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Tim Fargo, City Planner
6262 Van Nuys Blvd., Room 430
Los Angeles, CA 91401

April 5, 2022

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.

Re: Curtis School Master Plan – OPPOSE

CPC-2020-1086-SPE-DRB-SPP-MSP-ZAD-SPR; CPC-1989-763-CU-PA2
ENV-2017-3972-MND

Dear Tim Fargo:

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. Our mission is to encourage and promote policies and programs aimed at preserving the natural topography and wildlife of the mountains and hillsides, allowing for their safe enjoyment by all the people of Los Angeles, and maintaining the health and safety of our residential communities.

The Curtis Master Plan proposes to nearly double the square footage of its built campus (from 70,000 to 130,000 square feet), enlarging and reconfiguring the footprint in a way that would require over 115,000 cubic yards of grading and 75,700 cubic yards of soil export. This grading is in gross excess of the 3,200 cubic yards of grading allowed by the BHO. It is also a violation of the original 1980 and 1990 grants.

One of the challenges in evaluating this project is the loss or obscuring of institutional memory about the origins of Curtis School. The school had to submit its original project to City Council three times, each time reducing the size and scale of the request in order to gain final approval. Piper Tech (the City's document archives) has files that would fill in the blanks, but a new generation of City Planners is, understandably, not familiar with these materials, which is unfortunate because these are not just random historic trivia. They actually have tremendous ongoing significance for Curtis School and its project, today and into the future.

For Curtis to receive its original approvals to build out its campus, **the City required the preservation of 80% of the property as open space.** To this end, Curtis had to design and re-design its project. The consolidation of the various athletic playing fields, which the current proposal now wants to "unstack", was not just a clever design feature. It was a dual **mitigation**, 1) to ensure that the playing fields would take up less precious open space and 2) to cut down on the necessary grading. In addition, Curtis was required to

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Brian Moore
Gordon Murley
Polly Ward

build a berm, which the current proposal intends to cut away. But this berm also served a twofold **mitigating purpose**: 1) to ensure there would be no visibility of the built campus from Mulholland and 2) to eliminate soil having to be exported from the site.

Curtis has claimed before that they have some kind of “grading credit” left over from the original project. This is not true. They built out the earlier project and used up the grading that was allowed for that site plan (Exhibit A-4). There is nothing left over.

Also in the original grant, the build-out of public hiking trail elements was required as a further **mitigation**. The school has its explanations for why this build-out never happened. What is not explained is why they have never (to this day) proposed any alternative mitigation.

This current proposal is a big build-out and intensification of use, with the potential for serious impacts to the community and the environment. The most obvious impact is, of course, traffic, which is already at an absolute tipping point. The most concerning and potentially deadly impact may be the increase in emergency response times combined with increased opportunities for wildfires in what is already a Very High Fire Hazard Severity Zone. And of course there are the impacts on our native wildlife and native habitat, which are so vital and so endangered.

As noted above, Curtis is almost doubling its facilities, and although the school is not currently asking for an increase in its enrollment cap, they do propose adding 50 new faculty and staff to the current number (68), which is a significant increase, for a total of 118. This represents a major expansion and positions Curtis to increase enrollment at some future date. This is a strategy that has been employed by many of the institutions on Mulholland, and there is a name for it – *piecemealing*. As regards the new facilities Curtis proposes to add, the expanded performing arts and athletic facilities suggest increased events drawing in families and friends during and in all likelihood after school hours as well, creating more traffic, greater density, further intensification of use, and fewer hours of quiet enjoyment for residents, recreationalists, wildlife, etc. Curtis is also asking for a height exception for the gymnasium, which will set a significant negative precedent for the Corridor. They have yet to make a convincing case as to why such a deviation from code is necessary. (Research shows that comparable elementary school gymnasiums do not require a 37 foot ceiling.) Curtis is asking for other deviations from code for the retaining walls and excessive grading and exportation of soil, largely a byproduct of the plan to swap out the athletic field, currently located on top of the prominent ridge, with the parking lot below.

This is not an “upgrade” of its current plan (as Curtis claims) but, for all intents and purposes, an entirely new project. It proposes a number of significant changes to the Campus, violating the spirit and required mitigations of the original grant, violating/asking for numerous exceptions from the code, the BHO, etc., and potentially negatively impacting the Mulholland community in ways that the MND does not begin to contemplate. If approved, this plan would put a nail in the coffin of the preservation of open space which was integral to the original 1980 and 1990 approvals – doing away with required protections and mitigations (not even acknowledging them in any serious way) – and offering *nothing in return*. The Santa Monica Mountains Conservancy has repeatedly offered to work with Curtis to ensure preservation of a very important wildlife corridor, but (even though the school mascot is a puma!), they have not embraced this opportunity to collaborate in any meaningful way.

Further, Curtis has not taken advantage of the expertise of the Mulholland Design Review Board, whose architects and landscape designer have successfully worked on master plans for other schools.

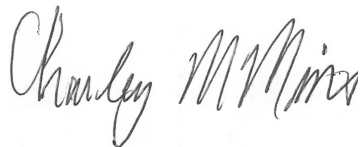
An MND is not the appropriate level of environmental review for a project that proposes changes of such significance. An EIR is required. Harvard-Westlake, Archer, and Mount St Mary's were all required to do EIRs for their buildouts. Curtis must do the same.

As noted in our letter of October 24, 2021, the following list of deficiencies in the Curtis MND necessitate a full Environmental Impact Report for this project:

- 1) Improper project description
- 2) Lack of disclosure/analysis of potential significant negative impacts
- 3) Inadequate growth inducing impacts analysis
- 4) Inadequate cumulative impacts analysis
- 5) Lack of analysis of continuing growth on the Mulholland Institutional Corridor without corresponding infrastructure improvements
- 6) Lack of analysis of recent proliferation of wildfires; including lack of detailed safety and evacuation studies and roadway capacity studies
- 7) Inadequate analysis of the major wildlife corridor along Mulholland Institutional Corridor, confirmed by recent studies and identification of mountain lions as a species of special concern
- 8) Failure to disclose and address previous unrealized mitigation measures (the Core Trail condition)

The Hillside Federation asks the City to send Curtis back to conduct a full EIR.

Sincerely,

A handwritten signature in black ink that reads "Charley Mims". The signature is written in a cursive, flowing style.

Charley Mims

cc: Courtney Yellen, LA City Planning
Mashaal Majid, CD4