



December 16, 2020

by email, to the Honorable Councilmembers Mike Bonin and Paul Koretz

Councilmember Mike Bonin
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**Re: CPC-2020-5985-GPA-ZC-CA-SP; ENV-2019-4565-EIR
BASPOA Request for Extension of Scoping Comment Period and some Comments OPPOSING the Berggruen Institute Project**

**Re: ENV-2018-1509-EIR
BASPOA Statement of Objection to Planning Department's Refusal to Extend Scoping Comment Period and some Comments OPPOSING the Retreat at Benedict Canyon Project**

Dear Councilmembers Bonin and Koretz:

I am writing to you on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) to request that the Comment Period for the Berggruen Institute Scoping be extended by *at least 45 days beyond the current December 21st deadline*, and, additionally, to protest the Planning Department's refusal to extend the Scoping Comment Period for the Retreat at Benedict Canyon.

Since early in the pandemic, the call has gone out for the City to PLEASE HOLD BACK on the release of environmentalals and to EXTEND public comment periods. Such simple measures would have gone (and could still go) a long way toward helping ensure continuity of proper planning process in these difficult times. But the Planning Department has apparently decided to ignore these very reasonable requests and instead is moving full speed ahead on a number of large,

extremely impactful projects, leaving Covid-impacted (and *distracted!*) citizen-stakeholders scrambling to keep up.

This trend—and these two projects in particular—spell trouble ahead for the City and especially for our fragile and already endangered hillsides which are BASPOA’s principal concern. The scoping documents for the Berggruen Institute and the Retreat at Benedict Canyon both describe out-of-scale private commercial developments that are inappropriate to their proposed urban-wildlands sites, where low density residential zoning interfaces with supposedly protected open space. Both sites are home to vital wildlife habitat and corridors and to public recreational trails. Both sites are within a designated Very High Fire Hazard Severity Zone. And, like so much of the hillsides, they are both in/adjacent to areas already developed to the tipping point, where infrastructure and emergency response times are often “substandard.” In order to allow the building of such impactful, growth-inducing projects on these clearly inappropriate sites, both Applicants are requesting unprecedented changes to the General Plan and to their respective Community Plans. (The Berggruen Project actually goes so far as to request its own *Berggruen Specific Plans!*) The residents of Bel Air Skycrest, situated as we are a few miles west of Benedict Canyon and a mile or two north of the Berggruen site, are deeply concerned about both these projects and the negative impacts they will inevitably have on the local canyon ecosystems, as well as their implications for the Santa Monica Mountains as a whole.

WHAT IS AT STAKE?

Along with our famously temperate climate and beautiful beaches, the Santa Monica Mountains are nature’s greatest gift to Los Angeles—a 46-mile swath of topographically diverse wilderness, miraculously—and tenuously—surviving inside a great urban center. This mountain range (one of the world’s largest pristine, ecologically complex, protected Mediterranean ecosystems) is home to over 1,000 plant species and some 500 bird, reptile, amphibian and mammal species. (To give just one example of the uniqueness of our situation: Los Angeles is one of only two megacities in the world where big cats—mountain lions in LA, leopards in Mumbai, India—live *within the city limits!*) So it is no wonder that the United States Congress recognized these mountains as a national treasure back in 1978, when it established the Santa Monica Mountains National Recreation Area, under the auspices of the National Park System.

Any urban-wildlands “marriage” is inherently fraught. The effort to conserve and the drive to develop coexist uneasily at the best of times. Bel Air Skycrest has experienced this conflict firsthand. Our sleepy little community is located off Mulholland, one mile west of the 405 freeway, cheek by jowl with the Mulholland Institutional Corridor. The corridor started small, little more than a footnote to the vision and the protections laid out in the Mulholland Scenic Parkway Specific Plan. But it has grown, and over the years our community has seen—and FELT—the impacts as institutional tentacles have, individually and cumulatively, crept farther and farther beyond the limits that were intended (and once believed) to guarantee compatibility with both the area’s low density residential zoning and with the rural, open space character of the parkway.

If either of these new projects is greenlighted, the impacts will be huge. And the first impact will, in all likelihood, be the greenlighting of the *other* project—followed by *many* other projects after that! Concerns about precedent-setting impacts often seem remote, even abstract, at this stage in the planning process. But if the zoning actions requested for these projects are approved, a whole slew of other hillside projects will emerge ready and waiting from the wings, so it won't be long before the cumulative and very concrete impacts begin to be felt. Years of construction followed by decades of commercial operations will profoundly impact our precious mountains. Extensive grading will erode the structural, biological and aesthetic integrity of the hillsides. The growth-inducing nature of the projects will lead to ever-increasing density and traffic congestion and yet longer emergency response times. Increased noise and light pollution will take their toll. And wildlife corridors and habitat will inevitably be lost, which will be a death knell for the wildlife itself. As happened with the Institutional Corridor, the tentacles, individually and cumulatively, will continue to spread and intensify over time. Make no mistake: however good the intentions behind these projects may be (both initial studies claim to offer environmental and community benefits), we are looking at the ongoing, systematic degradation and destruction of the finite, already endangered reserves of open space and natural beauty within our city. Oscar Wilde once wrote that “each man kills the thing he loves”, and so it is: the very qualities which make these sites so attractive to the developers of a prospective think tank and urban wildlands retreat in the first place will doom them to exploitation and extinction.

Along with the actual physical destruction of Santa Monica Mountains habitat, the time-honored democratic process which is supposed to guide our city planning will be fatally undermined. All the long-contemplated, carefully crafted, intensely fought over protections which the City and its citizenry have worked so hard to put in place over the years, in recognition of the value and the fragility of our hillsides and canyons, will fall like dominoes. The timing alone—amending the General Plan and changing zoning to facilitate what are essentially land grabs—and all just in advance of the City's revisions of its various Community Plans and the creation of a long-awaited Ridgeline Ordinance—at a moment when we are all laid so low by this horrible pandemic—feels like a particularly shameless betrayal of public trust, a Hail Mary pass that, in the current political climate, can only be interpreted as an attempt to minimize inconvenient, time-consuming input from the community and circumvent the rule of law. (Here again, longtime Bel Air Skycrest residents are reminded of the way that the Mulholland Scenic Parkway's creation and approval was dragged out over 20 years, during which interim developers had their way and the Institutional Corridor was able to expand its foothold far beyond what was originally intended.) As a result, those upcoming Community Plan Revisions, the overdue Ridgeline Ordinance, and so on will be seriously compromised from Day One in their ability to address the problems of megafires and climate change and all the other challenges our City faces (and will continue to face once the pandemic is finally under control).

Is this the legacy we want for our city?

What is the big rush here? Surely the preservation of our beautiful mountains and the many lifeforms in them; the health, safety and quiet enjoyment of our residential communities and of

visitors from across our city and around the globe are more important than fast tracking all these projects? Bel Air Skycrest Property Owners' Association asks that the City respect the protections that the City itself put in place and SLOW DOWN THIS PROCESS, extend the public comment periods, and ensure that stakeholders still have our rightful say, even during these very challenging times!

Kindly enter this letter into record for both the Berggruen Institute and the Retreat at Benedict Canyon, and please put BASPOA on the notification lists for both projects.

Respectfully,



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Federation of Hillside and Canyon Associations (Hillside Federation)
Brentwood Residents Coalition (BRC)
Canyon Back Alliance (CBA)
Mountaingate Open Space Maintenance Association (MOSMA)