



Angeles Chapter
Central Group
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90010-1513

June 30, 2021

Mayor Eric Garcetti
Office of the Mayor
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012
VIA EMAIL
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cc:

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Karo Torossian, Chief of Staff

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Los Angeles City Council
City of Los Angeles
200 North Spring Street, Room 340 Los Angeles, California 90012

RE: Opposition to Policy of Exempting "Non-Visible" Projects in the Mulholland Scenic Parkway from Design Review Procedures as Described in the March 30, 2021 Memorandum from Director of Planning

Dear Mayor Garcetti and Councilmembers Krekorian, Blumenfield, Raman, Koretz, and Bonin:

The Sierra Club Angeles Chapter spans Los Angeles and Orange Counties in Southern California and represents 100,000 members and supporters collectively. Sierra Club's purpose is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.

Sierra Club strongly opposes Director of Planning Vincent Bertoni's March 30, 2021 Mulholland Scenic Parkway Specific Plan Implementation Guidance Memorandum, exempting Non-Visible projects in the Mulholland Scenic Parkway (spanning five council districts) from the standard Design Review Procedure and hearings before the Design Review Board. This memo is in direct conflict with all that we value as an organization. According to the Santa Monica Mountains Conservancy (SMMC), this action eliminates in-depth review of impacts to parkland, scenic overlooks, scenic road corridors, wildlife corridors, riparian corridors, and the urban forest.

- The Director's decision is inconsistent with the city's obligation under the California Endangered Species Act ("CESA"). It has eliminated one of the only land use planning tools available to ensure contiguous wildlife habitat in the Santa Monica Mountains zone, which is crucial to the survival of the mountain lions, and will result in the degradation of the ecological and watershed health of the area.
- The Southern California mountain lion was recently provisionally listed under CESA and are presently at risk of extinction, primarily due to loss of habitat connectivity and open space caused by poorly sited development and lack of wildlife crossings (Gustafson et al. 2018; Benson et al. 2016; Benson et al. 2019). The City has an obligation to protect these species.
- In 2019's LA's Green New Deal Sustainability Plan, the 2021 Milestones and Initiatives are to "Set biodiversity targets and pilot LA's first wildlife corridor" and "Achieve and maintain 'no-net loss' of native biodiversity by 2035." The Memorandum's action will result in the continued loss of native biodiversity in one of the most important habitat areas remaining in the City.

It would only take one ill-planned project to disrupt or block wildlife connectivity completely. This could be as small as an impenetrable fence or too bright a light being projected into a wildlife

pathway. That is why the city is currently working on a Wildlife Ordinance with the purpose of maintaining and protecting existing wildlife and their ecosystems. We must seek to preserve a balance between private property development and enhancement of habitat areas vital for wildlife connectivity. This balance is achieved by receiving input from the Mulholland Design Review Board hearings procedure. Ignoring this process jeopardizes important mitigation for wildlife and natural resource protection.

The Director's memorandum was issued unilaterally with no prior notice or opportunity for public comment, is in direct conflict with the express language of the Specific Plan, exceeds his authority under the City Charter, and usurps the legislative function of the City Council which signed the Specific Plan into law in 1992.

At an April 19, 2021 SMMC board meeting Executive Director, Joseph T. Edmiston, powerfully stated: "The Mulholland Design Review Board and the Mulholland Ordinance have really been singularly responsible for the fact that we have preserved wildlife corridors. It's really the only effective tool that we have."

If we reduce protections in this area, we will allow even further irreversible damage to occur. It is the responsibility of the City of Los Angeles to protect the environment and the wildlife that inhabit it. As the elected officials who represent Mulholland Scenic Parkway constituents, and who are responsible for appointing the Mulholland Design Review Board members, we ask that you collectively urge Director Bertoni to immediately rescind and withdraw his illegal memorandum.

Regards,

A handwritten signature in black ink, appearing to read "Dennis Loya". The signature is fluid and cursive, with a large initial "D" and "L".

Dennis Loya
Chair
Angeles Chapter, Sierra Club