

BRENTWOOD RESIDENTS COALITION**CANYON BACK ALLIANCE** A NON-PROFIT PUBLIC BENEFIT CORPORATION

February 15, 2011

Mulholland Scenic Parkway Design Review Board
c/o Los Angeles City Planning Department
Mulholland Specific Plan Staff
6262 Van Nuys Boulevard, Suite 351
Van Nuys, CA 91401-2709

Re: Opposition to Proposed Realignment of the Mulholland Drive Bridge
And Skirball Center Drive Widening

Dear Board Members:

Canyon Back Alliance¹ and Brentwood Residents Coalition² strongly oppose the proposed Mulholland Drive Bridge Relocation Project. The Project would degrade the historic alignment and scenic character of the Mulholland Scenic Parkway by transforming the section of Mulholland Drive spanning the I-405 into a growth-inducing major highway, facilitating the expansion of educational and religious institutions in the vicinity and making it a magnet for cut-through traffic, without any consideration of the broader environmental costs of doing so. This would be an egregious violation of the California Environmental Quality Act ("CEQA").

The Mulholland Drive Bridge Relocation Project's adverse environmental impacts, including not only its traffic-related and growth-inducing effects, but also the project's aesthetic, recreational and wildlife impacts must be considered in an environmental impact report ("EIR") subject to public comment and input from members of the general public and the broad group of governmental agencies with expertise in all of these areas. This has not been done. CEQA requires much greater transparency and accountability for governmental actions that may degrade the environment, including adverse impacts on aesthetic, recreational, wildlife and historic public resources like the Mulholland Scenic Parkway, Mulholland Drive, a City-designated scenic highway, and Mulholland Bridge, a designated historic resource.

¹ Canyon Back Alliance is a non-profit public benefit corporation dedicated to preserving public recreational trails in the Santa Monica Mountains and maintaining unrestricted public access.

² Brentwood Residents Coalition is a grass roots, non-profit advocacy group whose purposes are to preserve and enhance the environment and quality of life in Brentwood, to protect the integrity of residential neighborhoods, to assist with planning, to uphold zoning and municipal codes, to encourage traffic safety, and to educate the public on issues that affect quality of life and the environment.

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1. The Mulholland Drive Bridge Relocation Is A *New Project* Under CEQA, Requiring An EIR Separate And Apart From The I-405 Project EIR

The City of Los Angeles is responsible for reviewing the environmental consequences of the Mulholland Drive Bridge Relocation Project because the project requires two discretionary approvals from the City of Los Angeles, which triggers CEQA-mandated environmental review by the City. The *first* discretionary determination is for a roadway realignment under Section 7 of the Specific Plan. The *second* discretionary determination is for a Specific Plan Amendment pursuant to Section 11.5.7.G(7) of the Los Angeles Municipal Code, which is required because the proposed realignment would change the Specific Plan boundaries, thereby bringing within its regulatory jurisdiction properties that have never before been subject to Specific Plan regulation. CEQA, which prohibits piecemealing, requires that *both* aspects of the project be considered in the same environmental review. CEQA Guidelines Section 15378(c). In addition to the specific CEQA requirements, discussed below, Municipal Code Section 11.5.7.G and Specific Plan Section 7 require *public notice* and *comment* before any such discretionary approvals may be granted and, for Section 11.5.7.G, the procedures specified in Municipal Code Section 12.32 and a 24-day notice period, and, for Section 7, mandated findings for approval of any such scenic roadway realignment.

This obligation to conduct environmental review under CEQA is separate from the previously certified environmental review for the I-405/Sepulveda Widening Project (the “I-405 Project”), which has already been the subject of a certified EIR, because the I-405 Project EIR did not consider the realignment of Mulholland Drive. Thus, the environmental consequences of realigning that scenic highway within this Specific Plan-protected area were not subjected to environmental analysis with CEQA-mandated public notice and opportunity for public review and comment. The I-405 Project involves the widening of the 405 freeway and Sepulveda Blvd., and includes certain mitigation measures, none of which encompass the newly-proposed realignment of Mulholland Drive. Where, as here, a prior project EIR does not consider an activity that may have potentially significant environmental impacts, that activity is a *new project* for CEQA purposes, mandating a new EIR. See *Save Our Neighborhood v. Lishman*, 140 Cal.App.4th 1288, 1297 (2006).³

³ Nevertheless, even if the new project could be deemed a “modification” of an earlier EIR-certified project, which it cannot, the existence of significant environmental impacts would necessitate circulation of a subsequent or supplemental environmental impact report before any such project could be approved. CEQA Guidelines Sections 15162, 15163.

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2. Mulholland Drive and Mulholland Scenic Parkway Are Environmental Resources That Cannot Be Degraded Without A Full EIR

The proposal to realign Mulholland Drive without an EIR violates CEQA. The purpose of CEQA is to “compel government at all levels to make decisions with environmental consequences in mind” by day-lighting those consequences through the promulgation and certification of an EIR analyzing the environmental impacts and requiring that such impacts either be mitigated to insignificance or that the responsible elected officials affirmatively state their approval despite the adverse environmental impacts. *Bozung v. LAFCO*, 13 Cal.3d 263 (1975). The EIR is “the heart of CEQA” because it “demonstrates to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its actions” through a transparent public process. CEQA Guidelines, §15003(a), (c). The EIR process thereby enables the public “to determine the environmental and economic values of their elected and appointed officials thus allowing for appropriate action come election day should a majority of the voters disagree.” CEQA Guidelines, § 15003(e).

“Any substantial negative effect of a project on view and other features of beauty could constitute a significant impact under CEQA.” *Ocean View Estates Homeowners Assoc., Inc. v. Montecito Water District*, 116 Cal.App.4th 36 (2004). The aesthetic significance of Mulholland Scenic Parkway and Mulholland Drive are indisputable. Mulholland Drive has been designated a “scenic highway” under the City of Los Angeles’s General Plan. The City further recognized the environmental significance of the Mulholland Parkway by passing the Mulholland Scenic Parkway Specific Plan (Ordinance No. 167,943) on May 13, 1992 (the “Specific Plan”). The Specific Plan provides “specific controls for the protection and enhancement of [the Mulholland Scenic Parkway’s] scenic resources [which must be] individually tailored to the unique character” of this scenic corridor. The Specific Plan requires that transportation, land use, and recreational uses maintain “a low-intensity, low-volume, slow-speed, parkway-type setting” and that its “existing alignment” and rural character be maintained, with exceptions only for and to the limited extent necessary to protect public safety. The Design and Preservation Guidelines for the Mulholland Scenic Parkway Specific Plan explains that the intent underlying the Specific Plan is to “ensure that all projects, both public and private, are compatible with the Scenic Parkway environment” by preserving, complementing and enhancing “the views from Mulholland Drive, as well as preserv[ing] the natural hillside character of the entire Parkway” and providing “standards that apply to public projects along Mulholland Drive, such as utility construction and roadway design, so that the intended character of Mulholland Drive as a low-density, low-volume, slow-speed roadway in a hillside parkway-type setting is preserved.”

The project, if approved, would have many adverse environmental impacts that are grossly inconsistent with the Specific Plan and its Guidelines, as described below, thereby satisfying the liberal standard for requiring an EIR. Under CEQA, an EIR is required for any project that may have one or more significant impacts on the environment. *Save Our Neighborhood v. Lishman*, 140 Cal.App.4th 1288, 1294 (2006). By that standard, an EIR is required “whenever it can be

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fairly argued that on the basis of substantial evidence the project may have significant environmental impact,” which “creates a low threshold requirement for initial preparation of an EIR and reflects a preference for resolving doubts in favor of environmental review when the question is whether any such review is warranted.” *Moss v. County of Humboldt*, 162 Cal.App.4th 1041, 1049 (2008). Here, where the Mulholland Drive Bridge Relocation Project turns the policies and objectives of the Specific Plan and its Guidelines on their heads, it can fairly and easily be argued to have a significant impact on the environment, thereby triggering the obligation to prepare an EIR.

Finally, CEQA commonly requires the preparation of a full EIR for discretionary street relocation and improvement projects that have significant environmental impacts. The need for such formal environmental review was recognized by the Court of Appeal in *Friends of “B” Street v. City of Hayward*, 106 Cal.App. 3d 988 (1980), where the court famously held that it was an abuse of discretion to approve a similar “street improvement” project with a Negative Declaration rather than a full EIR because a “fair argument” had been presented that there would be adverse impacts requiring mitigation. See also *City of Antioch v. City Council*, 187 Cal. App. 3d 1325 (1986) (trial court ruled that because the proposed project was presently unconnected to existing roads and systems, and did not include building construction, the potential environmental impact was speculative, and therefore granted judgment to defendant, but the Court of Appeal reversed, holding an EIR was required for the project as it could be fairly argued that the roadway and appurtenances would cause significant environmental impact).

3. The New Project Encompasses Both (1) The Mulholland Drive Bridge Realignment And (2) The Widening Of Skirball Center Drive

The new project is not limited to the realignment of Mulholland Drive Bridge. The project also includes the widening of Skirball Center Drive, which was not analyzed in the I-405 Project EIR. The Skirball Center Drive Widening portion of the new project calls for approximately 33,000 cubic yards of grading into hillsides within the Mulholland Scenic Parkway area, the installation of five concrete retaining walls totaling approximately 1,400 linear feet on the east side of Skirball Center Drive and Mulholland Drive, ranging in height from 8 to 15.5 feet, and 500 linear feet of concrete retaining walls on the west side – directly within the Mulholland Drive viewshed.

Under CEQA, the “project description” must include both the realignment of Mulholland Drive Bridge and the widening of Skirball Center Drive because the CEQA Guidelines require a “project description” that is sufficient to allow an adequate evaluation and review of the project’s environmental impacts. See CEQA Guidelines, § 15124. “Only through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives.” *City of Santee v. County of San Diego*, 214 Cal.App.3d 1438, 1454 (1989). Where, as

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here, the project description is misleading by failing to alert the public to a project's true scope and impacts, the resulting environmental review is incurably defective. *San Joaquin Raptor Rescue Center v. County of Merced*, 149 Cal.App.4th 645, 654-655 (2007).

It is clear that the widening of Skirball Center Drive raises significant environmental concerns. The Specific Plan and Design Guidelines specify that, within the Mulholland Scenic Parkway, the following actions (among others) may cause significantly adverse environmental impacts: Grading, destruction of the natural hillsides, the installation of retaining walls, and non-natural intrusions into the views from Mulholland Drive. The widening of Skirball Center Drive requires massive grading cut into the hillsides adjacent to Mulholland and the subsequent installation of retaining walls to shore-up the graded hillsides. The environmental significance of such actions are made explicit in the Specific Plan Guidelines. "Goal 1" of the Specific Plan Guidelines is to "preserve and enhance the natural character of the Santa Monica Mountains and the scenic, hillside character of the Mulholland Scenic Parkway." Guideline No. 1, concerning "natural topography," states that the goal is to "minimize the amount of grading and the use of retaining walls . . ." Guideline No. 10, concerning site grading, states that there must be "design review of grading," which is "in addition to the review of grading conducted by the Department of Building and Safety and is more sensitive to aesthetics rather than engineering." In that regard, "design review addresses the appearance of a grading project and its compatibility with the appearance of natural slopes in the Santa Monica Mountains," as opposed to technical competence and safety aspects of grading. Grading and the installation of retaining walls and other "improvements" must also be assessed with regard to the impact on wildlife and the viewshed from Mulholland. Guideline No. 13 states that projects near wildlife corridors should be "sensitive to preserving wildlife habitats and the ecology of the Scenic Parkway." Objective 1.4 is to "preserve views of the Parkway's scenic features and resources," which requires under Guideline No. 17, visibility studies "to determine project visibility from Mulholland Drive" and, as specified in Guideline No. 18, protection for the viewshed from Mulholland Drive.

4. The Project Would Significantly Degrade Mulholland Drive and the Mulholland Scenic Parkway's Aesthetic and Recreational Resources

A full EIR is required for the project because Mulholland Drive and Mulholland Scenic Parkway are scenic and historic resources of the people, subject to special protections in the Specific Plan, including restrictions on the realignment of Mulholland Drive, which demonstrates that *any* realignment can fairly be deemed to have a significant adverse aesthetic impact, thereby necessitating preparation of an EIR. Moreover, the specific realignment and widening that is now being proposed will clearly degrade the quality and character of Mulholland Drive and the Scenic Parkway in several critical respects.

First, the project would change the present alignment of the bridge portion of Mulholland by moving the east end of the bridge approximately 200, 290 or 430 feet to the south (depending on which of the three conflicting CalTrans/Metro project documents is relied upon), changing the angle of the bridge above the I-405 to approximately 90-degrees, and

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lowering the height of the bridge by 20 feet, thereby impairing the broadly scenic views of the San Fernando Valley and outlying mountains from the Mulholland Bridge. Further, the Skirball Center Drive Widening aspect of the project would replace the eastbound view of natural hillsides with a view of 1,400 linear feet of concrete retaining walls.

This degradation of the view from Mulholland is a significant environmental impact, as made explicit by the Specific Plan, which recognizes that the “spectacular mountain, ocean and city views” from Mulholland Drive present “scenic and recreational opportunities” for the people and that the Specific Plan is designed for the “protection and enhancement of [such] scenic resources,” to “assure the protection of Mulholland Drive as a scenic corridor.” *Specific Plan, p. 2.* Remarkably, the Environmental Addendum prepared (but not publicly distributed) by CalTrans does not even consider the new project’s impact on views *from* Mulholland Drive or anywhere along the Mulholland Scenic Parkway – it considers only the project’s impacts on views *of* the bridge *from* the I-405 freeway. CEQA does not permit such environmental myopia.

Second, the Specific Plan is designed to preserve the rural nature of Mulholland Drive as a two-lane country road that winds along the spine of the mountains, consistent with the character of the original alignment in the 1920s, with a continuous flow along Mulholland on both sides of the bridge. The project, however, would replace that continuous flow with a major intersection carved into the hillsides to accommodate multiple traffic lanes at the east end of Mulholland Bridge, which would require those traveling east on Mulholland to make a left turn (on command of a left-turn arrow) off the bridge, travel north on Skirball Center Drive (driving parallel to the 405 freeway) before veering right and reentering the historical alignment of Mulholland Drive – thereby destroying the continuous flow and the country road “feel” of the present and historically consistent alignment.⁴ Indeed, as stated in a CalTrans/Metro document dated January 26, 2011, “LADOT generally concurs with the concern that Mulholland Drive would become a discontinuous street” under this proposal, an adverse impact “[s]ince Mulholland Drive is a scenic and historic highway,” and “deference should be paid to its alignment.”

Third, the Skirball Center Drive Widening portion of the project will expand Skirball Center Drive on the east side of the I-405 from four lanes (two in each direction) to at least six lanes (three in each direction) plus a bicycle lane, and possibly a *seventh* vehicle lane. This new traffic capacity will be obtained through grading into the natural hillside adjacent to Mulholland and within the viewshed. CEQA requires environmental review of a project’s foreseeable future impacts. *Laurel Heights Improvement Assoc. v. Regents*, 47 Cal.3d 376 (1988). A clearly foreseeable environmental impact of this traffic-infrastructure intensification would be increased

⁴ The project would require east bound vehicles to take a left turn on Skirball Center Drive, which eventually becomes Mulholland Drive. The project apparently seeks to conceal this discontinuity by renaming this section of Skirball Center Drive, “Mulholland Drive.”

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development and use of the religious and educational institutions on Mulholland Drive. These institutions, which have already grown exponentially in the past 20 years, would have the capacity for further substantial growth with the proposed traffic infrastructure “improvements.” This type of institutional growth would be inconsistent with the zoning. The area is zoned low-density residential and the local residents have already suffered greatly due to institutional growth in a manner that conflicts with the zoning. There has been no environmental analysis of the project’s foreseeable potential impacts on this residentially-zoned area.

Fourth, the project, by moving the east end of the Mulholland Bridge 200, 290 or 430 feet to the south of its existing alignment, would bring 10-20 *additional* and *previously-unregulated* properties within the Specific Plan’s regulatory jurisdiction, which will potentially degrade the scenic character of the Mulholland Scenic Parkway. This environmental impact, which requires an amendment to the Specific Plan (per Section 11.5.7.G of the Municipal Code), has not been considered in any environmental review, contrary to CEQA. Further, the bridge relocation, the grading and retaining walls on the hillsides along Skirball Center Drive, and increased traffic on Skirball Center Drive would occur directly below the Casiano community, without any analysis of the sound or viewshed impacts on that residential neighborhood.

Fifth, the project will also change the alignment of the Core Trail over the bridge, adversely impacting the viewshed for members of the public using the trail. This is the same type of potentially adverse aesthetic impact deemed to require an EIR in *Ocean View Estates Homeowners Assoc., Inc. v. Montecito Water District*, 116 Cal.App.4th 36 (2004) (holding that an EIR is required because glare reflecting off a reservoir cover would impact views from public recreational trails). Moreover, by realigning Mulholland Drive through a retaining-wall dominated intersection on the east end of the Mulholland Bridge, at Skirball Center Drive, the project creates dangers and aesthetic degradations that impair the recreational value of the Mulholland Scenic Parkway.

Sixth, the project requires the installation of five retaining walls totaling approximately 1,400 linear feet on the east side of Skirball Center Drive and Mulholland Drive and approximately 500 linear feet of retaining wall on the west side, which would have an adverse impact on views *from* Mulholland Drive, Mulholland Bridge, and public recreational trails in the surrounding Santa Monica Mountains. These retaining walls are necessary because the widening of Skirball Center Drive on the east side of the I-405 will be achieved by massive grading into the adjacent hillsides. This would significantly degrade the aesthetic and recreational value of Mulholland Drive and the Mulholland Scenic Parkway. It is difficult to imagine a project that would be more inconsistent with (1) Specific Plan Guidelines Goal 1, which is to preserve and enhance the natural character of the Santa Monica Mountains and the scenic, hillside character of the Mulholland Scenic Parkway; (2) Guideline No. 1, to minimize the amount of grading and the use of retaining walls; and (3) Guideline No. 10, which requires design review of grading that is more sensitive to aesthetics than engineering.

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Seventh, the project requires the removal of the existing Mulholland Bridge, the remnants of which (potentially including retaining walls, masses of disturbed soil and bridge elements left in place) will be within view of a realigned Mulholland Bridge, Mulholland Drive, Core Trail, and other public trails, and therefore potentially degrade the quality of the viewshed.

Eighth, the realignment will degrade a wildlife corridor by replacing the existing east-side entrance and adjacent natural hillsides with a concrete-intensive entry point at the site of a more complex and wildlife-inhibiting traffic light and intersection, adjacent to retaining walls instead of natural hillsides. This is inconsistent with Guideline No. 13, which requires sensitivity to preserving wildlife corridors, habitats and geology.

Ninth, another foreseeable impact of the Skirball Center Drive Widening and the realignment of Mulholland would be to encourage the use of Mulholland Drive for cut-through traffic, an intensifying use inconsistent with the residential zoning and the Specific Plan goal of preserving Mulholland Drive as a “low-intensity, low-volume, slow-speed, parkway-type setting,” which is critical to its country road feel. See *Specific Plan Design Guidelines*, p.3. Similarly, the use of Mulholland Drive as a short-cut route would also impact other residential communities along any such cut-through traffic routes.

In sum, there is no question that these significant environmental impacts require preparation of an EIR. We nevertheless point out some other deficiencies of the project, which further demonstrate the need for full and open public review. *First*, there is no reason to believe that the realignment will have any positive impact on traffic flow because (1) Skirball Bridge is a major bottleneck; (2) the long line of cars turning into the schools on Mulholland likewise block traffic flow; and (3) the growth-inducing features of the project would eliminate any traffic-movement gains that might otherwise be achieved. *Second*, the EIR for the I-405 Project makes clear that the temporary traffic delays for construction along the Sunset and Mulholland bridges will be mitigated to minimize the construction-period delays – and experience has demonstrated that these mitigation measures have already worked on the Sunset Bridge. Moreover, there is no consideration of the project work on Skirball Center Drive, a bottleneck area that will likely be hugely impacted by the massive scope of construction (adding several lanes to the roadway, grading into the hillside, hauling trucks and placing five retaining walls into the hillside). Given the dubious nature of any claimed benefits, the real purpose of the project appears to be the transformation of Mulholland Drive into a major highway to accommodate growth of the institutions to the immediate west of the I-405, which directly conflicts with the mandate of the Specific Plan.

5. CalTrans and Metro Have Failed To Advise The Public About The Scope And Environmental Impacts Of The New Project

CalTrans recently prepared an Environmental Addendum to its I-405 Project EIR. This document has not been distributed to the public, it has not been posted on its website, and it

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was not distributed to members of the I-405 Project Community Advisory Committee. It was obtained from the City in response to a public records act request. In any event, the Environmental Addendum does not mention, consider or analyze the environmental impacts of the Mulholland Drive Bridge Realignment/Skirball Center Drive Widening Project within the Mulholland Scenic Parkway. The Addendum considers only the aesthetic impact of relocating the Mulholland Bridge from the perspective of those using the I-405 freeway. The Addendum completely ignores the environmental impacts of the project on the Mulholland Scenic Parkway and does not even mention the environmental considerations expressly highlighted in the Mulholland Scenic Parkway Specific Plan. Even if an Environmental Addendum was a proper mechanism for analyzing this project, which it is not, this particular Addendum does not even come close to addressing the project's potentially significant environmental impacts.

The signed Environmental Addendum purports to analyze the impacts of realigning Mulholland Bridge by moving its eastern terminus 200 feet to the south of its current location. The CalTrans/Metro Fact Sheet posted on the Internet, however, indicates that this alignment will not be utilized because it would have a significant right-of-way impact on the west end of the bridge. This impact, however, can be averted, according to the Fact Sheet, by a more perpendicular alignment, positioning the eastern terminus of the Mulholland Bridge approximately 430 feet south of the existing location. Thus, according to the "Fact Sheet" that CalTrans/Metro has posted on the Internet, the Environmental Addendum analyzes an alignment that will not be utilized.

CalTrans/Metro has distributed to a privileged few another document, the "I-405 Sepulveda Pass Improvement Project: Mulholland Bridge Realignment Design," which has not been made available to the public. This document conflicts with both the Environmental Addendum and the so-called Fact Sheet by stating that the preferred alignment for the Mulholland Bridge is approximately 290 (not 200 or 430) feet south of the existing location. Remarkably, this "preferred" alignment was not among the several alternatives that have been studied. The Mulholland Drive Overcrossing Realignment: Design Alternatives Study (January 26, 2011) studied alternatives located 200 and 430 feet south of the current location, and found that neither would be acceptable. The alignment 200-feet south of the current location was infeasible because of the right of way impacts on the west side of the Mulholland Bridge. This alignment was also so close to the existing bridge that it would increase the stress on the existing bridge, which would create a risk that the existing bridge might collapse in an earthquake during the construction phase, although the bridge "would not be expected to collapse." The alignment located 430 feet south will not be utilized because "the bridge grade was aesthetically unacceptable to CalTrans." After these two designs were rejected, the 290 foot alignment was chosen, although it is not clear from the documentation exactly how that alignment was chosen.

In sum, the CalTrans/Metro process has been and remains a mystery to the public. Further, these agencies appear to have made a conscious decision to ignore the environmental significance of the Mulholland Scenic Parkway and the Specific Plan by proposing a new project

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that undermines virtually every goal and guideline for the protection of this scenic and recreational resource. Fortunately, CEQA prohibits the governmental approval of a project that disregards such significant environmental impacts.



David Hockney, Mulholland Drive: The Road To The Studio

6. Even Apart From CEQA, The Project Cannot Be Approved Because The Specific Plan’s Mandated Findings For Realigning Mulholland Cannot Be Made

Section 7.B of the Specific Plan states that “[t]he paved portion of Mulholland Drive shall conform to its existing alignment from California State Highway Route 101 to the intersection of Topanga Canyon Boulevard, except as modified for safety reasons.” None of the documents prepared by CalTrans and Metro purport to justify the realignment of the Mulholland Bridge on the basis of “safety reasons,” nor could they do so. For that reason alone, the proposed realignment must be rejected.

Further, Section 7.A provides that “[n]o changes or improvements may be made to the alignment or design of the paved portion of Mulholland Drive or the right of way” absent the following mandated findings – all of which must be satisfied but none of which can be satisfied: (1) The project is required for public health and safety reasons; (2) The project does not obstruct a scenic feature or resource; (3) The project is compatible with the scenic parkway environment; and (4) The project is not inconsistent with the purposes and objectives of the Specific Plan. The Mulholland Drive Bridge Relocation is not “required for public health and safety reasons,” it would obstruct and degrade scenic features and resources within the Mulholland Scenic Parkway, it is highly incompatible with the Scenic Parkway environment, and it is grossly inconsistent with the Specific Plan’s purposes and objectives of preserving the aesthetic views from Mulholland, the natural topography, and the recreational uses of Mulholland Drive and the entire Scenic Parkway. Consequently, even apart from the project’s violation of CEQA, it cannot be recommended for approval because the four mandated findings cannot be made.

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For these reasons, the Mulholland Bridge Relocation and Skirball Center Drive Widening Project cannot be considered, much less approved, until after the completion of an EIR process that has yet to begin.

Respectfully submitted,



Thomas R. Freeman, President, Canyon Back Alliance



James Provenzano, Vice-President, Canyon Back Alliance



Wendy-Sue Rosen, President, Brentwood Residents Coalition

Donald G. Keller

Donald G. Keller, Vice-President, Brentwood Residents Coalition

cc: State Senator Fran Pavley
State Assemblymember Mike Feuer
State Assemblymember Julia Brownley
County Supervisor Zev Yaroslavsky
City Councilmember Bill Rosendahl
City Councilmember Paul Koretz
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