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October 5, 2016

The Honorable Chief Justice Tani G. Cantil-Sakauye
and Associate Justices
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102-4797

Re: Amicus Letter in Support of Petition for Review
Friends of the Hastain Trail, et al. v. Coldwater Dev. LLC,
No. S237073

Dear Chief Justice Cantil-Sakauye and Associate Justices:

The Federation of Hillside and Canyon Associations, Inc. (the "Hillside Federation") files this Rule 8.500(g) letter in support of the Petitions for Review filed by the Mountains Recreation and Conservation Authority ("MRCA") and Friends of the Hastain Trail ("Friends").

Identity and Interest of The Hillside Federation

The Hillside Federation, founded in 1952, is a non-profit social welfare organization representing 45 resident and homeowner associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The mission of the Hillside Federation is to protect the property and the quality of life of the residents of the Santa Monica Mountains and other hillside areas of Los Angeles and its environs, and to encourage and promote 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 Hillside Federation is one of the most important and active grassroots community advocacy organizations for environmental, land use, development, and related issues within the eastern Santa Monica Mountains. Among other activities, the Hillside Federation has long advocated for the preservation of hiking and recreational trails, wildlife corridors and habitat, and hillside open space areas. *See* <http://www.hillsidefederation.org/>.

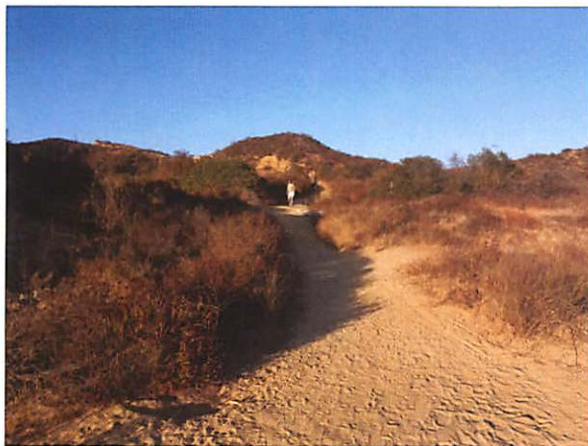
Beachwood Canyon Neighborhood
Bel-Air Association
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
CASM-SFV
Crests Neighborhood Assn.
Franklin Ave./Hollywood 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.
Lake Hollywood HOA
Laurel Canyon Assn.
Lookout Mountain Alliance
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
Rancho Verdugo Estates
Residents of Beverly Glen
Roscomare Valley Assn.
Save Coldwater Canyon!
Save Sunset Blvd.
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.

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The Hastain Trail, the subject of the *Friends of the Hastain Trail* litigation, has been in use as a recreational hiking trail by members of the public for more than five decades. The 2.3 mile loop trail is located in the heart of the eastern Santa Monica Mountains within Franklin Canyon Park. It is a beautiful and important resource for both nearby and distant community members, including children. Franklin Canyon Park provides habitat for many species of birds (Red-tailed Hawks, American Kestrels, Cooper's Hawks, Screech Owls, Long-eared Owls, and California Quail), mammals (coyotes and bobcats), frogs, salamanders, and snakes. In addition, the park and trail are a showcase for local flora, including California Black Walnut, Coast Paintbrush, Coastal Wood Fern, Coyote Brush, Narrow-leaved Milkweed, and other plant species.

The Hastain Trail is an important recreational resource. In one of the most park-starved dense cities in the nation, the loss of such an important resource so close to dense urban areas would be hard-felt. This is all the more so because the trail provides such a unique opportunity to experience the local natural environment while also enjoying remarkable canyon, City, and ocean views, which extend as far as Catalina Island on a clear day.

Unfortunately, the trial court judge is the only judicial officer in this case who had the opportunity to visit the Hastain Trail. Now that this Court must consider whether saving the Hastain Trail is of sufficient importance to justify review, the Hillside Federation believes pictures best convey that which is at stake for the general public.



If the majority opinion is not reversed, this important public resource will be lost forever. For these reasons, the Hillside Federation therefore respectfully requests that this Court grant review.

Respectfully submitted,



Charley Mims
President
Federation of Hillside & Canyon Associations, Inc.

cc: Roy G. Weatherup (Lewis Brisbois Bisgaard & Smith),
counsel for Coldwater, et al.
Stephen L. Jones (Overton Lyman & Prince),
counsel for Friends of Hastain Trail, et al.
Thomas R. Freeman (Bird Marella) and Eric F. Edmunds
counsel for MRCA

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a member of the Federation of Hillside and Canyon Associations, Inc. (“Hillside Federation”) and am over the age of 18. On October 7, 2016, I served the Hillside Federation’s amicus letter in support of the Petitions for Review in Case No. S237073, on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

By placing a true copy thereof in sealed envelopes addressed to the parties listed on the attached Service List, with proper postage affixed, and deposited them in the mail at Santa Monica, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 7, 2016, at Los Angeles, California.



John Given
Vice President / Executive Secretary
Hillside Federation

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