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October 14, 2021

City Planning Commission
Los Angeles, CA
Via email: cpcc@lacity.org, kathleen.king@lacity.org,

Re: Mount St. Mary's Proposed Project - OPPOSE
12001 Chalon Road, Los Angeles, CA 90049
ENV-2016-2319-EIR, CPC-1952-4072-CU-PA1, ZAD-2017-928-ZAD

Dear City Planning Commission:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. Our mission is to encourage and promote policies and programs aimed at preserving the natural topography and wildlife of the mountains and hillsides, allowing for their safe enjoyment by all the people of Los Angeles, and maintaining the health and safety of our residential communities.

At its July 2021 meeting, the Hillside Federation voted to oppose the Mount St. Mary's University (MSMU) Chalon Campus expansion project, in particular the proposed construction of a 35,500 square foot Wellness Pavilion. This oversized structure, referred to throughout the application document as a "gym", would more accurately be described as a multi-use facility and events center. With a scope far surpassing the need for an in-house student athletic facility, this center would bring intensification of use, increased traffic and density, and proprietary, non-school/academic-related events to the campus seven days a week, including evenings.

Such a project is clearly not compatible with the area's low density residential zoning, and the Hillside Federation is deeply concerned about the failure of MSMU's Final Environmental Impact Report (FEIR) to accurately describe the project, disclose and analyze impacts, or offer viable mitigation measures. (Where mitigations are required the FEIR instead offers "Project Design Features.")

MSMU must be instructed to come back with a project and environmental review that correct these shortcomings, disclosing where current operations do not comply with current operating conditions (including accurate enrollment figures, which are known to be far above the permitted number of 750), and which support their proposed expansion with a correct baseline and updated studies. Areas of significant concern and negative impacts that must be addressed include:

- **WILDFIRE DANGER**
- **VIOLATIONS OF ZONING CODE**
- **EMERGENCY EVACUATION AND ACCESS**
- **DESTRUCTION OF HUMAN LIFE, WILDLIFE, AND BIOLOGICAL RESOURCES**

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Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Bundy Canyon
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn. Lake
Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mountaingate
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
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WILDFIRE

MSMU is located at the end of a dead end road atop Bundy Canyon, a box canyon in a residentially-zoned, Very High Fire Hazard Severity Zone (VHFHSZ). The campus' sole access is from Sunset Boulevard on the south, via two and a half miles of narrow, winding (two lane) residential streets, passage on which is frequently impeded by the presence of parked cars and oversized vehicles. The neighborhood is already at a tipping point, coping with the current level of purely school-related traffic, officially quantified at some 2,000 private car trips per day coupled with a steady stream of oversized MSMU buses that rumble up and down the street, from early morning until after dark. While MSMU is not currently requesting an enrollment increase (because they falsely claim they have already been approved for 2,200 students), the increased visitor traffic generated by non-school related events at the new facility will do irreparable harm to both the residential neighborhood and wildlands habitat in which it is located.

Furthermore, the scale of expansion MSMU is proposing would clearly exacerbate wildfire risks in this already fragile and fire-prone hillside area. In 2020 alone, California experienced the most destructive wildfire season in the state's recorded history with more than 4 million acres burned. As of October 14, 2021, a total of 7,064 fires have been recorded, burning 1,968,326 acres across the state, claiming one life and destroying 3,050 structures (<https://www.fire.ca.gov/incidents/2021/>). Science tells us this is the "new normal", a volatile Anthropocene cocktail in which years-long drought and other extreme weather conditions come together with increased human presence (intruding on wildlands and displacing resilient native habitat with urban development) to spark hotter, drier and more intense "mega" wildfires.

Over the past several years a number of such fires have burned frighteningly close to (and in some cases actually encroached on) the MSMU campus. These recent fires, which include the 2017 Skirball Fire and 2019 Getty Fire, illustrate all too clearly the challenges faced by the school, local residents, and rescue workers when they must react to nature's sudden shows of force—for example, the difficulties of a swift and orderly evacuation from a remote urban-wildlands location. (Never mind the utter impossibility of getting a horde of panic-stricken students to follow the official shelter-in-place mandate of the fire authorities!)

With Climate Change accelerating, events such as these are becoming more common and more severe. MSMU's proposed project with its poorly described and inadequately analyzed intensification of use would also FURTHER INTENSIFY the risks posed by conflagrations such as these, not only to the campus itself or to Bundy Canyon but extending across neighboring hills and canyons and, in the worst case scenario, the entire Santa Monica Mountains range. It would do this by: 1) bringing increased human ignition opportunities into an existing high fire hazard severity zone and by 2) impeding the ingress and egress necessary for residential and campus communities and visitors to safely evacuate the area at the same time that emergency workers and vehicles are trying to access it, using the same limited-access, substandard streets.

The threat posed by a Mount St. Mary's-type (proposed) expansion/intensification is not limited to wildfires but could extend to any number of disaster scenarios, particularly those which would require emergency action and evacuations, including earthquakes, floods, landslides, etc.

ZONING CODE

The zoning code and specific plans were created to protect the special character and needs of different parts of the city, and there are powerful reasons why hillside communities in particular (such as Bundy Canyon) are designated and should be preserved for exclusively low density uses. Over the years a fortunate few educational and cultural institutions have been granted a conditional foothold in the beautiful, highly desirable, environmentally sensitive Santa Monica Mountains. Because of the perceived benefit they offer to the community and the once-upon-a-time fantasy of unlimited environmental resources, these privileged institutions have at times been allowed quite a lot of leeway in the interpretation of their CUP conditions. But the time for fantasies is over. The dangers threatening our hillsides and canyons can no longer be ignored and projects in these hillsides must be held to a higher standard. We are in a climate emergency, and the City needs to set and enforce appropriate limits so that development is scaled back to a safe level. It is absolutely imperative that everyone, residential communities and institutions alike, conduct themselves in a manner compatible with the very low density zoning. Our survival depends on it.

EMERGENCY EVACUATION AND ACCESS

MSMU'S proposed project creates significant emergency-access risks. In addition to the potentially occluded residential box canyon streets, the major traffic artery into which these streets lead is Sunset Boulevard, a traffic conduit to the 405 Freeway and one of the most congested commercial streets in California.

The Hillside Federation asks that, going forward, an Evacuation Study and Roadway Capacity Analysis be required of all large projects in our hillsides.

DESTRUCTION OF WILDLIFE AND BIOLOGICAL RESOURCES

In addition to endangering human life and property, the intensification of use generated by this project poses a serious threat to wildlife habitat and biological resources. As stated in the biological impacts analysis by Land Protection Partners, a project with a smaller footprint would reduce impacts to the natural chaparral while complying with the Governor's 30X30 Executive Order, which prioritizes protection of wildlife and biological resources.

IN CONCLUSION

The Hillside Federation supports schools. But a school cannot be allowed to grow exponentially if it does not have the proper infrastructure to support it. Unlike UCLA or USC, Mount St. Mary's Chalon Campus is a remote facility high in the urban-wildlands of the Santa Monica Mountains, located at the end of a dead end street and accessed through a residential community characterized (like so many hillside communities) by substandard streets and infrastructure.

Our society has long believed continued growth and maximization of resources to be the "best and highest use" of property and a reliable indicator of a business or institution's (or individual's) health and success. But the time has come to rethink these values. An April 2019 report "Wildfires and Climate Change: California's Energy Future" put out by the Governor's office recommends that *local governments begin to deprioritize new development in areas of the most extreme fire risk*. This advice is especially relevant to the hillsides: we need to start scaling back development and maintaining lower densities to preserve wildlife habitat and connectivity and protect our hillside environment and residents from devastating wildfires. How does this translate in the case of the present project? The obvious solution is for Mount St. Mary's to build a much smaller gym and utilize the natural environment for some of their exercise. A more modest gymnasium truly focused on the health and fitness of students (rather than a showy event center) would reduce the project's carbon footprint and be far less impactful to the neighboring residential community as well as the MSMU staff and students, because it would involve less grading and fewer events outside the academic realm to attract visitors. It might also free up school resources for other uses. But whatever project MSMU chooses to present, they must support their application with much more robust and meaningful data, particularly a proper wildfire evacuation plan and roadway capacity analysis, in order for the significant impacts to be properly disclosed and evaluated.

The Federation of Hillside and Canyon Associations asks the City of Los Angeles to reject the current EIR and demand a recirculation that includes a higher level of accountability where this and all other hillside projects are concerned.

Please add us to the notification list for this project.

Sincerely,



Charley Mims, President

Cc:

Councilmember Mike Bonin
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