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City Council
City of Los Angeles
Los Angeles, CA 90012

Re: Support of Appeal of Approval of Lake Hollywood and Upper Vista
Outdoor Improvements, Project PRJ21233, Board number 19-039 approved
on February 20, 2019; City Council Agenda Item # 20, Wed. June 5, 2019

Honorable Councilmembers:

On behalf of Committee to Save the Hollywoodland Specific Plan (“Appellant”), we appealed the February 20, 2019 decision of the Board of Commissioners of the Los Angeles City Recreation and Parks Department to adopt a categorical exemption for approval of Lake Hollywood and Upper Vista Outdoor Improvements, Project PRJ21233, Board number 19-039 (“Project”).

When viewed in proper perspective as one of a series of actions to promote an international tourist destination by creating an funneling traffic to a series of Hollywood Sign viewsites, this Project requires environmental review that addresses the cumulative impacts created or knowingly allowed by the City in this area without sufficient study or mitigation. The access and public health hazards created by uncontrolled usage of the area, which is a high fire hazard zone, must be analyzed and mitigated before further actions such as this Project are taken.

Appellant respectfully urges the City Council to deny approval of the Project until an environmental impact report (EIR) has been prepared that adequately discloses and mitigates the impacts of the Project in conjunction with all other actions the City has taken to promote use of the Lake Hollywood Overlook and nearby view pad at the intersection of Mulholland Highway and Canyon Lake Drive as an international tourist destination.

While the Project authorizes landscaping and irrigation changes, it is one in a series of actions that are part of a larger project of developing an international tourist destination (i.e., a viewsite to view the Hollywood Sign) across the street from

Hollywoodland and residential property owners that are significantly impacted without undertaking prior environmental review or obtaining proper permits. The City, through Council District 4, commissioned and accepted the Dixon “Comprehensive Strategies Report” with its series of recommendations for “Improving Access, Safety, and Mobility around Griffith Park and the Hollywood Sign” dated January 2018. The Report is not a project, nor an EIR for a project.

With the January 2018 Dixon Resources Unlimited study (Dixon Report) of strategies that affect access, safety, and mobility around Griffith Park, the City’s actions including the current approval are now placed in a context of a single overall project, which the City is implementing piece by piece with such approvals as the one at issue in this appeal. The approval also contemplates additional Dixon Report recommendations including fencing and an ancillary structure though it was amended to not include them at this time. There is nothing to prevent their being incorporated into the project at a later date. This is additional evidence of piecemealing the overall project. Recommendation 7-1 in the Dixon Report is clearly stated as “Strategy #1. Enhance the most Accessible and Safe Hollywood Sign Viewing Locations and Hikes” (Dixon Report, p. 50.) The Dixon report further states:

Lake Hollywood Park

There is a view of the Hollywood Sign from Lake Hollywood Park and the vista point where Canyon Lake Drive transitions into Mulholland Highway. This is a common location that to take photos of the sign. *There are ways to enhance this location with amenities that will improve the visitor experience* (see page 62).

(Dixon Report, p. 51, emphasis added.) These portions of the Dixon Report flatly refute the assertion that the project approval at issue here is somehow a standalone project.

We have written to the City about the series of actions to promote an international tourist destination as early as September 9, 2011 objecting to the implementation of such strategies at the Mulholland Highway/Canyon Lake Drive view pad without environmental review. Again, on December 17, 2015, we pointed out the nuisance conditions that were being created by the City’s continuing actions to promote access for viewsites without controlling it sufficiently including congestion and unsupervised usage of areas in a high fire hazard zone prone to wildfires. We objected to use of this Dixon Report to guide further approvals without environmental review. Our appeal letter of March 1, 2019 is part of the appeal package and includes this prior correspondence from 2011, 2015, and 2017.

Cumulatively, the Project’s impacts along with similar projects nearby could have significant adverse impacts on access and hazards in the area that have not been adequately considered or mitigated. A project that creates cumulative impacts is one of the designated exceptions to the categorical exemptions provided in CEQA Guidelines

sections 15301, 15303, and 15304, cited by the City's approval of this Project. Specifically, the Guidelines state: "All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant." (Guidelines section 15300.2 subd. (b).)

The Project has been improperly piecemealed as review of accessibility improvements, and their likely environmental impacts, have been omitted from the analysis and indeed have never been undertaken for this area. The present appeal is about "Lake Hollywood and Upper Vista Outdoor Improvements" but the issues of concern are a lot bigger than that single most recent proposal. The larger issue is about the City's ongoing series of projects, with the Upper Vista outdoor improvements being the latest. The improvements must be understood in the context of the long history of City actions to promote tourist visitation to the Hollywood sign, without addressing how those promotion efforts affect the health, safety, and welfare of the residential neighborhoods nearby.

While Appellant supports access to Griffith Park, that access must be controlled in a way so as to not create burdens and hazards to the surrounding area as described in our December 17, 2015 letter.

The City has not described its actual project, or presented alternatives, or mitigation measures for its decision as would be presented in an actual Environmental Impact Report (EIR) under CEQA- the California Environmental Quality Act. Instead, the City has focused on minor actions such as the Outdoor Improvements that are the subject of this appeal and has claimed each individual minor action is too small to be subject to CEQA. The City's Project is doing nothing less than promoting the Hollywood Sign as an international tourist destination with the Hollywoodland area impacted as ground zero.

The City should undertake its tourist destination promotion project in a methodical and orderly way (which should be a CEQA review process) to decide which Dixon Report recommendations to implement, which to reject, and which to modify for implementation.

Conclusion

We ask that you grant the appeal. The City must act in a coordinated fashion that identifies the overall Project the City is undertaking as promotion of Hollywood Sign tourism, and that you prepare an EIR that fully addresses the impacts of that Project, proposes mitigation measures and alternatives for it, and adopts every feasible means to mitigate those public safety, mobility, and accessibility impacts. The public health, safety, and welfare of your constituents in the Hollywoodland area neighborhoods should be the primary concern among these.

City Council
June 4, 2019
Page 4

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas P. Carstens", written in a cursive style.

Douglas P. Carstens