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Ms. Emily Dwyer
Planning Assistant
Department of City Planning
Plan Implementation Division – Major Projects
200 Spring Street, Rm. 750
Los Angeles, CA 90012

August 16, 2013

Re: Harvard-Westlake School Parking Improvement Plan,
ENV-2013-1950-EAF

Beachwood Canyon Neighborhood
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Bel Air Ridge Association
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland Homeowners
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
Lookout Mountain Alliance
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Oaks Homeowners Assn.
Outpost Estates Homeowners
Pacific Palisades Residents Assn.
Residents of Beverly Glen
Roscomare Valley Assn.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

Dear Ms. Dwyer:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 41 homeowner and residents associations spanning the Santa Monica Mountains, from Pacific Palisades to Mt. Washington. The Federation's mission is to protect the property and quality of life of its over 200,000 constituents and to conserve the natural habitat and appearance of the hillside and mountain areas in which they live.

The Federation considered the Harvard-Westlake School's development project at its July 2013 meeting. The Board was concerned about many aspects of the project, especially the plan to develop property to the west of Coldwater Canyon Avenue. The Board passed a motion to request that the Department of City Planning, in preparing the project's Draft EIR, consider only alternatives that would confine any development to the east side of Coldwater Canyon, leaving intact the designated "Open Space" and low-density residentially-zoned property to the west of Coldwater.

The most problematic aspects of the project are (1) the construction of a three-story parking structure on the west side of Coldwater Canyon; (2) the athletic field on top of the proposed parking structure, which will be illuminated with field lights, surrounded by a fence; and (3) a bridge over Coldwater Canyon Avenue connecting the parking structure on the west side with the main campus on the east side of Coldwater Canyon (the "Sky Bridge").

The proposed three-story, 750-car parking structure with an illuminated and fenced-in athletic field on what is currently designated "Desirable Open Space" is grossly out of character with the natural hillside environment. And the proposed Sky Bridge would not only destroy the character of the hillside environment, it would set a terrible precedent for all canyon roads within the Santa Monica Mountains. With the three-story parking structure and a Sky Bridge over Coldwater Canyon, which the City has identified as a "Scenic Highway," Harvard-Westlake proposes nothing less than the urbanization of one of the Santa Monica Mountains' great and historically significant canyon roads.

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The proposed structures and nighttime illumination on the west side of Coldwater would also have an adverse impact on wildlife habitats and corridors. At the very least, the Draft EIR must include an alternative that would confine development to the east side of Coldwater—maintaining the integrity of the Open Space and single-family residentially zoned land on the west side of Coldwater.

The Federation is also concerned that Harvard-Westlake has expressed its intention to bypass the Charter-mandated procedures for seeking variances. The project calls for variances (and exceptions) from, among other requirements, zoning laws, setback limits, grading restrictions, excavation limits, and airspace and height restrictions. Variances can *only* be authorized through the formal variance process and require detailed findings establishing that the statutory requirements have been satisfied. The variance process and mandated findings cannot be avoided by utilizing a CUP process to impose less stringent requirements. The purpose of a CUP is merely to impose conditions on a proposed use of land that is not otherwise permitted within the zone and those conditions must render the otherwise nonconforming use consistent with the applicable zoning restrictions. Contrary to the suggestion of Harvard-Westlake's representatives, a CUP cannot be used to grant the equivalent of a variance outside the mandated variance procedures.

In sum, the proposed development project, with the large and intrusive parking structure/athletic field construction on the west side of Coldwater Canyon and a Sky Bridge traversing Coldwater Canyon Avenue would have a devastating impact on this historic section of the Santa Monica Mountains and set a dangerous and unwelcome precedent for future hillside development. The Federation strongly urges the Department of City Planning to consider only alternatives that would confine the proposed development to the east side of Coldwater Canyon, which would be far less impactful, destructive and disruptive to the character of the hillsides.

Sincerely,

Marian Dodge

Marian Dodge

cc:

Paul Krekorian, Councilmember, CD-2
Michael LoGrande, Director, Department of City Planning
Studio City Neighborhood Council
Santa Monica Mountains Conservancy