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



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Maya Zaitzevsky Office of Zoning Administration 200 North Spring Street, 7th Floor Los Angeles, California 90012

September 28, 2010

Location: 16190 West Mulholland Drive Re: ENV-2009-3085-MND Case No. ZA-2009-3083-CU

Dear Ms. Zaitzevsky:

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. 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. A Master Plan is required because the private institutions have over-taxed the infrastructure and any further intensification would result in significant adverse environmental impacts. Consequently, the Federation cannot support the pending development project submitted by the Bel Air Presbyterian Church and requests that a full Environmental Impact Report (EIR) be prepared for this project.

The Mulholland Institutional Corridor lies within the Mulholland Scenic Parkway, a treasure of the Santa Monica Mountains. The institutional population of the residentially-zoned Corridor has grown from a church, a temple and a single school with just 100 students in the late 1960s, to ten schools, with an estimated 4,500 student and staff population, and a greatly expanded church and temple – but no corresponding increase in the infrastructure supporting the institutional uses within the residential zone. Mulholland Drive remains, as it was in the late 1960s, 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, enhanced public safety risks, noise disturbances, intensified illumination, and impaired wildlife habitat and resources. The oversaturation of institutional uses within the Corridor necessitates affirmative corrective action by promulgation of a Master Plan before any further development is approved.

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In 2003 and 2004, the Federation, along with virtually every other local community group, opposed the Bel Air Presbyterian Church's request to build a permanent multi-use facility in Case No. ZA 86-1070 (CUZ)(PA3). The Church withdrew its application in 2005, in response to the overwhelming opposition. Then, in April 2006, the Federation requested a Master Plan for the Institutional Corridor, which would be necessary before any further development projects could be approved due to the over-saturation of institutional uses in relation to the ancient infrastructure. This action was followed by the Federation's October, 2008, letter in Case No. ZA 2008-1263(CU)(ZAA)(F), opposing Stephen S. Wise Temple's application for a

Conditional Use Permit to operate a nursery school at 16100 Mulholland Drive due to the intensification of institutional use along the Corridor and the lack of adequate environmental review. Later, in December, 2008, at the Federation's Annual Holiday Event, Councilman Bill Rosendahl responded to the Federation's concerns about the over-stressed Mulholland Institutional Corridor by promising to deliver a Master Plan for the area. But that promise has yet to be fulfilled.

The Bel Air Presbyterian Church's new project is being proposed without the benefit of a Master Plan or an EIR. The Mitigated Negative Declaration prepared for this project is inadequate because the existing condition in the Corridor is already at the saturation level, whereby any increased intensity would be significant. That is the cost of years of inaction by the private institutions responsible for the everincreasing environmental impacts as project after project has been approved in a piece-meal fashion without the necessary planning.

The Federation therefore opposes the pending Bel Air Presbyterian Church Preschool application and requests that a Master Plan or a full EIR be prepared.

Sincerely Yours,

Marian Dodge, President

cc: Councilman Bill Rosendahl, 11th District Councilman Paul Koretz, 5th District