

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



PRESIDENT
Charley Mims
CHAIRMAN
Marian Dodge
VICE PRESIDENTS
Mark Stratton
John Given
SECRETARY
Stephen Benson
TREASURER
Don Andres

October 31, 2018

Mission Canyon Park Project - CEQA Comments
Attention: Ms. Eimon Smith, CEQA Project Manager
2202 South Figueroa Street, #621
Los Angeles, CA 90007
via electronic mail: comments@iecg-inc.com

Beachwood Canyon Neighborhood
Bel-Air Association.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
CASM-SFV
Crests Neighborhood Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Oaks Homeowners Assn.
Outpost Estates Homeowners
Residents of Beverly Glen
Save Coldwater Canyon!
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

Re: Mission Canyon Park Project MND

Dear Ms. Smith:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 42 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Federation supports the concept of a park in Mission Canyon and has been following this project with interest. However, at its October 3, 2018 meeting, following discussion of the MND's numerous shortcomings, the Federation voted to demand a full EIR, as well as reiterating an earlier vote (February 2018) to require a comprehensive traffic study for all projects in this area.

The Transportation & Traffic (also referred to as "Transportation and Circulation") section of the MND is particularly weak. The Mulholland Scenic Parkway and the Sepulveda Pass are both environmentally sensitive areas already overburdened with traffic. It would be disingenuous to assume, simply because the project in question is a park, that it does not have the potential for significant negative impacts on these two roads and the surrounding hillside communities and institutions.

The MND repeatedly references the park as an island of open space "surrounded by fully developed urban land uses." This is wrong. The Santa Monica Mountains are not an "urban setting", as the County and the MRCA know well. And Mulholland Drive, even at its most "urbanized" point is still a two-lane country road and still a part—a problematic but important part—of the Mulholland Scenic Parkway. The reality is a mixed bag, far more complicated than *urban* or *not urban*.

//

//

CHAIRS EMERITI
Shirley Cohen
Jerome C. Daniel
Patricia Bell Hearst
Alan Kishbaugh
Steve Twining
CHAIRS IN MEMORIAM
Brian Moore
Gordon Murley
Polly Ward

//

With this reality in mind, the Hillside Federation took a stand (February 7, 2018) that any new project along Mulholland or Sepulveda would require a comprehensive traffic study, *with input and supervision from Council Districts 4, 5 and 11*. The idea is to take the special character and needs of the area into account, in a way that standard traffic studies do not. Unfortunately, to anyone familiar with either the Mulholland Institutional Corridor or the Sepulveda Pass, it is obvious that the traffic study for the Mission Canyon MND is not just "standard", it is sub-standard and completely misses serious traffic and safety problems that need to be addressed before the project goes further. It misidentifies peak hours, overlooks obvious conflicts with institutional uses of the Mulholland public right-of-way, grossly underestimates park attendance, and does not even acknowledge the very real dangers of what is to be the primary park entrance (insisting on a hairpin right-turn-only situation and failing to analyze either the danger of this turn or the additional likelihood that people will persist in making illegal left turns across heavily trafficked Sepulveda). As for the proposed secondary entrance off Mulholland, such an entrance and its impacts are very inadequately analyzed. Bottom line, the infrastructure is not in place to safely support this park. This alone should be reason enough for an EIR.

That being said, it is the Hillside Federation's understanding that the MRCA has committed to making major changes to the Project, including removing the parking lot and public entrance proposed off of Mulholland Drive, updating the traffic analysis for the Project, and recirculating the Mitigated Negative Declaration. The Hillside Federation applauds the responsiveness to community concerns and looks forward to reviewing the new environmental clearance document when it is published. The Hillside Federation will review all new documentation with fresh eyes and will make an informed, thoughtful decision on the new MND.

Sincerely,

Charley Mims

President

The Federation of Hillside and Canyon Association, Inc.

cc: *Maria Chong-Castillo* (MCCastillo@bos.lacounty.gov)

Gabriella Garry (gabriella.garry@mrca.ca.gov)