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Ms. Diana Kitching, Planning Associate Major Projects & Environmental Analysis Section City of Los Angeles, Department of City Planning 200 N. Spring Street, Room 750 Los Angeles, CA 90012

November 23, 2015

Re: ENV-2015-2354-EIR; Abode at Glassell Park Project (Walnut Canyon)

Dear Ms. Kitching:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 homeowner and resident associations spanning the Santa Monica Mountains, from Pacific Palisades to Mt. Washington. The Federation's mission is to protect the property and quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live.

Federation members voted unanimously to support the efforts of NELA Greenspace to secure funding in order to purchase Walnut Canyon to be preserved as open space parkland for passive recreation.

The approximately 4-acre Walnut Canyon property has been used by local residents for decades as a popular hiking trail. It is populated by oak and California Black Walnut trees (both protected species) as well as coastal sage scrub, and is home to wildlife, including foxes, bobcats, coyotes, owls and over 40 species of resident and migratory birds according to the Cooper Report (Ecological Assessment of Open Space Remnants in Northeastern Los Angeles commissioned by the Mountains Recreation and Conservation Authority).

We have reviewed the Initial Study for the 32-home project planned for this property and have the following concerns, among others: loss of a recreational trail, loss of open space, loss of protected trees, and loss of wildlife habitat. Walnut Canyon offers a rare opportunity to create passive recreation to serve densely populated, underserved communities in Northeast Los Angeles. The Hillside Federation requests that a full Environmental Impact Report be prepared that includes a Passive Park Alternative.

We also request that thorough studies be completed in the areas of aesthetics, air quality, biological resources, greenhouse gas emissions, land use planning, noise and recreation. The aesthetic study must analyze line of sight and light and glare impact to the surrounding community as well as light and glare impact to wildlife. The biological resource study must analyze habitat linkages associated with the site and adjacent open space, and must include a protected tree survey. The land use study must analyze the proposed project's consistency with the Northeast Los

Angeles Community Plan and Mount Washington/Glassell Park Specific Plan. The recreation study must analyze the loss of a trail and open space to the park-poor community in which the proposed project is situated.

CEQA requires full disclosure of all potential significant environmental impacts to give the community an opportunity for meaningful public input and decision-makers an in-depth review of projects, including a no-project alternative. Based on the EIR's objective analysis, an agency is required to avoid or mitigate significant impacts.

The Hillside Federation joins community groups and hundreds of individual community members in requesting a Passive Park Alternative be included in the environmental review process, and that the property be preserved as open space for passive recreational use.

Sincerely,

Wendy-Sue Rosen

Wendy-Sue Rosen, Vice President

cc:

Senator Kevin de León
Assemblymember Jimmy Gomez
County Supervisor Hilda Solis
Mayor Eric Garcetti
Councilmember Gil Cedillo
Santa Monica Mountains Conservancy
NELA Greenspace
Aguacate Alliance
Chatten-Brown and Carstens