

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



PRESIDENT
Charley Mims
CHAIRMAN
Marian Dodge
VICE PRESIDENT
Mark Stratton
SECRETARY
Julie Kremkus
TREASURER
Don Andres

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
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
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Torreyson Flynn Assn.
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

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

Jason McCrea
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012

December 5, 2020

Re: **Scoping Comments for The Retreat at Benedict Canyon Project —
OPPOSE**
Case Number: ENV-2018-1509-EIR

Dear Mr. McCrea:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Federation's mission includes protecting the property and quality of life of the residents of the Santa Monica Mountains and other hillside areas of Los Angeles and its environs, and encouraging and promoting those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles.

The Federation strongly opposes the proposed Retreat at Benedict Canyon. This commercial venture would (1) replace two single-family homes in a minimum-low density residentially-zoned neighborhood in the Santa Monica Mountains—a designated Very High Fire Hazard Severity Zone—with a 59-room hotel, spa, restaurants and bars, with rooftop dining, a screening room, subterranean parking, funicular railway, and (2) develop eight single-family residences on approximately 33-acres of mostly undeveloped open space.

The project would require an amendment to the General Plan to up-zone the area from low residential to high residential which will commercialize the hillsides. The proposed development project violates zoning restrictions designed to protect the character of the surrounding low-density hillside residential community, sets a dangerous precedent for commercialization and intensification of use, exacerbates fire risks in this fire-prone hillside area, and is grossly inconsistent with the state's climate change policy. The project is therefore inconsistent with the Federation's mission and violates policies and programs that support consistency with zoning for public health and safety in the hillsides, that support maintaining lower densities to preserve wildlife habitat and connectivity, flora and fauna and protect the hillside environment from devastating wildfires.

To make matters worse, this precedent-shattering project is being streamlined for passage during the height of the COVID-19 pandemic—while public attention is necessarily diverted from the important long-term public policy concerns implicated by the project.

Finally, it is important to emphasize the fire risks as our state is experiencing the largest and most destructive wildfire season recorded in California's modern history—with more than 4 million acres burned in 2020 so far. Experts warn this is the “new normal” due to (1) Climate Change producing hotter, drier, and more intense wildfires and (2) increased human intrusion into fire-prone areas like the Santa Monica Mountains. The project is flatly inconsistent with California Governor Newsom’s April 2019 report “Wildfires and Climate Change: California's Energy Future,” recommending that local governments begin to deprioritize new development in areas of the most extreme fire risk.

The project also creates significant emergency-access risks. Primary ingress and egress to the hotel portion of the project would be via Hutton Drive, while Wanda Park Drive would provide primary access to the project’s residential component. Both are narrow substandard hillside streets. Each would provide inadequate secondary emergency access for the development and would expose residents to the risk of bottle-necking their means of evacuation in an emergency.

Constructing high-density projects like this in the Santa Monica Mountains moves us further from California’s climate goals mandated by Governor Newsom in an executive order issued on October 7, 2020, committing the state to a goal of protecting 30 percent of California’s land and coastal waters by 2030.

For all of the reasons stated above, the Hillside Federation opposes The Retreat at Benedict Canyon Project. Please add the Hillside Federation to the notification list for this project.

Sincerely,

A handwritten signature in cursive script that reads "Charley Mims". The signature is written in black ink and is positioned below the word "Sincerely,".

Charley Mims

cc: Los Angeles Mayor Eric Garcetti
Councilmember Paul Koretz
Councilmember Mike Bonin
Planning Director Vince Bertoni