

City Council Special Meeting  
May 18, 2005

Email Correspondence (1)

Received by the City of Calabasas in  
Support of the Heschel West School Project

## Kimberly Rodrigues

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**From:** Mike Kamino  
**Sent:** Monday, May 16, 2005 7:27 AM  
**To:** Kimberly Rodrigues  
**Subject:** FW: AR-M450\_2650819200\_20050509\_164733\_43.pdf

Kimberly,  
Here is the letter from Calabasas re Heschel. mk

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**From:** Elizabeth Parker [mailto:eparker@cityofcalabasas.com]  
**Sent:** Monday, May 09, 2005 4:36 PM  
**To:** Mike Kamino  
**Subject:** AR-M450\_2650819200\_20050509\_164733\_43.pdf

Dear Mr. Kamino,

Attached, please find a copy of the Heschel School correspondence.

Please, let me know if I can be of further assistance.

Sincerely,  
Elizabeth Parker  
Executive Assistant  
City of Calabasas



CITY of CALABASAS

May 5, 2005

Dr. Daryl Koutnik  
The County of Los Angeles  
Department of Regional Planning  
Impact Analysis Section, Room 1348  
320 West Temple Street  
Los Angeles, CA 90012

Dear Mr. Koutnik:

The City of Calabasas has reviewed the revised Draft Environmental Impact Report (DEIR) for the Heschel School Project. The City finds no significant impacts to the City of Calabasas and our community resulting from the project, and has no comments regarding the DEIR.

Please also note for the record that on March 2, 2005, the City Council met to review the status of previous correspondence sent by then Mayor, Leslie Devine and then acting Community Development Director, Steve Craig. The determination of the Council was that their previous correspondence reflected personal viewpoints and was not an official position taken by the City on the DEIR. Copies of this prior correspondence are attached.

The City of Calabasas is a community which actively supports the highest quality of public and private educational opportunities for our youth. As such, we believe that the construction of Heschel School will benefit our residents by providing opportunities for expanded schooling options.

A record of the Staff report and discussion on Heschel School is available by referencing the City Council meetings of March 2, 2005 and May 4, 2005 on our website, [www.cityofcalabasas.com](http://www.cityofcalabasas.com).

Please contact us should you have any additional questions. Note that all official correspondence on this project will be issued through my office.

Sincerely,

Maureen Tamur  
Community Development Director

c: Members of the City Council  
Anthony Corrales, City Manager  
City of Agoura Hills

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Attachment "A"



CITY of CALABASAS

DISTRIBUTION:  
City Council  
Planning Staff  
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\_\_\_\_\_

LESLEY DEVINE  
Mayor

December 10, 2002

Mr. Kerwin Chih  
Supervision Regional Planner  
LA County Dept. of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

Delivered by fax to 213-974-6438  
626-0434

Dear Mr. Chih;

I have personally reviewed the full 2-volume draft EIR for the Heschel West School proposal.

I know of the Heschel School's fine reputation and would very much like to see them achieve a permanent campus that will be a positive learning space. There is certainly the need in the region for their service to an active, educationally oriented population.

The first goal, especially when dealing with children, is safety. I believe there should be a higher standard of public safety when dealing with a facility where children will spend a great deal of time. It is known that the younger the child, the more susceptible to environmental health problems. It is society's first job to protect the children. It is in that category that I find the specifics within this EIR to be lacking and minimizing very potential problems. These need to be better thought out and fully mitigated before either approving the presently conceived project or certifying this EIR. Specifically my concerns are:

- FIRE DANGER -- The idea of "shelter in place" for a canyon surrounded by chaparral hills, in a "high fire danger area", I find inadequate. Anyone who has seen the power of a full fire storm knows that survival in such a canyon could be iffy. I have great respect for the fire consultant, Scott Franklin, and cannot believe this section is fully representative of his suggestions. Fire departments usually require 2 ingress/egress roads, yet only one is shown on these maps. That one road is at a freeway bottleneck. There is no evacuation plan for children given. It would be vital to get children out of the potential path of fire! How will that be done? This site, if used for children, must condition the school to have buses on site to

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evacuate the children if needed, at least during the fire season months. Moreover, what will be the impact from frightened parents descending from all directions? The need to protect children will force the firefighters to prioritize the school, at what cost to the overall area needs?

- **LANDFILL IMPACTS and POTENTIAL RADIATION** -- The EIR uses a 1998 report on the Calabasas Landfill as the basis of the conclusion of "no significant impacts". Two serious reports have not been considered and need to be included.
  - First was the disclosure by Senator Barbara Boxer that low level radiation may have been dumped at the Calabasas Landfill. The State has ordered the Regional Water Quality Board to take the lead in new testing within the landfill for radioactive materials. The protocol for that testing is just now being finalized and there are many who feel that the surrounding lands, not just on the landfill, need testing added. It will be months before there is any initial information. Since this site sits near the landfill, this issue cannot be ignored. If there is radiation, and if the spread goes near areas where children spend time, there can be serious, harmful effects. No school should go forward without full information and that is not yet available.
  - Second was the disclosure in the last month that perchlorate has been found by the RWQB at the top of the watershed, along Las Virgenes Creek, on the Ahmanson Ranch. There has been no testing yet of the extent of the "plumes" although there is movement toward getting those tests done. Given the geologic movement of 1994, some respected geologists are now theorizing that the underground waterways may have shifted courses and left unknown new paths for such pollutants to migrate. Again, the information is just starting to be analyzed and the area effects are yet unknown. Since children are to be at this site, all information needs to be found first.
  
- **TRAFFIC SAFETY** -- the intersection of the 101 Freeway and Cheesboro is presently fairly dangerous. The strange configuration, with a gas station at the corner, a 2-lane bridge, and bad sightlines make it a difficult road as is. There is little doubt that the addition of so many cars plus a proposed road so few feet from the on/off ramps, would make it truly "accident-ville"! Mitigations to accommodate the school should concentrate on getting the children safely to and from school. Minimum conditions that should be considered include:
  - Mandating widening the Cheesboro bridge over the 101 Freeway and improving the on/off ramps.
  - The road into the school would have to be brought away from the intersection, which could perhaps be accomplished by adding a split new west-bound off ramp that connected to the school road considerably east of the intersection.
  - The school should be conditioned to have bus transportation to and from school for the children. If pick up/ delivery at homes is impractical, they could have some safe bus meeting places for parent delivery of children to their buses. Then the car trips could be reduced.

- The school should be conditioned to never have high school students. Teenage drivers at that location would add to safety problems. [sometimes impatient parents are bad enough.]

There are environmental concerns that I am sure others will go into in detail, including our City staff. I would just like to add a few items.

- The impacts to the long sought "wildlife corridor" from this site size and configuration are major impacts. Another alternative should be found to fully accommodate the wildlife needs. As a neighbor of hard won public "open space parks", that wildlife needs to be appreciated as a duty to society. Lights too effect the animals, so a condition that only low level safety lights are left on after dark should be included. I am sure that NPS will have full discussion of this issue.
- The water quality section of the draft EIR is non-existent. Just being required to follow NPDES Permit rules does not relieve the County of fully knowing and conditioning most of the "best management practices" within the project proposal. NPDES requires thought out knowledge of stormwater flow and percolation areas. That needs to be known ahead of time so that the buildings, walkways, etc. can be properly sited. It is a lot more financially practical to think it out in the beginning, rather than retrofit later to meet the law. This site is at the bottom of hills, yet no estimate of runoff into the site is considered. This section needs to be fully done prior to certifying the EIR.
- Soils of this pristine land need to be surveyed by a Soil Scientist prior to certification of the EIR. The NRCS-USDA has found totally unique soils within the Santa Monica Mountains, some that are found no where else in the world. The geology section of the draft EIR was not sufficient on this subject.

It may be that the "Alternative" of using a site on the south side of the 101 may present opportunities without as many constrains.

It is my hope that a better school project can be crafted that will provide for children's education and safety and which will then becoming a proud part of the community. I thank you for considering my comments.

Sincerely,



Lesley Devine

cc. councilmembers & planning staff



## CITY of CALABASAS

December 10, 2002

To: Department of Regional Planning  
Hall of Records  
320 West Temple Street -13th Floor  
Los Angeles, CA 90012  
Attn: Mr. Daryl Koutnik

From: Jasch Janowicz, Environmental Coordinator  
Steve Craig, Calabasas Director of Planning and Community Development

Re: County Project No. 98-062, SCH No. 98101060 (Heschel West School)—Comments on the  
Draft EIR on the Master Plan and "Interim Plan" for Heschel School

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The City of Calabasas has carefully reviewed the subject EIR. While the document represents a first step towards analyzing the impacts of the proposed project, the City's design, engineering, and environmental review staff believes that substantial work is necessary to make this draft report an accurate full disclosure document. In our collective opinion, this document seriously underestimates the potential effects of such a large school facility on the environment. This is a large project that will create substantial changes to the natural and physical environment.

To put the scale of this project in perspective compared to other educational facility expansions in the region, it is important to understand that this school expansion is about half the size of the Soka University expansion that was proposed several years ago. We believe that in many respects, the construction of this new facility, if permitted as proposed, will have impacts comparable to the Soka expansion. The Heschel proposal is also larger than the Viewpointe School Master Plan currently being reviewed in the City of Calabasas. The Viewpoint campus is smaller, accommodates a high school, and contains less square footage than the Heschel Proposal. And, while Heschel School has indicated that it does not intend to include a high school in the ultimate master plan, this position seems disingenuous because the athletic facilities in the Heschel Master Plan far exceed what would be necessary for an elementary and middle school.

The City is also very concerned about the County's apparent ad hoc "Interim School" approval process which has involved the apparent misuse of the Temporary Use Permit program in the County's development code. A similar mistake was made when another parochial school, the Mesivta School, was approved as a temporary use adjacent to Hidden Hills and Mountain View Estates near the City of Calabasas. This temporary facility was not properly reviewed and remains, after three years of contentious debate and litigation, a physical eyesore and source of disinvestment in a community of fine and expensive homes. This situation is directly attributable to the use of a temporary use permit to establish an "Interim School". Now it appears the County is repeating the same mistake made when Mesivta School was similarly approved using temporary use permit approvals. The following introductory comments address this issue. These comments are followed by a detailed critique of the Draft EIR.

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## Introduction: General Entitlement Processing Concerns

The County of Los Angeles Planning Staff has verified that a Temporary Use Permit was issued to Heschel School to allow the relocation and operation of the existing school facilities on the new proposed development site. This obviously creates a fundamental problem because in order for the school to relocate, a primary access route would need to be constructed. Apparently, the issuance of the "temporary" use permit allowed the school to commence operations which would include the admittance of up to 550 students and over 235,000 cubic yards of grading and was approved with only administrative review. It is also alleged that Heschel School has agreed to postpone implementation of their "temporary" school until their Master Plan Concept is ultimately approved. The administrative approval of even an interim school facility that would operate for up to five years under this temporary permit and require over 235,000 cubic yards of grading is in violation of the County's Zoning Code and a violation of the due process review requirements provided for in the California Environmental Quality Act.

Moreover, the TUP status further confuses the issue of exactly what "project" is being proposed by Heschel West. For example, if the proposed Master Plan Concept is ultimately rejected by the County Planning Commission and/or the County Board of Supervisors, would the "Interim" project inadequately described in the Draft EIR be allowed to proceed without an additional public hearing or any other form of review (such as a focused CEQA document)? If so, the County of Los Angeles and Heschel West would likely be subjected to various forms of litigation as was the Mesivta proposal.

The City of Calabasas is not against the establishment of well designed educational facilities that are appropriately designed and scaled for the neighborhood where these facilities will be situated. To accomplish a realistic review of this proposal, we respectfully request that the County of Los Angeles makes a genuine effort to fully disclose all components of this project and require that development of the school be consistent with its own Zoning Code and in full compliance with the provisions of the California Environmental Quality Act. The following comments were provided with this premise in mind.

### **Comments on the Project Description and Plans and Policies Analysis**

#### Project Description

As presented, the Project Description is very confusing relative to what is actually being proposed. The Description is also legally inadequate in many respects due to significant and serious omissions. The basic entitlements and permits being sought by the applicant are never even disclosed in the Project Description—for example is a master CUP being sought for the entire Master Plan or is a minor Development Plan approval being requested for the Interim School—what actions and approvals are required by the County and how do these approvals differ for the Master Plan Concept and the Interim School? What type of subdivision map is being used to hold and convey the open space and development site (if an open space transfer is part of the proposal, which is unclear)? What permits and approvals are required by the County before a grading permit can be issued?

The majority of the Project Description is dedicated to the illustration and documentation of a Master Plan Concept, including architectural renderings, grading plan, but the actual undertaking as proposed is a project that bears little if any resemblance to the Master Plan proposal. The initial project design bears little if any relationship to the Master Plan Concept, which, we learn, in the conclusion of the Project Description (page 2.0-11), will result in the construction of an Interim School on six acres. Further confusing the matter is a declaration on page 2.0-9 that states the existing school operating out of leased property one mile to the east (adjacent to Saratoga Hills) "would transfer to the new site upon project completion". Upon completion of what project? The Interim School or the Master Plan Concept?

This distinction becomes very important when one looks at the details of the project grading, stormwater planning, traffic circulation and land use compatibility concerns. The Interim School and the Master Plan concept will result in substantially different impacts. The grading for the "initial" phase of the project



(illustrated in Figure 2.0-5) appears not to be organized to implement the ultimate Master Plan Concept. Indeed, two rather than one access roads appear to be required to implement the initial phase of the project. The parking lot for the Interim School and Master Plan bear no relationship to one another. The orientation of the parking field for the Master Plan is directly positioned to be exposed to the adjacent residential community while the Interim Plan shows a different location.

Because of this distinction between the impacts of the Interim School (which will be built) and the Master Plan concept (which may be built), the EIR is fundamentally flawed. A clear Project Description detailing the potential impacts and operations of the Interim School and Master Plan concept needs to be provided. At present, the Interim School is poorly and very sketchily described. However, from what can be gleaned from the few references to this part of the project, it appears that the proposed relocated Interim School will essentially look like the existing school (trailers, temporary structures, etc.). Moreover, it seems possible that this interim solution could operate for a period of 7-10 years before the final phases of construction are initiated. This is not an acceptable design solution.

The physical improvements associated with the initial project appear to call for a relocation of existing modular buildings from the present school site adjacent to the proposed Woodland Properties subdivision and Saratoga Hills/Saratoga Ranch in Calabasas. The use of modular structures, which do not support the type of architectural form that is value enhancing to the immediately adjacent neighborhood, is being presented as an interim solution to the school's needs. However, the present school has been situated in modular facilities for years and absent a clear and achievable funding plan, the presumption is that the existing modular structures will simply be moved to a highly visible location. In appearance, the school will present an inconsistent design form in a highly visually prominent location. This EIR must clearly be revised to separately discuss and evaluate the impacts of the Interim Project and the Master Plan Concept Project for two reasons: first, the Master Plan Concept may never be built within the effective "shelf-life" of the EIR and the Interim Project is now embedded almost irretrievably within the Project Description and subsequent analyses.

The "Project" really is the Interim School and the Master Plan is, in many respects, a statement that is supposed to govern buildout of the entire facility in the future. In reality, the Interim School and Master Planned facility are, at least in appearance, architectural form and site configuration, completely separate undertakings. The Project Description needs to focus on what the Interim School will look like. Renderings of the modular school facility need to be provided. A preliminary landscaping plan and photometric concept are also absent. The ultimate buildout of the school, if it is donation or revenue dependent, may never proceed to fruition and therefore the Project Description section of the EIR should assess the Interim School as an independent undertaking. The Master Plan Concept should be separately described since the two appear to bear little relationship to one another.

Private schools vary in their ability to achieve financial and student attendance goals. According to the staff at the City of Calabasas, the private sectarian Mesivta School situated between Hidden Hills and Calabasas has been in operation for nearly four years and it has the appearance of a partially dismantled trailer storage yard with points of accent of new construction. Temporary structures have been left in place, grading has occurred in a disorganized and sporadic manner, and the overall visual impact of the interim facility is clearly disrespectful of the needs and interests of the surrounding community which is devaluing to the surrounding properties. In contrast, the Viewpoint School in Calabasas, a private school very similar in general concept to the Master Plan Concept proposed by Heschel, has a clear planning intent and all interim construction is consistent with the Master Plan concept. If such coincidence between interim actions and plan concept is not going to be the buildout scenario for the Heschel School, we respectfully request that the Interim School be given careful and complete description in the Project Description section of the EIR as a separate undertaking. The Master Plan concept is adequately presented but it is not really germane to the Interim Project. No elevations, renderings or simulations are provided of the Interim School which document the appearance, size, visibility and relationship to surrounding open space of this undertaking.

There are several commitments that could be made by the project proponents that would help minimize potential conflicts between the Interim School or Master Plan Concept. These commitments, which are described in our review of the Land Use section, should be integrated into a design process for this Project which will involve community participation.

#### Existing Setting

The section titled Local Setting (subsection: Surrounding Land Use) should disclose with considerably more detail two issues: first, the status of the Calabasas Landfill barrier penetrations and plume movement towards the school facility (this information is contained in the National Park Service Environmental Assessment completed for the federal landfill operating permit issued by the Park Service) and more recent information about on-going studies of radioactive materials and perchlorates potentially that were introduced into the Landfill from the partially abandoned Rocketdyne facility. Potential grading related interactions with this plume and depth of grading in relation to the plume need to be considered in the EIR.

Other corrections that need to be made in this section include:

1. A brief discussion needs to be provided of the Woodland Valley/Samson Investment residential subdivision proposed immediately west of Saratoga Hills/Saratoga Ranch—discussions of the annexation of this parcel to the City of Calabasas have been initiated at the developers request.
2. Figure 3.0-3 incorrectly labels land east of the proposed school site as being held by the Santa Monica Mountains Conservancy. Actually, the Conservancy holding is relatively small at the mouth of Liberty Canyon. The reason this correction is very important is that the EIR seems to suggest that ample room is present for a viable wildlife corridor at Liberty Canyon; the reality is that with the creation of Heschel West School and development of the Woodland Valley parcel west of Saratoga Hills, the area dedicated to wildlife protection is relatively small. The pinching effect of development on either side of Liberty Canyon should be illustrated in this figure.
3. The history of interest by the National Park Service and Conservancy in acquiring the Heschel West site should also be discussed since it is germane to the ultimate disposition of any open space that may be dedicated.

### Comments on the Environmental Impact Analysis

#### Section 4.1: Visual Resources

Neighboring properties within the City of Agoura Hills and the County of Los Angeles currently enjoy an unobstructed view towards a number of pristine open space areas. This proposed school facility would unnecessarily detract from the current viewshed dominated primarily by natural habitat areas. Care should be taken by this project developer to reduce the scale and mass of this project below the crest of the horizon and the significant natural habitat areas so that views will continue to be defined by "undisturbed" views rather than by rooflines as shown in Figure 4.1-6. The actual structures should be single story and should be designed with a low profile to help minimize visual impacts to the greatest extent feasible.

The most serious deficiency of the view analysis provided is the failure to include view simulation of the proposed "interim" school facility. Since this interim condition would likely be used for 7 to 10 years (and thus should be considered semi-permanent), view simulations need to be provided illustrating this condition. Most portable school buildings have little architectural articulation and would be totally incompatible with the existing residential community and the surrounding open space. Landscaping

similar to what is proposed in the Master Plan would likely be needed to adequately reduce the visual impacts of this condition. However, without this information it is likely that this issue would not be addressed and could create a significant visual impact on adjacent residences.

#### Comments on Mitigation Measures Recommended by the EIR (Page 4.1-28)

Although the mitigation measures provided in this section address most issues associated with view impacts, we recommend the following additional measures to further reduce the project's visual impact:

1. Lighting within parking areas shall not exceed fourteen sixteen feet in height, including the base. All exterior lighting fixtures shall be decorative in design and shall be directed downward. The Lighting Plan shall include photometric mapping of offsite illumination. Offsite spillage shall not be permitted. No light source shall exceed 250 watts and the photometric plan shall show compliance in the light sources not exceeding one (1) footcandle of illumination at the property lines. No roof-mounted lighting shall be permitted.
2. Any roof mounted venting, elevator or heating equipment shall be fully screened from public view, including the residential properties to the west. Roof screening treatments, if needed, shall be subject to the approval of the County of Los Angeles Planning Department.

#### Section 4.2: Transportation and Access

The City of Agoura Hills is currently processing applications with Caltrans in an effort to retrofit two other City freeway interchanges. The estimated cost to improve the Kanan Interchange and the Reyes Adobe Interchange is expected to reach \$30 million dollars. The improvements to these two interchanges are a direct result of having frontage roads too close to the freeway ramps. This project is creating the same problem that the City of Agoura Hills is trying to alleviate at the other two locations. We are in agreement with the November 19, 2002, Caltrans letter, that recommends closing Canwood Street and exploring other access alternatives. In addition, Caltrans has requested the applicant to widen the existing WB off ramp to three lanes in order to accommodate the additional school traffic. This widening would further exacerbate the access problem at Canwood Street, thus facilitating the need to close Canwood Street.

The following are detailed comments regarding the content of the DEIR.

Page	Comment
ES-6	Item 4.2-1: Mitigation measures include payment of "Fair Share" to the Los Angeles County Department of Public Works. This should be changed to the City of Agoura Hills. Fair Share shall be established at 50% of costs.
ES-7	Item 4.2-6: Applicant's "fair share" shall be paid to the City of Agoura Hills. This amount should equal 25% of the cost of the bridge widening or if revised traffic study mitigations require, construct the bridge widening improvements to improve the safety of the surrounding intersections.
4.2-11	It is felt the DEIR does not adequately address items 2, 3, and 5 of the County's EIR Traffic Impact Guidelines. For example, (a) the project will interfere with the existing traffic flow due to location of access, (b) the proposed signal at Palo Comado/US 101 will not provide for adequate safety, and (c) the traffic generated on Driver and Chesebro could alter the existing

residential character. These items should be explored and adequately addressed in the DEIR and not summarily dismissed.

4.2-37.1 Item 4.2-4: This mitigation measure is not listed in the summary table. This mitigation measure should include a right turn only and a through/left turn only. The applicant shall complete this item.

4.2-37 All mitigation measures in this section should be revised to reflect the comments made on pages ES-6 and ES-7 above.

#### Section 4.4: Human Health

The majority of the information uses in this section was obtained from the Environmental Assessment prepared by the Los Angeles County Sanitation District in September 1998. Subsequent to the release of this report, members of the Senate have alleged that low-level radiation may have been dumped at the Calabasas Landfill. The state has ordered the Regional Water Quality Control Board to develop new testing protocols for radiation within the landfill. This testing program is just being finalized and may include provisions for off-site testing on those lands directly adjacent to the disposal facility. Since the proposed school site is near the landfill and is in the proximity of an area known to contain subsurface leachate, this issue cannot be ignored because of the potential health effects. The Heschel school proposal should not move forward until all information regarding the disposal of radioactive waste in the Calabasas Landfill is available and incorporated into the Draft EIR.

#### Section 4.5: Biological Resources

Overall, the City of Calabasas has general concerns regarding the lack of detail and accuracy with respect to biota issues. The DEIR de-emphasizes the potential impacts to the significant plant and wildlife resources present on the site. The major areas of concern are as follows:

The project's landscaping plan needs to reflect local character. The plant palette dictated by the Fire Management Plan calls for Coast Live Oak, California Walnut, Holly Leaved Cherry and several other non-native species. Valley Oak is a historic and predominant feature in the natural areas surrounding the project. Coast Live Oak does not presently exist on the site. The project should emphasize Valley Oak in the outlying areas around the buildings. The Plan states that Coast Live Oak will be used to replicate oak woodland around the site. The site would have less visual impact by replicating the look of a valley oak savanna and would likely also be more in conformance with the NPS recommendations. Coast Live Oak could be used directly adjacent to buildings for screening where acceptable to LA County Fire, as they are generally slow to ignite and are slow burning.

A current biotic field survey needs to be conducted by qualified professional botanists. The field surveys included in the Draft EIR Appendices are outdated and incomplete. Several references to specific field surveys were provided in the text of the Draft EIR but are not included in the Draft EIR Appendices. There is no mention of the botanist(s) that completed the initial surveys. The DEIR references field surveys from 1999 and earlier. Current data is called for to determine whether the presence of special status or locally significant plants or plant communities are present. Based on recent discoveries on the nearby Ahmanson Ranch property of plant species previously thought to be extinct, it would stand to reason that up-to-date field surveys should be completed prior to rendering a final decision of the project to ensure that no impacts to endangered species would result from project construction. Per the limited information provided, the botanists did not appear to conduct their field surveys according to CDFG and CNPS field survey protocol for rare plants for timing and completeness. CDFG requirements are listed in their NOP letter dated November 3, 1988.

The Technical Appendices lack adequate detail regarding the methods and timing of field surveys for plant and animal resources. The report states in section 4.5 that "Focused special status surveys were conducted in the spring of 1999 during the blooming period." The timing and methods used must be specifically listed per CDFG. Many rare native plants do not bloom in the spring. Without this information it is impossible to discern whether the field surveys were completed during the most opportune time for identification of such biological resources.

The methods used to classify vegetation are outdated. The report describes using Holland (1986) as a vegetative classification source. Those descriptions of the natural vegetation are outdated and inadequate. The Manual of California Vegetation (1995) is a more recent resource for habitat descriptions. The label Non-native Grassland Habitat oversimplifies the potential on the site for rare plants to exist within the habitat. The classification avoids the actual existing conditions of the project site and could potentially mislead the reviewer as to the value, importance, and biodiversity of the project site resources. Grasslands, even those dominated by non-native grasses have some of the highest plant and animal species richness in California plant communities.

Not all impacts on local wildlife are considered. The DEIR does not consider the importance of grassland vegetation to wildlife. No mitigation for the loss of grassland acreage was provided. Moreover, page 4.5-25 of the Draft EIR states that US Fish and Wildlife Protocol Surveys for the California gnatcatcher were completed yet these surveys were not included in the DEIR Technical Appendices.

The Fire Management Plan is not consistent with LA County Fire Department Guidelines. Special status native plant communities can be retained in 80% of Zone A, the setback zone. Page 4 of the LA County Fuel Modification Guidelines states that special consideration will be given for rare and endangered species, geologic hazards, tree ordinances, or other conflicting restrictions. Therefore, consideration for preservation of additional of Valley Needlegrass Grassland and Coastal Sage (Venturan) Scrub acreage is warranted.

The Fire Management Plan in Appendix I, calls for a very limited palette of eight (8) species of trees. The plan mandates this tree palette for all planting on the site. There is a richness of native and non-native vegetation which is considered "low fuel volume" if maintained. The DEIR calls for planting *Quercus agrifolia* at 30-foot centers around the buildings. The LA County Fuel Modification Guidelines allow for the planting of Valley Oak (*Quercus lobata*) and many other species. Failure to incorporate a diverse native plant palette in the proposed fuel modification plan could potentially result in significant impacts to the surrounding undisturbed biological habitat. The guidelines can be found at [www.LACOFD.org/fuel.htm](http://www.LACOFD.org/fuel.htm). Another resource can be found at [www.ucpfl.ucop.edu/I-Zone/XIV/vegetati.htm](http://www.ucpfl.ucop.edu/I-Zone/XIV/vegetati.htm). The site contains a list of fire performance ratings of residential landscape plants and additional resource links. We would recommend that this fuel modification plan be submitted for review and approval by the Department of Fish and Game prior to rendering a final decision on this project to address the potential impact of fuel modification on the site's natural habitat.

The DEIR's analysis of biological impacts is too generalized, and does not adequately address impacts and therefore does not provide adequate mitigation measures. For example, the DEIR states that there are jurisdictional areas within the site, but that they have not been delineated or otherwise evaluated. At least one of these areas is depicted within the building area. If these areas are not evaluated, full disclosure of the loss of riparian areas cannot be accomplished, nor can adequate mitigation measures be developed. All impacts need to be identified and feasible mitigation measures developed to the extent feasible within the DEIR prior to document certification.

The DEIR does not provide for adequate protection for oak trees and other native habitat. The plan needs to identify specific measures to prevent immediate and long-term damage to native habitat, including monitoring programs and seed and cutting collection at least 1-2 years in advance of any on-site plantings. Native species need to be collected on-site or in nearby canyons and propagated well in advance of any construction and planting to ensure maximum specimen survivorship. It is likely that the

State and Federal resource agencies will require all mitigation areas to be permanently protected through the establishment of a conservation easement over the remaining open space areas. Without this additional layer of protection, what will restrict the school from future expansion into the habitat mitigation areas?

*Comments on Mitigation Measures Recommended by the EIR (Page 4.5-44)*

In general, the mitigation measures recommended in the DEIR, while somewhat comprehensive, do not require any sort of secure funding source. A performance bond or other form of surety should be required by the County of Los Angeles to ensure the timely completion of the enhancement and revegetation plans proposed as mitigation. The remaining 42 acres of open space should also be permanently preserved, especially since the majority of project mitigation is proposed within this area. Failure to record a conservation easement over the undeveloped area or failure to formally dedicate the remaining open space could promote future development that would likely have catastrophic impacts on the native habitat and the adjacent wildlife movement corridor.

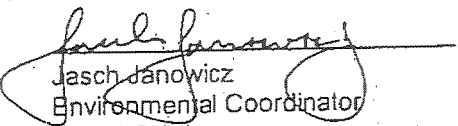
**Summary and Conclusions**

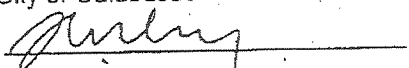
To accomplish a realistic review of this proposal, we respectfully request that the County of Los Angeles make a genuine effort to fully disclose all components of this project and require recirculation of the Draft EIR. We also request that the County of Los Angeles require full compliance with the provisions of the California Environmental Quality Act by requiring consistency with the conservation based planning policies of the North Area Plan and feasible project mitigation. We believe this can only be achieved by addressing all of the issues discussed in this comment letter.

We would like to reiterate that the City of Calabasas is not against the establishment of well-designed educational facilities that are appropriately sited and scaled consistent with the surrounding neighborhood and the North Area Plan. One of the primary goals of the North Area Plan was to provide a blueprint for orderly development that can coexist in harmony with the natural environment. Changes in the design of this proposed school facility should be instituted so that both the goals of the project proponent and the conservation-oriented goals of the North Area Plan are achieved.

Thank you for opportunity to comment on this proposed project.

Respectfully submitted,

  
Jasch Janowicz  
Environmental Coordinator  
City of Calabasas

  
Steven Craig  
Director of Planning and Community Development  
City of Calabasas

City Council Special Meeting  
May 18, 2005

Written (Letter) Correspondence (1)

Received by the City of Hidden Hills in  
Support of the Heschel West School Project

9



# City of Hidden Hills

6165 Spring Valley Road • Hidden Hills, California 91302  
(818) 888-9281 • Fax (818) 719-0083

March 8, 2005

Los Angeles County Department of Regional Planning  
Room 150 Hall of Records  
320 W. Temple Street  
Los Angeles, California 90012

To Whom It May Concern:

As its meeting on February 28, 2005, the Hidden Hills City Council voted unanimously to voice its support for the building of Heschel West Day School on a 72 acre parcel, owned by the school, off of Chesebro Road near Agoura Hills. Numerous children of Hidden Hills residents attend or have attended Heschel West, which educates approximately 187 students from pre-K through 5<sup>th</sup> grade.

As you are aware, the school is currently located on a leased property and is seeking permission to build a new 160,000 square foot campus that could serve up to 750 children. We realize some of the property owners near the proposed site have expressed opposition to Heschel West, but we understand multiple design changes have been made to accommodate their concerns. Schools are an integral and very important part of a community, and we feel this school will benefit the area as follows:

- No state funds are used for the school, as Heschel West is 100% privately financed, saving public education costs for local taxpayers.
- The school sponsors community services such as a weekly collection of food for the needy, tree planting, and visiting the elderly.
- By providing an alternative, Heschel West helps alleviate overcrowding in the local public schools.
- The school's facilities can be made available for community events, sports leagues and emergency services.

The Heschel West student population is growing and in order to accommodate this growth, a larger school needs to be built. We therefore hope the Department of Regional Planning will look favorably upon the Heschel West project.

Sincerely,

CITY OF HIDDEN HILLS

Steve Freedland  
Mayor

SF/dlg

Post-it® Fax Note	7671	Date	5/5/05	# of pages	1
To	GREG RAMIREZ		From	CHERIE PAEWIA	
Co./Dept.			Co.		
Phone #			Phone #		
Fax #			Fax #		

4/12/05 To: Greg Ramirez, Hidden Hills #12345