

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



September 23, 2013

Ms. Emily Dwyer  
City of Los Angeles Planning Department  
200 N. Spring Street, Room 750  
Los Angeles, California 90012

**Harvard-Westlake Parking Improvement Plan  
Notice of Preparation Comments  
ENV-2013-1950-EAF**

Dear Ms. Dwyer:

Santa Monica Mountains Conservancy offers the following comments on the Harvard-Westlake School parking structure project proposed next to Mountains Recreation and Conservation Authority (MRCA) open space.

The proposed parking structure and bridge is totally incongruous with the subject land and with the Santa Monica Mountains terrain. The proposed structure would adversely alter the feel and appearance of a primary gateway to the Santa Monica Mountains from the San Fernando Valley. Our review of other commentors letters reveals multiple potential alternative projects within the campus ownership to increase parking, to avoid the loss of over a hundred protected native trees, and to truck over 125,000 cubic yards of dirt 35 miles to a landfill in the San Gabriel Mountains. Rarely are big hillside excavations as surgical and tidy as proposed on paper including in Environmental Impact Reports.

The Initial Study does not make even a moderately strong case for either the need for more parking or playing field space. There must be other factors driving the need to locate and construct such a massive structure across the street from the school. We urge the City and the school to look at numerous project alternatives that make use of the subject parcel employing low, stair-stepped buildings with some subterranean parking. A project should work with the subject land the surrounding lands and not be antithetical to them.

Employee housing, temporary bus parking, and administrative offices are uses that do not need frequent crossings of Coldwater Canyon Avenue. Tall campus buildings (including parking structures) should not sit at the foot of the mountains on the west side of Coldwater Canyon Drive. Any building site within the campus east of Coldwater Canyon Ms. Emily

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Avenue would have substantially less visual and ecological impacts. The proposed 13-foot-wide bridge could then be eliminated. The school has an existing traffic light at the location. The light timing and cross walk features could be maximized for a safe, high quality crossing.

The loss (including temporary and indirect impacts) of an acre of oak-walnut woodland connected to core habitat in the eastern Santa Monica Mountains is an unavoidable significant adverse biological impact. It has been over 28 years since any project in the Santa Monica Mountains east of the 405 freeway has successfully resulted in the elimination of that much north slope woodland. The environmental document must address the rarity of California black walnut woodland and how unique the community is above Studio City westward to Sherman Oaks.

The direct, and long-term indirect, adverse biological impacts of the structure would extend many feet beyond the back retaining walls that define its structural footprint. Some perimeter brush clearance would be required, and a perimeter band of new irrigated landscaping is shown on the plans. Because of a broad, deep cut into bedrock around the structure, the subsurface hydrological regime that sustains the surrounding woodland would suffer difficult-to-assess, adverse biological impacts that could take years to be noticeable.

In addition, the remoteness value of surrounding habitat on both MRCA land and school land for human-intolerant mammal and bird species would permanently decline. The ripple effect of habitat degradation impacts would pulse outwards from the proposed structure.

As proposed, the project's direct ecological impacts would contact the brush clearance disturbance zones of the houses over the ridgeline to the west. The result would be a multi-acre disturbance zone at the northern end of a large habitat block that is accessible to every animal species that inhabits the Santa Monica Mountains east of the 405 freeway.

A much reduced project footprint—such as with half the depth and three-quarters the proposed length—would pull the majority of the project into pre-disturbed habitat and not result in unavoidable significant adverse ecological impacts.

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Some alternatives considered in the Environmental Impact Report, should include the permanent deed restricting of all the remaining school-owned open space surrounding the proposed development area as a mitigation measure. That would preclude any future habitat impacts or wildlife movement blocking fencing. Conservation easements are a superior protection mechanism to deed restrictions if they can be obtained from the applicant.

Because the proposed project would result in unavoidable significant adverse biological and visual impacts, the City must adopt a statement of overriding considerations to approve the project. Without a well demonstrated need for so much additional parking on the campus, the Conservancy does not see how the City can make those findings for a private institution. We believe that an alternatives analysis and constraints analysis that puts all of the campus ownership into play can produce a reduced scope development located west of Coldwater Canyon Avenue that protects sensitive habitat and an important frequently viewed viewshed.

Please direct any questions to Paul Edelman of our staff at 310-589-3200 ext. 128 or at the above letterhead address.

Sincerely,

IRMA MUÑOZ  
Chairperson