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November 4, 2013

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

**Harvard-Westlake Parking Improvement Plan
Draft Environmental Impact Report Comments
ENV-2013-1950-EAF (SCH NO. 2013041033)**

Dear Ms. Kitching:

The Santa Monica Mountains Conservancy (Conservancy) provides the following comments on the above-referenced Draft Environmental Impact Report (DEIR). Harvard-Westlake School lies at a unique wooded gateway to the Santa Monica Mountains. Coldwater Canyon Avenue gently climbs above the San Fernando Valley floor and transitions into hillsides with native walnut trees and twisting streets. Harvard-Westlake School in its current form is part of that mountain transition into a scenic corridor enjoyed daily by thousands of motorists.

The *Santa Monica Mountains Comprehensive Plan* is anchored by the premise of let the land dictate the use.

If constructed, the proposed project, and every single DEIR development alternative (except the Existing Zoning - Four Homes alternative) would produce structures with unavoidable significant adverse visual impacts to the Coldwater Canyon Avenue viewshed. Even the Reduced Development Alternative (Two-Story Structure, No Athletic Field, No Pedestrian Bridge) would result in a significant visual impact on scenic roadway.

Across the board, unavoidable significant visual impacts for all DEIR development alternatives is a strong indication that either a major component of the proposed project objectives does not fit within any area owned by the school, or that the range of alternatives is inadequate to avoid such a level of visual impact.

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An athletic field that needs to be almost 350-feet-long and 195-feet-wide cannot fit into even moderately steep hillside terrain without going to extraordinary means of land alteration and structural support (retaining walls over 70-feet-tall). There appears to be no room for such a new athletic field on the east side of Coldwater Canyon Avenue. There is no way to put an athletic field on the west side without unavoidable significant adverse visual and biological impacts. The Conservancy urges the school to consider a revised project objective for new athletic field practice areas. The Conservancy suggests the exploration of small practice fields. The proposed option of significantly degrading a major public scenic resource for limited, private athletic practice uses is not in the public interest.

Parking can be broken into smaller sub-units and integrated with other structures. For example, a considerable-sized, not visually overwhelming parking structure can be built on the subject development proposal site with at least two underground levels. Many combinations could achieve the desired level of parking. Shuttle buses can also be used to ferry students from one side of Coldwater Canyon Avenue to the other for safety considerations.

For example, the DEIR states that a potential 50-year-flood and a year-round high groundwater table make such excavation impossible. That impossibility may certainly be true for the campus property on the east side of Coldwater Canyon Avenue but not for the west side. Google Earth elevations show that the proposed development area alone is 20-30 feet in elevation above Coldwater Canyon Avenue. The school is an additional 5-15 feet lower than the road. Nothing visible on the surface of the west side shows any indication of near surface groundwater. We challenge these DEIR stated constraints to underground construction west of Coldwater Canyon Avenue.

We urge the school to explore constructive use of this land but in an architectural manner that complements the scenic corridor. Shy of such concerted exploration, the Conservancy remains opposed to the project and all of the DEIR alternatives except the Existing Zoning - Four Homes alternative. The school's need for an additional athletic field area must not be solved on the back of a Santa Monica Mountain's scenic corridor or on a high quality walnut woodland habitat block mostly comprised of permanently protected public land.

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As addressed in the Conservancy's September 23, 2013 letter on the project, the subject area can be developed without significant visual and ecological impacts with stair stepped pad designs often espoused by the Mulholland Scenic Parkway Design Review Board. Ecological impacts can be significantly reduced by pulling the project out of the deeper reaches of the hillside to where the existing historic disturbance footprint is generally located.

To further illustrate the incongruity of the proposed project with the hillside constraints, the height of the required retaining walls need to be examined. On the western boundary they range from 50 to 87 feet in height. On the northern and southern boundaries the retaining walls (all hundreds of feet long) range from 30 to 70 and from 20 to 60 feet, respectively.

A hillside project adjacent to Mountains Recreation and Conservation Authority (MRCA) open space on two sides that disturbs at least 60 percent of the subject parcel is not a case of a project working with the land. That equation also does not factor in additional fire department required brush clearance zones. The proposed project would reduce rainwater infiltration into the water table and unnecessarily add to the flood control load of the over taxed Los Angeles River channel. The DEIR states California black walnuts do not respond well to changed hydrologic changes in their root zones. However the proposed project would create a slice into the wooded mountainside over 700 feet long at a depth ranging from 20 to 87 feet. The DEIR is deficient for not addressing how both walnuts and oaks could be adversely affected from this down slope headcutting for retaining walls, particularly for trees not counted as directly impacted by immediate construction impact into the root zones and canopy areas.

The DEIR mitigation for the loss of over a hundred native protected trees is deficient. The tree planting mitigation plan calls for a over one third of the over 416 replacement trees to be located within the 200 foot fuel modification zones of adjacent, offsite residences. The ecological value of trees in fuel modification zones is substantially inferior to those in natural woodland settings. In addition there is a significant native mitigation tree planting zone proposed in the intervening area between the large parking structure and Coldwater Canyon Avenue. The ecological value of trees planted in such a proposed area would be significantly diminished. In short, the DEIR falls far short of mitigating the loss of native trees and native woodland.

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A further deficiency of the mitigation planting plan is to plant mostly oaks to replace the removed walnuts based on the rationale that the walnuts all have a fatal canker disease. The Conservancy questions whether this untested wholesale tree species changeover is ecologically sound. Plus the use of scrub oaks to replace walnuts on soils and aspects that produced phenomenal looking walnut woodland in the DEIR tree report is not justified scientifically.

If the City moves forward with one of the large project alternatives, we urge that the school be required to permanently protect over 50 acres of habitat in the Santa Monica Mountains between the 101 and 405 freeways prior to beginning construction. At least 10 of those acres should be native California black walnut woodland. At least 25 acres should be fee simple open space transferred to a public agency and the remainder must be protected by highly restrictive conservation easements granted to public agencies. This level of permanent offsite habitat, watershed and viewshed protection is commensurate with the combined insufficiently mitigated project impacts.

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

Sincerely,

Irma Munoz
Chairperson