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Councilmember Katy Yaroslavsky
Councilmember.Yaroslavsky@lacity.org
via email

May 27, 2023

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
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.
Friends of Walnut Canyon
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kage 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
Sunshine Hills Residents Assn.
Tarzana POA
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

Re: EF Education First Project – SUPPORT

Dear Councilmember Yaroslavsky:

The Hillside Federation, which celebrated its 70th anniversary last year, represents 47 resident and homeowner associations with 250,000 constituents across 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.

At its May 2023 meeting, the Federation voted unanimously to support the EF Education First purchase of the American Jewish University (AJU) campus on the Mulholland Institutional Corridor and the establishment of an International Language School on that campus with a new Conditional Use Permit (CUP).

The Federation has been dealing with the Mulholland Corridor institutions and the revolving door of piecemeal applications and approvals for many decades. Its members have experienced firsthand the negative impacts – individual and cumulative – of countless institutional projects. Long ago this sensitive wildland-urban area passed its tipping point, leading the Federation to adopt, in 2018, a policy opposing further intensification of use on the Institutional Corridor.

The EF project does not present intensification of use. On the contrary, EF is actually rolling back the intensity of uses which were permitted to AJU and will further reduce impacts on the *entire* Corridor by a number of strategies, many of which have already been tested and proven effective at other of their campuses.

In evaluating a project like this one, the Hillside Federation looks at whether the project:

1. is consistent with zoning and uses in the area
2. minimizes negative impacts on the community
3. minimizes negative impacts on the environment
4. offers feasible, enforceable mitigations and conditions (and also shows a willingness on the part of the applicant to work with the community)
5. follows proper City process, including a complete application seeking the correct entitlements and level of environmental review

EF fulfills every requirement on this list.

1. **EF's project is consistent with zoning and uses in the Institutional Corridor/Scenic Parkway.** EF is a reputable educational institution (whether for profit or not-for-profit). It actually de-intensifies uses from what is currently deemed, in the AJU CUP, compatible with the low-density, residentially-zoned Scenic Parkway. No other institution or enterprise, to our knowledge, has ever sought a reduction from current approved uses.
2. **EF's project minimizes negative impacts on the community.** Given that traffic and parking are such major concerns on the Institutional Corridor and its environs, EF offers the following to reduce traffic and improve flow:
 - lowering overall enrollment
 - increasing the percentage of students who board at the school
 - shuttling those who live with host families to and from campus in accordance with a carefully managed shuttle traffic plan
 - prohibiting students from owning a car or driving/being driven to or from campus
 - redesigning the school's entrance to get vehicles off Casiano Road and Mulholland Drive

In addition, EF maintains a closed campus and has committed to *no outside events*, except for a parking and soccer field sharing arrangement with the Wise Temple and School across the street (in order to keep Wise students from having to travel farther to use a playing field and to prevent congregants and other visitors from parking in the residential neighborhood).

In keeping with the closed campus policy, there will be no extracurricular activities, no special events or leasing of facilities. This is completely unprecedented on the Corridor.

The closed campus arrangement is also far more secure for both the school and the community than what is currently in place.

3. **EF's project minimizes negative impacts on the environment.** EF is preserving all existing open space on the property, working with the Santa Monica Mountains Conservancy to protect wildlife habitat and migration corridors. And they are working closely with the Los Angeles Fire Department (LAFD), allowing the campus to be used as an LAFD Command Center in emergency situations, which will be a benefit to the whole community.

Rather than tearing down existing structures and rebuilding the campus as other institutions/buyers would have likely done (requiring massive grading and hauling), EF is re-using existing buildings with some interior modifications, including much needed safety upgrades (most important bringing the buildings up to current fire code).

4. EF's project offers feasible, enforceable mitigations and conditions. EF's representatives are proactively looking for ways to solve problems before they occur. EF has shown a level of transparency and a desire to partner with the residential community that is frankly unheard of among institutions on the Corridor. Early in the process, EF began communicating with community members, asking for their input and making thoughtful and substantive changes to the project in a good faith effort to satisfy neighbors' concerns. Most important, they invited stakeholders to give input into the conditions for their new Conditional Use Permit.

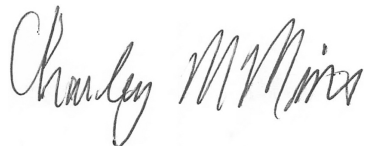
5. EF follows proper City process. EF's representatives have worked hard to familiarize themselves with and follow correct process, reaching out to relevant City agencies and the neighborhood council, dotting every *i* and crossing every *t*.

The Hillside Federation has consistently advocated to protect the safety and quality of life of the residential neighborhoods, as well as the character and natural resources of our mountains. All too often that has meant going to battle with the institutions on the Corridor and throughout the hillsides, because too often the institutions, including those characterized as *not for profit*, seem driven to develop every square inch of their properties in order to maximize profitability – what a church representative once referred to as their “best and highest use” – without regard to negative community and environmental impacts or long term sustainability.

The Hillside Federation has dealt with a lot of institutions and a lot of institutional projects. EF is different. Just as it is important to take a stand against inappropriate and highly impactful projects like the Bulgari Hotel in Benedict Canyon, we believe it is important to support good projects when they come along. Here is an institution that is doing the right thing – the environmentally correct, process appropriate, community responsive thing – without prompting!

We support this project and can only hope it will set new positive precedents for the institutions on the Corridor.

Respectfully,

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

Charley Mims

cc: dylan.sittig@lacity.org
cpc@lacity.org
Katie.Knudson@lacity.org
jarrett.thompson@lacity.org

A Few Positions Taken by the Hillside Federation in the Past 20 Years:

2003-2004: the Federation opposed the Bel Air Presbyterian Church proposal for 24/7 multi-use facility Case No. ZA 86-1070 (CUZ)(PA3) on basis of intensification of Corridor uses and inadequate environmental review. The Church withdrew application in 2005.

2006: the Federation requested a Master Plan (and development moratorium) for the Institutional Corridor on basis of intensification of Corridor uses and reliance on inadequate, overburdened, antiquated infrastructure.

2008: the Federation opposed Stephen S. Wise Temple application for a large (church-operated) pre-school Case No. ZA 2008-1263(CU)(ZAA)(F) on basis of intensification of Corridor uses and inadequate environmental review.

2011: the Federation opposed Caltrans seeking to alter lay-out of Mulholland Bridge on the basis of possible growth-inducing consequences and inadequate environmental review. Caltrans withdrew its proposal and rebuilt the bridge in its original configuration.

2011-2022: the Federation opposed a series of Curtis School applications ENV-2017-3972-MND/CPC 2020-1086-SPE-DRB-SPP-MSP-ZAD-SPR on the basis of traffic impacts, massive grading, failure to follow correct process, etc. (At various times the project included: proposal to illegally co-opt a Caltrans service road for use as a third access road for the campus; unjustified request for numerous variances and exceptions with regards to building height; hugely impactful swap of existing parking area and athletic field; failure to honor past conditions required as environmental mitigation; failure to follow correct City process.) After more than a decade, Curtis downsized their project.

2018: the Federation requested moratorium on further Institutional Corridor intensification until there is a comprehensive traffic and safety study/plan for the entire Corridor, carried out under supervision from Council Districts 4, 5, 11.

2018: the Federation commented on Mission Canyon Park project proposing a second parking lot off Mulholland as being traffic-inducing and out of keeping with special character of the area. MRCA and the County subsequently removed the parking lot from the project.

2020-2021: the Federation opposed the Berggruen Institute project ENV-2020-5985-GPA-ZC-CA-SP on the basis of process, precedent, impacts on neighboring hillside residential communities and the local canyon ecosystem.

2021: the Federation opposed Mount St. Mary's project ENV-2016-2319-EIR, CPC 1952-4072-CU-PA1 on the basis of intensification of use not compatible with low density zoning and increased fire risk.

2021-2023: the Federation brought lawsuit against the City over Planning Director's Specific Plan Implementation Guidance "Memo" amending Specific Plan in order to remove Outer Corridor cases from Mulholland Design Review Board authority. The lawsuit was decided in the Federation's favor and MDRB's full authority was restored.

2023: the Federation supported Councilmember Yaroslavsky's motion CF 21-0777-S1 to rescind the General Plan amendment for the Bulgari Hotel Retreat at Benedict Canyon on the basis of inconsistency with low-density zoning, the use of a Specific Plan to up-zone, and the negative impacts on natural resources in our precious hillsides. (We are appreciative of your leadership in bringing a motion to consider revoking the General Plan amendment for the Project.)