

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



PRESIDENT
Charley Mims
CHAIR
Marian Dodge
VICE PRESIDENTS
Mark Stratton
Jamie Hall
SECRETARIES
Julie Kremkus
Robin Greenberg
TREASURER
Don Andres

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Bundy Canyon Assn.
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin/Hollywood West Res.
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mountaingate
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

CHAIRS EMERITI
Shirley Cohen
Jerome C. Daniel
Patricia Bell Hearst
Alan Kishbaugh
Steve Twining
CHAIRS IN MEMORIAM
Brian Moore
Gordon Murley
Polly Ward

Kimberly Henry
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012
Kimberly.Henry@lacity.org

May 10, 2022

Re: **ENV-2020-1512-EIR**
Harvard-Westlake River Park Project

Dear Ms. Henry:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 46 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains, including the Studio City Residents Association. The Federation's mission is to protect the property and the quality of life of the residents of the Santa Monica Mountains and other hillside areas of Los Angeles and its environs, and to encourage and promote those policies and programs which will best preserve the natural topography and wildlife and of the mountains and hillside for the benefit of all the people of Los Angeles. The Federation voted to oppose the proposed Harvard-Westlake River Park Project at its April 19, 2022 meeting for the following reasons:

The Harvard-Westlake River Park Project would transform Weddington Golf & Tennis – 17 acres of heavily utilized, river-adjacent and heavily canopied, open space – enjoyed by the public for nearly 70 years – into a gigantic and intrusive Sports Event Facility for Harvard-Westlake, a private high school. Harvard-Westlake would continue to occupy their 22-acre campus facility in Studio City, located 0.6 miles away from the project site.

One look at the plan for the proposed facility leaves one asking, “Where is the park?”

With four “arenas” – two full size sports fields, one Olympic-size pool, and an 80,249-square foot gym, each with spectator bleachers and 45, up to 80-foot-tall field lights, there is simply no room left for a park. As environmentalists and advocates of open space, we do not believe a narrow track around a walled facility and interstitial bits of space between venues is an appropriate trade-off for the public recreational facility that exists today. The adjacent Zev Yaroslavsky Los Angeles River Greenway would remain, but that is a public asset and should not be appropriated by reference.

Impacts of the potential loss of the existing recreational, green space would be broadly felt throughout the Valley. The loss of 17 acres of river-adjacent, forested, open space would eliminate recreational opportunities for thousands if replaced by this private sports event facility. The opportunity to create an environmentally superior, public LA River recreational facility with aquifer recharging would be irrevocably lost. Living with the reality of climate change emergency, destruction of living green space and hundreds of mature trees is something we can ill afford.

Impacts on residents in Los Angeles would be stunning. The loss of Weddington Golf and Tennis impacts not only the residents of Studio City but residents throughout the city who lack access to green open space. Local residents established Save LA River Open Space which developed a plan over ten years ago that would have created the LA River Natural River Park to capture stormwater and clean contaminated run-off from city streets. It would have truly been a park for all and complemented the LA River Revitalization plan.

The elimination of trees and wildlife and the excavation of 250,000 cubic yards of soil would leave a 21-foot-deep pit – a barren wasteland in the heart of Studio City. Neighbors would immediately experience a heat island effect from the construction site, as well as years of exposure to dangerous dust, harmful GHGs, particulates and contaminants, along with constant noise and vibration during the 30-plus month construction period. Residents would be exposed to safety hazards, including dangerous traffic, 300-plus daily haul trucks on neighborhood streets included in the Vision Zero HIN (high incidence network). During operation, the Project would bring continued unacceptable levels of noise, light, air quality contaminants, and runoff from artificial turf that would introduce new “forever chemicals,” PFAS, to surrounding neighborhoods and the River. Traffic would remain congested and dangerous in all adjacent neighborhoods. Vehicle trips would be vastly increased and traffic made dangerous for drivers, cyclists, and pedestrians, due to the unnecessary addition of 503 subterranean parking spaces, along with 29 surface parking spots.

Wildlife, from insects to mammals, currently living on the property, would be lost, destroyed, or displaced. Friends of Griffith Park’s Raptor Study has identified a Cooper’s hawk at Weddington. Opportunities for recreation would vanish. Health benefits attributable to exposure to natural green space, including better physical and mental health, general well-being, and even increased longevity, would instantly disappear.

Impacts to hillside residents living in the foothills of the Santa Monica Mountains, just south of the Project, would experience special impacts including Aesthetics and Noise: Aesthetics would be degraded. Views of forested green space would be replaced by artificial turf and brightly lit fields, all with bleachers, and glare from 45 light poles up to 80-feet high, many directed toward hillsides. This light intrusion is detrimental to hillside wildlife, disrupts connectivity and interferes with migration patterns.

Noise from practice and frequent events and noise effects such as echo, exacerbate impacts to hillside residents. The public address system would be directed to the south, toward hillsides. These neighbors are already experiencing debilitating noise from well-documented relocated flight paths from BUR and VNY airports, which was not considered in DEIR as a cumulative noise impact. Health impacts from excessive noise are well-documented and include heart disease, and all stress/inflammation related disease, including Alzheimer’s. A comprehensive Health Assessment, including these noise impacts, must be included in a revised and recirculated RDEIR.

Alternatives presented in the DEIR are insufficient and do not represent an earnest attempt to weigh the concerns of the community with the desires of Applicant, Harvard-Westlake. There is no Alternative that removes any one of the four “arenas” – two fields, pool, and gym. There is no Alternative that eliminates or meaningfully reduces parking. The Project has exploded far beyond the initial concept into an oversized, disruptive public nuisance that will destroy quality of life for far too many.

The Conditional Use Permit, it must be made comprehensive to include both campuses – Coldwater Canyon and the Harvard-Westlake River Park, to prevent constant shifting of operations. The operations of both facilities would be undeniably linked. If this project is approved the School must deliver a master plan to the City and agree to a moratorium on growth for 20 years.

Alternatives 2, 3, and 4 all would eliminate the stormwater capture and reuse system. Stormwater capture and reuse is the only environmentally friendly aspect of the Applicant's entire proposal. To consider eliminating it is unconscionable and flies in the face of the reality of shrinking water supplies for California. We need to capture every drop of water we can.

Given the lack of reasonable alternatives proposed by the Applicant, the only option that is environmentally superior is Alternative 1 - No Project. However the Applicant adds that "The current Weddington Golf and Tennis facility would discontinue operation." That is simply mean spirited. It demonstrates the Applicant's lack of concern for the community. The loss of natural resources to the entire region who have relied on Weddington for decades, leads to the conclusion that this project as proposed is indefensibly disruptive and must be rejected.

The Hillside Federation strongly urges the Department of City Planning to reject outright the Harvard-Westlake River Park Project as currently proposed.

Sincerely,

A handwritten signature in cursive script that reads "Charley Mims".

Charley Mims
President

cc: Councilmember Nithya Raman