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Regarding Case #: CPC-2025-3449-CU3-SPPC-DRB-MSP ENV-2025-3450-CE

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Dear Bel Air–Beverly Crest Neighborhood Council Members,

The community is genuinely happy to have Milken as part of our neighborhood family. However, I am writing to urge the Council not to support the proposed CUP increase for Milken's East Campus ([15600 Mulholland Drive](#)), and to recommend that the City require a full CEQA study and an in-depth traffic analysis before any approval is considered.

The application suffers from major CEQA deficiencies that make a Categorical Exemption improper. Under the "Fair Argument" standard, a full environmental review is required because:

- 1. Misrepresented CEQA Baseline:** under the California Environmental Quality Act (CEQA), the legal baseline is defined by the actual physical conditions on the site at the time of the application, not a theoretical "on-paper" capacity. While the applicant frames the relocation of 900 high school students as a "reduction", this is a mischaracterization of the current reality; the site is presently a former campus with significantly lower occupancy. Increasing the active student body to 900 represents a massive intensification of use and a 450% increase over the 100-200 students historically present. By using an inaccurate baseline, the applicant avoids analyzing the true traffic, noise, and safety impacts of the project, rendering the current Categorical Exemption legally invalid.
- 2. Incomplete Project Description (Dormitories):** The current application is silent regarding the future use or disposition of the existing dormitory buildings. By failing to include the rehabilitation, demolition, or repurposing of these structures in the current CUP, the applicant is failing to analyze the "whole of the project." Any future use of these facilities will significantly increase the intensification and traffic load of the site. CEQA requires these foreseeable impacts to be analyzed now to avoid unlawful "project splitting."

- 3. Sensitive & Constrained Site Conditions:** The campus sits on a single-ingress cul-de-sac in a High Fire Hazard Severity Zone. The intensification to 900 students creates a life-safety hazard regarding emergency access. The school provides only 10 queuing spaces; any overflow will create a stationary obstruction on Casiano Road, violating LAMC 12.21.C.10 and trapping residents during an emergency and use of the roads on a daily basis.
- 4. Cumulative Impact & Theoretical Modeling:** The study ignores the shared reality of our street, specifically the peak-hour bottleneck created by Stephen S. Wise traffic and third-party bus staging. Furthermore, the findings rely on theoretical simulations rather than real-world data from our specific hillside geography.

Given these issues, the current Findings cannot legally support an approval or exemption. The neighborhood deserves a transparent and lawful review—especially where safety, traffic, and hillside environmental protection are at stake.

I respectfully request that BABCNC:

- **Decline to support the CUP increase as currently proposed.**
- **Formally recommend that the City lead an Initial Study to assess the "whole of the project," including the future use of the dormitories and cumulative safety impacts.**

Thank you for protecting our community and upholding proper environmental review. Milken is a valued part of our community, and our goal is simply to ensure that any future growth respects the safety and infrastructure of the neighborhood we all call home.

[Quoted text hidden]