



Cahuenga Pass Property Owners Association

Representing the Cahuenga Pass since 1952

February 3, 2011

Jon Foreman, Senior City Planner
City of Los Angeles Department of City Planning
200 N. Spring Street, Room 601
Los Angeles, CA 90012

RE: NBC Universal Evolution Plan
Draft Environmental Impact Report
EIR Case No. ENV-2007-0254-EIR, Clearinghouse Number 2007071036
100 Universal City Plaza, Universal City, CA 91608

Mr. Foreman:

For over fifty years, the Cahuenga Pass Property Owners' Association (CPPOA) has represented the interests of owners and residents of both commercial and residential properties in the Hollywood Hills west of the 101 Freeway, north of Mulholland Drive, and south of Vineland Avenue. There are approximately 1500 homes and businesses in our hillside community. Many of our members work in the entertainment business or in ancillary occupations, so there is a predisposition to be in support of entertainment-related development. However, as our community will be one of those most significantly impacted by the proposed NBC Universal Evolution Plan, our Board of Directors has taken time to review the Plan's DEIR and this letter constitutes our official response. We submit these remarks to become part of the official record as well as part of the FEIR. Unless otherwise stated, please consider statements as well as questions to be in need of an appropriate response from the applicant.

Our concerns and questions are as follows:

Scale of DEIR:

The 39,000 page, twenty-seven volume DEIR for Universal Studios' twenty year Evolution Plan is an unwieldy document. A project of this scope and scale undoubtedly required years to conceptualize and extensive expertise to draft, yet the public, lacking similar resources, is provided only sixty days to read, absorb, understand, and respond to its contents. To ask communities to do so without the aid of professional consultations of equal caliber to the team that submitted this DEIR seems contrary to the fair and balanced process that we believe should guide transformations to our community.

It is especially unreasonable to release the document just prior to the winter holiday season when people are busy with the obligations of family and friends typical of the end of the year. We believe that denying the community an additional thirty days to compensate for pre-holiday release of the document was wrong. Why are resources not provided, either by the developer or the City or County, to assist the public in this process and why were additional days not granted to review this exceptionally large proposal?

Bifurcation

The Metro Universal and Evolution plans are, for all intents and purposes, one single project. The principal beneficiary is Universal. The principal user is Universal. The one-time property owner is Universal. Because of the proximity of the sites and their geographic location, the impacts from the two projects will have a cumulative effect on the region. Why was bifurcation allowed? How can the City and County allow the MTA Universal and Evolution plans to be assessed separately without any serious consideration of their cumulative impact on the surrounding community? While the environmental quality-of-life impacts will be significant – scale, visual glare, shade and shadow, air pollution, noise pollution, energy demands, and so on – the most profound impact of the bifurcated project will be in the area of traffic. Why has the City not demanded the assessment of traffic impacts as a unified whole? What are those cumulative impacts? What provisions can be implemented to guarantee that one aspect of traffic mitigation will not be delayed or postponed predicated on delays in the progress of the other portion of the proposal?

Specific, Master and Comprehensive Plans

The Evolution Plan contains egregious requests for exceptions and exemptions from existing community plans. How can the City and County consider these requests, which ostensibly allow private interests to trump thoughtful planning measures that were created in collaboration with elected officials, planners, and communities? In particular:

- **The Ventura-Cahuenga Boulevard Corridor Specific Plan** governs a large area immediately in the shadow of this site, and an even larger portion of the plan would be profoundly affected by traffic impacts from the Evolution proposal. The mitigations offered do not adequately address those impacts. Beyond those inadequacies, what happens after the twenty-year project scope in terms of continued mitigations for the Evolution Plan's traffic impacts on this vital transportation corridor in our community? In addition, the DEIR proposes a sign district 2C (Universal City Southern Entry Point Sign) within the Universal City Specific Plan. Does the proposed sign district in area 2C in the proposed city specific plan conform to the preexisting signage standards established by the Ventura/Cahuenga Boulevard Corridor Specific Plan for this location? If not, will an exception be requested? Why is such a request not mentioned in the DEIR?

- An especially scenic portion of the **Mulholland Scenic Parkway Specific Plan** overlooks this site. Residents who live within the plan's scope are expected to abide by the rules of the plan. The proposal requests that the corner of Cahuenga East/Buddy Holly Drive and Barham Boulevard be removed from the Mulholland Plan. Staff and consultants employed by the applicant have stated Universal's intention to replace the existing billboard with a thirty-foot tall digital electronic billboard. We firmly believe this will have extremely disruptive repercussions on the lives of the residents of our neighborhood who will have to endure the glare from the proposed signage. What benefit does an exception to the Mulholland Plan provide for the people of our community? Isn't such a sign in violation of the scenic corridor designation of Barham Boulevard?
- **The Los Angeles River Improvement Overlay District** and the **LA River Revitalization Master Plan** affect the riverfront edge of the project site. The Evolution Plan flouts these documents and proposes to cut off the riverfront from the citizenry. It proposes breaking the linkages and destroying the continuity of the River's 32 mile flow in the City of Los Angeles. Why was a viable option that preserved the River Plan not part of the alternatives? Why should private interests prevail over the public good?
- **The Santa Monica Mountains Comprehensive Plan** would be impacted by the proposal. All the construction proposed by the Evolution proposal would serve to further squelch native wildlife on the Universal site. It would wipe out remaining wildlife populations and eliminate remaining wildlife corridors. How can we allow our environment to be degraded and disregarded in this way?
- The Evolution Plan would like multiple exceptions and exemptions from the **City of Los Angeles Sign Code Revisions**. This is NOT Times Square West as has often been suggested by the applicant. The environs of this site are not the same as those surrounding Staples Center or even Hollywood Boulevard, and they should not be treated in the same way. Why should exceptions and exemptions be considered for this site? Haven't such exceptions already proven problematic for the City's attempts to regulate outdoor advertising and signage?

20-year Development Agreement and "Thresholds"

It is our belief that the definitions of the thresholds delineating the various development phases are too vague and favor the applicant over the affected surrounding community. Hillside neighborhood protection measures and improvements are woefully inadequate and virtually non-existent. What detailed measures and indicators can be defined for these thresholds throughout the twenty-year development that sets specific conditions that must be met before subsequent phases of development are initiated? What can the surrounding communities expect in the way of substantive neighborhood protection programs?

Transportation Hub Access

If the developer wanted to truly facilitate ease of access to the transportation hub for those residents who will reside in the proposed housing element, the inclusion of a riverfront walkway, especially a moving walkway, would have been a much more efficient, attractive and environmentally sound solution. Why was that not considered?

Land Use

As stated in our introductory paragraph, many of our members work in the entertainment business or in related fields. As such, there is a predisposition to support entertainment-related development projects. In general, we tend to have few issues with the studio or the theme park-related aspects of the Evolution Plan, but we do take issue with the residential component. We feel that the loss of the back lot is detrimental to this proposal and the economy of the region. We feel that it's a foolhardy trade-off for the region, especially at a time when production is leaving the area at break-neck speeds, depriving Angelinos of their skilled livelihoods. We feel that the conversion of Universal's historic back lot to housing represents an unrecoverable loss to the entertainment and tourist industries in this region. Not only that, but the need for support production facilities has repeatedly been cited as the justification for the Metro Universal proposal across Lankershim. If Universal truly needs that space and wanted to fully exploit their property, wouldn't it be more sensible and efficient to locate those production offices, post production and ancillary uses on their own campus? The appropriate place for housing is immediately adjacent to the MTA transit hub, not off Barham Boulevard, as outlined in the DEIR as Alternative Two. The MTA property is a much more appropriate location for the residences plus it satisfies the MTA's own mandate for housing. Why not put the housing where it belongs, i.e., by the MTA station, and the studio and entertainment components where they rightly belong, i.e., on the Universal Studios lot?

The NBC Universal Evolution Plan DEIR alludes to a number of short-term construction jobs and part-time and/or temporary service jobs that will be created as part of the project. These individuals seem unlikely to occupy any of the proposed housing either because they will be commuting from their existing residences during construction or because they will likely be unable to afford to live in the proposed development. If the proposed residences were at least geared to a portion of the market that was low to middle income, a case could be made that this was a reasonable response to a genuine need for housing in Los Angeles. Instead, the proposed target market for the housing is middle to upper income buyers, with the applicant seeking to make the open-ended entitlements as attractive as possible to potential developers, clearly seeking to realize maximum financial gain. To compound matters, this comes at a time when existing middle income geared units in the immediate area are sitting unsold, further proving the inappropriateness of this approach.

Beyond the housing jobs imbalance created by the proposed project, the decision to locate the residential component such a great distance from the existing MTA Universal City Station is also fraught with problems for local transportation infrastructure. Residents of this proposed housing will undoubtedly have personal vehicles. The impetus to have those cars would be diminished were the housing to be more appropriately located down the hill in genuine proximity to the MTA station. These personal cars will add to pollution, traffic and other overloads in an already congested area. Additionally, it seems unlikely that most of them would add 15 or 20 minutes to their commute to take a shuttle to the Universal City Station as proposed in the DEIR. To take optimal advantage of the proximity to the MTA bus and subway station on Lankershim, these units should most logically be located on the MTA site, not miles away from it. The current location requires the proposed vehicular shuttles/jitneys or long hikes over and around to the MTA station. What efforts will be made to address this jobs:housing mismatch? Will portions of the development be constructed for individuals and families of various means? Will the new

proposed housing be constructed in such a way as to support the housing needs of various members of the community including middle and low-income families and individuals? What efforts will be made to assist employees with finding housing in the proposed development and surrounding area in order to reduce traffic? Why were residential units proposed at such an ill-suited location? If the developer wants to truly facilitate ease of access for those residents to the transportation hub, the inclusion of a riverfront walkway, especially a moving walkway, would have been a much more efficient, attractive and environmentally sound solution. Why was that not considered?

Scale of Project

2,937 town homes, condos or apartments are proposed for the portion of the current back lot to be annexed to the City of Los Angeles, yet no square footage allowances have been stipulated. As stated elsewhere in this letter, this is a suburban neighborhood, not a neighborhood of urban high rises. This portion of the site is adjacent to the single-family residences of the Hollywood Manor neighborhood. Why is the scale of the real estate development not in conformity with the existing scale and character of the surrounding neighborhoods?

Jobs

The City, County and State have gone on record regarding the fiscal hardships created by “runaway production.” Once the homes have been built, the opportunity for this back lot will be forever lost, as will any possible production uses. If this large, easily accessible historic studio back lot is sold off and replaced by housing, how will that benefit the residents of Los Angeles whose livelihood and quality of life are compromised by production leaving the city?

Traffic

The Traffic section of the DEIR is flawed and filled with inaccuracies. It fails to recognize the unique nature of the transportation network of our community. Streets are omitted and neighborhoods are left out. There is a glaring lack of accuracy in the Level of Service ratings time and time again. For instance, there is no distinction made between Cahuenga West or Cahuenga East or the portion of Cahuenga Boulevard that extends north off Lankershim Boulevard; three major thoroughfares in the area. How can the DEIR be considered valid if there has been no distinction made between these streets? Unsupported assumptions are made resulting in unsupportable conclusions. Things are dismissed cavalierly reflecting a genuine lack of understanding of how the neighborhoods surrounding Universal function. Even with these flaws, the results are still “significant and unmitigatable.” How can the City and County accept the findings in this DEIR when it does not fairly or accurately assess the current traffic conditions?

\$100 million is proposed for traffic mitigations. \$10 million of that is to go towards preparing “shovel-ready” drawings to attract supposed federal and state highway improvement funds. What guarantee is there that those funds will still be there, much less awarded once the drawings have been completed? That’s potentially \$10 million down the drain leaving the region to bear the brunt of Universal’s added traffic with no viable recourse. What guarantees can Universal provide that the preparation of the drawings will result in the construction being implemented and completed in a timely manner? If they cannot provide those assurances, what is Universal willing to provide instead to mitigate their traffic impacts on the local freeways and beyond

should funding from other sources not prove viable? \$45 million is proposed for the construction of a southbound 101-freeway slip ramp. Why is Universal proposing to build only HALF of an on- and off-ramp configuration? That supposedly leaves \$45 million approximately split for roadway and transit improvements. Universal's traffic consultant, Pat Gibson claims that only nine (9) intersections will experience significant and unavoidable impacts. We seriously question Mr. Gibson's conclusions. How can a few new traffic lights, a turn lane here and there plus some minor street widening balance an increase of over 36,000 new daily vehicle trips?

Universal's traffic consultants seem to lack an understanding of our area. As the name suggests, we reside in a mountain pass: a topographically constrained hillside community. While the 101 Freeway and Cahuenga Blvd. West run through the middle of the Pass, the majority of the roadways are small and narrow. Many streets are barely two lanes wide, enough to handle the traffic to accommodate residents and their needs, yet hardly suitable to sustain additional traffic. Some roads are only one lane, and considered substandard. Automobile traffic here functions like water; when it overflows it will seek alternate routes. They posit that if there is no simple, equivalent parallel route extant, that there cannot be any hardship to the surrounding communities if the first route becomes overloaded by their traffic. That is simply illogical and superficial. People in our neighborhood have become skilled at locating alternative routes, and if we can find them, so can other people. There is even a book available for purchase of cut-through streets in Los Angeles as well as several web sites. Some of our main cut-through streets include: Wrightwood Drive and Lane, Mulholland, Woodrow Wilson, Passmore, Oakshire, Fredonia, Broadlawn, Oak Glen, Ione, Bonnie Hill, Adina, Nichols Canyon, Outpost, Laurel Canyon, Bennett Drive and so on. Why should these perfunctory analyses be accepted if they fail to acknowledge the character of our community? How does Universal propose to address the impacts that new cut-through traffic will have on our community? What genuine neighborhood protection measures are proposed for when problems inevitably arise after initiation of any new project on this site? Can we expect the streets mentioned above to be thoroughly studied in the FEIR? Can we also anticipate additional mitigations for these aforementioned streets and routes? What benefits is Universal offering to the surrounding communities who will have to suffer and endure the 80% increase in traffic?

Universal proposes to offer jitneys, shuttles and other supposed transportation mitigations, but only for the twenty (20) year span of their project. What happens to those supposed mitigations in the twenty-first year? Is Universal absolved of any commitment or responsibility to maintain them? If they have caused the impact, why should they not be responsible for mitigating it in perpetuity?

Allusions are made to linking trip thresholds to construction phases, yet there is no clear exposition not only of those phasing thresholds but of who monitors and audits those thresholds. Who determines those thresholds? Will the community have input regarding the designated levels of those thresholds? Who will monitor thresholds once they are established? Will the community have representation on those monitoring bodies? What mechanisms will be in place to ensure that thresholds are met before development can proceed? What guarantees does the community have that those mitigations will be sufficient to balance the newly added hardships?

Bicycle Connectivity

Why isn't the construction of the LA River Bike Path section from Barham to Lankershim required as a condition of this project? Further, as a regional traffic mitigation, why not require Universal to pay for the construction of the LA River Bike Path portions if traffic can be lessened by having them provide trams using that bike path to shuttle people from Griffith Park to the Universal MTA Station?

In prior iterations, Universal submitted plans that included an interface with the LA River Bicycle Path. Those plans incorporated the security that Universal requires for its production facilities and provided a pleasant border as seen from the LA River. Currently, Universal has not incorporated those plans and instead is offering a trailhead to a bike lane on their proposed new north-south road. Universal executives have cited security issues after the 9/11 terrorist attacks as their reason for removing the LA River Bicycle Path from their plans. None of us want to invite a terrorist attack, however, what measures were used to determine that the elimination of the LA River Bike Path created less opportunity for a terrorist attack than those extant on the public streets on the Universal property: Universal Hollywood Drive, Universal Studio Blvd, Buddy Holly Drive and Hotel Drive? The tourist and recreational value of being able to bicycle from the Sepulveda dam to Long Beach far outweighs any possible risks created by allowing the public to utilize this resource. The suggested alternative of detouring up the north-south road would require users to climb a steep hill (340 ft gain in elevation) each way. Further, if one views the LA River access roads from either the Barham or Lankershim bridges, it is clear that constructing the LA River Bike Path would not seriously interfere with Universal's production abilities. At worst, it would require Technicolor to remove its temporary storage to accommodate the access road. Given the importance of the bike path to the community, why have the City and County not demanded that the LA River Bike Path be a mandatory component of the development proposal?

According to observations made during workweek rush hours, a great many of Universal Tour's trams remained in Universal's storage lot. Also, many parking places sat vacant in Griffith Park at the same times. It seems reasonable to suggest that if a shuttle ran along the bicycle path between the MTA station and Griffith Park, many drivers who currently use the Forest Lawn Drive/Barham Blvd route would choose to park their vehicles and use the LA Metro. This system would require widening the LA River Path at specifically determined locations to allow trams to pass each other and would also require the creation of waiting areas, possibly with pleasant views of the river. Why has this not been considered? Finally, what assurances do we have that the developer will pay the cost of traffic mitigation, as is customary?

Environmental Issues

The requested scale of this project is huge and the environmental demands of a development of this size are equally daunting. Air quality, noise pollution and traffic are admitted as short-term impacts. Air quality, traffic and solid waste are admitted as long-term impacts. We posit that these impacts have been grossly underestimated. How can the City and County find credible that approximately five million square feet of proposed development, and the density it creates on the site, is not inappropriate and out of scale to its environs?

Air Quality

As previously stated, the 6,500 new residents of the 2,937 units will undoubtedly have personal vehicles for their use. These vehicles will add to the air quality concerns for the area as will the vehicles of new employees and increased guest attendees. What considerations have been given to mitigating those added long term impacts as a result of these new emissions? Not only will the residents have personal vehicles, but the residences will also have emissions from HVAC as well as other utility consumption. What mitigations are proposed for those discharges?

Water

This area has a semi-arid climate. California has been experiencing a dire water shortage for many years. With water rationing currently imposed on the region, it is irresponsible to even consider adding that much new development, especially the residential component. Several years ago during the back lot fire, low water pressure was a serious issue that inhibited and exacerbated the ability to put out that fire efficiently. What specific improvements and specifications would be imposed on the property development to assure ample water supply in times of crisis?

At the 1-5-11 meeting with the Hillside Federation, Tom Smith said that DWP determines water availability, and that they have asked Universal to improve water storage capacity. Grey water is acceptable for landscaping purposes, but potable water is a completely different matter. What assurances can be provided to the community that the proposed Evolution Plan, including the new residences, will not have an adverse effect on the water supply to the surrounding neighborhoods? What actions are proposed to provide adequate and ample potable water to the site without harming its neighbors or the region? Why is native and drought tolerant landscaping not required for the entirety of the site, without exception?

Electricity/Power

The power consumption demands not only for the proposed back lot residential portion but for the entire Evolution Plan will be enormous. How will that demand be accommodated? Additionally, what back-up and augmentation systems have been proposed? What assurances do the surrounding neighborhoods have that the new demands will not adversely affect their ability to continue to power their homes and businesses at present levels and to accommodate reasonable future growth demands? What about on-site solar, wind and other self-sustaining power generating devices/systems to fill the Evolution Plan's needs? Also, if the land swap/annexation proceeds, how would any shared energy resources be divided and jointly governed/managed?

Solid Waste

Just recently there were serious protest demonstrations in Arcadia regarding the destruction of old growth groves of trees to build yet another dump/land fill. It is irresponsible to keep building and dumping without the intention of finding a sustainable solution for this type of development. If Universal wants to continue to build and develop, as they appear to have plenty of land from which to benefit financially, why not designate a portion of their own property to satisfy the solid waste disposal needs rather than burdening either the City or County with that obligation? If not that, then what mitigations have been provided to address this long-term environmental impact on the City, County and State?

Sewer

Is odor from sewer lines considered a less than significant impact? How will the significant additional flows affect stations downstream that are currently required to lessen the odor escaping from those existing lines? How many new additional stations like the one at Gardner and DeLongpre will be required to eliminate the odor from sewer lines? How much funding will be provided to the City of Los Angeles in the land transfer for the residential development to compensate for the additional services required by that residential development? Will “scrubbers,” like those currently employed Studio City to burn off excess sewage, be required to mitigate the impacts of sewage? Where will those scrubbers be placed?

Noise

Is NBC Universal excluded from the more restrictive nighttime limits of the LA County Noise Ordinance? If so and if only daytime limits apply to Universal, isn't the noise section of the DEIR completely inadequate since the difference between these limits represents a doubling of the noise level to the human ear? This reduced level of noise restriction standards will have an especially profound effect on the proposed housing element.

Shouldn't the selection of the locations upon which the noise study results are based include locations where Universal's noise output has been proven to be problematic in the past? If the locations studied are biased, aren't the DEIR noise portion and its conclusions also biased? Who, representing either the County or City of Los Angeles, has reviewed the locations studied to determine whether they are adequate to support the conclusions of the DEIR and that they represent an accurate overview of sound emissions to the general community?

The community receptor area in Table 55 for the Cahuenga Pass does not include any locations at which Universal has been cited in the past for violation of the LA County Noise Ordinance. Within that area, there is a canyon/ravine that topographically forms an acoustical funnel for noise. When coupled with the typical summer inversion layer, sound from Universal's property carries to locations on and near the intersection of Woodrow Wilson and Passmore Drives. The LA County Health Department took readings twice in the past at locations within this funnel area, and each time the amplified noise from Universal's property was both determinable and in excess of the level allowed by the LA County Noise Ordinance. The second time, then LA County Deputy District Attorney Gilbert Garcetti issued a citation to then Universal Chairman Lou Wasserman. Attached is a copy of figure 93 from the DEIR with this area identified and a copy of the first noise study.

After visiting the locations studied in the DEIR, HHC1 through HHC11, these locations can be characterized as either: 1) generally low and deep in the freeway noise, 2) around the corner from direct sound impact, 3) high and far away from Universal in an area where sound is more readily dispersed, or 4) close to Universal but totally sheltered from sound emanating from the freeway and Universal. In other words, the locations selected are biased and not representative of actual noise intrusion experienced by hillside residents. How will that be addressed and rectified in the FEIR?

Signage

The signage requested for the proposed development alludes to an urban context akin to Times Square in New York City or the Strip in Las Vegas. Such signage is not appropriate for a location whose character is largely suburban and, in some cases, rural. In the hills surrounding the proposed development many of the streets are narrow, one-lane roads that frequently terminate in open wilderness. While the proposed signage might be appropriate in locations that are primarily commercial in nature, it seems incongruous to the character of our hillside neighborhoods.

One of our particular concerns regarding signage is the request to remove the small area at the corner of Barham and Buddy Holly Drive from the Mulholland Scenic Corridor Specific Plan and to instead place it in the City Specific Plan. Universal's attorney, Maria Hoy of Latham and Watkins, confirmed that the reason behind this request is so that Universal could have the "option" to convert their current conventional billboard to a digital/electronic billboard, which would not be allowed under the Mulholland Plan. Why should Universal be allowed exemption from the Mulholland Specific Plan in order to negatively impact the visual appearance and quality of life in our neighborhood? What about this project makes it eligible for consideration for removal from an established specific plan?

We are also concerned about the impact the Lankershim Edge Sign District will have on our community. Here, they propose to add the equivalent of 14,000 sq. ft of brightly lighted electronic advertising plus supergraphic signage, or the equivalent of one double-faced plus 20 full-sized billboards. Page 139 of the Project Description 2A states that "animated, moving, programmed, flashing, neon, LCD and similar lighting displays or installations shall be permitted" in this area despite a pending city sign ordinance that would prohibit such signage in this location. Why should this project be granted the ability to establish sign districts outside the boundaries being considered by the City of Los Angeles?

Additionally, the DEIR makes the following claims related to the Scenic Corridor designation of Barham Boulevard and Forest Lawn Drive: "Barham Boulevard is designated as a Major Scenic Highway II in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan. Since the area in which Barham Boulevard travels contains views of both natural and urban elements (e.g., urban development north of the Project Site within the City of Burbank) and the Community Plan provides no indication as to why Barham Boulevard was designated as a scenic highway, it is concluded that the highway was chosen for its views of the Cahuenga Pass for southbound motorists, and the San Fernando Valley and Verdugo Mountains for northbound motorists.

And, “Forest Lawn Drive is designated as a Major Scenic Highway II in the City’s General Plan Transportation Element. As stated above, the Transportation Element describes the selection criteria for scenic highways as including natural scenic qualities in undeveloped or sparsely developed areas of the City, or urban area(s) of cultural, historical, or aesthetic value, which merit protection and enhancement. The Community Plan provides no indication as to why Forest Lawn Drive was designated as a scenic highway. Based on its surroundings, it is concluded that Forest Lawn Drive was chosen for its views when traveling east, which are of a sparsely developed area and are framed by the Santa Monica Mountains to the south and the Los Angeles River Flood Control Channel to the north.” On what basis are the assumptions made that Forest Lawn Drive is only valued for its views traveling east and Barham is valued only for its views traveling south? What are the consequences for the signage proposed at the corner of Barham and Forest Lawn Drive if the value of these scenic corridor are considered from all vantages?

Fire, Police, Sheriff, and Emergency Services

The Evolution Plan proposes to split off the back lot portion for residential development and to annex it to the City of Los Angeles. It proposes two specific plans for the existing site – the major portion representing largely the County with the studio and theme park uses, and the other in the City for the residential annexation. This annexation and splitting would involve the LA County Local Agency Formation Committee/LA LAFCO. Universal proposes to sell off the entitlements that they hope will be granted for the back lot to real estate developers to, in effect, underwrite the long-term costs of development for the proposed new County specific plan improvements. The City of Los Angeles will bear the brunt of the costs of providing utilities and services to the proposed newly annexed area, largely “in exchange” for new real estate tax revenues. How will these new tax revenues justify the costs and inconveniences to the City’s residents?

Mr. Smith stated that Universal will expand County Fire Station 51 on their property to fill the demands that their new development plans will require. Mr. Smith also stated that existing LAFD Station 76 does not have sufficient room on site to accommodate the new equipment necessary to fight high-rise fires in the proposed back lot residential area to be annexed to the City of Los Angeles. The existing neighborhoods served by Station 76 are very attached to the station and its staff and rely on its efficient operation. The current site is optimally located to provide prompt and efficient services to the present users. The neighborhoods are very reluctant to see Station 76 relocate, thereby putting existing residences and businesses in potential jeopardy from delayed emergency response services. What assurances do existing users have that a relocated station will not slow emergency response times? Will County Fire Station 51 be expanded prior to initiation of the project?

As the impetus to enlarge 76 can be attributed solely to the proposed new back lot high rises, Universal should bear the entire cost of the relocation, expansion and construction, not merely a “fair share.” Will that be the case? In lieu of that, why shouldn’t Universal bear the entire cost of a completely new, additional LAFD station? Also, no new high-rise construction should be undertaken or permits granted until such time as LAFD has the ability to fulfill its responsibilities to fight those potential high-rise fires whether through an additional station or a relocated, expanded station. Will that be the case?

Given the state of our current economy, city-, county-, state-, and nationwide budgets and services are being cut on a daily basis. To add to the burden of our diminishing security forces is irresponsible and puts the citizenry in jeopardy. Currently, the North Hollywood LAPD station serves our Cahuenga Pass neighborhood and response time is slow. Our association has unsuccessfully enquired about changing jurisdiction to the Hollywood LAPD station to improve response time. To add the proposed 2,937 residential back lot units to the already overburdened NoHo LAPD station will inevitably further delay response times. Should the land swap/annexation proceed, what guarantees will Universal provide regarding timely police protection to our neighborhood and to the neighboring communities? Will Universal pledge to fund, in perpetuity, the salaries of additional police officers as well as the facilities, equipment and support staff required for them to properly perform their jobs?

Schools

Mr. Smith cited approximately 6,500 new residents as occupants of the proposed housing. Undoubtedly some of them will include children in need of schooling as well as transportation to and from those schools. He also stated that there was sufficient Middle and High School capacity within the existing LAUSD system, but a lack of Elementary School spaces. Valley View Elementary School is a very small neighborhood school closest to the Universal lot. What does Universal propose to do to help Valley View Elementary and facilitate construction of new primary schools to educate the children living in their proposed residential development?

Parks

An approximately 35 acre linear public park with designated parking available for non-resident users has been proposed, theoretically under the purview of the Home Owners' Association of the new residences. If it is to be under the control of the HOA, why are there no assurances that it will remain open to the general public in perpetuity? What commitments are there that the HOA will not only maintain any new parks on the Universal property in perpetuity but also ensure that they will always be accessible to all Los Angeles residents? Wouldn't it be more sensible to deed this land over to the city, county or other public agency to ensure its protection and accessibility in perpetuity? What guarantees will Universal or its assignees provide that these parks will remain in perpetuity as parks and not be bulldozed for other for-profit purposes?

Conclusion

As evidenced by the length of our response, the Board of Directors of the CPPOA, on behalf of its membership, has significant concerns regarding the Evolution Plan. In particular, we continue to assert that the Evolution Plan and the Metro Universal Plan should be considered concurrently for the purposes of determining the environmental impacts this project will have on the character and quality of life in our community.

We identified what we believe to be significant flaws and omissions in the DEIR as well as inadequate mitigations based on faulty and misinformed assumptions about our neighborhood. We respectfully ask that development of this project take into consideration the points we raise here and that future iterations of this proposal are inclusive of the opinions and beliefs of members of our community.

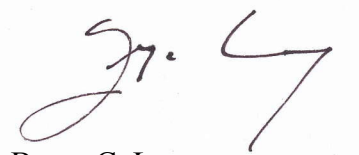
We find the widespread “significant and unavoidable impacts” cited in the DEIR unacceptable, particularly in a period of increasing calls for sustainable development. As it is currently presented, our organization cannot support this project.

I want to thank members of my board: Dan Bernstein, Florence Blecher, Eryk Casemiro, Stephen Goldfisher, Judy Marlin, Patricia Weber and our immediate past president, Krista Michaels, for their dedication to this process. We thank the following organizations for their efforts on behalf of our community and support their views on this proposal:

- Campo de Cahuenga Historical Memorial Association
- Coalition to Ban Billboard Blight
- Communities United for Smart Growth
- Friends of the Los Angeles River

As President of the Cahuenga Pass Property Owners’ Association, I thank you for your time. Our organization welcomes the opportunity to work with you and the applicant to create a socially, economically, and ecologically sustainable vision for this site and our community.

Respectfully,



Bryce C. Lowery
President, Cahuenga Pass Property Owners’ Association
bryce_lowery@yahoo.com

cc: Michael LoGrande, Director, City of Los Angeles Department of City Planning
Richard J. Bruckner, Director, County of Los Angeles Department of Regional Planning
Kim Szalay, County of Los Angeles Department of Regional Planning
Tom LaBonge, Los Angeles City Councilmember 4th District
Renee Weitzer, Chief of Land Use Planning
Doug Mensman, Planning Deputy
Zev Yaroslavsky, Supervisor Los Angeles County 3rd District
Ben Saltsman, Planning Deputy
Antonio Villaraigosa, Mayor, City of Los Angeles
Ed Reyes, Councilmember, City of Los Angeles
Paul Krekorian, Councilmember, City of Los Angeles
Dennis P. Zine, Councilmember, City of Los Angeles
Paul Koretz, Councilmember, City of Los Angeles
Tony Cardenas, Councilmember, City of Los Angeles
Richard Alarcon, Councilmember, City of Los Angeles
Bernard Parks, Councilmember, City of Los Angeles
Jan Perry, Councilmember, City of Los Angeles
Herb J. Wesson, Jr., Councilmember, City of Los Angeles
Bill Rosendahl, Councilmember, City of Los Angeles
Greig Smith, Councilmember, City of Los Angeles
Eric Garcetti, Councilmember, City of Los Angeles
Jose Huizar, Councilmember, City of Los Angeles
Janice Hahn, Councilmember, City of Los Angeles
Gloria Molina, Supervisor, Los Angeles County
Mark Ridley Thomas, Supervisor, Los Angeles County
Don Knabe, Supervisor, Los Angeles County
Michael D. Antonovich, Supervisor, Los Angeles County