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

Alina Vartany <alina@vartany.com>

Wed, Jan 28, 2026 at 10:42 AM

To: "Council@babcnc.org" <Council@babcnc.org>, "Info@babcnc.org" <Info@babcnc.org>, "Tlongcore@babcnc.org" <Tlongcore@babcnc.org>

To: Bel Air–Beverly Crest Neighborhood Council (BABCNC) Committee Members

RE: Agenda Item #9, Wednesday, January 28, 2026

2785 N CASIANO ROAD; 2791 N CASIANO ROAD; 2845 N CASIANO ROAD

Milken Community School E Campus (Also commonly known as [15600 Mulholland](#))

CPC-2025-3449-CU3-SPPC-DRB-MSP ENV-2025-3450-CE

Dear Bel Air–Beverly Crest Neighborhood Council Members,

I write as a 24 year Bel Air Park homeowner and a parent who has spent more than 20 years driving children to private schools throughout Los Angeles and observing, firsthand, how schools address traffic, safety, and neighborhood impacts—both successfully and unsuccessfully. My perspective is grounded in both experience and training: I hold a B.S. in Civil Engineering from USC and an M.S. in Construction Engineering and Management from Stanford, and I have served for the past five years on a USC advisory board after being asked to contribute my professional judgment to complex planning discussions. I offer this background not to elevate my voice, but to explain why I feel a responsibility to engage constructively. Our community genuinely welcomes Milken Community School and values having them as a neighbor; this letter is not an objection to Milken as an institution, but a good-faith effort to ensure that student safety, neighborhood safety, and legal standards are applied carefully and consistently, and to help chart a more collaborative and sustainable path forward with the surrounding community.

Introduction

This letter is submitted for the administrative record regarding the proposed Milken Community School East Campus project and the City's reliance on Class 1 and Class 32 categorical exemptions. While the application materials characterize the project as a benign reuse of an existing campus, the record demonstrates that the proposed start of 540 current high school students and future enrollment increase to 900 high school students presents **unusual circumstances, hazard-related risks, and cumulative corridor impacts** that disqualify it from categorical exemption under CEQA.

1. Improper CEQA Baseline

The exemption analysis relies on a **historical paper entitlement** associated with the former American Jewish University (AJU) campus rather than the **existing physical conditions** on the site. CEQA is explicit that the environmental baseline must reflect the actual conditions at the time of review, not dormant or defunct uses.

The AJU campus is currently closed, with:

- no resident student population,
- <100 students using the parking lot weekday peak-hour arrivals,
- no daily K-12 drop-off or pick-up activity.
- And when students were present, there was 100-200 students enrolled.

By contrast, the proposed project introduces up to **900 daily high school students with concentrated arrival and dismissal peaks**, materially intensifying traffic, queuing, and evacuation demand. Reliance on a decades-old CUP that no longer reflects site operations is legally insufficient and conflicts with CEQA Guidelines §15125(a).

2. Misuse of SB 743 and VMT Metrics

The Gibson Transportation memorandum relies heavily on regional Vehicle Miles Traveled (VMT) reductions under SB 743 to conclude that transportation impacts would be less than significant. However, SB 743 does **not** eliminate CEQA's obligation to analyze **site-specific traffic safety hazards**, queuing failures, pedestrian conflicts, or emergency access constraints—particularly in hillside communities. The attached VMT Calculator document has Milken School generating fewer trips. Does this make sense when historically AJU had 100-200 students?

Importantly, our Community has **documented evidence of traffic safety failures associated with student driving behavior**. Specifically, there have been **three documented incidents** in which junior students exiting **Lot 4** parking nearly collided with **oncoming street traffic or pedestrians**. These incidents were sufficiently serious that **some students lost their driving privileges** as a result.

These events constitute **substantial evidence** that localized traffic operations already present safety risks under current conditions. CEQA does not permit agencies to dismiss such evidence by substituting regional VMT metrics for on-the-ground safety analysis. A project may reduce regional VMT while simultaneously creating—or exacerbating—dangerous localized conflicts that qualify as significant environmental impacts.

The failure to analyze these known hazards, including sightline limitations, driver inexperience, and interaction with public right-of-way traffic, renders the transportation analysis incomplete and legally inadequate.

3. Unrealistic Queuing and Operational Assumptions

The transportation analysis assumes idealized conditions, including evenly distributed arrivals, perfect compliance with circulation rules, and minimal dwell times. These assumptions are inconsistent with observed parent driving behavior at private schools, where arrivals cluster, drivers hesitate, and small disruptions cause cascading failures.

CEQA requires analysis of **reasonably foreseeable behavior**, not best-case operational promises. A traffic system that fails when one assumption breaks cannot be deemed environmentally insignificant.

4. Inadequate Fire and Evacuation Analysis

The fire and evacuation analysis relies on theoretical lane reversals, perfect coordination between schools, and full driver compliance during emergency conditions. The record contains:

- no LAFD-approved clearance time analysis,
- no modeling of simultaneous evacuation of residents and schools,
- no evaluation of parents attempting to return to campus during an emergency.

In a Very High Fire Hazard Severity Zone with limited egress, these omissions constitute substantial evidence of a reasonable possibility of significant environmental impacts, triggering the unusual circumstances exception to categorical exemptions.

5. Failure to Address Cumulative Corridor Impacts

The Mulholland corridor contains multiple institutional uses that share limited access and evacuation routes. The project materials acknowledge this context but fail to analyze cumulative impacts resulting from overlapping dismissal times, emergency evacuations, or corridor-wide congestion.

CEQA prohibits piecemealing and requires consideration of cumulative impacts where multiple projects affect the same constrained system.

6. Objection to Reliance on Class 32 Categorical Exemption for Milken East Campus

I respectfully object to the City's reliance on a Class 32 Categorical Exemption for the proposed Milken East Campus project.

The exemption does not apply because the project is not fully defined. The site includes existing dormitories and large developable areas, yet the application provides no comprehensive, site-wide operational plan and no enforceable restrictions preventing future use of those facilities. Stating that dormitories are "not proposed" is not the same as prohibiting their use.

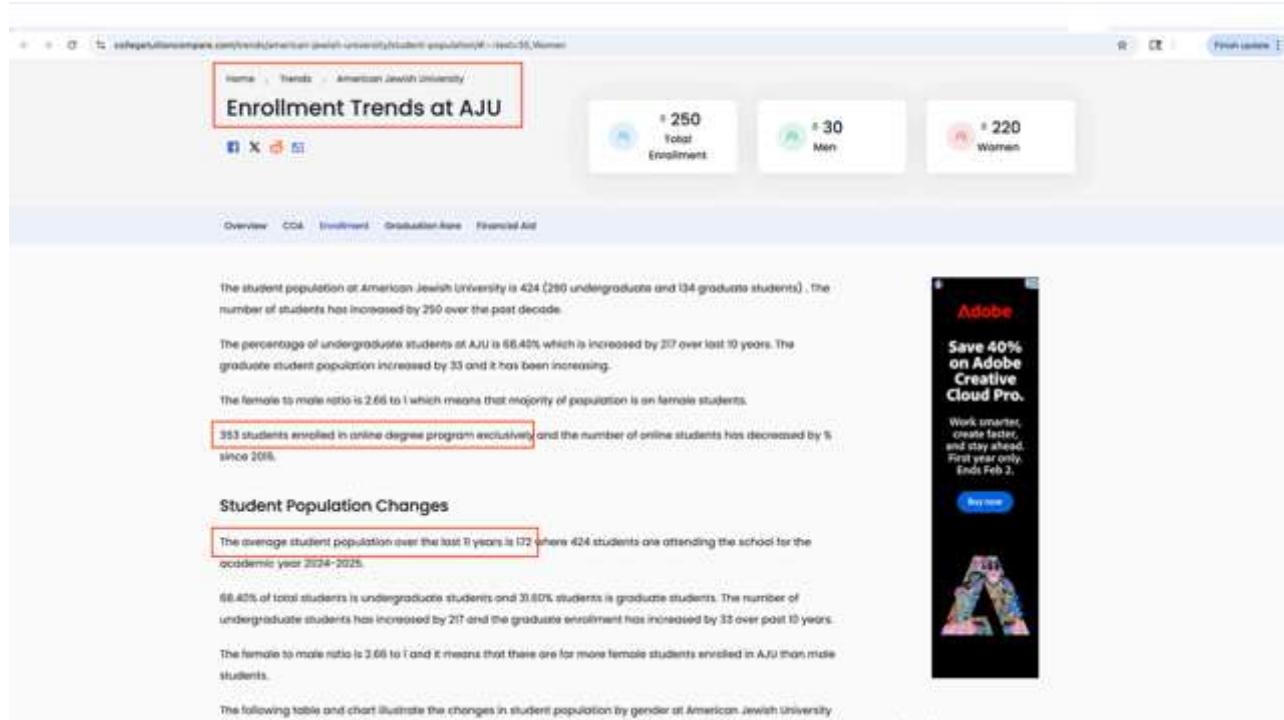
CEQA requires review of the whole project, including all reasonably foreseeable uses. Leaving major site components undefined constitutes piecemealing and prevents the City from making the required finding that the project would have no significant impacts to traffic, noise, or public services.

Because the project lacks clear boundaries and binding operational limits, reliance on a categorical exemption is legally vulnerable. At minimum, further environmental review is required before this project can be responsibly approved.

Conclusion

Because the project relies on an improper baseline, employs unrealistic operational assumptions, and fails to analyze foreseeable safety and evacuation impacts, the use of categorical exemptions is legally vulnerable. At a minimum, further environmental review is required to address these deficiencies before any discretionary approval.

Thank you,
Alina Vartany
Bel Air Park Resident



2 attachments

image.pdf
222K

AJU - actual enrollment by year.pdf
93K

CITY OF LOS ANGELES VMT CALCULATOR Version 1.5



Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: Milken School J1930
Scenario: Option 2
Address: 15600 MULHOLLAND DR, 90077



Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?

Yes No

Existing Land Use

Land Use Type	Value	Unit
School University	1000	Students
School Private School (K-12)	400	Students
School University	800	Students [a]

Click here to add a single custom land use type (will be included in the above list)

Proposed Project Land Use

Land Use Type	Value	Unit
School High School	900	Students
School Private School (K-12)	900	Students

Click here to add a single custom land use type (will be included in the above list)

Project Screening Summary

Existing Land Use	Proposed Project
2,052 Daily Vehicle Trips	1,929 Daily Vehicle Trips
24,076 Daily VMT	22,690 Daily VMT

Tier 1 Screening Criteria

Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station.

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips -123
Net Daily Trips

The net increase in daily VMT \leq 0 -1,386
Net Daily VMT

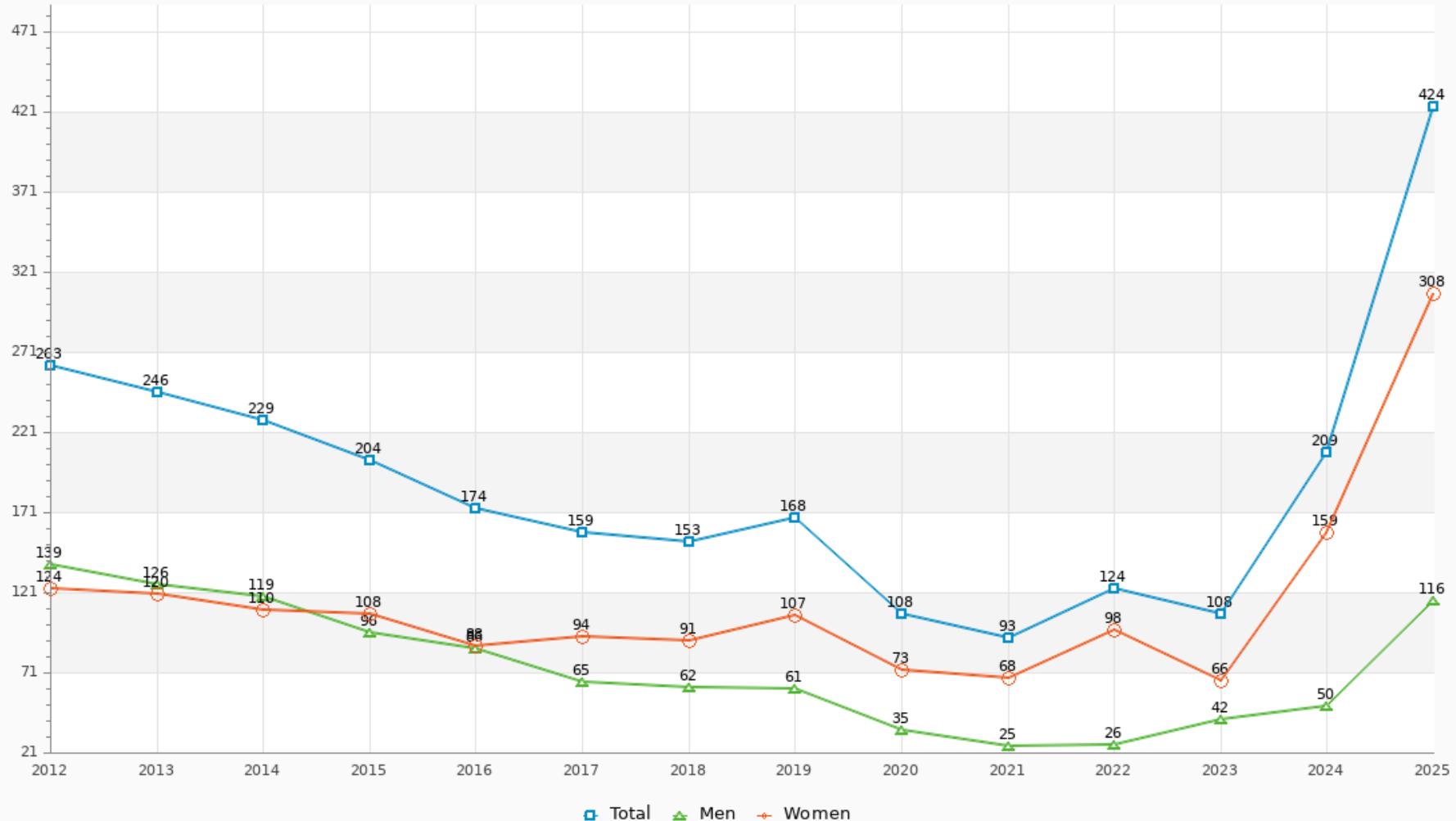
The proposed project consists of only retail land uses \leq 50,000 square feet total. 0.000
kstf

The proposed project is not required to perform VMT analysis.



[a] To provide a conservative analysis, the 200 students who reside on campus were not considered as part of the existing land use for VMT screening purposes.

American Jewish University Student Population Trends Since 2012 (2012 - 2025)



Data Source: IPEDS, U.S. Department of Education

 www.collegetuitioncompare.com