen Road, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States

- 63 8051, Willow Glen Road, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 64 1810, North Cherokee Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90028, United States of America
- 65 314, North Spaulding Avenue, Carthay Circle, Hollywood, Los Angeles, Los Angeles County, California, 90036, United States of America
- 66 7270, Hillside Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 67 Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 68 1860, North Fuller Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 69 314, North Spaulding Avenue, Carthay Circle, Hollywood, Los Angeles, Los Angeles County, California, 90036, United States of America
- 70 933, North La Brea Avenue, Hollywood, Los Angeles, Los Angeles County, California, 90046, United States
- 71 8078, Fareholm Drive, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 72 7224, Hillside Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 73 1735, North Fuller Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America
- 74 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 75 1701, Nichols Canyon Road, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States
- 76 1255, North Orange Drive, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90038, United States
- 77 Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America
- 78 1043, North Curson Avenue, West Hollywood, Los Angeles County, California, 90046, United States
- 79 7121, Lexington Avenue, West Hollywood, Los Angeles County, California, 90046, United States ~4 America



- 80 5482, Wilshire Boulevard, Hancock Park, Hollywood, Los Angeles, Los Angeles County, California, 90036, United States  
- 81 1048, North Curson Avenue, West Hollywood, Los Angeles County, California, 90046, United States  
- 82 7717, Romaine Street, West Hollywood, Los Angeles County, California, 90046, United States  
- 83 1718, North Vista Street, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States  
- 84 7717, Romaine Street, West Hollywood, Los Angeles County, California, 90046, United States  
- 85 Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America  
- 86 7224, Hillside Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America  
- 87 7224, Hillside Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America  
- 88 7215, Hillside Avenue, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America  
- 89 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America  
- 90 930, North Spaulding Avenue, West Hollywood, Los Angeles County, California, 90046, United States  
- 91 7205, Hollywood Boulevard, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America  
- 92 West Olympic Boulevard, Beverly Hills, Los Angeles County, California, 90064, United States of America  
- 93 1750, Camino Palmero Street, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States of America  
- 94 8360, Blackburn Avenue, Carthay Circle, Hollywood, Los Angeles, Los Angeles County, California, 90048, United States  
- 95 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America  
- 96 Franklin Avenue, Whitley Heights Historic District, Hollywood, Los Angeles, Los Angeles County, California, 90046-4101, United States of America  

- 97 1202, North Fuller Avenue, West Hollywood, Los Angeles County, California, 90046, United States of America  
- 98 3003, Runyon Canyon Road, Whitley Heights Historic District, Hollywood Hills, Los Angeles, Los Angeles County, California, 90046, United States  

## EXHIBIT 4

### Appendix I-2: Approved Fire Hydrant and Access Plan

# NavigateLA Map

## LEGEND

### Points - Map Notes

- Confidential
- Closed
- Open
- Not Assigned

### Lines - Map Notes

- Confidential
- Closed
- Open
- Not Assigned

### Fire Hydrants (DWP)

- 2 1/2 D
- 2 1/2 DX4S
- 2 1/2 S
- 2 1/2 X4D
- 4D
- 4S
- SPEC

### Distribution Pipes (DWP)

### Streets

- Multiple Symbols

### Easements

- Private Street
- Original Lot & Deed in Street
- Governmental (Except L.A. City)
- City of Los Angeles
- Former City Bnd/County/Other City
- Tract Line in Street & Freeway

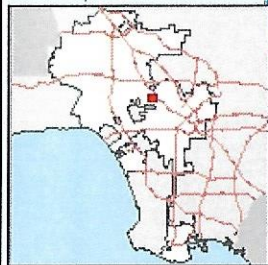
### Landbase Lines / Parcel Outline

- All Others
- Right-of-way Sideline
- Tract Line
- Lot Line
- Lot Cut
- Freeway Road Way

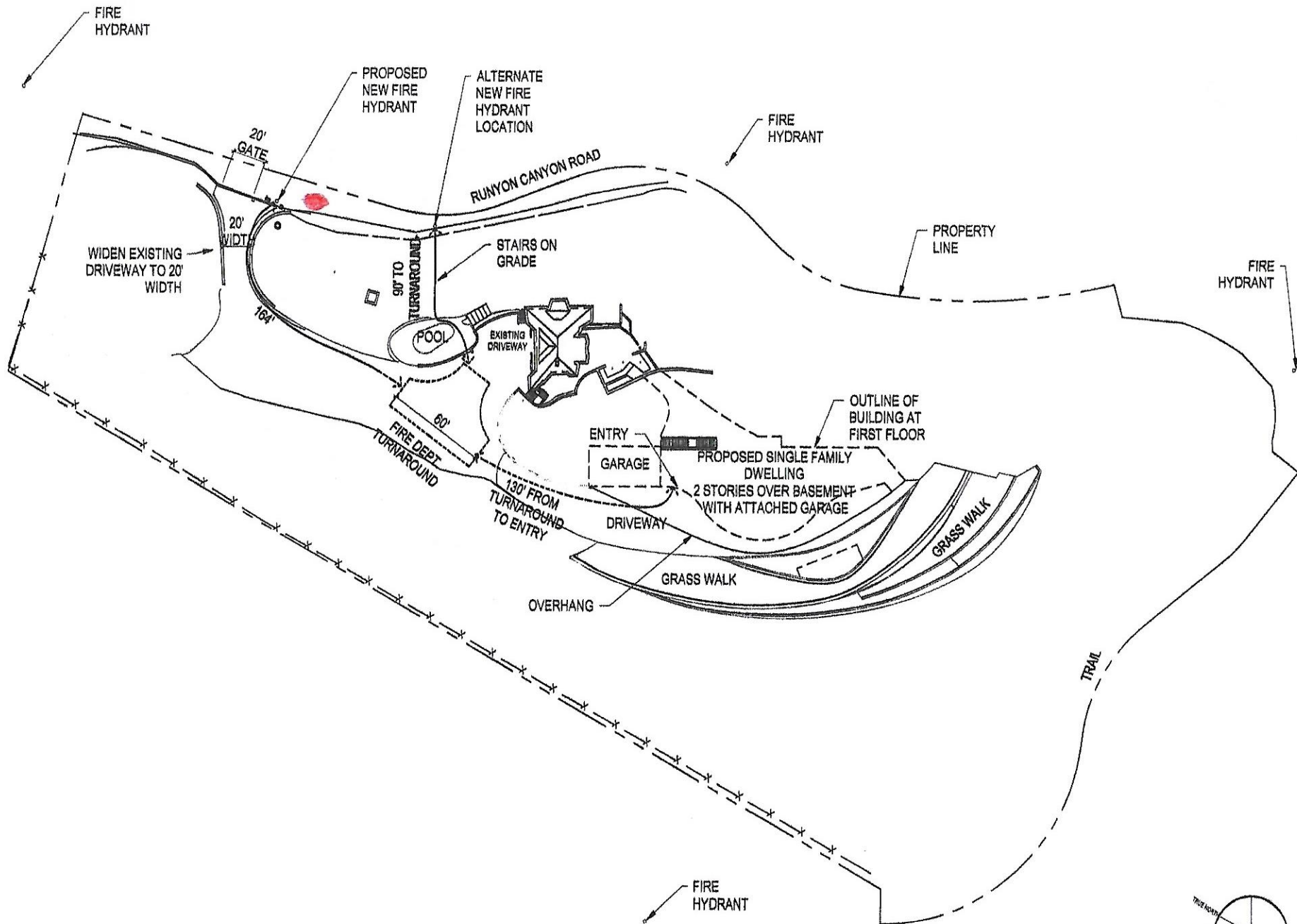
### Parcels



This map is a user generated static output from an Intranet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

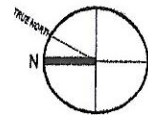


Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, OpenStreetMap contributors, and the GIS User Community



**ameen syoub  
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afayoub@outlook.com  
www.ameenayoub.com



3003 RUNYON CANYON ROAD  
LOS ANGELES, CA 90046

FIRE DEPARTMENT EXHIBIT PLAN  
SCALE 1" = 50'  
JULY 2018



**APPROVED**

**FIRE HYDRANT AND ACCESS**

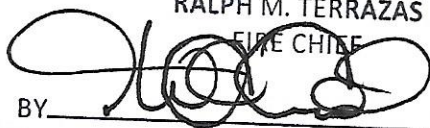
**LOS ANGELES FIRE DEPARTMENT**

**FIRE DEVELOPMENT SERVICES**

**RALPH M. TERRAZAS**

**FIRE CHIEF**

BY



DATE

8-9-18

NEW INSTALL

(1) 2 1/2 x 4 DFH

## EXHIBIT 5

- ARCHITECTURE



- ARCHITECTURE





- ARCHITECTURE



3003 RUNYON CANYON  
SITE LINE 5 solar View South



- ARCHITECTURE



## Communication from Public

**Name:** Travis Lesesane

**Date Submitted:** 02/03/2025 10:14 AM

**Council File No:** 24-1371

**Comments for Public Posting:** The City council c/o City clerk, My name is Travis Lesesane. I am in support of this house. I am a long-time resident of Nichols Canyon, a walker, hiker and lover of Runyon Canyon Park. I was immediately struck by the Valencia family's dedication to preserving the natural beauty of their property. From the moment I first visited their proposed home, I was impressed by how seamlessly it blends into the surrounding landscape. Manny Valencia and his family have shown a deep commitment to maintaining the ambiance of Runyon Canyon, ensuring that their project respects and enhances the environment. Their willingness has demonstrated considerable responsiveness to the feedback from both the board and the community, including revising the original plans out of genuine care for the community. Delaying and modifying the project repeatedly is a clear indication of their commitment of being a good neighbor. The Valencia family's approach to this project is characterized by humility and a genuine desire to put the park's wellbeing above all. The Valencia's have consistently demonstrated respect and care for both environment and the community. Their proposed home is thoughtfully designed to integrate seamlessly with the natural surroundings. I ask for your approval. Thank you for your time and consideration  
Travis

## Communication from Public

**Name:** Tracey Pence

**Date Submitted:** 02/03/2025 01:35 PM

**Council File No:** 24-1371

**Comments for Public Posting:** My name is Tracey Pence and I am writing this in support of the project at 3003 N Runyon Canyon Rd. It has been several years since Mr. Valencia and his family have first proposed this addition to his property. Over the years I have seen firsthand on my daily hikes how he has improved the subject property as well as the park itself. For years prior to his ownership the hillside was in disarray and eroding. His considerate stewardship to keeping the property maintained and thus improving the environment of the park cannot be discounted. I am sure he will maintain this type of respect for his property and the park with all decisions re: the new structure. As you know he has pared down the original plan considerably. He listened and took into consideration the board and community notes in all revisions. His home is on private property but he is well aware that his changes may affect the public. His thoughtful actions and consideration of others is clearly shown by his many years of delay and adjustments to the plans. I feel his intentions are for the good of all and I propose we allow he and his family to move forward with building their new home. I apologize in advance that because of a scheduling conflict I may not be able to attend the meeting on Tuesday, February 11th in person . However, I welcome any follow up questions please feel free to call me at 323-309-4585