



MOUNTAINS RECREATION & CONSERVATION AUTHORITY

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April 14, 2021

City Planning Commission
c/o Ms. Cecilia Lamas, Commission Executive Assistant
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012

Justification for Appeal of Director of Planning's Changes to Mulholland Scenic Parkway Specific Plan Implementation

President Millman, and Commissioners:

This appeal by the Mountains Recreation and Conservation Authority (MRCA) seeks to reverse the recent interpretation of the Mulholland Scenic Parkway Specific Plan (MSPSP) by the Director of City Planning as stated in the Director's March 30, 2021 memorandum, "Review Process for Projects Not Visible from Mulholland Drive". The subject policy subverts the purpose and intent of the Mulholland Scenic Parkway Specific Plan (MSPSP) as envisioned when the City Council adopted the Specific Plan in 1992, and the City Planning Commission's adoption of the Design and Preservation Guidelines in 2003.

Los Angeles Municipal Code Section 11.5.7.H(3) states: "The City Planning Commission shall hear appeals on Director interpretations which affect an entire specific plan area or any of its subareas, and the Area Planning Commission shall hear appeals on Director interpretations which are applicable only on a site specific basis." The subject action by the Director of Planning, which re-interprets a portion of a Specific Plan, is therefore appealable to the City Planning Commission.

The MRCA is a local public agency exercising joint powers of the Santa Monica Mountains Conservancy, the Conejo Recreation & Park District, and the Rancho Simi Recreation & Park District pursuant to Section 6500 et seq. of the Government Code. Without question this change in Department of Planning policy will impair public notice and public participation rights in the vast bulk of MSPSP cases. It will result in the degradation of the scenic qualities, ecological capacity, and watershed health of the eastern Santa Monica Mountains.

These changes to the implementation of the MSPSP will likely result in significant adverse environmental impacts, which must be addressed under the California Environmental Quality Act (CEQA). No environmental review has been performed by any City agency prior to the Director's enactment of this policy.

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The criteria cited in the subject memorandum for exempting a project from Design Review Procedures do not address "Non-Visible" projects within 200 feet of the public parkland marbled throughout the range, despite the MSPSP's very specific language regarding parklands and environmental protections in Sections 5B.3, and 6B.

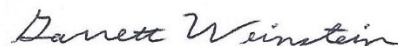
These changes by the Director, now enacted without prior input from the public or the Design Review Board, severely curtail the professional oversight that Design Review Board architects and other professionals bring to all Mulholland projects. It eliminates in-depth reviews of impacts to parkland, scenic overlooks, scenic road corridors, wildlife corridors, riparian corridors, and the urban forest. Grading in the non-visible Scenic Corridor would also miss the benefit of additional (no public cost) professional review, as demonstrated by the numerous projects that have been initially presented to the Design Review Board in the past with grading discrepancies and erroneous slope calculations.

These changes will deprive Planning staff and future decision makers of the expertise of the Design Review Board. The Design Review Board represents the interest of the public through the relevant council office appointments, and that voice should continue to be heard without restriction.

The MRCA reserves the right to submit additional comments and supplemental materials at a later date regarding this appeal.

If you have any questions or clarifications, please contact me at 310-589-3230, ext. 124, or by e-mail at garrett.weinstein@mrca.ca.gov. Paul Edelman, Chief of Natural Resources and Planning may also be contacted at 310-589-3230, ext. 128, or at edelman@mrca.ca.gov. Please send further correspondence regarding the subject project to my attention at the above letterhead address. Thank you for your time and consideration.

Sincerely,



Garrett Weinstein
Project Analyst

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