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June 23, 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.  
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  
Sunshine Hills Residents Assn.  
Tarzana POA  
Upper Mandeville Canyon Assn.  
Upper Nichols Canyon NA  
Whitley Heights Civic Assn.

**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 47 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 previously voted to oppose the proposed Harvard-Westlake River Park Project in May 2022 and submitted a letter of opposition to City Planning (ENV-2020-1512-EIR) during the Draft Environmental Impact Report (DEIR) public comment period. Most recently, the Federation voted to oppose the proposed Harvard-Westlake River Park Project at its June 20, 2023 meeting. Many of the Federation's initial concerns have not been sufficiently addressed and remedied in the Environmental Impact Report (EIR). New commentary can be found italicized in the list of bullet points below:

**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.

- *The Federation remains concerned about the physical footprint of the proposed Project, since the Applicant has made no changes to its proposed Project in the EIR that sufficiently address and remedy the reservations held by the Federation.*

**One look at the plan for the proposed facility leaves one asking, “Where is the park?”** With four “arenas” – two full size artificial turf 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.

- *The Federation remains concerned about the reference to the proposed Project's "park," since it may be misleading. Although the number of light poles has decreased from 45 to 28, the Applicant has made no changes to its proposed Project Alternatives in the EIR that remove Project components to provide for a larger contiguous segment of the Project Site that would more closely resemble the term "park," which may have addressed some of the reservations held by the Federation. Finally, the Zev Yaroslavsky Los Angeles River Greenway is a thriving, but delicate, ecosystem with mature habitats planted decades ago; therefore, the Greenway should not be disturbed and parts demolished for the sole purpose of installing a ramp that the Applicant is requesting in its proposed Project.*

**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.

- *The Federation remains concerned about the loss of publicly accessible existing recreational green space due to the proposed Project, since the Applicant has made no changes to its proposed Project in the EIR that sufficiently address and remedy the reservations held by the Federation.*

**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 Project's 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.

- *The Federation remains concerned about a variety of environmental issues (removal of mature urban tree canopy, loss of wildlife populations, soil excavation quantities, construction air and noise pollution, introduction of "forever chemicals" to local community, etc.). Although the quantity of the Project's export has been reduced from 250,000 to 197,000 cubic yards, the revised figure is still enormous and for reference, large enough to fill over 50% of the Rose Bowl Stadium. Also, although the number of on-site parking spaces has decreased from 532 to 403, the Applicant has made no changes to its proposed Project that remove Project components to allow for more retention of existing green open space, which may have addressed some of the reservations held by the Federation.*

**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-foot high, many directed toward hillsides. This light intrusion is detrimental to hillside wildlife, disrupts connectivity and interferes with migration patterns.

- *The Federation remains concerned about the potential for increased light pollution due to the proposed Project. Although the number of total light poles has decreased from 45 to 28, the Applicant has made no changes to the maximum height of its proposed light poles. Revisions to the DEIR removed the light poles*

*that were lowest in height, but inherently, the remaining, taller light poles would compensate for the lower light poles that were removed. A reduction in the number of maximum height light poles in the EIR may have addressed some of the reservations held by the Federation.*

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.

- *The Federation remains concerned about the anticipated increase in noise levels from construction and operation of the proposed Project. Although there are now plans to cover the pool to try to mitigate noise pollution, the Applicant has made no other changes to its proposed Project in the EIR that sufficiently address and remedy the reservations held by the Federation. Also, while the consultants who prepared the Revisions to the DEIR document frequently state that a "commenter does not provide any substantive facts or support for these concerns or opinions," it seems to be an opinion of consultants that noise from practice and events "would not be frequent." In fact, according to the EIR, in addition to regular use beginning as early as 7 am and ending as late as 10 pm, there can be up to 5 special events per year for the public and 30 school-related special events per year (27 events with up to 500 attendees and up to 3 special events with up to 2,000 attendees). The Federation is confident individuals not on the consultant team would consider noise pollution to be frequent, according to operational terms set forth by the Applicant.*

**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 Federation remains concerned about the lack of a good faith effort to provide Project Alternatives that decrease the physical footprint of the proposed Project. Although the number of on-site parking spaces has decreased from 532 to 403, the Applicant has made no changes to its proposed Project Alternatives in the EIR that removes Project components, which may have addressed some of the reservations held by the Federation.*

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.

- *The Federation remains concerned about the lack of a comprehensive Conditional Use Permit (CUP), since the Applicant has made no changes to its proposed Project that sufficiently address and remedy the reservations held by the Federation. As part of their expansion entitlements process to obtain a Conditional Use Permit (CUP), other private educational institutions comparable to Harvard-Westlake School, like Brentwood School, Marlborough School, and The Archer School for Girls, have all developed master plans. In addition, as gestures of goodwill towards community members, Brentwood School and The Archer School for Girls have developed covenants, which are private agreements that are bolstered by stricter guidelines and enforcement potential than any city permit. Furthermore, for its 30-Year Education Master Plan, Brentwood School received a CUP that covers specific operations (including land use, enrollment rates, growth, and traffic reductions) across its multiple campuses. Harvard-Westlake School must adhere to the precedent already established by the previously mentioned schools, and prepare both a master plan and covenant as part of this process.*

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.

- *The Federation remains concerned about the exclusion of a stormwater capture system in Project Alternatives 2, 3, and 4, as well as revisions to the DEIR regarding the proposed Project's stormwater capture and reuse system. In the original DEIR, the Applicant claimed, "The Project would capture, treat, and store up to 1 million gallons of stormwater and other urban runoff at a time from the developed*

portions of the Project Site, as well as from an approximate 38.64-acre off-site drainage area to the north of the Project Site.” Revisions to the DEIR now claim that “The Project would capture, treat, and store up to 350,000 gallons of stormwater runoff from the developed portions of the Project Site.” The stormwater capture and reuse system was previously touted as a mechanism to 1) collect and treat water from the 39-acre residential neighborhood to the north of the Project Site before it would be discharged to the Los Angeles River and 2) relieve the current flooding and drainage issues in the immediate neighborhood surrounding the Project Site. According to the revisions to the DEIR, this is no longer the case. Therefore, there is no public benefit to the stormwater capture system. Stormwater would be collected on the Applicant’s property, treated for the Applicant’s use, and used on the Applicant’s Project Site. It is also concerning that the community is being made to endure the detrimental environmental impacts of massive excavation in order to install the Project’s storage system – for a feature that does not directly benefit the community. As mentioned in previous comments, unlike the Applicant’s proposed Project, there are Project alternatives, such as the Los Angeles River Natural Park developed by Save LA River Open Space, that would actually provide a benefit to the public by capturing and storing stormwater via more natural means (like bioswales), cleaning contaminated runoff from city streets, and using treated water on-site.

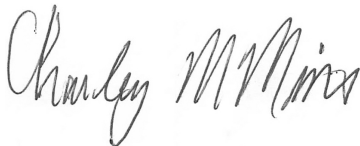
Given the lack of reasonable alternatives proposed by the Applicant, the only option that is environmentally superior is Alternative 1 - No Project. However, the Applicant adds that “The current Weddington Golf and Tennis facility would discontinue operation.” That is simply mean spirited. It demonstrates 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 Federation maintains its previously stated opposition to the proposed Harvard-Westlake River Park Project as currently proposed.*

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

- *The Federation maintains its previously stated opposition to the proposed Harvard-Westlake River Park Project as currently proposed.*

Sincerely,



Charley Mims

cc: Councilmember Nithya Raman