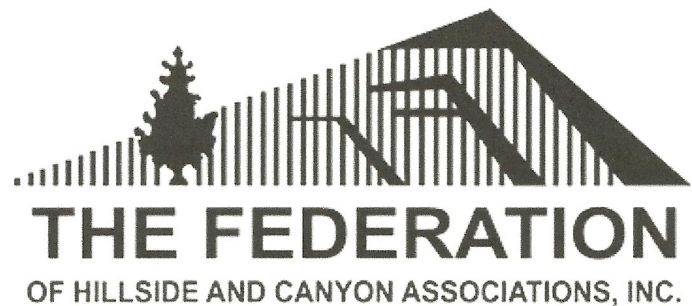


P.O. Box 27404
Los Angeles, CA 90027
323-663-1031
president@hillsidefederation.org
www.hillsidefederation.org



PRESIDENT
Marian Dodge
CHAIRMAN
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TREASURER
Dan Palmer

January 28, 2011

Diana Kitching, Environmental Review Coordinator
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, California 90012
diana.kitching@lacity.org

Location: Bel Air Presbyterian Church
16190 West Mulholland Drive
Re: Scoping Comments ENV-2009-3085-EIR

Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Bel Air Ridge Association
Benedict Canyon Association
Cahuenga Pass Neighborhood
Crests Neighborhood Assn.
Encino Property Owners Assn.
Forrest Hills Homeowners Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland Homeowners
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
La Tuna Canyon Community Assn.
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.
Outpost Estates Homeowners
Residents of Beverly Glen
Roscomare Valley Assn.
Shadow Hills Property Owners
Sherman Oaks H O Assn.
Studio City Residents Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Whitley Heights Civic Assn.

Dear Ms. Kitching:

The Federation of Hillside and Canyon Associations, Inc. (the Federation) was founded in 1952 for the purpose of conserving the natural habitat and appearance of the Santa Monica Mountains and other hillside and canyon environs of the Greater Los Angeles area. The Federation's membership includes 33 residential and homeowner associations spanning the Santa Monica Mountains.

The Mulholland Institutional Corridor lies within the Mulholland Scenic Parkway, a treasure of the Santa Monica Mountains. Since 1970, the institutional population of the residentially-zoned Corridor has grown from a church, a temple and a single school with just 100 students, to ten schools, with an estimated population of 4,500 students and staff, and a greatly expanded church and temple – but no corresponding increase in the infrastructure to support the institutional uses within the residential zone. Mulholland Drive remains a two-lane country road. This limited infrastructure cannot handle the existing institutional uses, much less any intensification of those institutional uses.

The Federation has consistently recognized the need for proactive planning along the Mulholland Institutional Corridor. The cumulative environmental impacts of the ongoing, piecemeal institutional growth since the 1970s has resulted in traffic and parking congestion, aesthetic blight, noise

disturbances, intensified illumination, deteriorated and overstrained infrastructure, enhanced public safety risks, and impaired wildlife habitat and resources.

In April 2006, the Federation voted 14-1 in favor of requiring that a Master Plan be adopted for the private institutions along the Mulholland Institutional Corridor before any further development within the Corridor could be approved. In fact, the impacts of the Corridor have become so pronounced and detrimental to the community, Councilmember Bill Rosendahl promised the Hillside Federation that a Master Plan would be completed during his tenure. Lacking a Master Plan, the Federation, in November 2010, voted unanimously that a full Environmental Impact Report (EIR) be required for this and every project along the Corridor.

The EIR must address the impacts of this new project in the context of already existing cumulative impacts, as well as future ones. Of particular concern to the Federation are the nighttime uses being proposed, which were not even considered in the Church's 2009 MND:

- The EIR must address the aesthetic impacts of expanded nighttime use on the Mulholland Institutional Corridor and environs. What mitigations will be required to protect the character of this area as a scenic parkway and wildlife corridor?
- What will be the impact of intensified illumination, including headlights from the increased night traffic, streetlamps illuminating the parking lot, and light from the facility itself, on the visual character of the Corridor as viewed from Mulholland and surrounding ridges?
- What will be the impact of intensified illumination on the neighboring residential community and on the area's wildlife?
- The EIR must propose mitigation measures that address glare, light scatter, direction of light, intensity of light, etc.
- What will be the impact of nocturnal noise disturbances, including noise from the increased night traffic on Mulholland, the parking lot, and from the facility itself, on the aural character of the Corridor?
- What will be the impact of nocturnal noise disturbances on the neighboring residential community and on the area's wildlife?
- The EIR must propose mitigation measures that address the impacts of nocturnal noise disturbances.

- What will be the impact of increased strain on area infrastructure, including adequacy of emergency personnel and equipment for the population served, increased response time at peak traffic hours, ability to respond when frequently called away to assist in other parts of the city, and limited access and deteriorated road conditions, all contributing to exacerbated public safety risks to commuters, students, institutional staff, neighboring residential community and emergency personnel on the Corridor?
- What other manifestations of infrastructure strain will impact either the Corridor and/or the neighboring residential community?
- The EIR must propose mitigation measures that address the increased strain on the infrastructure. It must take into account the area's vulnerability to brushfires.
- The EIR must analyze how the project will comply with the intent, purposes and regulations of the Mullholland Scenic Parkway Specific Plan.
- In addition, the EIR must address impacts on wildlife habitat and resources.

The private institutions have over-taxed the infrastructure in this area. The existing condition in the Corridor is already at the saturation level and any further intensification will result in significant adverse environmental impacts that cannot be adequately mitigated. Because it is no longer possible to mitigate these impacts to the point of insignificance and in order to protect the rural character of the hillsides and the character and quality of life for the neighboring residential community and the area's wildlife, the Hillside Federation recommends that nighttime and weekend uses be confined to Church property on the north side of Mulholland.

The over-saturation of institutional uses within the Corridor necessitates affirmative corrective action by promulgation of a Master Plan before any further development is approved.

Sincerely yours,



Marian Dodge, President

cc: Councilman Bill Rosendahl, 11th District
Councilman Paul Koretz, 5th District
Mulholland Design Review Board