III. Responses to Comments (Continued)
Comment Letter No. 48

Margarita Pagliai
Head of School
Seven Arrows Elementary School
15240 La Cruz Dr.
Pacific Palisades, California 90272

Comment No. 48-1

As the Head of School at Seven Arrows Elementary School in the Pacific Palisades, I am writing to request your support for the campus improvement plan of The Archer School for Girls. We share their belief that independent schools play a pivotal role in the education movement here in Los Angeles.

As you may know, Archer is the only independent, non-sectarian girls’ school on the Westside of Los Angeles. The school reflects the diverse character of the entire city and includes girls from a wide range of cultural and socioeconomic backgrounds, offering significant financial assistance to ensure that girls of all backgrounds can attend. In fact, the school currently enrolls students from 92 zip codes throughout the city.

Archer students participate in award-winning visual arts programs including photography, painting, drawing, and ceramics. These activities are integral to the school’s experiential, liberal arts curriculum, but due to the limitations of their campus, participation in these programs presents significant challenges. The Archer Forward plan will allow the school to provide an even better education for its students by adding the facilities that most other independent schools already have: modern classrooms, athletic facilities, and performing and visual arts centers.

I believe that the Archer Forward campus plan is both thoughtful and comprehensive. I hope that Archer can count on your support for the plan.

Response to Comment No. 48-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 49

Deborah David  
Head of School  
St. James’ Episcopal School  
625 S. St. Andrews Place  
Los Angeles, CA  90005

Comment No. 49-1

This email is being sent in regards to support Archer Forward. Please see attached letter.

Response to Comment No. 49-1

This introductory comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 49-2

As the School Head of Saint James’ Episcopal Day School, I am writing in support for Archer’s campus improvement plan, Archer Forward. This building plan will provide 21st century facilities that its students need and deserve.

Archer abides by a strict Conditional Use Permit that includes a comprehensive traffic management program designed to minimize traffic in Brentwood. More than 80% of students take the bus to school and the remainder arrive to campus in carpools of a minimum of three students. Additionally, Archer prohibits parents from parking in the neighborhood during school events and employs security guards to monitor the neighborhood.

In addition to athletic, performing, and visual art spaces, Archer Forward includes an underground parking structure that will allow parents and guests to park on campus for most events. By having more parking onsite, the school will be able to accommodate faculty and staff parking along with parking for guests who will no longer have to walk across Sunset Boulevard to get to campus.

I hope that Archer’s track record of CUP compliance proves that the school is able to fulfill its commitments while respecting its place in a residential community. I hope that Archer, and its students, can count on your support of this plan.
Response to Comment No. 49-2

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 50

Stu Work
Head of School
St. Matthew’s Parish School
1031 Bienveneda Ave.
Pacific Palisades, CA 90272

Comment No. 50-1

Schools, whether public, charter, or private, are positive forces in the community, helping develop the next generation of citizens, offering programs to neighbors, and providing good paying jobs. The Westside of Los Angeles is blessed to have many fine schools, including the Archer School for Girls.

I am Head of School of St. Matthew’s Parish School in the Pacific Palisades and I am happy to lend my support to Archer’s campus enhancement project, Archer Forward. The project will allow Archer to offer its students, who come from across the city, great opportunities in athletics, arts, and academics. It also takes into account the concerns of neighbors in terms of traffic and parking, and has an underground parking garage as a component.

Archer Forward is good for its students and families, its neighbors, the Brentwood community and the wider area. I hope you will join in supporting it.

Response to Comment No. 50-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 51

Beverly Grossman Palmer  
Strumwasser & Woocher LLP  
10940 Wilshire Blvd., Ste. 2000  
Los Angeles, CA  90024

Comment No. 51-2

Please find attached comments from the Residential Neighbors of Archer on the Draft Environmental Impact Report for the Archer Forward project (ENV-2011-2689-EIR). A hard copy is being personally delivered to your office this afternoon.

Please let me know if you have any problem with this transmission.

Response to Comment No. 51-2

This introductory comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 51-1

The Residential Neighbors of Archer, an unincorporated association of residents who live nearby the Archer School, submits the following comments on the Draft Environmental Impact Report (“DEIR”) for the Archer Forward project, through the law firm of Strumwasser & Woocher LLP. In addition to this comment letter, the Residential Neighbors of Archer submits analysis from four consultants on specific impacts of concern, which are attached hereto. Exhibit A contains the analysis of Tom Brohard, P.E., on traffic and parking impacts; Exhibit B contains the analysis of Derek Watry of Wilson Ihrig & Associates on noise impacts; Exhibit C contains the analysis of James Benya of Benya Burnett Consultancy on the aesthetic impacts of night lighting; and Exhibit D contains the analysis of Matt Hagemann of SWAPE on air toxics.

Response to Comment No. 51-1

This introductory comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.
Comment No. 51-2

In a document that spans nearly 5,800 pages, the DEIR identifies significant, and unmitigable, impacts to the environment in the areas of traffic (construction and operations phases), noise (construction and operations phases), and air quality (construction phase) as a result of adding a net 76,000 square feet of new facilities and significantly intensifying the use of the site. In addition, the DEIR appears to understate and improperly evaluate the impacts of the proposed project on land use, aesthetics, and localized air quality. The proposed project will significantly burden the nearby residential community with each of these impacts, and the cumulative effect of the aggregation of the impacts—through six years of construction and on-going increased use and activity at the campus—is nowhere considered in the DEIR.

Response to Comment No. 51-2

This comment correctly summarizes the Project's significant and unavoidable impacts as set forth in the Draft EIR. With regard to the size of the Project, in response to comments on the Draft EIR, refinements are proposed to the Project, including a reduction in the size of certain proposed buildings. Overall, the Project’s net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet. In addition, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on Archer’s operations are proposed, including additional limitations on the hours of operation and additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

The Draft EIR for the Project, including the land use, aesthetics, and air quality analyses, was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. In addition, the air quality and greenhouse gas emissions analyses were also prepared in accordance with SCAQMD methodology. The duration of Project impacts were considered when reaching significance conclusions in the EIR. For example, as discussed on page IV.I-23 of the Draft EIR, construction noise associated with the Project was analyzed considering, among other things, construction duration. In addition, on page IV.B-23 of the Draft EIR, it states that the duration of construction activities, including grading, excavation, and hauling activities, were taken into account when determining the Project’s air quality impacts. As demonstrated in the responses to the specific comments regarding these topics below, no new significant information (as defined by CEQA Guidelines Section 15088.5) has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all
comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR.

Comment No. 51-3

And what is the reason for exposing the neighboring community to increased environmental impact? To achieve what can only be described as a “wish list” of project objectives so grandiose and overreaching that it spans three entire pages of the nearly 6,000 page DEIR (a report nearly as lengthy as the 8,600 page program DEIR for the statewide high-speed rail project). By comparison, the 1997 Archer School DEIR was able to summarize its project objectives in just over half a page. Achieving each and every one of Archer’s myriad objectives comes at a price—and it is a price paid by the school’s neighbors and the surrounding community. As these comments will demonstrate, Archer can reasonably achieve its “basic objectives” without triggering many of the impacts, identified in the DEIR the facilities and programs that Archer would be able to offer under a reduced development scheme would be comparable to the programs offered by other Los Angeles–area private middle and high schools, and such facilities would be more appropriate given the school’s setting on a relatively small lot in a residential neighborhood. Because Archer can achieve its “basic objectives” without the environmental impacts associated with its over-large, proposed project, the California Environmental Quality Act (CEQA) requires that the City reject the proposal in favor of an alternative that avoids and/or reduces the environmental impacts.

Response to Comment No. 51-3

“CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives” (California Oak Foundation v. Regents of University of California, 188 Cal.App.4th 227, 276-277 (2010)). “CEQA simply requires the agency to thereafter prepare and certify a legally adequate EIR that provides the agency and the public alike with detailed information regarding the proposed project's significant environmental impacts, as well as reasonable alternatives that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen [those impacts]” (Id. (internal citations omitted); see also CEQA Guidelines, Section 15126.6, subd. (a); In re Bay-Delta etc., 43 Cal. 4th 1143, 1166 (2008)) Furthermore, although a lead agency may not give a project’s purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal.

As stated on page II-14 of the Draft EIR, the underlying purpose of the Project is to modernize the facilities and provide Archer with a campus that can maximize the fulfillment of its educational mission now and in the future. Section II, Project Description, of the Draft EIR includes the complete list of the Project’s specific objectives. The objectives of the
project are listed within the following categories: (a) Academic Objectives; (b) Athletics Objectives; (c) Visual Arts Objectives; (d) Performing Arts Objectives; and (e) Site Design and Community Objectives. In accordance with CEQA, the Project objectives include specific goals that would enable the Project to achieve its underlying purpose as stated above. The primary purpose of the project objectives is to help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary (CEQA Guidelines Section 15124(b)). As discussed on page V-1 of Section V, Alternatives, of the Draft EIR, the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. As such, the Project objectives were appropriately stated in Section II, Project Description, of the Draft EIR, in accordance with CEQA Guidelines Section 15124(b).

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-4

I. THE DEIR’S ANALYSIS of ENVIRONMENTAL IMPACTS IS INADEQUATE UNDER CEQA

It needs almost no mention that an accurate analysis of the environmental impacts of a proposed project is a sine qua non of an adequate environmental impact report (EIR). The DEIR fails this basic requirement, offering analysis that overlooks serious potential impacts from the project. Such shoddy analysis defeats the objectives of CEQA. A fundamental purpose of CEQA is for decisionmakers and the public to be made aware of the significant environmental impacts of a proposed project before any action is taken on that project. (Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the University of California (Laurel Heights I) (1988) 47 Cal.3d 376, 390-391; Pub. Resources Code, § 21100.) “The purpose of requiring public review is to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.... Public review permits accountability and informed self-government.” (Schoen v. Department of Forestry and Fire Protection (1997) 58 Cal.App.4th 556,573.) “Because the EIR must be certified or rejected by public officials, it is a document of accountability. If CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees.” (Laurel Heights I, 47 Cal.3d at p. 392.)

The DEIR must be revised to accurately address the impacts that the proposed project is likely to have on the environment, or else the public and decisionmakers will not be
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provided with the information necessary to reach an informed decision on the implications of approving this massive expansion program. The DEIR does not come close to “scrupulously follow[ing]” CEQA as required by law, because it does not adequately or accurately address the environmental impacts.

Response to Comment No. 51-4

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. In accordance with Article 9, Contents of Environmental Impact Reports, of the CEQA Guidelines, the Draft EIR includes a table of contents; summary of the Project, alternatives, and impacts; detailed description of the Project; environmental setting; analysis of environmental impacts (including project impacts, cumulative project impacts, growth inducing impacts, and secondary impacts); mitigation measures; analysis of alternatives; effects found to be less than significant; and a list of organizations and persons consulted. The impact analyses for the issue areas analyzed in the Draft EIR are comprehensive and are based on technical analyses from experts in the relevant fields, input from numerous other agencies and input received in response to the Notice of Preparation of the Draft EIR. For each of the issue areas where significant impacts have been identified, mitigation measures have been proposed to reduce such impacts where feasible.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states:

“New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.”

As demonstrated in this Final EIR, no new significant information (as defined by CEQA Guidelines Section 15088.5) that would require recirculation of the Draft EIR has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR. Neither the comments submitted on the Draft EIR nor the responses contained herein constitute
new significant information warranting the recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

In accordance with CEQA, there has been an extensive formal process for review of the Project and its potential environmental impacts. As stated in Section I, Executive Summary, of the Draft EIR, the City of Los Angeles circulated a Notice of Preparation for the Project to agencies and interested parties for a 30-day review period, beginning January 3, 2012. In addition, a public scoping meeting was conducted on January 18, 2012. In accordance with CEQA, the Draft EIR was initially circulated for a 46-day public comment period beginning February 27, 2014, and ending April 14, 2014. In response to public comments, the comment period was extended an additional 15 days through April 29, 2014, 61 days total, to provide more time for responsible and trustee agencies, as well as the public, to comment on the Draft EIR. Although not required by CEQA, this Final EIR will be made available to the public on the City of Los Angeles Department of Planning’s website. Furthermore, the City will provide notice of the public hearings associated with the Project approvals.

Comment No. 51-5

As an initial matter, the DEIR repeatedly errs when it describes the existing conditions on the site by characterizing existing operations according to the current CUP. The school does not, and has never, utilized all of the entitlements in the current CUP. The school does not utilize the field on any Saturdays, has never constructed a gym so cannot utilize that facility during the permitted hours, and does not enroll a full 518 students. CEQA requires that impacts are normally assessed against the environmental conditions at the time that the analysis commences. By repeatedly characterizing the existing conditions as those that are theoretically possible under the current CUP, and by not acknowledging that the school’s current use differs from the maximal permissible limits under the CUP, the DEIR repeatedly errs in setting the environmental baseline for the project.

Response to Comment No. 51-5

In accordance with CEQA Guidelines Section 15125(a), the baseline for environmental review is typically existing conditions at the time of environmental review. To implement this standard, the CEQA Guidelines provide that an EIR’s evaluation of environmental impacts should normally measure the changes a project will make in physical conditions in the area affected by the project as they exist when the notice of preparation is published, or at the time the environmental analysis begins if no notice of preparation is published (see CEQA Guidelines Section 15126.2(a)). Further, when a project involves modification or expansion of operations at a facility, the level of existing operations establishes the environmental baseline. Citizens for East Shore Parks v. State
Lands Comm., 202 Cal. App. 4th 549 (2011). The baseline shall be based on actual ongoing operations, not on some higher level of operations that might be authorized by existing permits. Communities for a Better Environment v. South Coast Air Quality Mgmt. Dist., 48 Cal. 4th 310 (2010). Here, the Draft EIR appropriately identifies existing conditions at the time of the notice of preparation (during the 2011-2012 Academic Year) rather than the permitted conditions set forth in the existing Conditional Use Permit. Section III, Environmental Setting, of the Draft EIR, provides an overview of the existing regional and local setting in which the Project Site is located, and contains a brief description of the existing conditions at the Project Site. Detailed environmental setting information is provided in each of the environmental issue analyses found in Section IV, Environmental Impact Analysis, of the Draft EIR. In addition, Section II, Project Description, of the Draft EIR provides additional information regarding existing conditions at the Project Site.

The noise analysis of the outdoor athletic activities is described on pages IV.I-87 to IV.I-110 of the Draft EIR. Because the School currently does not conduct outdoor athletic activities on weekdays after 6:00 P.M. or on Saturday, the noise analysis evaluates the proposed athletic activities during these times against the ambient noise levels without including any baseline of athletic activities noise.

The comment references the gym approved in the existing Conditional Use Permit. Section II, Project Description, of the Draft EIR includes a discussion of the existing campus operations. As discussed on page II-12 of Section II, Project Description, of the Draft EIR, although not part of the existing campus operations because it has not been constructed, the Conditional Use Permit approved a gym and provides specific hours of operation for the gym. The gym is not part of the baseline for environmental review in the Draft EIR.

As discussed in Section II, Project Description, of the Draft EIR, the existing Conditional Use Permit (ZA 98-0158(CUZ)(PA4)) provides for a maximum enrollment cap of 518 students. The Project does not propose to increase the maximum enrollment cap of 518 students. The Draft EIR appropriately identifies the enrollment at the date of the Notice of Preparation during the 2011–2012 Academic Year of 430 students in grades 6 through 12, rather than the permitted conditions set forth in the existing Conditional Use Permit, as the baseline. Accordingly, the Draft EIR appropriately analyzed the difference between maximum enrollment of 518 total students and the 2011–2012 enrollment of 430 students.

While CEQA does not require an analysis of permitted conditions versus proposed conditions, the Draft EIR does appropriately identify and analyze the proposed changes to existing conditions (i.e., the environmental baseline). In accordance with the CEQA
Guidelines, this analysis is based on the existing conditions at the Project Site. The proposed changes are summarized in Section I, Executive Summary and Section II, Project Description of the Draft EIR, and are described in greater detail by subject in Section IV, Environmental Impact Analysis, of the Draft EIR.

In addition, for informational purposes, the Draft EIR includes information regarding Archer’s existing Conditional Use Permit. See, e.g., Draft EIR at II-10, II-12 to II-13. Archer currently operates under Conditional Use Permit No. 98-0158, which established specific conditions for Archer, including a maximum enrollment of 518 students, restrictions regarding the use of the campus, limitations regarding special events, and specific hours of operation for classroom instruction, gymnasium use, passive outdoor use, and athletics outdoor use. As described in the Draft EIR at pages II-35 to II-38, Archer is seeking a new Conditional Use Permit for the Project. Thus, the physical improvements at the Project Site would be governed by the Conditional Use Permit.

Comment No. 51-6

A. Traffic, Transportation and Parking Impacts Are Not Analyzed Properly Nor Effectively Mitigated

The DEIR does not fully analyze the impacts to traffic from the operations of the proposed project, nor does it effectively mitigate the impacts that it does identify. As set forth in Exhibit A, Tom Brohard, P.E., a civil engineer with extensive experience in the analysis and management of traffic, conducted an analysis of the DEIR and the Transportation Analysis Report presented in Appendix P.1, and other associated documents. Mr. Brohard expresses a number of concerns regarding the DEIR’s analysis of traffic and transportation impacts, as well as the DEIR’s reliance on uncertain mitigation measures to address these recognized impacts. In particular, Mr. Brohard notes that the DEIR failed to perform any analysis of potential queuing impacts at intersections that are already, without the operation of the project, over their maximum capacity. Where intersections are already beyond capacity, cars waiting to traverse the intersection will not clear the intersection on a light cycle. A queuing analysis considers whether the cars waiting to pass through the intersection will block adjacent intersections or impede turning. Since Archer’s proposed operations will have a significant impact on several intersections that are already over-capacity, Mr. Brohard identifies a serious deficiency of the DEIR’s analysis. It is critical that the decisionmakers and the public be aware of the full ramifications of the traffic impacts that would be generated by Archer’s proposed project.

Response to Comment No. 51-6

This comment summarizes the conclusions made by Tom Brohard, P.E. Detailed responses to the specific comments made by Mr. Brohard are provided below. As
demonstrated therein, Section IV.K, Traffic, Access, and Parking, of the Draft EIR and the Traffic Analysis Report provided in Appendix P.1 of the Draft EIR are in compliance with CEQA, the CEQA Guidelines, the City of Los Angeles 2006 CEQA Thresholds Guide, and LADOT Traffic Study Guidelines.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

Comment No. 51-7

Mr. Brohard additionally questions key assumptions employed in the analysis of impacts to local streets. He notes that the DEIR assigns no traffic from the school to local streets such as Westgate and Chaparal. Mr. Brohard questions that assumption, particularly based upon observation that traffic flow on Sunset makes left turns to the east difficult from Archer’s driveway. He suggests that some vehicles intending to head east on Sunset may exit by turning west (right) on Sunset, turning north on Westgate, and then travelling east on Chaparal to Barrington, and using the signalized intersection of Barrington and Sunset to head east on Sunset. The DEIR may have understated the impact to Chaparal, Westgate, and other neighborhood streets from such traffic pattern.

Response to Comment No. 51-7

This comment summarizes the conclusions made by Tom Brohard, P.E. Detailed responses to the specific comments made by Mr. Brohard are provided below.

Comment No. 51-8

Mr. Brohard also reviews the proposed mitigation measures for traffic with great skepticism, particularly the measure that requires Archer to limit arrivals and departures to 72 vehicles during the PM peak hour. Mr. Brohard states that it is not possible to restrict people who are already at school from departing, and states that it would be better to limit event attendance and reduce the amount of parking so that additional vehicles are not able to arrive at the facility. On a related note, Mr. Brohard points out the DEIR does not analyze the impact of two back-to-back 300 person events in the late afternoon and early evening, so such events should either be analyzed for impacts or should be prohibited. Finally, Mr. Brohard notes that the funding for various traffic studies is likely not sufficient to provide any actual mitigation for traffic impacts and thus the studies are not effective mitigation measures under CEQA.
Response to Comment No. 51-8

This comment summarizes the conclusions made by Tom Brohard, P.E. Detailed responses to the specific comments made by Mr. Brohard referenced in the comment are provided below.

Comment No. 51-9

The DEIR’s traffic impacts analysis and mitigation measures do not meet CEQA’s requirements. The DEIR fails to study relevant factors, including queuing and back-to-back weekday events, and fails to require enforceable mitigation measures to eliminate the significant impacts of traffic by relying upon the ineffective “departure limitation” rather than an event attendance cap. The traffic impact analysis must be revised and recirculated to the public with adequate analysis and effective mitigation measures incorporated.

Response to Comment No. 51-9

Detailed responses to the specific comments made by Mr. Brohard referenced in the comment are provided below. As discussed, changes have been made to the Project and to certain of the mitigation measures in response to comments on the Draft EIR.

Comment No. 51-10

B. Analysis of Noise Impacts Does Not Capture The Full Range of Potential Noise Impacts and Fails to offer Any Mitigation for the Impacts of Operational Noise

The DEIR identifies significant and unmitigable impacts from both construction and operational noise from the proposed project. Derek Watry, an acoustical expert with Wilson Ihrig & Associates, analyzed the project’s noise study. His analysis is attached as Exhibit B. Mr. Watry concluded that the DEIR appears to understate the noise impacts from the project’s operation, by failing to recognize the significant impact of unwanted sounds introduced into a quiet setting, and by utilizing a threshold of significance that would permit unlimited incremental increases in noise levels.

Response to Comment No. 51-10

This comment summarizes the conclusions made by Wilson Ihrig & Associates. Responses to the specific comments made by Wilson Ihrig & Associates are provided below.
Comment No. 51-11

Mr. Watry studied the proposed project description and noise study at length to quantify the significant increases in use proposed by Archer's project. Mr. Watry observes that the school proposes to increase special events over 160 days more than presently occurs. The increase alone is 44 percent of the days in a year. Mr. Watry explains that regardless of the decibel levels associated with the noise from the increased use, any audible noise from the site under these circumstances should be considered a significant impact. As Mr. Watry explains, “noise is defined as ‘unwanted’ or ‘undesirable’ sound. To the residents on Chaparal Street, any audible sound from the Archer campus is a reminder that what was recently a quiet, residential enclave in the bustling City of Los Angeles is being transformed into an intensive use zone in which sport noise, talking, vehicles, and other sounds are pervasive. Regardless of the decibel level, these audible sounds are unwanted, undesirable noise to these residents and their impact should be assessed on the marked increase in exposure time in addition to the other quantified analyses presented in the 2014 Archer Forward DEIR.” (Exh. B, p. 6.)

1 The EIR does not analyze the noise impacts of "interscholastic tournaments." Interscholastic competitions are defined as games with Archer and another opponent. Interscholastic competitions involve a series of games with more guests arriving and departing over a longer period, which could have different noise impacts than a simple game between two teams. Since outdoor athletics in general is a significant impact for noise, the increased spectators at a tournament would likely be an additional impact. Archer should not be permitted to host tournaments; if it intends to do so, this must be disclosed and analyzed in the DEIR.

Response to Comment No. 51-11

This comment summarizes several of the specific comments made by Wilson Ihrig & Associates responded to in below. Specifically, as discussed further below, the City of Los Angeles does not base impacts on merely whether a sound is audible. Rather, the City has established specific significance thresholds that are based on a comparison of existing ambient noise levels with those levels that would be generated by a Project. All of the events and activities associated with the Project, including outdoor athletic activities, were thoroughly evaluated in Section IV.I, Noise, of the Draft EIR. Nonetheless, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, Interscholastic Athletic Tournaments are no longer proposed as part of the Project.

Comment No. 51-12

Mr. Watry also points out that the DEIR’s threshold of significance for noise impacts is improper. Because the threshold of significance identifies an impact only after a certain decibel level is generated for a resident off-site to hear, regardless of the baseline noise levels, noise levels in the environment could continually increase as incremental noise
generating events that do not cross the threshold occur. Over time, “there would effectively be no limit to how much sports noise could be produced over time, even though each discrete increase could be declared as less than significant.” (Exh. B, p. 7.) The same fallacy was disapproved by the Court of Appeal in *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, which rejected an EIR’s conclusion that an increase in noise below a decibel-level threshold was insignificant because the EIR failed to consider whether, in that context, even a more modest increase below the threshold could present a significant impact.

**Response to Comment No. 51-12**

See Response to Comment No. 51-105 responding to the specific comment made by Mr. Watry regarding significance thresholds and a discussion of how the Draft EIR used the appropriate significance thresholds and accounted for existing noise levels (i.e., the baseline) in the noise analysis. As described in detail therein, the significance thresholds were established based on the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide, the Los Angeles Municipal Code (LAMC) Chapter XI Noise Regulation, and applicable standards of other agencies. The City of Los Angeles CEQA Thresholds Guide specifically considers the existing ambient noise levels in determining the appropriate significance threshold.

As provided on page IV.I-29 in Section IV.I, Noise, of the Draft EIR, the thresholds of significance include the following:

- The Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category (see Table IV.I-2, City of Los Angeles Noise Compatibility Guidelines, on page IV.I-7 for a description of these categories) or causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA in CNEL or greater;

Under this significance threshold, where the existing ambient noise levels are within the “normally unacceptable” or “clearly unacceptable” categories, the significance threshold is reduced to 3 dBA to account for the existing noise conditions. Therefore, the Project’s significance thresholds consider and may be modified based on the existing ambient noise levels. In addition, as shown in Tables IV.I-6 and IV.I-7 in Section IV.I, Noise, of the Draft EIR, respectively, the existing weekday and weekend ambient noise levels along Chaparal Street are within the “normally acceptable” or “conditionally acceptable” range. Therefore, the area is not identified as high-risk for increased noise levels, and the Draft EIR’s use of the significance threshold is appropriate. Further, the ambient noise levels in the vicinity of the Project Site were considered in the Draft EIR’s cumulative noise impacts analysis,
which concluded that operational cumulative impacts would be less than significant. (See page IV.I-113 in Section IV.I, Noise, of the Draft EIR.) In addition, as further discussed in Response to Comment No. 51-105, the Draft EIR also included additional operational significance thresholds for outdoor activities, including outdoor athletic activities, which account for hourly $L_{eq}$ and $L_{max}$ noise levels.

Therefore, the Project’s significance thresholds are based on the existing ambient noise levels and are consistent with CEQA Guidelines Section 15064(a) because they take into account that “the significance of an activity may vary with the setting.” As a result, the concern expressed in Los Angeles Unified School District v. City of Los Angeles (1997) 58 Cal.App.4th 1019, cited by the commenter, is not applicable to the Project.

**Comment No. 51-13**

Mr. Watry explains that the extensive changes proposed by Archer lead directly to breadth of noise impacts at the site: “Why does the Archer Forward development create so many significant construction and operational (sports) noise impacts on the school's neighbors? Simply put, it’s because constructing a college-like, intensive use campus in what is essentially a quiet, residential enclave of Los Angeles is not in keeping with the character of the surrounding district.” (Exh. B, p. 10.) Mr. Watry notes that mitigation of the noise impacts is possible: by reducing the number of events and construction activity that will cause the noise in the first place, the noise impacts will be reduced.

As Mr. Watry succinctly opines: “[T]he extensive expansion proposed by Archer Forward raises the legitimate questions by the neighbors, ‘When is enough, enough?’ The strictly quiet residential character of Chaparal Street behind the school has been irrevocably altered by developments at Archer already, but does that portend that there no longer be due regard for the residential character remaining?” (Exh. B, p. 3.) Mr. Watry’s recommendations for analysis and mitigation measures should be followed and the DEIR should be revised with a properly conditioned project that reduces the noise impacts through a significant reduction in operations and construction.

**Response to Comment No. 51-13**

Refer to the responses to comments below that respond to the specific comments made by Mr. Watry.
Comment No. 51-14

C. The Proposed Project's Aesthetic Impacts Are Significant, Contrary to the DEIR’s Conclusion

i. Adding Night Lighting to Athletic fields Will Have a Significant and Unmistakable Aesthetic Impact on a Community that Has Minimal Night Lighting

The DEIR improperly concludes that adding night lighting to the presently dark night environment around the Archer School campus will not cause a significant impact to the environment. The DEIR reaches this conclusion on the basis of an improper threshold of significance, according to a review of the EIR’s aesthetics and lighting discussion and Appendix D, the lighting study, by James Benya, a professional lighting designer and expert in outdoor lighting issues. Mr. Benya’s analysis is attached as Exhibit C. Mr. Benya finds two major flaws in the DEIR’s analysis of lighting: use of an improper threshold of significance, and an improper calculation of the quantity of light that will intrude into nearby residences.

On the thresholds of significance, Mr. Benya notes that the Illuminating Engineering Society of North America ("IES") has published a 2011 IES Lighting Handbook ("Handbook"), which contains standards for outdoor lighting practices. The DEIR’s lighting study “recognizes the IES and the Handbook as the authority on good practice and claims compliance with its recommendations.” (Exh. C, p. 2.) Mr. Benya explains that the Handbook establishes permissible light intrusion limits based upon the amount of pre-existing ambient light at night so a smaller amount of light intrusion is permissible in an environment that is darker at night, to better preserve the present level of darkness. Because the neighborhood along Chaparal is relatively dark, Mr. Benya characterizes the environment as “lighting zone 2.” Under the Handbook, the maximum allowable “light trespass,” or light being cast where it is not wanted, in a darker area like lighting zone 2 is 3 lux, or 0.3 foot-candles.

Chaparal only has two street lights on the north side and one of the south side for the entire 0.2 mile length of the block behind Archer. The EIR’s aesthetics analysis misleadingly states that there are street lights without quantifying that these lights are infrequent, with only three spread over a largely un-illuminated quarter mile long block.

Response to Comment No. 51-14

This comment summarized the conclusions made by Benya Burnett Consultancy. Detailed responses to the specific comments made by Benya Burnett Consultancy are provided below. As demonstrated below, Section IV.A, Aesthetics/Visual Qualities, Views, Light/Glare, and Shading, of the Draft EIR and the Lighting Study provided in Appendix D
of the Draft EIR used the appropriate threshold of significance for light and glare and conducted a proper analysis of the impacts of the Project’s light and glare.

In addition, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, lighting of the athletic field has been removed from the Project. With the removal of the athletic field lighting, light and glare impacts from the Project would remain less than significant.

Comment No. 51-15

By contrast, even though the DEIR claims it complies with the Handbook’s standards, the DEIR uses the Los Angeles Municipal Code section 93.0117 limit of 20 lux, or 2 foot-candles, as the threshold to determine a significant impact. This reliance solely upon the municipal code limitation, which is not a CEQA threshold, is inappropriate. The City of Los Angeles CEQA Thresholds does not rely upon the municipal code provision, requiring an analysis on a case-by-case basis of the change in ambient light levels as a result of the project and the amount of light that would spill over from a proposed project. (See City of Los Angeles CEQA Thresholds at A.4.) Meanwhile, the DEIR actually recognizes and discusses the Handbook’s recommendations, yet dismisses these recommendation without any basis in favor of a regulation that was never intended to be applied as a threshold of significance. This is a violation of CEQA. (See Communities for a Better Environment v. Calif. Resources Agency (2002) 103 Cal.App.4th 98, 113.) The approach is also not consistent with CEQA Guidelines Appendix G, which states that a new source of substantial light that would adversely affect night views is a significant impact. The Handbook, recognized by Archer’s own experts as providing the best practice in this field, does not permit an across-the-board light trespassing 2.0 foot candles regardless of the context. The analysis must be re-visited with a proper threshold of significance.

Response to Comment No. 51-15

As discussed on page IV.A-28 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, Appendix G of the Appendix G of the CEQA Guidelines provides a set of sample questions that address impacts with regard to aesthetics. With respect the light and glare Appendix G asks:

Would the project:

- Create a new source of substantial light and glare which would adversely affect day or nighttime views in the area?
As discussed on page IV.A-30 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, in the context of the above question from Appendix G of the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide states that the determination of significance regarding light and glare shall be made on a case-by-case basis, considering the following factors:

- The change in ambient nighttime levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Additionally, as discussed on pages IV.A-7 through IV.A-8 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the City of Los Angeles regulates lighting with respect to building and safety, transportation, and light trespass (i.e., the spillover of light onto adjacent light-sensitive properties). The City also enforces the building code requirements of the California Building Code and the California Electrical Code. Exterior lighting, such as street lights and illuminated signs, is regulated by the LAMC. Applicable regulations for the Project Site include the following:

- Chapter 1, Article 2, Sec. 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter 1, Article 4.4, Sec. 14.4.4 E. No sign shall be arranged and illuminated in such a manner as to produce a light intensity greater than 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter 9, Article 3, Div. 1, Sec. 93.0117(b). No exterior light may cause more than 2 foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.
- Chapter 9, Article 9, Division 5, Sec 99.05.106.8. Comply with lighting power requirements in the California Energy Code, California Code of Regulations, Title 24, Part 6. Meet or exceed exterior light levels and uniformity ratios for lighting zone 3 as defined in Chapter 10 of the California Administrative Code, Title 24, Part 1.

Therefore, as explained on page IV.A-30 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, based on the Los Angeles CEQA
Thresholds Guide factors and the regulatory requirements identified above, the Project would have a significant impact with regard to artificial light or glare if:

- The Project generates light intensity levels of 2.0 foot-candles or more at the property line of the nearest off-site residence or other light-sensitive use;
- The Project creates new high contrast conditions visible from a field of view from a Receptor Site.
- The Project incorporates substantial amounts of highly reflective building materials or signage (i.e., daytime glare) in areas that are highly visible to off-site glare-sensitive uses.

The comment states the significance thresholds should not have relied on the Los Angeles Municipal Code Chapter 9, Article 3, Div. 1, Sec. 93.0117(b), which states:

No exterior light may cause more than 2 foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

Instead, the comment states that the significance threshold should have relied upon lighting levels determined as per the Nighttime Outdoor Lighting Zone Definitions referenced in the *Illuminating Engineering Society Handbook, 10th Edition* (IES). The IES Zone definitions include a range of outdoor lighting conditions from “LZ0, No Ambient Lighting” to “LZ4 High Ambient Lighting.” However, in addition to providing these suggested illuminance levels, the IES defers to the precedence of local codes, such as Los Angeles Municipal Code Chapter 9, Article 3, Div. 1, Sec. 93.0117(b), as the primary determining factor for the selection of the threshold. In addition, in accordance with CEQA Guidelines Sections 15064(b) and 15064.7, the lead agency has discretion to formulate standards of significance for use in an EIR. Further, ordinances, plans, policies, and regulations adopted by the lead agency, such as Los Angeles Municipal Code Chapter 9, Article 3, Div. 1, Sec. 93.0117(b), can provide relevant guidance that a lead agency can use to establish thresholds of significance. (See *North Coast Rivers Alliance v. Marin Mun. Water Dist.*, 216 Cal. App. 4th 614, 651 (2013).) Therefore, the Draft EIR used the appropriate significance thresholds for light and glare.

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Comment No. 51-16

Mr. Benya also concludes that the DEIR fails to include a proper measurement of the illuminance, or the total light that would be cast from the project onto nearby properties. Mr. Benya performs the calculation according to proper techniques and determines that far more than 0.3 foot-candles of light will trespass onto the property at the northwest corner of the site. Indeed, the results are close to the 2.0 foot-candle threshold wrongly applied in the DEIR, between 1.36 and 1.5 foot-candles. Properties across Chaparal from the lighting will receive even higher degrees of light trespass, up to as high as 5.0 foot-candles when all sources are factored in. Mr. Benya concludes that the light trespass at the residences nearest the site will certainly exceed the Handbook standards and likely even exceed the municipal code standard when calculated correctly. Mr. Benya quantifies the increase in light: an increase of 0.96 foot-candles is 239 times more light than the adjacent property receives under current conditions. There is no technology that can shield the lighting such that no light will trespass onto the nearby properties, and indeed, as Mr. Benya’s work in other locations shows, such lighting can be visible throughout a neighborhood, (See Exhibit C, Hoover High School study pp. 12–18.) The DEIR’s analysis of impacts from night lighting must be revisited to apply an appropriate threshold of significance and conduct a proper analysis of the impacts of night lighting.

Response to Comment No. 51-16

This comment summarized the conclusions made by Benya Burnett Consultancy. Responses to the specific comments made by Benya Burnett Consultancy are provided below. As demonstrated therein, Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR and the Lighting Study provided in Appendix D of the Draft EIR utilized the appropriate threshold of significance for light and glare and conducted a proper analysis of the impacts of the Project’s light and glare.

Comment No. 51-17

ii. Converting Residences to Institutional Structures, Removing Trees, and Intensifying the Use of the Campus Will Have a Significant Aesthetic Impact on the Bucolic Environment of Chaparal Street and Affect Private Views Over the Campus

In addition to the obvious error in the DEIR from failing to properly analyze the aesthetic impacts from the addition of sports lighting, the DEIR’s analysis of aesthetic impacts also fails to appropriately and adequately analyze the significant impacts that the development of the project will have on general area aesthetics and visual quality.
Response to Comment No. 51-17

Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood. Regarding athletic field lighting, as discussed in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, impacts associated with the athletic field lighting would be less than significant. However, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has removed the athletic field lighting. With the removal of the athletic field lighting, light and glare impacts from the Project would be reduced.

Comment No. 51-18

The removal of residences along Chaparal and Barrington, the increased “walling-off” of the street, and the removal of over one-hundred trees from the campus will all have a significant negative impact on the area’s aesthetics.

Response to Comment No. 51-18

Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood. Though residential structures would be removed as part of the Project, proposed buildings would be designed to complement the historic Main Building and respond to the residential scale of the surrounding area. The new School buildings would also be proportioned to modulate height and maintain the residential street character when viewed from Chaparal Street and Barrington Avenue.

The “walling off” of the street is understood to refer to the expansion of the existing ivy-covered wall flanked by a row of evergreen shade trees. This site feature provides a green background along Chaparal Street that reinforces the street edge, contributes to its quiet character, and shields residents from campus activities. The Project proposes extending this wall and the adjacent street trees an additional 110 feet. The extension of the ivy-covered wall and addition of street trees has been designed to be consistent with the residential character of Chaparal Street and to continue to shield residents from campus activities. In addition, in response to comments on the Draft EIR, additional trees would be planted along Chaparal Street, including a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street, thereby enhancing the quiet, green character of Chaparal Street. For a discussion of the use of residential
properties for school uses, refer to Topical Response No. 13, Use of Existing Residential Properties.

With respect to the removal of trees on campus, refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the Tree Report included as Appendix E to the Draft EIR, and the Tree Report Addendum included as Appendix E-2 of this Final EIR and associated clarifications included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR. As discussed therein, most of the trees to be removed are small trees or trees on the interior of campus that provide minimal aesthetic benefit to off-campus views. Where trees would be removed that currently provide visual screening of campus facilities, they would be replaced with trees that provide comparable or superior visual screening. As proposed in the Draft EIR, 102 trees would be planted as part of the Project. In response to comments on the Draft EIR, additional landscaping is proposed within the Project Site, and the Project proposes to plant a total of approximately 156 trees. In particular, in response to comments on the Draft EIR, additional trees along Chaparal Street are proposed, including a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. The Project has further been refined to shift the athletic field approximately 7 feet 6 inches to the east. This expanded setback would allow for an enhanced landscape buffer along the western property boundary of the campus. In addition, the southern row of parking spaces in the parking structure previously proposed to remain uncovered would be eliminated and replaced with an expanded landscape buffer. Further, the planting area between the southern edge of the underground parking structure and the southern property line would be increased from 7 feet 10 inches to 22 feet to accommodate an expanded landscape buffer that would enhance the views from neighboring apartments to the south and eliminate views of parked cars. In response to comments on the Draft EIR, the Project would also more than double the width of the landscape planting strip along the southern boundary of the Barrington Parcel and add a row of evergreen trees to further enhance this landscape buffer. As shown in the Revised Figure II-8, Conceptual Landscape Plan, included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, additional landscaping improvements also would be provided along Barrington Avenue.

Comment No. 51-19

The DEIR sets out the factors in the City of Los Angeles’s CEQA Thresholds Guide for assessing impacts to aesthetics and visual quality. These include the relative proportion of existing features that contribute to the visual character of a neighborhood that would be removed, altered, or demolished; the degree of contrast between the proposed project and the existing setting that represents the community’s aesthetic image; the degree to which the project would result in buildings that would detract from the existing style or image of the area; and the degree to which the project would contribute to the area’s aesthetic value, (DEIR, IV A-28–29.) The DEIR concludes that “the Project would have potentially
significant impacts if it were to substantially alter, degrade or eliminate the existing visual character of an area, including valued existing features or resources; or if the Project were to introduce elements that substantially detract from the visual character of an area,” (Id. IV A-29.) The DEIR separately states that the project would have an impact on views “if its development were to obstruct an existing view of a valued visual resource.” (Ibid.) The DEIR's view analysis focuses almost entirely on whether views of the historic main building will be affected by the project.

Response to Comment No. 51-19

The statements referenced in the comment are a summary of page IV.A-28 and page IV.A-29 of Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and describe the thresholds of significance as set forth in Appendix G of the CEQA Guidelines and the City of Los Angeles CEQA Thresholds Guide. According to the City of Los Angeles CEQA Thresholds Guide, the determination of significance regarding views shall be made on a case-by-case basis, considering the nature and quality of recognized or valued views; whether the project affects views from a designated scenic highway, corridor, or parkway; the extent of obstruction; and the extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail. In consideration of these factors, as the Main Building within the Archer campus is a historic resource, views of the building are considered “recognized or valued views.” Similarly, Sunset Boulevard is a designated Scenic Major Highway II by the Brentwood–Pacific Palisades Community Plan. Accordingly, in addition to evaluating the changes in views from the north, east, south, and west, the view analysis, including public and private views, provided on pages IV.A-51 through IV.A-67 of Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, also appropriately evaluates whether those changes in views would obstruct views of the Main Building.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-20

The DEIR does not appropriately apply the City of Los Angeles CEQA Threshold Guide factors to the proposed project and the residential community in to which it has been “shoehorned,” as one Zoning Administrator has opined. This is nowhere more true than along Chaparal, a twenty-foot-wide street that is more of a country lane than a city avenue. Residents in the area purchased homes on this street precisely because of the feeling of being removed from a city environment. For decades, these residents had as a neighbor a home for elderly women, set a full 220 feet back from Chaparal, and surrounded by open fields (and not fields used for sports, presumably).
While that environment has already been shattered by Archer’s current use of the site, the site remains visually similar to that which existed since the 1950s.

**Response to Comment No. 51-20**

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles CEQA Thresholds Guide, which was prepared in 2006. Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood. With regard to setbacks, the proposed School buildings would meet residential front yard setback requirements along Chaparal Street. The buildings would have a stepped profile and would be located behind 8-foot walls covered in vines and continuous landscaping to effectively screen the massing of the buildings along Chaparal Street with only portions of the buildings being visible along breaks in the landscaping. Additionally, the Project, as refined in response to comments, would maintain approximately 457 feet, or 64 percent, of the frontage along Chaparal Street as open space. On an overall basis, the Project would not obstruct an existing valued view, and view impacts would be less than significant. Refer to Figures IV.A-18 through Figures IV.A-21 of the Draft EIR, which compare photographs of existing conditions viewed from Chaparal Street with photographs that include renderings of the Project as proposed in the Draft EIR.

**Comment No. 51-21**

The current proposal would dramatically alter the visual landscape of the site, and fundamentally change the style and feel of the now-quiet street. The before and after illustrations in the DEIR confirm this conclusion.

Figure IV A-19 shows Chaparal as it now exists near the residence that presently houses its head of school. Looking west along the street, the existing view is of trees and sky, with the wall that surrounds Archer visible but not visually dominant. The proposed view is markedly different. Two stories of what looks almost like an office building now appear over the wall that stretches the full length of the image. If one did not know it was a school, a viewer might conclude an office park was proposed for the street. Figure IV A-20 similarly shows Archer’s visual impact as one progresses west along Chaparal, where the existing view is again of trees and sky. The proposed view now includes four seventy-foot light stanchions that loom over the viewer. In this figure, it is clear that if the perspective were changed so that the viewer looked south, the two story multipurpose facility would occupy much of the frame. Looking from the west towards the east, as shown in Figure IV A-21, the viewer presently sees trees and sky, while under Archer’s proposal, the viewer will see the institutional building appearing over the wall. In a similar vein, Figure IV A-16
shows the parcel on which the performing arts center will be constructed, replacing a modest home with a large institutional looking structure\textsuperscript{3}. The DEIR concludes that the massing and scale of these structures would be consistent with nearby residences. The DEIR does not contain any analysis of the size aesthetics or visual appearance of nearby residences, and the area’s residents would readily dispute that the appearance of either the multipurpose facility or the performing arts center are at all visually consistent with nearby homes. These structures may technically conform to code requirements for size, but neither their size nor appearance resembles a home.

\textsuperscript{3} If Archer were to move the location of the performing arts center to Chaparal with a 25 foot set back, as proposed in Alternative 3, the visual impact of the proposed project on Chaparal would be even greater, creating more of the look and feel of an office campus and removing more of the view of trees and sky.

**Response to Comment No. 51-21**

Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood. With regard to setbacks, the proposed School buildings would meet residential front yard setback requirements along Chaparal Street. The buildings would have a stepped profile and would be located behind 8-foot walls covered in vines and continuous landscaping to effectively screen the massing of the buildings along Chaparal Street with only portions of the buildings being visible along breaks in the landscaping. Additionally, the Project, as refined in response to comments, would maintain approximately 457 feet, or 64 percent, of the frontage along Chaparal Street as open space. On an overall basis, the Project would not obstruct an existing valued view, and view impacts would be less than significant.

Regarding athletic field lighting, as discussed in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, impacts associated with the athletic field lighting would be less than significant. However, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has removed the athletic field lighting. With the removal of the athletic field lighting, light and glare impacts from the Project would be reduced.

**Comment No. 51-22**

It is notable that the DEIR contains few “head-on” photos of the before and after environment along Chaparal as the campus would appear to a resident living across the street from the proposed multipurpose facility. It has, however, included such photos of the Sunset Boulevard side of its campus. The DEIR seems focused solely on ensuring that the
views of the historic main building are unaffected by its project. While that may be a minimal requirement to avoid an aesthetic impact, the private views of area residents are also relevant to the analysis of aesthetic impacts under CEQA. (See Ocean View Estates v. Montecito Water Dist. (2004) 116 Cal.App.4th 396, 402.) The DEIR’s aesthetics analysis does not adequately consider these private views of the Archer campus, beyond whether a private view of the historic main building would be affected. (See DEIR, IV A-66.) More is required. From the vantage point of a resident on Chaparal, the campus would change dramatically from what currently exists, as well as from what Archer is presently entitled to construct, as it is now required to set back its much smaller gym 80 feet from Chaparal. The DEIR must analyze whether the visual experience of its neighbors along Chaparal will be forever altered, in a manner that "substantially degrade[s] the existing visual character or quality of the site and its surroundings." (CEQA Guidelines, Appendix G.)

Response to Comment No. 51-22

Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

The Draft EIR appropriately analyzed private views of the Archer campus. As described on page IV.A-18 of the Draft EIR, private views of the Project Site from the adjacent single- and multi-family homes along Sunset Boulevard, Barrington Avenue, Chaparal Street, and Westgate Avenue are largely obscured by the existing ivy-covered cinderblock walls and mature landscaping. In addition, in response to comments on the Draft EIR, additional trees would be planted along Chaparal Street, including a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. Additionally, proposed buildings would have a stepped profile and would be located behind 8-foot walls covered in vines and continuous landscaping to effectively screen the massing of the buildings along Chaparal Street with only portions of the buildings being visible along breaks in the landscaping. Additionally, the Project, as refined in response to comments, would maintain approximately 457 feet, or 64 percent, of the frontage along Chaparal Street as open space. On an overall basis, the Project would not obstruct an existing valued view, and view impacts would be less than significant. Regarding private views of the campus, refer to Response to Comment No. 27-49.

Residences to the north, directly across Chaparal Street from proposed buildings, are set back approximately 55 feet from the north edge of the street (approximately 95 feet from the northern edge of campus, and 120 feet from proposed buildings) behind a row of mature landscaping over 40 feet in height. These include one- and two-story homes surrounded by densely planted trees and shrubs. Views from these residences are
primarily of their own landscaping, site walls, and gates. To the extent proposed buildings would be visible at all from these residences, only portions of the proposed buildings would be visible through new and existing landscaping.

Regarding the choice of illustrative photos, the Draft EIR analyzed private as well as public views along Chaparal Street, and five locations were selected from which to illustrate before-and-after views of the Project along Chaparal Street. The Draft EIR included five vantage points looking down the length of Chaparal Street, toward the Archer campus, showing how views of residents and others along the public way from either direction would be affected. Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, Figures IV.A-18 through IV.A-21, of the Draft EIR. These particular vantage points were chosen to illustrate the most generally representative impacts of the Project on views on Chaparal Street. The broader views were also chosen to show the scope of the Project in the context of the overall street and the existing Archer campus. Nonetheless, in response to comments on the Draft EIR, additional visual simulations containing before and after views from vantage points directly across from the proposed buildings are included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

**Comment No. 51-23**

The present Archer campus contains significant open space and trees. Two of the proposed project sites contain single family homes, much like the properties surrounding them, including a large, graceful tree presently adorning the lawn of the Chaparal Residence. (Figure IV A-3.) Replacing these residences with large, institutional structures, removing over 160 trees from the project site and replacing them with 102 “appropriately-sized” trees (DEIR, IV A-50), and adding structures to what are presently open spaces on the site, will all have a significant effect on the visual appearance of the campus, in a setting which is presently a quiet residential community.

**Response to Comment No. 51-23**

Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood. As discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, the Project’s net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet, leaving approximately 229,547 square feet of open space or approximately 72 percent of the campus. Upon full build-out of the Project, the School would comprise approximately 159,937 square feet. Thus, at build out, the Project’s floor area would comprise approximately 22 percent of the total allowable floor area for the Project Site. Moreover,
views of campus open space would be enhanced with a continuation in the openness provided by the athletic field, the removal of the existing west surface parking lot, and the implementation of additional landscaping. For a discussion of the use of residential properties for school uses, refer to Topical Response No. 13, Use of Existing Residential Properties.

Regarding landscaping, refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, Appendix E, Tree Report, of the Draft EIR, and the Tree Report Addendum included as Appendix E-2 of this Final EIR and associated clarifications included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR. As described therein, most of the trees to be removed as part of the Project are small trees or trees on the interior of campus that provide minimal aesthetic benefit or visual screening of campus facilities. Where trees would be removed that currently provide visual screening of campus facilities, they would be replaced with trees that provide comparable or superior visual screening. With the addition of landscaping along Chaparal Street and elsewhere, the Project would be further consistent with the residential scale and character of the neighborhood. As proposed in the Draft EIR, 102 trees would be planted as part of the Project. In response to comments on the Draft EIR, additional landscaping is proposed within the Project Site, and a total of approximately 156 trees would be planted. In particular, in response to comments on the Draft EIR, additional trees would be planted along Chaparal Street and a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. In response to comments on the Draft EIR, the Project has further been refined to shift the athletic field approximately 7 feet 6 inches to the east. This expanded setback would allow for an enhanced landscape buffer along the western property boundary of the campus. In addition, the southern row of parking spaces in the parking structure previously proposed to remain uncovered would be eliminated and replaced with an expanded landscape buffer. Further, the planting area between the southern edge of the underground parking structure and the southern property line would be increased from 7 feet 10 inches to 22 feet to accommodate an expanded landscape buffer that would enhance the views from neighboring apartments to the south and eliminate views of parked cars. In addition, in response to comments on the Draft EIR, the Project would more than double the width of the landscape planting strip along the southern boundary of the Barrington Parcel and add a row of evergreen trees to further enhance this landscape buffer. As shown in the Revised Figure II-8, Conceptual Landscape Plan, included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, additional landscaping improvements also would be provided along Barrington Avenue.

**Comment No. 51-24**

The DEIR’s analysis of aesthetic impacts must be revised to adequately reflect the significant impact that the proposed project will have on the area’s aesthetic image, the
degree to which the project’s construction would detract from the appearance of the area, and the degree to which the private views from Chaparal (and homes along Westgate) would be impacted by the magnitude of the program of new buildings proposed for the Archer site.

Response to Comment No. 51-24

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles CEQA Thresholds Guide. As provided on page IV.A-28 and page IV.A-29 of Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, according to the City of Los Angeles CEQA Thresholds Guide, the determination of impacts associated with aesthetics/visual quality shall be made on a case-by-case basis, considering the amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished; the amount of natural open space to be graded or developed; the degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site; the degree of contrast between proposed features and existing features that represent the area’s valued aesthetic image; the degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area; the degree to which the project would contribute to the area’s aesthetic value; and applicable guidelines and regulations.

Based on the above, aesthetics/visual quality impacts during construction and operation of the Project were determined to be less than significant. Specifically, as summarized on page IV.A-40 of the Draft EIR, the removal of on-site structures, surface parking areas, and landscaping would not cause the loss of unique visual resources or prominent existing features and would not substantially alter, degrade, or eliminate the visual quality of the Project Site or surrounding area. The Project would also incorporate project design features to further reduce potential aesthetics/visual quality impacts during construction. Refer to Project Design Feature A-1, which would require the installation of temporary construction fencing to screen construction activities from view, and Project Design Feature A-2, which would require daily inspections to ensure that no unauthorized materials are posted on any temporary construction barriers.

With regard to operational aesthetics/visual quality impacts, as discussed on page IV.A-51 of the Draft EIR, the Project would create a visually unified campus with new buildings designed to respond to the residential scale and character of the surrounding area. In addition, the Project would continue the existing building material and color palette to further integrate the new buildings within the campus and neighboring uses. The Project would also preserve the historic Main Building and would not remove existing valued
features or elements that contribute positively to the visual character of the surrounding area. Therefore, the Project would not substantially alter, degrade, or eliminate the existing visual character of the Project Site or surrounding area, including valued existing features or resources, or introduce elements that substantially detract from the visual character. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

An analysis of view impacts, including private views is provided on pages IV.A-51 through IV.A-67 of Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR. As evaluated therein, north-facing private views from the apartment building located immediately adjacent to the southwestern portion of the Project Site would be maintained and potentially enhanced with a continuation in the openness provided by the athletic field, the removal of the existing west surface parking lot, and the implementation of additional landscaping along this perimeter. Similarly, it is expected that private views from the residences to the north of the Barrington Parcel would be limited given the lower elevation within the Barrington Parcel and the dense, mature landscaping between the residences and the Barrington Parcel. In addition, the Aquatics Center and the Visual Arts Center to be constructed within the Barrington Parcel would include architectural features that would serve to integrate the building within the campus and be compatible with surrounding uses. Furthermore, while views of the campus from the adjacent residences to the west and north would be altered with the introduction of new school-related buildings and athletic facilities, new school buildings would feature architectural treatments to effectively integrate the new buildings into the existing campus and be compatible with the existing Main Building. In addition, existing, mature vegetation along the western boundary of the campus would be maintained to continue to buffer the residences from campus activities and obscure views of the adjacent athletic field and related amenities from lower levels. Proposed additional landscaping along the west and along Chaparal Street would further buffer the proposed uses from the surrounding residential streets.

Based on the above, no new significant information (as defined by CEQA Guidelines Section 15088.5) that would require recirculation of the Draft EIR has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR. Neither the comments submitted on the Draft EIR nor the responses contained herein constitute new significant information warranting the recirculation of the Draft EIR as set forth in CEQA Guidelines.
Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

It is noted that in response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood. Also refer to Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, regarding the Project refinement to remove the athletics field lighting from the Project. In addition, as detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. These refinements would serve to further reduce aesthetics/visual quality and view impacts during construction and operation of the Project.

Comment No. 51-25

D. The Construction Phase of the Project Will Have Significant Localized Air Quality Impacts from Diesel Emissions, in Contrast to the DEIR’s Conclusions; All Feasible Mitigation Measures Must be Required for Such Impacts

The proposed project is scheduled to be under construction over a period spanning six years, within feet of numerous residences, as well as proximate to the students at Archer itself. Both Archer’s students and the nearby residents are “sensitive receptors” for purposes of analyzing air quality impacts and that such impact cannot be mitigated. The DEIR concedes the construction operations will exceed air quality standards for NOx emissions.

Response to Comment No. 51-25

As discussed in Section IV.3.b of Section IV.B, Air Quality, of the Draft EIR, the localized effects from the on-site portion of Project emissions to sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) and potential impacts to Archer students were evaluated according to the SCAQMD’s localized significance threshold (LST) methodology. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. These ambient air quality standards provide public health protection,
including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly.

Section IV.B, Air Quality, of the Draft EIR provided an assessment of Project-related localized construction and operational air quality impacts consistent with SCAQMD's localized significance threshold (LST) methodology. The SCAQMD LST methodology requires calculation of on-site mass emissions, comparison of the calculated emissions to SCAQMD on-site mass emissions rate lookup tables based on source acreage and proximity to sensitive receptors, and project-specific air quality modeling where the project exceeds the LST lookup values.

As stated on Page 3-3 of the LST methodology, "The closest receptor distance on the mass rate LST lookup tables is 25 meters. It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."\(^{18}\) Based on this guidance, sensitive receptors (e.g., adjacent residential uses and Archer's students) in close proximity to proposed construction activities were evaluated using the 25 meter mass rate LST lookup tables. As shown in Table IV.B-14 on page IV.B-62 of the Draft EIR, construction of the Project would not exceed SCAQMD localized thresholds (i.e., LST lookup values) with incorporation of mitigation measures. As a result, consistent with SCAQMD LST methodology, the Project would not cause an exceedance of the LST standards and no project-specific air quality modeling was required. Moreover, as provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, additional mitigation incorporated as part of this Final EIR would further reduce Project construction emissions related to regional and localized impacts.

As discussed in Section IV.B, Air Quality, of the Draft EIR, the Project would result in an exceedance of the SCAQMD regional significance threshold for NO\(_X\) during the most intense construction periods. However, as provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, proposed additional mitigation would reduce this regional short-term NO\(_X\) impact to less than significant levels.

Comment No. 51-26

Matt Hagemann and Anders Sutherland of SWAPE reviewed the DEIR’s air quality analysis and determined that the analysis failed to disclose a likely significant impact from diesel particulate matter emissions. The analysis is attached as Exhibit D. While the CEQA threshold of significance for an impact from diesel particulate matter emission is an incremental increase in cancer risk of 10 in 1 million people, Mr. Hagemann and Mr. Sutherland calculate that the likely incremental increase in cancer risk as a result of diesel particulate matter emissions is 30.8 in a million for adults. Even more troubling given the proposal to conduct construction while students are in school, the cancer risk for children is predicted to increase to 53.1 in a million. Archer’s DEIR fails to properly calculate the risk to its own students from exposure to toxic diesel emissions as a result of construction operations of this magnitude and duration.

Response to Comment No. 51-26

This comment references specific comments provided in a screening level analysis prepared by SWAPE and included as Exhibit D. Responses to specific comments made by SWAPE are provided below.

The SWAPE analysis and related technical appendices were carefully reviewed for purposes of considering the potential of the Project to result in health risk impacts. Based on this evaluation, multiple methodological flaws were identified that substantially undermine the relative accuracy of the SWAPE results compared with the more refined, site-specific analysis that was included in the Draft EIR. The most important of these issues are detailed here and then discussed as needed in other specific Response to Comments.

A key limitation with the SWAPE analysis is that it relied on a “screening level” model to evaluate health risks. A screening level analysis can be appropriate to assess whether more detailed, refined modeling assessment is needed. Screening models typically rely on rough, very conservative assumptions to check if a project could cause a significant health impact. If, based on the screening, there is no potential for a significant impact, then no additional analysis is required. In this way, screening models can help save time and money by eliminating the need for some projects to complete more expensive, time-consuming dispersion modeling.

This use of screening models is consistent with industry standard and agency guidance. As recommended by the Office of Environmental Health Hazard Assessment (OEHHA), page 4-25 of The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments states “Screening models are normally used when
no representative meteorological data are available and may be used as a preliminary estimate to determine if a more detailed assessment is warranted.”¹⁹

Specifically, the SWAPE analysis was conducted using a screening level model (AERSCREEN) which provides overly conservative results in terms of assessing Project impacts. As noted above, screening level results that show a potential significant impact are only relevant to the extent that to demonstrate that SWAPE should have then conducted additional analysis using a refined mode, which, notably, is exactly what was provided in the Draft EIR to evaluate potential health risk impacts. As discussed on page IV.B-43 in Section IV.B, Air Quality, of the Draft EIR, health risks were analyzed consistent with SCAQMD methodology and used AEROMOD to complete refined dispersion modeling. AEROMOD accounts for a variety of refined, site-specific conditions that facilitate a more accurate assessment of Project impacts compared to the less refined AERSCREEN screening model. The most important differences between AERSCREEN and AERMOD are the following:

- Meteorological Data—The AERSCREEN model uses User-defined conditions, which typically assume worst-case meteorological conditions occurring 24 hours per day, 365 days per year for the entire construction duration along with the maximum daily emissions occurring each of those days. The HRA provided in the Draft EIR instead used AERMOD which allows for SCAQMD representative meteorological data (Los Angeles–VA Hospital Station) to be used in calculation of annual concentrations. This SCAQMD meteorological data provides hourly conditions (e.g., wind speed, wind direction, and stability class) over a five year period (43,800 hours). With these conditions, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.

- Site Specific Conditions—AERMOD allows for analysis of multiple volume sources and to account for complex terrain in the area (elevation) which is required to adequately represent Project construction. The use of a single rectangular source to represent construction activities provided in the SWAPE analysis does not adequately represent the Project site and does not account for complex terrain conditions and likely overstates emissions because of the plume interaction with terrain. In addition, a volume source and not an area source is the type of source recommended by the SCAQMD for modeling construction equipment exhaust emissions (SCAQMD LST Guidelines). By accounting for the complex terrain around the Project site, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.

Consequently, the coarser AERSCREEN evaluation provides a much less accurate assessment of Project health risks compared to the refined AERMOD evaluation. Moreover, as discussed in the specific comments below, the SWAPE screening level analysis was not performed in accordance with requirements included in SCAQMD’s LST methodology and OEHHA’s guidance. The analysis also did not account for the following: (1) site specific conditions; (2) use of a refined dispersion model; and (3) use of SCAQMD mandated meteorological data from the closest/most representative meteorological monitoring site within the Project area. If the SWAPE analysis accounted for the guidance and data discussed above, then the results would have been similar to the findings of the Draft EIR.

Accordingly, potential health risk impacts from the Project to nearby sensitive uses (e.g., Archer’s students and adjacent and nearby residences) as the result of proposed construction activities is more accurately identified by the AERMOD evaluation presented in the Draft EIR. As discussed in Section IV.B, Air Quality, of the Draft EIR, the Project would not result in a significant health risk impact during construction or operations with incorporation of mitigation measures. In addition, as provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, Mitigation Measure B-4 has been strengthened to require off-road diesel-powered equipment to meet Tier 3 standards during construction of the proposed Project and to require front end loaders used for Phase 1—Excavation and Grading to meet California Air Resources Board Tier 4 Interim Standards (Title 13, CCR, Section 2423, Table 1b) which will further reduce Project impacts related to diesel particulate matter, with impacts continuing to remain less than significant.

Comment No. 51-27

The DEIR presently contains no mitigation measures for the increased risk of cancer to the nearby residents, or the children who attend Archer. Mr. Hagemann and Mr. Sutherland note that required mitigation measures would include no diesel truck idling, staging, or queuing within 1000 feet of sensitive receptors. However, the DEIR states that such trucks will utilize the driveways on Sunset, Chaparal, and Barrington during various phases of construction, all well within 1000 feet of sensitive receptors like Archer’s students and neighboring residents. The construction operations must be rethought to design a safe and effective mitigation program that avoids exposing Archer’s students and the neighboring community to increased cancer risk as a result of the proposed project’s construction and associated toxic diesel emissions.

Response to Comment No. 51-27

Contrary to the commenter’s assertion that the Draft EIR contains no mitigation measures to reduce DPM emissions, the following mitigation measures are included in Section IV.B, Air Quality, of the Draft EIR and would substantially reduce DPM emissions:
• Mitigation Measure B-4 requires use of off-road diesel-powered equipment that will be used an aggregate of 40 or more hours during any portion of the construction activities associated with Phase 1—Excavation and Grading and Phase 1—Building Construction shall meet the Tier 3 standards. In addition, construction contractors supplying heavy duty diesel equipment greater than 50 horsepower shall be encouraged to apply for AQMD SOON funds. Use of equipment meeting Tier 3 standards would substantially reduce DPM emissions.

• Mitigation Measure B-5 requires all construction equipment to be properly tuned and maintained in accordance with the manufacturer’s specifications.

• Mitigation Measure B-6 requires the Project to use contractors with a minimum of 80 percent of haul trucks meeting EPA Model Year 2007 NOX emissions levels during Phase 1—Excavation and Grading soil import/export.

• Mitigation Measure B-7 requires contractors to maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues will have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions.

• Mitigation Measure B-9 requires to the extent possible, petroleum-powered construction activity shall use electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.

In addition, as provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, Mitigation Measure B-4 has been supplemented to further reduce construction emissions by requiring the use of equipment meeting Tier 3 standards during the entire construction duration and front-end loaders used for Phase 1—Excavation and Grading would meet Tier 4 interim standards. As shown in the revised tables included in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, Project emissions during construction for regional and local impacts would be less than significant with the incorporation of mitigation measures. This additional mitigation would also serve to reduce DPM emissions.

The additional mitigation requirements under Mitigation Measure B-4 would serve to reduce DPM emissions during proposed construction activities and no additional mitigation measures are warranted based on this comment. Refer to the responses to comments below for a detailed response to the SWAPE specific comments. Potential health risk impacts from diesel particulate matter to nearby sensitive uses (e.g., Archer’s students and adjacent and nearby residences) as the result of proposed construction activities remain less than significant with incorporation of mitigation measures. As a result, no additional mitigation is required to address this comment.
Comment No. 51-28

E. The Extensive Development Proposed in a Residential Community Is Not Consistent with Applicable Land Use Policies Nor Compatible With the Neighborhood, a Significant Impact that the DEIR Fails to Recognize or Mitigate

The DEIR improperly concludes that the proposed project will not have a significant impact on land use. The DEIR reaches this conclusion only by glossing over the fact that the proposed project will convert established, residential properties to institutional use, in the middle of a single family residential neighborhood. Such change is inconsistent with the policies in the applicable land use planning document for the area, the Brentwood–Pacific Palisades Community Plan (“BPPCP”). The inconsistency between the proposed project and the BPPCP is a significant impact under CEQA, which must be discussed and analyzed in the DEIR. The DEIR explains that under the CEQA Guidelines, a project may have a significant impact on land use if it “conflict[s] with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project... adopted for the purpose of avoiding or mitigating an environmental effect.” (DEIR, IV H-13.) The City of Los Angeles CEQA Thresholds Guide elaborates that a proposed project must be evaluated for consistency with land use policies by comparison to the policies in the relevant Community Plan. (Ibid.) The City of Los Angeles CEQA Thresholds Guide also contains parameters to evaluate land use consistency of a proposal, including the extent of the area that would be impacted, nature and degree of impacts, type of land use, and the number and type of “secondary impacts” to surrounding land uses from the proposed project. The proposed project has significant impacts both under the metric of consistency and compatibility.

Response to Comment No. 51-28

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. As provided on page IV.H-13 of Section IV.H, Land Use, of the Draft EIR, according to the City of Los Angeles 2006 CEQA Thresholds Guide, the determination of impacts associated with land use consistency shall be made on a case-by-case basis, considering whether the proposal would be inconsistent with the adopted land use/density designation and whether the proposal would be inconsistent with the General Plan. Based on these factors, the Project would have a significant land use consistency impact if it were found to be in substantial conflict with the adopted Community Plan or with relevant environmental policies in other applicable plans. It is important to note that inconsistency with a few policies within a plan does not necessarily constitute a significant impact. Furthermore, the determination of impacts associated with land use compatibility shall be made on a case-by-case basis, considering the extent of the area that would be impacted, the nature and degree of
impacts, and the type of land uses within the area; the extent to which neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Project. Based on these factors, the Project would have a significant impact if the Project would substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses, or would disrupt, divide, or isolate existing neighborhoods or communities.

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City’s residential neighborhoods. Additionally, as the Project represents a continuation of an existing private school use, the Project would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

Additionally, the Project does not propose a zone change for the Chaparal Parcel or the Barrington Parcel, and these parcels would continue to be zoned for residential uses. Therefore, the Project would not result in any reduction in acreage zoned for single-family uses. As such, the Project would also be consistent with the intent of the Brentwood–Pacific Palisades Community Plan to maintain the existing acreage of residential lands designated for single-family use. As described further in Topical Response No. 13, Use of Existing Residential Properties, school uses are permitted in the RE and R3 zones with a CUP. As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer currently operates pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding the compatibility of the School’s operations and its facilities with the surrounding neighborhood.

**Comment No. 51-29**

The DEIR purports to analyze the proposed project’s consistency with the BPPCP, but takes a selective approach to the policies it identifies for consistency. The DEIR argues that the proposed project is consistent with the BPPCP because it, in brief, preserves the
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historic Main Building, creates a unified campus, and enhances open space by placing parking underground. (See DEIR IV H-46–49.)

Response to Comment No. 51-29

As provided on page IV.H-33 through page IV.H-49 of Section IV.H, Land Use, of the Draft EIR, the Draft EIR appropriately analyzes the Project’s consistency with the applicable policies of the Brentwood-Pacific Palisades Community Plan. As described therein, the Project would be generally consistent with the Community Plan.

Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

Comment No. 51-30

The DEIR’s analysis ignores the BPPCP’s policies regarding the preservation of residential neighborhoods. Objective 1-1 of the BPPCP is “to provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area.” Policy 1-1.46 states that “the City should promote neighborhood conservation, particularly in existing single family neighborhoods, as well as in areas with existing multiple-family residences.” Objective 1-3 is “to preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.” The policies that implement Objective 1-3 include “seek a higher degree of architectural compatibility and landscaping for new development to protect the character and scale of existing residential neighborhoods.” (Policy 1-3.1.) Policy 1-3.3 provides that “factors such as neighborhood character and identity, compatibility of land uses, impacts on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.” The DEIR discusses none of these policies. Yet the proposed project will replace two long-established homes, in the middle of a residential neighborhood, with institutional uses. This is directly contrary to the policies requiring the preservation of residential neighborhoods, and the protection of residential communities against incompatible non-residential encroachment.

Response to Comment No. 51-30

As provided on page IV.H-33 through page IV.H-49 of Section IV.H, Land Use, of the Draft EIR, the Draft EIR analyzed the Project’s consistency with applicable policies of the Brentwood–Pacific Palisades Community Plan. As described therein, the Project would be consistent with the general intent of the Community Plan. In addition, refer specifically
to pages IV.H-34 through IV.H-35 for an analysis of the Project’s consistency with Objective 1-3.

With regard to the other objectives and policies of the Brentwood–Pacific Palisades Community Plan referenced in the comment, as described on page II-7 of Section II, Project Description, of the Draft EIR, the existing residence on the Chaparal Parcel was renovated in 2008 to house the Head of School. The residence on the Barrington Parcel is vacant. In addition, the Project does not proposed to change the existing single family residential zoning of either the Barrington Parcel or the Chaparal Parcel, resulting in no reduction of lots zoned for residential use. Further, as evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City’s residential neighborhoods. Additionally, as the Project represents a continuation of an existing private school use, the Project would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses. Accordingly, the Project would be consistent with Brentwood-Pacific Palisades Community Plan Objective 1-1, Policy 1-1.46, Policy 1-3.1, and Policy 1-3.3 to promote neighborhood conservation.

As detailed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the buildings and enhanced landscape buffers, which would further the Project’s compatibility with the surrounding uses. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

Also refer to Topical Response No. 13, Use of Existing Residential Properties, for a discussion of the use of residential properties for school uses. As described therein, school uses are permitted in the RE and R3 zones with a CUP.

**Comment No. 51-31**

Indeed, past approvals involving the Archer School and its predecessor on the site, the Eastern Star Home, confirm that the City has viewed the encroachment of institutional uses along Chaparal to be inconsistent with the residential character of that street. As disclosed in the 1997 Archer School DEIR, the original approval to construct the Eastern Star Home
required a 224-foot setback from Chaparal. In 1950, when the Eastern Star Home sought to construct a structure within 80 feet of Chaparal, the request was denied. In 1998, when Archer sought approval to construct a 12,000 square foot gymnasium (71 percent smaller than the presently requested 41,400 square foot “multipurpose” facility), the Zoning Administrator required a 75-foot setback from Chaparal and prohibited doors and windows opening to the north, east, and west to protect residences from the noise emanating from the gym. The City’s past treatment of Archer’s property confirms that institutional land uses should not be placed directly adjacent to residences, and should not replace existing residences.

**Response to Comment No. 51-31**

The Project has been designed in consideration of adjacent residential streets. Specifically, as described on page II-27 of the Draft EIR, the Project would create a visually unified campus with new buildings designed to complement the historic Main Building and respond to the residential scale of the surrounding area. The new school buildings would be proportioned to modulate height and maintain the residential street character when viewed from Chaparal Street and Barrington Avenue. Additionally, the buildings would be designed to shield neighbors from internal campus activities and noise, including having no operable windows that open on the sides of buildings directly adjacent to Chaparal Street and Barrington Avenue. In addition, as described on page IV.H-52 of the Draft EIR, the Project would have 25-foot front yards along Chaparal Street and Barrington Avenue in compliance with residential front yard requirements. The Project also proposes enhanced landscaping buffers to provide privacy and reduce noise to nearby properties. As described in more detail in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, along Chaparal Street is a solid cinderblock wall and wrought iron gate covered in vines. Also along Chaparal Street is a row of existing pine trees.

As discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, refinements to the Project are proposed, including planting additional trees along Chaparal Street and a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. In addition, in response to comments, the Project has also been refined to shift the athletic field approximately 7 feet 6 inches to the east. Shifting the athletic field would move the athletic field further away from the neighbors to the west of the campus property boundary while still maintaining regulation size soccer and softball fields. This expanded setback would allow for an enhanced landscape buffer along the western property boundary of the campus. In response to comments, the Project would also add a row of landscaping along the southern boundary of the Barrington Parcel.
With respect to the Multipurpose Facility, as described in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, the Multipurpose Facility is proposed to be reduced from 41,400 square feet to 39,330 square feet. As described on page II-22 of the Draft EIR, the Multipurpose Facility would comprise two general levels. The lower level would be located below grade and partially open to the sunken North Garden to the west. As such, approximately 19,950 square feet of the Multipurpose Facility would be above grade. As evaluated on page IV.I-82 to page IV.I-83 of the Draft EIR, potential noise impacts from the Multipurpose Facility would be less than significant.

In response to comments on the Draft EIR, the Project has been further refined to fully enclose the Aquatics Center to reduce noise impacts from the Project. Due to the enclosure of the Aquatics Center, there would be no side yard along the northern property line at the Barrington Parcel. As such, the School is requesting relief from LAMC Section 12.21.C.3.b to allow this setback along the north side yards. Three parcels border the Barrington Parcel to the north: the Chaparal Parcel, which is owned by Archer and part of the Project Site; 11718 Chaparal Street; and 11706 Chaparal Street. The rear yards of 11718 Chaparal Street and 11706 Chaparal Street are truncated by a retaining wall and property fencing located between 8 and 13 feet from the northern Barrington Parcel property line, increasing the actual distance between development on the Barrington Parcel and adjacent residential uses. Finally, the Project would comply with side yard requirements with respect to the boundary between the Barrington Parcel and 11706 Chaparal Street, as the Project would not result in development within 20 feet of the 11706 Chaparal Street property line. The Aquatics Center would be located 24 feet, 3 inches from the 11706 Chaparal Street property line.

Also refer to Topical Response No. 13, Use of Existing Residential Properties and Topical Response No. 16, Environmental Review and Conditional Use Permit Processes.

Comment No. 51-32

The DEIR also conveniently relies only upon “non-event” traffic to conclude that the project is consistent with BPPCP Policy 13-5, which requires that projects mitigate the significant effects of development on traffic. While the DEIR mentions that the event days will result in significant impacts at four intersections, it goes onto to say that “the Project proposes physical mitigation measures that would reduce the Project’s potential impacts as required by Policy 13-1.5.” However, there are no physical mitigation measures for the significant impacts of event day traffic. Even 300-person events have a significant and unmitigable impact on two intersections. Such events are not likely to be such a rarity under Archer’s proposal, because simultaneous sporting events at the aquatic center, in the two gyms,
and on the athletic field could easily draw 300 spectators. The proposed project is not consistent with the policy requiring that traffic impacts from development be mitigated.

**Response to Comment No. 51-32**

As noted on pages IV.H-42 and page IV.H-43 of the Draft EIR, the Project would be partially consistent with Policy 13-1.5 of the Brentwood-Pacific Palisades Community Plan as significant traffic impacts would remain. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR (see page IV.K-58 as an example), the Project would result in potentially significant impacts at Intersection No. 4, Saltair Avenue & Sunset Boulevard, during an event day. As such, Mitigation Measure K-3, which includes a modification to the northbound approach of Saltair Avenue, is included. However, as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, the Project is incorporating additional operational mitigation measures to reduce operational significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

**Comment No. 51-33**

Just as the proposed project is not consistent with the BPPCP, it is likewise not a compatible land use for the residential neighborhood. The DEIR relies upon the fact that the proposed project is already in operation to conclude that further school use is compatible with the other land use in the area. However, decreasing the proportion of properties on Chaparal that will be used for residential purposes, and increasing the number of institutional uses along Chaparal (both by removing residences and by eliminating what is presently open space), are fundamental modifications to the existing land use in the area.

**Response to Comment No. 51-33**

Refer to Response to Comment No. 51-28 regarding compatibility of the Project with the surrounding neighborhood. It is noted that the School has approximately 710 feet of frontage along Chaparal Street. The Project, as refined in response to comments on the Draft EIR, would maintain approximately 457 feet, or 64 percent, of the frontage along Chaparal Street as open space. Refer to Section II, Corrections and Additions to the Draft EIR, of this Final EIR, for a description of the proposed refinements to the Project.

**Comment No. 51-34**

While the underlying zoning may permit school use pursuant to a conditional use permit, the fact that such use is only permissible by special permit reinforces the notion that school/institutional use is not inherently compatible with residential use.
construction and operation on residentially-zoned [sic] property must be evaluated to ensure that the operation is compatible and appropriate for the proposed location. In this case, the residences are too close to the new school uses proposed and the secondary impacts (such as noise, light pollution, and increased traffic) on the residences are far too significant to deem the change in use from residential to school “compatible” with the surrounding neighborhood. The construction of a 41,400 square foot multipurpose facility 25 feet from the property line, and the replacement of single family homes with a 22,600 square foot performing arts center and an outdoor swimming complex are not compatible with the quiet character of the surrounding residential community.

**Response to Comment No. 51-34**

The development of school buildings within the Barrington and Chaparal Parcels is part of the Project and, as such, potential visual, noise, and traffic impacts were appropriately evaluated in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, Section IV.I, Noise, and Section IV.K, Traffic, Access, and Parking, of the Draft EIR, respectively. As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City's residential neighborhoods. Additionally, as the Project represents a continuation of an existing private school use, the Project would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses.

Refer to Topical Response No. 13, Use of Existing Residential Properties, for a discussion of the use of residential properties for school uses. Also refer to Section II, Corrections and Additions to the Draft EIR, of this Final EIR, for a description of the proposed refinements to the Project, including a reduction in the square footage of some of the proposed buildings. In particular, the North Wing Renovation is proposed to be reduced from 39,071 square feet to 30,400 square feet, the Multipurpose Facility is proposed to be reduced from 41,400 square feet to 39,330 square feet, and the Performing Arts Center is proposed to be reduced from 22,600 square feet to 19,025 square feet. In addition, to reduce noise impacts from the use of the pool, the Project has been refined to fully enclose the proposed Aquatics Center. Enclosing the Aquatics Center would increase the square footage of the Aquatics Center from 2,300 square feet to 9,675 square feet. Overall, the Project’s net new floor area would be reduced from 75,930 square feet to 68,989 square feet.
Further, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional measures are proposed to reduce noise associated with campus operations.

As described in Topical Response No. 2, in response to comments on the Draft EIR, the Project has also been refined to eliminate the previously proposed athletic field lighting.

Lastly, as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, the Project is incorporating additional operational mitigation measures to reduce operational significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

**Comment No. 51-35**

In addition to the conflicts with the BPPCP, the number of modifications to existing generally applicable zoning and development standards that would apply to the proposed project’s structures is itself evidence that the proposed project will have a significant impact on land use. The proposed project requires seven quasi-judicial approvals permitting deviation from height regulations, reduced side yards, heightened boundary walls, and a site plan review due to the construction of more than 50,000 gross square feet on the site. (See DEIR IV H-16–17.) By contrast, Archer’s 1997 DEIR identified only one such deviation required for its project. The number of modifications required strongly suggests that the proposed project is not consistent with land use in the area. While the DEIR asserts that the scale of the institutional uses will be comparable to the permissible scale of a home built on these lots, there is no evidence in the DEIR that any nearby home is comparable in scale to the 22,600 square feet performing arts center, let alone the 41,500 square feet multi-purpose facility. It is a matter of no dispute that homes are not designed in the same manner as performing arts centers, gymnasiums, or aquatic centers. The significant portions of the structures visible along Chaparal will not be mistaken for nearby homes. Adding some visual modification to a structure and hiding it behind an 8-foot wall is little more than surface dressing for a fundamental change in land use.

**Response to Comment No. 51-35**

As described in Section IV.H, Land Use, of the Draft EIR, the Project would not result in significant land use impacts. Specifically, the Project represents a continuation of an existing private school use and would not introduce new uses that would conflict with or have an adverse impact on surrounding land uses. The density of the Project would also be consistent with the scope of development envisioned for the Project Site by existing planning regulations, and would be compatible with the residential, educational, and
commercial uses in the surrounding area. Additionally, the new buildings would be consistent with the scale and character envisioned for the surrounding residential neighborhood and the Project would not disrupt, divide, or isolate any existing neighborhoods or communities. Thus, the Project is considered compatible with the surrounding area in terms of both land type and design. As such, as evaluated in Section IV.H, Land Use, of the Draft EIR, the Project would not substantially or adversely change the existing land use relationships between the Project Site and existing off-site uses.

As described on page IV.H-22 of the Draft EIR, the Project is requesting a modification of the height regulations pursuant to LAMC Section 12.24F for the height of the North Wing Renovation, which would have a roof slope of 25 percent and would be 5 feet–4 inches taller than the required maximum height of 36 feet, and the Multipurpose Facility, which would have a roof slope of less than 25 percent and would be taller than the required maximum height of 30 feet. Notwithstanding, with the completion of Phase 1, the height of the new North Wing would measure and visually appear an average of 31 feet-4 inches from the finished grade at the Court of Leaders, i.e., from the portion of the Project Site that is within the RE-11 zone and the place from which pedestrians would experience the building. In addition, the new North Wing would not be visible from Sunset Boulevard. The Multipurpose Facility would comprise two general levels, with a Middle School gymnasium on the lower level and an Upper School gymnasium on the upper level. The lower level would be located below grade and partially open to the sunken North Garden to the west. The maximum height of the Multipurpose Facility would be approximately 28 feet on the north elevation near Chaparal Street, which is lower than many of the existing trees, and would be a maximum of 36 feet on the south elevation near the Court of Leaders and the Main Building. As illustrated in the building elevations provided in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the proposed building heights would be generally compatible with the surrounding area, including the adjacent single-family homes which range in height to up to 36 feet and multi-family homes which range in height to up to 45 feet. Therefore, the new School buildings would be consistent with the scale and character envisioned for the surrounding residential neighborhood despite exceeding the 36-foot limit for the RE11-1 zone for only the North Wing Renovation and the 30-foot limit for buildings with flat roofs for the Multipurpose Facility.

As described on pages IV.H-51 to IV.H-52 of the Draft EIR, the Project is seeking modification of area regulations pursuant to LAMC Section 12.24F to permit reduced yard requirements and encroachments into yards on the Project Site. As described in Topical Response No. 13, Use of Existing Residential Properties, the School is requesting relief from LAMC Section 12.21.C.3.b to allow a reduced setback along the north side yard of the Barrington Parcel. It is important to note that pursuant to LAMC Section 12.07.01.C.2, if
the lot was being developed with a single-family residence, the required side yard would be
5 feet. It is because the development is a school that the increased side yard is required.

As described in Section IV.H, Land Use, of the Draft EIR, the Project is seeking a
Zoning Administrator’s Adjustment pursuant to LAMC Section 12.28 to permit fences,
gates, and walls up to 8 feet in height within the required front yards along Chaparal Street
and Barrington Avenue, the Chaparal Street side and rear yard, the Sunset Boulevard side
yard, and the Barrington Avenue side yards in lieu of the 3.5 feet otherwise permitted in
front yards and the 6 feet otherwise permitted in side and rear yards. These modifications
are required for student safety. As described on page IV.J.2-9, pursuant to Project Design
Feature J.2-4, the Project shall include the installation of new security fences and an
emergency alert system. Pursuant to Project Design Feature J.2-7, Archer shall maintain a
closed campus requiring all visitors, guests, and vendors to have appointments prior to
being granted access.

As discussed in Topical Response No. 2, Removal of Athletic Field Lighting and
Refinements to Lighting, in response to comments on the Draft EIR, the Project has been
refined to remove the athletic field lighting from the Project. Therefore, a modification of
area and height regulations pursuant to LAMC Section 12.24.F to permit the location and
height of lighting for the proposed outdoor athletic field is no longer required.

Further, as described in Topical Response No. 12, Site Plan Consistency with the
Residential Scale and Character of the Neighborhood, in response to comments on the
Draft EIR, refinements to the Project are proposed, including reducing the square footage
and massing, width, and length of some of the proposed buildings, reducing the number of
parking spaces, and creating expanded landscape buffers. Specifically, the Multipurpose
Facility would be reduced from approximately 41,400 square feet to 39,300 square feet and
the Performing Arts Center would be reduced from 22,600 square feet to 19,025 square
feet. In addition, the North Wing Renovation would be reduced by approximately 8,671
square feet. Overall, the Project’s net new floor area would be reduced from approximately
75,930 square feet to 68,989 square feet.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in
response to comments on the Draft EIR, additional restrictions on School operations are
also proposed, including additional limits on the hours of operation, reducing the number
of proposed School Functions, and eliminating community use of the facilities and the rental,
lease, or use of the facilities for non-School Uses. In addition, as detailed in Topical
Response No. 4, Additional Measures to Reduce Noise, the Project has been refined to
incorporate additional measures to reduce noise associated with campus operations. As
discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate
Significant Traffic Impacts, the Project is also incorporating additional operational mitigation
measures to reduce operational significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

**Comment No. 51-36**

The DEIR’s discussion of land use compatibility fails to discuss the “secondary impacts” of the proposed project, which include noise impacts from the operation of the project and from the six years of construction, traffic impacts from regular and frequent special events, and the unacknowledged aesthetic impact from the use of night lighting on the athletic fields. The fact that the project's construction and operation will burden residential neighbors with additional noise, traffic, and visual pollution confirm that the proposed project is not compatible with the surrounding neighborhood.

**Response to Comment No. 51-36**

Section VI, Other CEQA Considerations, of the Draft EIR, includes an analysis of significant irreversible environmental changes, growth-inducing impacts, and potential secondary effects associated with implementation of the proposed mitigation measures. Specifically, Section 15126.4(a)(1)(D) of the CEQA Guidelines requires that “if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.” Accordingly, Section VI, Other CEQA Considerations, of the Draft EIR, provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the Project mitigation measures.

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. As provided on page IV.H-14 of Section IV.H, Land Use, of the Draft EIR, in consideration of the factors established in the City of Los Angeles 2006 CEQA Thresholds Guide for the determination of impacts associated with land use compatibility, the Project would have a significant impact if the Project would substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses, or would disrupt, divide, or isolate existing neighborhoods or communities. As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. Additionally, as the Project would represent a continuation of an existing private school use, the Project would not substantially and adversely change the existing land use relationships between the Project Site and existing off-site uses.
Potential impacts related to the generation of noise during construction and operation of the Project are evaluated in Section IV.I, Noise, of the Draft EIR. Potential traffic impacts from events during the proposed hours are evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. Potential lighting impacts from the field lights are evaluated in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR.

As discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has been refined to remove the athletic field lighting. With the removal of the athletic field lighting, light and glare impacts from the Project would be reduced. Further, as described in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. As detailed in Topical Response No. 1, Refinements to Proposed Operations, additional restrictions on School operations are also proposed, including additional limits on the hours of operation, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Additionally, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project is incorporating additional measures to reduce noise associated with campus operations. As provided in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, the Project is also incorporating additional operational mitigation measures to reduce operational significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. Lastly, as detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. With these refinements, the Project would further preserve the residential scale and character of the surrounding neighborhood and would eliminate potential lighting impacts associated with the field lights.

**Comment No. 51-37**

**II. THE DEIR DOES NOT ADEQUATELY ANALYZE ALTERNATIVES TO THE PROPOSED PROJECT**

An analysis of alternatives to a proposed project is a critical component of an EIR. “One of [CEQA’s] major functions... is to ensure that all reasonable alternatives to the proposed projects are thoroughly assessed by the responsible official.” ([Wildlife Alive v. Chickering](1976) 18 Cal.3d 190.197.) CEQA requires an analysis of a reasonable range of
alternatives to a proposed project, “which could feasibly attain the basic objectives of the project....” (Guidelines, § 15126, subd. (d).) Additionally, the EIR’s discussion of alternatives must focus on alternatives that are capable of avoiding or substantially lessening any significant environmental impacts, even if those alternatives would be more costly. (Id., § 15126.6, subd. (b).) As one court explained:

“The [alternatives] discussion must ‘focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.’ A major function of the EIR is to ensure thorough assessment of all reasonable alternatives to proposed projects by those responsible for the decision.” (Kings County, supra, 221 Cal.App.3d at p. 733 (quoting Guidelines, § 15126, subd. (d)(3)).)

The alternatives analysis is particularly important where it may demonstrate that a feasible alternative has fewer impacts than a proposed project. Where there is a better alternative environmentally, the developer must present “evidence” that costs and profits lost are “so severe as to make the project impractical.” As the Kings County court stated:

“An environmentally superior alternative cannot be deemed infeasible absent evidence the additional costs or lost profits are so severe the project would become impractical.” (Id., 221 Cal.App.3d at p. 736.)

The alternatives analysis serves an important purpose in providing the reviewing agency adequate information about feasible means to avoid impacts and gives the public a clear window into governmental decisionmaking about environmental impacts. “An EIR which does not produce adequate information regarding alternatives cannot achieve the dual purpose served by the EIR, which is to enable the reviewing agency to make an informed decision and to make the decisionmaker’s reasoning accessible to the public, thereby protecting informed self-government.” (Id. at p. 733.)

Courts have consistently concluded that discussion of an inadequate range of alternatives invalidates an EIR. (See, e.g., California Clean Energy Committee v. City of Woodland (2014 WL 132107) [basis for rejecting alternative must be supported in record]; Flanders Foundation v. City of Carmel-by-the-Sea (2012) 135 Cal.App.4th 603, 615-617 [failure to respond to comment requesting study of alternative to proposed project that considers sale of historic property on smaller parcel of parkland invalidates EIR for failure to respond to comment addressing environmental issue]; Uphold Our Heritage v. Town of Woodside (2007) 147 Cal.App.4th 587, 598-603 [conclusion that alternatives to demolition of historic residence are not economically or legally feasible not supported by evidence]; Preservation
Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336, 1355–1358 [analysis of reduced size alternative inadequate because record contains no evidence supporting conclusion that reduced size alternative is not feasible]; Laurel Heights I, supra, 47 Cal.3d at pp. 399–403 [EIR without sufficient discussion of alternatives is inadequate under CEQA].) The CEQA Guidelines require that the DEIR’s “discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (Guidelines, § 15126.6.) “The purpose of an EIR is not to identify alleged alternatives that meet few if any of the project’s objectives so that these alleged alternatives may be readily eliminated. Since the purpose of an alternatives analysis is to allow the decisionmaker to determine whether there is an environmentally superior alternative that will meet most of the project’s objectives, the key to the selection of the range of alternatives is to identify alternatives that meet most of the project’s objectives but have a reduced level of environmental impacts.” (Watsonville Pilots Ass’n v. City of Watsonville (2010) 183 Cal.App.4th 1059, 1089.)

Response to Comment No. 51-37

The identification and analysis of Project alternatives is consistent with CEQA Guidelines Section 15126.6 emphasizing that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project. CEQA Guidelines Section 15126.6 further states that an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Therefore, pursuant to CEQA, the Draft EIR appropriately analyzed a reasonable range of feasible Project alternatives. Specifically, as discussed on page V-2 of Section V, Alternatives, of the Draft EIR, based on the significant environmental impacts of the Project and the objectives established for the Project, and based on the feasibility of the alternatives considered, the following five alternatives to the Project were evaluated in detail: No Project—Continued Operation of Existing Campus; No Project—Development and Use in Accordance with Existing Approvals; Alternate Site Layout; Reduced Program within Existing Campus Boundary (Option A and Option B); and Reduced Excavation, Export, and Program.

Comment No. 51-38

A. The Alternatives Are Not Adequately Analyzed

As an initial matter, it is important to note that the analysis of the alternatives is cursory at best. For example, Alternative 2, the “reasonably foreseeable” development alternative, the analysis of traffic impacts concludes that the alternative will have no traffic impacts,
relying upon the analysis in the 1998 Archer EIR. (DEIR, V-38.) None of the analysis is replicated in the DEIR or readily available for the public reading the DEIR to consult. Moreover, the 1997 DEIR appears not to have analyzed traffic impacts during the PM peak hour as the school was not anticipated to generate significant traffic at that time. (See 1997 DEIR, page 95 ["Per LADOT recommendations, the analysis does not include the PM peak hour (5:00 to 6:00 p.m.), as relatively little proposed Project-generated traffic would occur during evening commuter hours"]). The current DEIR analyzes the PM peak hour and identifies significant, unmitigable impacts from departures of events with 300 attendees (or larger). Reliance upon the 1997 DEIR’s analysis of the traffic impacts of Alternative 2 is inappropriate. The impacts should be analyzed so that the public and decision makers are aware of what the likely impacts to traffic would from Archer operating at its maximal capacity. The current traffic baseline does not reflect maximal operations at Archer, so there is nothing in the DEIR to rely upon for the conclusion that operating at maximum capacity would not have a significant impact on traffic. The analysis of the other alternatives is likewise scanty and insufficient for a true comparison of impacts. (See, e.g., Exh. A, p. 12.)

Response to Comment No. 51-38

As set forth in CEQA Guidelines Section 15126.6(d), “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” The Draft EIR appropriately provided sufficient information to allow for a comparison of impacts to the Project. Specifically, as described on page V-22 of the Draft EIR, Alternative 2 represents use of the Project Site in accordance with the existing Conditional Use Permit. As further stated on page V-22, the environmental impacts of the approved development were previously analyzed in the 1997 Archer School for Girls Certified EIR (SCH No. 96071106) and supplemented by findings made in support of Case No. ZA-98-0158(CUZ)(PA2). As described on page V-24 of the Draft EIR, in accordance with the existing CUP, additional Interscholastic Athletic Competitions could be held on-site on the athletic field and with the construction of the proposed gymnasium building, in accordance with the existing CUP. On the athletic field, the existing CUP permits Interscholastic Athletic Competitions until 6:00 P.M. Monday through Friday. Saturday use of the athletic field is permitted four days per year for a four hour period between 10:00 A.M. and 6:00 P.M., with a goal of Interscholastic Athletic Competitions occurring between 3:30 P.M. and 6:00 P.M. In the proposed gymnasium, Condition 11 of the existing CUP permits Interscholastic Athletic Competitions from 6:00 P.M. to 7:30 P.M. on Monday through Thursday to 9:00 P.M. on Friday, and from 10:00 A.M. to 6:00 P.M. as needed for playoffs on Saturday. CUP Exhibit B-3 permits Interscholastic Athletic Competitions in the gymnasium between 3:30 P.M. and 6:00 P.M. on Monday through Friday. Accordingly, consistent with these provisions of the existing CUP and as stated in the comment, given that relatively little proposed Project-generated traffic would occur during the P.M. peak hour (5:00 P.M. to 6:00 P.M.), including limited events during the
referenced P.M. peak hour, LADOT determined an analysis of the P.M. peak period under existing CUP conditions was not necessary.

The Draft EIR analyzed certain scenarios during the P.M. peak period because modifications are proposed to the existing CUP which would permit additional events during that peak period. Under the analysis of Alternative 2, campus operations are assumed to be governed by the existing CUP for which potential traffic impacts have already been evaluated. In accordance with CEQA Guidelines Section 15126.6(d), the analyses of the remaining alternatives similarly included sufficient information to allow meaningful evaluation, analysis, and comparison with the Project. In addition, after the analysis of each alternative with respect to the environmental topics addressed in Section V, Alternatives, of the Draft EIR includes a summary comparing the impacts of the alternative to the Project.

**Comment No. 51-39**

**B. Failure to Analyze an Alternative Site Is a Critical Deficiency of the DEIR**

Analysis of an alternative site is a critical component of an EIR, when an alternative location for a project is feasible. (See CEQA Guidelines, § 15126.6 [EIR must consider alternatives to the project or to the location of the project].) The DEIR states that an alternative site was “considered and rejected,” meaning that the DEIR presents no analysis of the potential impacts of a new location for the entire school, or for a portion of the school. The DEIR reasons that Archer owns the site, does not own a comparable site, that it is not reasonable to assume that a comparably sized property will become available for Archer, and that the operation of the school could not feasibly be divided or transferred to another location. The remainder of the discussion rejecting an alternative site merely recites the reasons why Archer must improve its current site, and states that moving to an alternative site would not achieve those objectives. This is an illogical argument, as moving to another site could obviate many of the stated reasons for the proposed project. Finally, the DEIR asserts without a shred of support that an alternative site would have the same impacts as development on the current site.

The DEIR errs by not discussing an alternative site in detail. An alternative need be only potentially feasible in order to be evaluated in-depth in an EIR. (See Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437, 1457.) The fact that the project proponent does not own an alternative site is not dispositive as to the feasibility of the alternative. (Ibid.) “The duty of identifying and evaluating potentially feasible project alternatives lies with the proponent and the lead agency, not the public.” (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 568.) The Residential Neighbors of Archer are not obligated to prove that alternative sites exist that could
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accommodate Archer—that is the job of the City and of Archer in the DEIR, and the DEIR fails to demonstrate that either entity has taken seriously this task.

The DEIR contains only bare assertions in support of the conclusion that an alternative site could not feasibly be acquired or utilized by Archer, either for all or part of its operations. This analysis is insufficient. In Laurel Heights I, 47 Cal.3d at pp. 403–404, the Supreme Court explained why it is critical to provide adequate information regarding the feasibility of an alternative. The EIR in that case provided neither an assessment of existing sites where the facility at issue could be located, nor any discussion of the possibility of locating such a site. (Ibid.) “[T]he EIR’s statutory goal of public information regarding a proposed project has not been met; the EIR provides no information to the public to enable it to understand, evaluate, and respond to the bare assertion of nonavailability of alternative space.” (Id. at p. 404.) The Court explained that the key issue in an EIR’s discussion of alternatives is informed decision-making and public participation. By providing inadequate information, both of these functions were diminished.

The same may be said for the DEIR. By failing to identify any potential sites, or evidencing any research on the prospects for such a site (including the basic size and locational requirements, which would be necessary to specify in order for the public and decisionmakers to evaluate the claim that no alternative site would be feasibly acquired by the school), the DEIR fails to provide sufficient information to show that this alternative is genuinely infeasible. For instance, it is not necessarily the case that Archer would have to acquire a site as large as its present site. Archer serves both middle and upper school girls. It is the educational norm in this state that separate school sites are provided for middle school and high school students. The DEIR does not present any factual support for the assertion that Archer would have to move its entire operation to a new site, rather than shifting either upper or middle school portion of the school. Indeed, such a division could very well reduce the impacts of proposed project, as neither site would need to be as intensively used as Archer proposes for the current site. The DEIR is inadequate because it fails to support its assertion that an alternative site is infeasible, and does not provide any analysis of the potential use of an alternative site for all or a portion of the activities discussed in the proposal.

Response to Comment No. 51-39

An alternative site was considered in Section V, Alternatives, of the Draft EIR and rejected as infeasible. Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives, particularly those related to improving the existing Archer campus and ensuring the
continued preservation of the historic Main Building. Further, as described therein, splitting the School onto two separate sites would also fail to meet project objectives.

**Comment No. 51-40**

**C. Nearly All of the Alternatives Have Fewer Impacts than the Proposed Project and Meet the “Basic Objectives” of the Proposed Project**

It is quickly apparent from a review of the DEIR’s alternatives analysis that there are readily available alternatives to the proposed project that would satisfy the “basic objectives” of the project. Of the five alternatives analyzed in the DEIR, the DEIR concludes that Alternative 5, the reduced excavation scenario, is the “environmentally superior” alternative. (DEIR, V-139–140.) The DEIR also acknowledges that Alternative 4, which constructs a more limited set of improvements and retains the residential structures as residences, “would reduce the greatest number of Project impacts.” (Id. at 140.) Finally, Alternative 2, future development in accordance with the current approvals for the site would eliminate the impacts associated with construction and traffic. The only remaining significant and unavoidable impacts would be those associated with noise during construction. Although Alternative 2 is technically a “no-project” alternative and, as such, a different alternative must be selected as “environmentally superior,” it is clear that from an environmental perspective, Alternative 2 is far superior to any of the other options.

**Response to Comment No. 51-40**

As discussed on page V-1 of Section V, Alternatives, of the Draft EIR, the CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to a proposed project. As such, in accordance with CEQA, the alternatives selected for analysis focused on reducing the impacts of the Project. Accordingly, the commenter is correct in noting that the alternatives would have fewer impacts than the Project.

**Comment No. 51-41**

Of all five alternatives studied in the DEIR, only one, Alternative 3 has impacts that are for the most part identical to the proposed project, with noise impacts that are slightly different from the proposed project but essentially a variant of the same, and all other impacts being identical. Alternative 3 is the only alternative presented with a full photographic analysis of the proposed project, showing that it, like the proposed project, will replace the residences along Chaparal with institutional structures that are not consistent with the area’s residential structures. Alternative 3 simply moves structures around on the site and does nothing to lessen the significant impacts of the proposed project. Yet, tellingly, Alternative
3 is the only alternative that the DEIR does not reject out-of-hand for failing to meet Archer’s lengthy “wish list” of project objectives.

Response to Comment No. 51-41

As described on page V-47 of Section V, Alternatives, of the Draft EIR, as with the Project, Alternative 3 would incorporate architectural design features such as variations in building planes to reduce massing and introduce new landscaping to enhance the pedestrian environment, provide visual relief, and maintain the residential street character when viewed from Chaparal Street and Barrington Avenue. The enhanced landscaping to be provided under this Alternative along Chaparal Street, along the western boundary of the campus, and along the southern boundary of the Barrington Parcel would also further shield new campus facilities and would preserve the visual character of the Project Site to a greater extent than the Project. Contrary to the commenter’s opinion, as summarized on page V-74 and V-75 of the Draft EIR, Alternative 3 would reduce the Project’s noise impacts by enclosing the pool within the Aquatics Center.

Comment No. 51-42

The DEIR reflects the manner in which the environmental review process has been co-opted by Archer’s overly specific identification of project objectives. CEQA requires that the EIR identify and evaluate alternatives that would “feasibly attain most of the basic objectives of the project.” (CEQA Guidelines, § 15126.6, subd. (a)(emphasis added).) There is no requirement in CEQA that the alternatives be compared against every item included by the whim of the applicant on the project objectives list; to the contrary, the Guidelines are clear that the alternatives should be measured against the “basic objectives” of the project. While in some cases, “basic objectives” and “project objectives” may be identical, here, the overly prescriptive dream-list of project objectives cannot serve as the basis for comparing alternatives to the project. As a practical matter, evaluating each alternative against the 33-item project objectives list creates an environmental document that is extremely difficult for the reader to use to compare the various alternatives. This alone defeats the disclosure objectives of CEQA. Another problem with the DEIR’s use of the full 33-item checklist is that it equally weights all of Archer’s project objectives as similarly meaningful to the success of its project, when that simply cannot be the case as a practical matter. Without having exercised the requisite judgment to identify “basic objectives,” Archer foists this task upon the decisionmakers, who would otherwise abdicate their duty to the public to undertake a meaningful assessment whether there are alternatives to the project that satisfy the “basic objectives” of the school expansion program.
Response to Comment No. 51-42

CEQA Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” CEQA Guidelines Section 15124(b) further states that “the statement of objectives should include the underlying purpose of the project.” As stated on page II-14 of the Draft EIR, the underlying purpose of the Project is to modernize the facilities and provide Archer with a campus that can maximize the fulfillment of its educational mission now and in the future. Section II, Project Description, of the Draft EIR includes the complete list of the Project’s specific objectives. The objectives of the project are listed within the following categories: (a) Academic Objectives; (b) Athletics Objectives; (c) Visual Arts Objectives; (d) Performing Arts Objectives; and (e) Site Design and Community Objectives. In accordance with CEQA, the Project objectives include specific goals that would enable the Project to achieve its underlying purpose as stated above. The primary purpose of the project objectives is to help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary (CEQA Guidelines Section 15124(b)). As discussed on page V-1 of Section V, Alternatives, of the Draft EIR, the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. As such, the Project objectives were appropriately stated in Section II, Project Description, of the Draft EIR, in accordance with CEQA Guidelines Section 15124(b).

Comment No. 51-43

Archer’s prior environmental review reveals that it knows how to concisely identify project objectives that reflect the basic goals of its project. The 1997 Archer DEIR contains the following list of project objectives, in full:

- “Fill an existing gap in the mix of education opportunities in the West Los Angeles area by providing an independent, non-sectarian secondary school for girls (grades 6–12).
- “Provide a first-rate educational experience for a study-body which reflects the economic, social, religious, and racial mix that defines Southern California.
- “Provide on-site, both indoor and outdoor, facilities which foster active participation in a full range of educational, intellectual, curricular, athletic, and social opportunities;
- “Create a learning environment whose physical features stimulate the educational, aesthetic, and cultural experiences of the school community.
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• “Provide educational services and programs for students in a hospitable environment where student, faculty, and staff will continue to be part of the educational tradition providing models, mentors, and friends and creating a network of women who will throughout their professional, social and civil lives contribute to Archer School and their own communities.

• “Provide a safe and secure physical environment with grounds and facilities that are designed to complement the program functionally, while simultaneously providing an aesthetically pleasing atmosphere.

• “Provide a Project which seeks to balance the maintenance of an economically viable educational institution with community needs and environmental constraints in such a manner as to sustain a student body of sufficient size to support a full range of educational, intellectual, curricular, athletic, and social opportunities.” (1997 DEIR, pp. 32–33.)

The above list contains generalized project objectives that could be feasibly achieved in a variety of ways, and thus permits meaningful analysis of whether a given alternative might satisfy the objectives. Somewhere between 1997 and the present, it seems that Archer determined its original project no longer provided “on-site, both indoor and outdoor, facilities which foster active participation in a full range of educational, intellectual, curricular, athletic, and social opportunities,” and thus generated the present proposal with its attendant 33-item wish list of improvements. Notably, nowhere on the list is an item that seeks to balance Archer’s needs “with community needs and environmental constraints.” Indeed, the 10-item list of “site design and community objective” refers to the outside community only once, to “use Archer-owned properties to create an all-pedestrian campus with facilities that are compatible with the character of the surrounding neighborhood.” (DEIR, II-16.) The DEIR accordingly reflects Archer’s lack of objective to balance its goals and desires with the desire of its neighbors to enjoy their homes and their community in peace and quiet without unwanted visual blight and light intrusion associated with the construction and operation of what is tantamount to a small college campus.

Response to Comment No. 51-43

Refer to Response to Comment No. 51-42 above regarding the selection of Project objectives. As provided on page II-16 of Section II, Project Description, of the Draft EIR, in addition to the objective referenced by the commenter, an additional objective of the Project is to provide a new underground parking structure that minimizes vehicular noise to adjacent neighbors. In addition, as described on page II-27 of the Draft EIR, the Project was specifically designed to respond to the residential scale of the surrounding areas. Specifically, the new School buildings would be proportioned to modulate height and maintain the residential street character when viewed from Chaparal Street and Barrington Avenue. The Project has also been designed to limit views of the new facilities from

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Sunset Boulevard, minimize building footprints, and maximize green space within the campus. Additionally, the buildings would be designed to shield neighbors from internal campus activities and noise, including having no operable windows that open on the sides of buildings directly adjacent to Chaparal Street and Barrington Avenue.

It is noted that in response to comments on the Draft EIR, the Project has been refined, including a reduction in the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the consistency of the design of the Project with the residential scale and character of the neighborhood. As discussed therein, the overall Project net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet. In addition, in response to comments on the Draft EIR, and as described in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, the Project has been refined to remove the athletic field lighting. Further, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project would include additional measures to reduce noise associated with campus operations. As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years.

Comment No. 51-44

Archer’s DEIR fails to identify “basic” objectives, but it does contain a statement regarding the core purpose of its project: “The underlying purpose of the Project is to modernize the facilities and provide Archer with a campus that can maximize the fulfillment of its educational mission now and in the future.” (DEIR, II-13–14.) Lacking any basis to differentiate between Archer’s need for the 33 items on its “wish list,” the DEIR should analyze only each alternative’s ability to meet this “underlying purpose” of the expansion project.

Response to Comment No. 51-44

Refer to Response to Comment No. 51-42 above regarding the selection of Project objectives. In accordance with CEQA, the Draft EIR analyzed the alternative’s ability to meet the Project objectives.

Comment No. 51-45

Broadly viewed, as required by CEQA, Archer’s “basic objectives” would likely be satisfied with an alternative that has fewer impacts than the project. Alternative 5, for instance,
purportedly fails to satisfy the project’s objectives for parking. As an initial matter, this conclusion is not supported by the DEIR’s traffic analysis, which shows a daily demand for parking of fewer than the 160 spaces provided in Alternative 5. The conclusory statement that the reduced parking would not satisfy the project’s daily parking needs is not supported by the DEIR.

**Response to Comment No. 51-45**

Alternative 5, the Reduced Excavation, Export, and Program Alternative, would provide approximately 160 parking spaces compared to the Project’s proposed 212 spaces. The on-site parking in Alternative 5 may be expanded to accommodate a total of 196 parking spaces when necessary with use of attendant assisted parking compared to the Project’s proposed 282 spaces. As discussed on page IV.K-80 and IV.K-81 of Section IV.K, Traffic, Access, and Parking, of the Draft EIR, parking demand for the Project was estimated using assumptions regarding student and employee travel modes of transportation and arrival and departure patterns. These assumptions were used to develop a parking accumulation model during the course of a non-event day and during event days in the afternoon and evening. Based on this model, it was determined that a total peak parking demand of 153 parking spaces at 12:00 P.M. would be required during the course of a non-event day. On weekday event days with up to 300 attendees with arrivals between 3:00 P.M. and 4:00 P.M., and on 300-attendee event days with arrivals between 6:00 P.M. and 7:00 P.M., a peak parking demand of 272 spaces at 4:00 P.M. would be required. On weekday event days with a 300-attendee event with arrivals between 3:00 P.M. and 4:00 P.M., and on event days with up to 650-attendee events with arrivals between 6:00 P.M. and 7:00 P.M., a peak parking demand of 434 spaces at 7:00 P.M. would be required. As such, based on the proposed parking under Alternative 5, this Alternative would only satisfy parking requirements for a non-event school day. Therefore, with the reduced on-site parking, Alternative 5 would require Archer to use off-site parking facilities to a greater degree than the Project.

 Nonetheless, as discussed in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure has been reduced from 212 parking spaces to 185 parking spaces, expandable to 251 parking spaces with attendant-assisted parking.

**Comment No. 51-46**

Alternative 4, which retains the residences on Chaparal and Barrington, and provides for the construction of a combined gymnasium and performing arts center and either a visual arts center or aquatics center, also meets Archer’s basic objectives. Under Alternative 4, Archer would have a performing arts center and a gymnasium, would be able to
accommodate the entire school for assemblies, would have both soccer and softball fields. If Alternative 4 is unable to accommodate an aquatics center, that function is met at present by providing off-site aquatics, and if the alternative is not able to accommodate a visual arts center, there is no evidence in the DEIR that such facilities could not be included in the renovated north wing as part of its renovations. Given that Alternative 4 would have reduced environmental impacts in nearly every respect over the project⁴, a true analysis of whether Alternative 4 (or other reduced alternatives) would satisfy the “basic objectives” of the project is a requirement under CEQA.

⁴ According to the DEIR, Alternative 4 would have the same construction and traffic impacts as the proposed project. These impacts could be further reduced by reduction in use and parking construction, as set forth below.

**Response to Comment No. 51-46**

An analysis of the relationship of Alternative 4 to the Project objectives is provided on page V-105 through V-109 of Section V, Alternatives, of the Draft EIR. As summarized on page V-109, Alternative 4 would not meet some objectives and would partially meet other objectives. In addition, as discussed in the comparative evaluation of Alternative 4 and Alternative 5 provided on page V-140, while Alternative 4 would reduce the greatest number of Project impacts, all of the Project’s significant and unavoidable impacts would remain under Alternative 4.

With regard to the comment regarding the Visual Arts Center, as described on page II-7 of Section II, Project Description, of the Draft EIR, since the Main Building was designed in 1931 as a women’s dormitory, Archer is challenged to deliver a 21st-century education within its confines. In particular, the existing classrooms, each of which were created by joining two dormitory rooms, are not adequately sized or proportioned to accommodate the needs of today’s and tomorrow’s academic programs and girls’ specific learning styles. As such, the purpose of the North Wing Renovation is to provide adequate classrooms for students.

Refer to Response to Comment No. 51-42 above regarding the selection of Project objectives. In accordance with CEQA, the Draft EIR analyzed the alternative’s ability to meet the Project objectives.

**Comment No. 51-47**

The DEIR’s alternatives analysis is wrongly distorted by the reliance upon Archer’s “wish list” as a touchstone against which to evaluate the alternatives. The alternatives analysis must be revised to evaluate the “basic objectives” of the project against the various alternatives.
Response to Comment No. 51-47

Refer to Response to Comment No. 51-42 above regarding the selection of Project objectives. In accordance with CEQA, the Draft EIR analyzed the alternative’s ability to meet the Project objectives.

Comment No. 51-48

III. THE DEIR CONFIRMS THAT THE PROJECT HAS TOO MANY IMPACTS, AND THAT A COMBINATION of ALTERNATIVES 2, 4 AND 5 WOULD PERMIT ARCHER TO ACHIEVE ITS OBJECTIVES AND REDUCE OR ELIMINATE THESE IMPACTS

Archer’s proposed project cannot be approved because there are alternatives and mitigation measures available that would reduce or eliminate nearly all of the identified (and unidentified) significant and unmitigable impacts. A fundamental objective of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Pub. Resources Code, § 21002.) Here, there are both feasible alternatives and mitigation measures that would substantially lessen the aesthetic, noise, traffic, land use and air quality impacts of the proposed project, and those alternatives and mitigation measures must be adopted in lieu of the proposed project.

The DEIR’s alternatives analysis demonstrates that both Alternative 4 and 5 would have reduced impacts as compared to the project, and provides little substantive basis to reject either. By constructing Alternative 4 on the existing school properties, the aesthetic impacts would be reduced, the land use conflicts would be minimized, the noise impacts are either lessened or comparable to the proposed project, and the construction impacts are likely reduced at least in duration, which is significant given the planned six year construction program. However, coupling Alternative 4 with Alternative 5 provides even further reductions in construction emissions. By reducing the amount of excavation and dirt hauling, Alternative 5 eliminates significant air quality impacts (although the analysis of diesel emissions for Alternative 5 should be revisited, as it likely reflects the same errors as the analysis of the proposed project). A more appropriate project than the proposed project would combine the reduced building program in Alternative 4 with the reduced excavation and parking program in Alternative 5 to reduce as many of the impacts of the expansion as possible while still meeting the objectives of modernizing the campus facilities, providing both a gymnasium and a performing arts center, increasing the supply of on-campus parking to meet the school’s daily needs, and permitting the school to construct either a visual arts center or an aquatics center, depending on the school’s priorities.
What would be lost by requiring such an alternative? Providing extra parking to accommodate larger, infrequent events; orienting the softball field to the northwest; and the ability to schedule simultaneous practices and games for middle school and upper school basketball and volleyball. Swimming teams may continue to travel off-site as they already do, to a facility in Santa Monica that is already constructed, and operating, and which will certainly be used by other schools if Archer gives up its slot, so there are unlikely to be environmental gains from relocating Archer’s practices and meets. Indeed, numerous private schools operate under similar constraints. As set forth in Table I, below, no Los Angeles–area private school on a campus similarly sized to Archer’s has more than one gymnasium, and all utilize off-site locations for some sports.

<table>
<thead>
<tr>
<th>Athletics off campus</th>
<th># of Gyms</th>
<th>Acres</th>
<th>Year Founded</th>
<th># of Students</th>
</tr>
</thead>
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<tr>
<td>Crossroads</td>
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<td>1</td>
<td>15</td>
<td>1971</td>
</tr>
<tr>
<td>Marlborough School</td>
<td>yes</td>
<td>1</td>
<td>4</td>
<td>1889</td>
</tr>
<tr>
<td>Sierra Canyon</td>
<td>yes</td>
<td>1</td>
<td>37</td>
<td>1978</td>
</tr>
<tr>
<td>Archer School for</td>
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<td>0</td>
<td>6.2</td>
<td>1995</td>
</tr>
<tr>
<td>Girls</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marymount High School</td>
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</tr>
<tr>
<td>Windward School</td>
<td>yes</td>
<td>1</td>
<td>9.5</td>
<td>1971</td>
</tr>
</tbody>
</table>

Table I: Comparable Private Schools, Enrollment; and Athletic Facilities

In particular, the Marlborough School provides an excellent point of comparison to Archer. Both are all-girls schools of comparable size, located in residential neighborhoods on similarly-sized lots. Marlborough has only one gymnasium for its middle and upper school teams to share. The supposed “need” for separate gymnasiums for middle and upper school students must be weighed against the impact of this massive proposal on the neighborhood. Alternative 4 and 5 together present a reasonable approach allowing Archer to significantly expand while minimizing the impacts to neighbors and the environment.

**Response to Comment No. 51-48**

In accordance with CEQA Guidelines Section 15091, the City of Los Angeles, as the Lead Agency for the Project, will make one or more written findings for each of the significant effects of the Project, accompanied by a brief explanation of the rationale for each finding. In addition, during certification of the EIR and the approval process for the
Project, the City will consider all feasible mitigation measures and Alternatives to the Project, and pursuant to CEQA Guidelines Section 15093, the City will balance, as applicable, the economic, legal, social, technological, or other considerations, including region-wide or statewide environmental benefits, of the Project against its unavoidable environmental risks when determining whether to approve the Project.

It is noted that in response to comments on the Draft EIR, refinements are proposed to the Project. These refinements include reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the size of the underground parking structure and number of parking spaces, creating expanded landscape buffers, and removal of the athletic field lighting. Overall, the Project's net new floor area would be reduced from 75,930 square feet to 68,989 square feet. In addition, with the reduction in the size of the Performing Arts Center, the number of seats would be reduced from 650 seats to 395 seats. Further, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project would include additional measures to reduce noise associated with campus operations. Also refer to Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, regarding additional mitigation measures to reduce significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to a level that is less than significant with mitigation. Additionally, as summarized in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, additional mitigation has been provided to reduce the Project's air quality impacts.

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, and the topical responses referenced therein for a detailed response to the alternative suggested by the commenter, which is similar to that proposed by the Residential Neighbors of Archer.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-49

Last, and significantly, Alternative 2 demonstrates that the impacts of site operations can be mitigated by operating within the limits of the school’s current CUP. The proposed project, and all the other alternatives aside from Alternative 2, have significant and unmitigable impacts on traffic. These impacts are due not to the school’s daily operations, but to special events of 300 attendees or more, particularly where those attendees depart or arrive during the PM peak hour. The DEIR contends that Alternative 2 does not have a significant impact on traffic. The operations set forth in Alternative 2 permit athletics until 6 pm weekday, only on four days per year on Saturdays, and in the gymnasium competitions
are permitting during the early evening hours. If it is correct that abiding by these limitation would not cause a significant impact to traffic (DEIR, V-38), Archer should be required to adhere to those conditions. As set forth in the analysis of Mr. Brohard, the traffic impacts from mid-sized events (as opposed to 650-person events, which are infrequent), would likely be mitigated if those events were capped to limit attendance to 50 vehicles, or about 75 guests, arriving or departing during the PM peak hours. Limiting parking as proposed in Alternative 5 and requiring the school to schedule games so that no more than 50 vehicles would be arriving or departing during the PM peak hour would reduce the traffic impacts to less-than-significant after mitigation. (See Exh. A, p. 12) An additional benefit to these reductions would be reduced noise impacts, and by not permitting lighting, both reduced aesthetic and noise impacts as the duration of the games would be reduced. Saturday athletic field use should be eliminated entirely, which would remove the noise impact entirely from use on that day. Finally, special events with more than 300 guests should be extremely limited and the school should be held to its current limit of 48 special events. There is no evidence that the school requires 96 special events to meet its objectives, and these events have significant traffic impacts that would be reduced if the events were correspondingly limited. Archer should be prohibited from using its facility for private special events and from commercial filming other than that currently permitted for the Los Angeles Conservancy.

History has shown that it is necessary that the EIR for the Archer School include these specific limitations as mitigation measures. The limitations are, in fact, mitigation for the significant noise and traffic impacts of the proposed project. As Archer has demonstrated since it negotiated its first Conditional Use Permit in 1998, it considers limitations placed on it by a such a document to be up for negotiation, and with each review of its permit, Archer has attempted to relax those limitations, with varying degrees of success. The community should not be required to fight these battles over and over. The reason that these conditions have been imposed in the past, and the reason that the conditions should continue to be imposed, is that Archer is located on a small site in the middle of a residential neighborhood, with no buffer on any side from neighboring properties. Nothing in that nature has changed since 1998—the neighborhood is as quiet now as it was then, and similarly burdened by heavy traffic on major streets and arterials—so there is no reason to permit these changes to operations now. By including operational limitations as specific mitigation measures in the EIR, these measures will have the permanency that was intended by the community in 1998: mitigation measures are not “mere expressions of hope,” but rather binding conditions that must be adhered to unless an applicant sustains the weighty burden of demonstrating that the mitigation measures are infeasible. (Lincoln Place Tenants Assoc. v. City of Los Angeles (2005) 130 Cal.App.4th 1498, 1508.) Only by including the limitations on use as specific mitigation measures for the project’s significant operational impacts to noise and traffic will the community be assured that these measures
will be maintained and not up for grabs the next time Archer’s permit comes before the City.

**Response to Comment No. 51-49**

As described in detail in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, the Project is incorporating additional mitigation measures to reduce significant operational traffic impacts during an event day (related to School Functions and Interscholastic Athletic Competitions) to a level that is less than significant with mitigation. Specifically, Mitigation Measure K-2 has been refined so that on weekdays, afternoon Interscholastic Athletic Competitions and School Functions with start times between 3:00 P.M. and 4:00 P.M. would be limited to a maximum of 44 inbound vehicles and evening School Functions with start times between 6:00 P.M. and 7:00 P.M. would be limited to a maximum of 126 inbound vehicles. Archer would no longer hold weekday evening Interscholastic Athletic Competitions and School Functions with start times between 5:00 P.M. and 6:00 P.M. Saturday Interscholastic Athletic Competitions and School Functions with start times between 1:00 P.M. and 2:00 P.M. would be limited to a maximum of 243 inbound vehicles.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, the Project also proposes additional restrictions on its operations including additional limitations on the hours of operation including hours of operation on Saturday, reducing the number of proposed School Functions from 98 to 86 and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. These restrictions, which would be incorporated as part of Archer’s CUP, would also reduce traffic along the surrounding streets. Specifically, as described on page II-35 of Section II, Project Description, of the Draft EIR, with the approval of a new CUP and other concurrent entitlement requests, Archer would continue to be subject to numerous conditions of approval, which would ensure that the School’s operations and its facilities would remain compatible with the residences in the vicinity of the campus.

Further, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has incorporated additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to a level that is less than significant with mitigation Monday through Friday. In addition, potentially significant noise impacts from the Saturday use of the athletic field would be reduced to only ten days a year within a limited timeframe. As discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the athletic field lighting would also be removed from the Project.
Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the consistency of the Project design with the residential scale and character of the neighborhood. Refer to Topical Response No. 13, Use of Existing Residential Properties, concerning the use of residential properties for school use for additional information on front yards and setbacks.

**Comment No. 51-50**

The DEIR provides ample basis for the conclusion that the proposed project is far too big for the site; that the proposed project burdens the neighbors and the broader community with increased traffic, noise, light and glare, and air toxics; and that it is the community that will bear the brunt of Archer achieving its goals of creating a dream school. No one benefits from Archer’s project but Archer itself. Archer needs to wake up to the reality that its proposed project will detrimentally impact its neighbors and scale its plans and operations accordingly.

**Response to Comment No. 51-50**

As discussed in Section IV.H, Land Use, of the Draft EIR, Los Angeles Municipal Code Section 12.21.1.A.1 permits a maximum floor area ratio of 3:1 in the R3-1 zone. In the RE11-1 zone, Los Angeles Municipal Code Section 12.07.01.C.5 permits a maximum residential floor area of 35 percent for lots 15,000 square feet or greater. In the RE11-1 zone, an additional 20 percent of the maximum residential floor area is allowed if certain design principles are met. Because Section 12.07.C.5 applies only to residential floor area, and Archer is not proposing any residential uses, the maximum residential floor area limits set forth in Section 12.07.C.5 are inapplicable to the Project. Therefore, the total maximum floor area for the entire Project Site, including the RE11 zones, is governed by the 3:1 floor area ratio set forth in LAMC Section 12.21.1.A.1. The existing campus and the two adjacent properties contain approximately 90,948 square feet of enclosed floor area. The Project, as refined in response to comments, would result in the addition of approximately 68,989 square feet of net new floor area. Upon full buildout of the refined Project, the School would comprise approximately 159,937 square feet, or 22 percent of the total allowable floor area. Therefore, the Project would be developed within the allowable floor area.

As previously discussed in the responses to comments regarding land use compatibility above, in response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. As described in Topical Response No. 1, Refinements to Proposed Operations, additional restrictions on School operations are also proposed, including additional limits on the hours of operation, reducing the number of proposed
School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project is incorporating additional measures to reduce noise associated with campus operations. As described in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, the Project has been refined to remove the athletic field lighting. Further, as described in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, the Project is also incorporating additional operational mitigation measures to reduce operational significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. Lastly, as discussed in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, additional mitigation has also been provided to reduce the Project’s significant air quality impacts. With these refinements, the Project would further preserve the residential scale and character of the surrounding neighborhood.

Comment No. 51-51

IV. RECIRCULATION OF THE DEIR IS REQUIRED

The Residential Neighbors of Archer have raised significant issues in this comment letter, and disclosed a number of ways in which the DEIR is inaccurate and inadequate under CEQA. Responding appropriately to these comments will require significant revisions and new analysis in the FEIR. Thus, the FEIR cannot be certified until it has been re-circulated for public review and comment upon a substantial number of new issues evaluated for the first time in the FEIR. A lead agency must reissue the notice, re-circulate the EIR, and permit additional public comment prior to certification “[w]hen significant new information is added to an environmental impact report” after notice and comment from the public but “prior to certification[.]” (Pub. Resources Code, § 21092.1.) Information is “significant” if its addition to the FEIR after circulation “deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” (Laurel Heights Improvement Assoc. v. Regents of the Univ. of Calif. (1993) 6 Cal.4th 1112, 1130 (Laurel Heights II).) The California Supreme Court has recognized that re-circulation is required where new information discloses:

“(1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented; (2) a substantial
increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance; (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project’s proponents decline to adopt; or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless." (Ibid. (citations omitted); see also Guidelines, § 15088.5, subd.(a)(l)-(4).)

When the draft EIR has been significantly modified after the close of the public comment period, re-circulation is essential to provide the public with the full information and disclosures required by CEQA. “The revised environmental document must be subjected to the same ‘critical evaluation that occurs in the draft stage,’ so that the public is not denied an ‘opportunity to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom.’” (Save Our Peninsula Comm. v. Board of Supervisors (2001) 87 Cal.App.4th 99, 13 I [quoting Sutter Sensible Planning, Inc. v. Board of Supervisors (1981) 122 Cal.App.3d 813, 822].) The EIR will require recirculation due to the need to augment and improve the analysis and discussion of many issues inadequately discussed in this DEIR.

Response to Comment No. 51-51

Refer to Response to Comment No. 51-4 regarding the adequacy of the Draft EIR and why circulation is not required.

Comment No. 51-52

V. CONCLUSION

For all its length, the DEIR does not live up to CEQA’s requirements to accurately and thoroughly analyze the impacts of proposed projects.

Response to Comment No. 51-52

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. In accordance with Article 9, Contents of Environmental Impact Reports, of the CEQA Guidelines, the Draft EIR includes a table of contents; summary of the Project, alternatives, and impacts; detailed description of the Project; environmental setting; analysis of environmental impacts (including project impacts, cumulative project impacts, growth inducing impacts, and secondary impacts); mitigation measures; analysis of alternatives; effects found to be less
than significant; and a list of organizations and persons consulted. The impact analyses for the issue areas analyzed in the Draft EIR are comprehensive and are based on technical analyses from experts in the relevant fields, input from numerous other agencies and input received in response to the Notice of Preparation of the Draft EIR. For each of the issue areas where significant impacts have been identified, mitigation measures have been proposed to reduce such impacts where feasible.

As demonstrated in this Final EIR, no new significant information (as defined by CEQA Guidelines Section 15088.5) that would require recirculation of the Draft EIR has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR. Neither the comments submitted on the Draft EIR nor the responses contained herein constitute new significant information warranting the recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 51-53**

In fact, the DEIR fails to identify significant impacts to aesthetics, land use, and air toxics, and understates the significance of the impacts to noise and traffic.

**Response to Comment No. 51-53**

This closing comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As responded to in detail above, the Draft EIR for the Project, including the land use, aesthetics, air quality, noise and traffic analyses, was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. In addition, the air quality and greenhouse gas emissions analyses were also prepared in accordance with SCAQMD methodology. As demonstrated in the responses to the specific comments regarding these topics below, no new significant information (as defined by CEQA Guidelines Section 15088.5) has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all
comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR.

**Comment No. 51-54**

The DEIR’s alternatives analysis errs by evaluating each alternative against an incredibly detailed 33-item list of project objectives, so that it is impossible for the decisionmakers reviewing the document to evaluate whether any of the proffered alternatives comes close to satisfying Archer’s basic goals. In fact, Alternatives 4 and 5 combined should both meet Archer’s basic objectives and reduce the significant impacts of the proposed project.

**Response to Comment No. 51-54**

Refer to Response to Comment No. 51-42 above regarding the selection of Project objectives. Refer to Topical Response No. 14, Residential Neighbors’ Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

**Comment No. 51-55**

Finally, mitigation measures that limit Archer’s use to its present day levels (including no Saturday use, no summer school, no commercial filming and no outside private events) must be imposed to address the significant impacts of the project and ensure that the community is not required to repeatedly oversee and advocate against Archer’s efforts to relax the limits that have been imposed to ensure that the school doesn’t adversely impact its neighbors. The neighborhood deserves no less than the full protection of the current CUP imposed as a CEQA mitigation for the project’s significant noise, light and traffic impacts.

**Response to Comment No. 51-55**

In accordance with California Public Resources Code Sections 21002.1(a) and 21100(b)(3) and CEQA Guidelines Section 15126.5, under CEQA, an EIR must propose and describe mitigation measures to minimize the significant environmental effects identified in the EIR. CEQA does not require mitigation for insignificant environmental impacts. Therefore, an EIR is not required to discuss mitigation measure for impacts when the EIR has determined that such impacts would be less than significant.

As described in Topical Response No. 1, Refinements to Proposed Operations, the Project has been refined to include additional restrictions on its operations including
additional limits on the hours of operation, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has been further refined to include additional measures to reduce noise associated with campus operations. As described in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, the Project has also been refined to remove the athletic field lighting. Lastly, as provided in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, the Project is incorporating additional mitigation measures to reduce significant traffic operational impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

With respect to summer academic and camp programs, refer to Topical Response No. 1, Refinements to Proposed Operations, which provides additional information regarding the summer programs. Also refer to Topical Response No. 1, Refinements to Proposed Operations, for additional restrictions on the proposed filming on campus.

With respect to noise impacts, eliminating Saturday uses would fail to meet Project objectives. Specifically, eliminating Saturday uses would fail to meet the athletics objectives to “[m]aximize the functionality and use of existing and proposed athletic facilities” and the site design and community objective to “[e]nhance campus facilities and revise operating conditions to make the appropriate use of new on-site facilities consistent with other public and independent schools throughout Los Angeles.” However, as described in Topical Response No. 4, Additional Measures to Reduce Noise, and provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, implementation of Mitigation Measure I-4 would reduce the potentially significant noise impacts from the Saturday use of the athletic field to only occur ten days a year within a limited timeframe.

Comment No. 51-56

Exhibit A

SUBJECT: Review of the DEIR for Archer Forward: Campus Preservation and Improvement Plan in the City of Los Angeles—Traffic, Access, and Parking Issues

I, Tom Brohard, P.E., have reviewed various portions of the February 2014 Draft Environmental Impact Report (DEIR) prepared by Matrix Environmental for the Archer Forward:’ Campus Preservation and Improvement Plan (Proposed Project) in the Brentwood–Pacific Palisades Community Plan Area in the City of Los Angeles, with particular focus on the following sections:
According to the Project Description, the Proposed Project involves 75,930 square feet of net new floor area at the Archer School for Girls at 11725 Sunset Boulevard including:

- Replacement of the existing 30,071 square-foot North Wing of the Main Building with a 39,071 square-foot renovated North Wing
- Development of a 41,400 square-foot Multipurpose Facility, a 22,600 square-foot Performing Arts Center, a 7,400 square-foot Visual Arts Center, and an Aquatics Center with a 2,300 square-foot support facility.
- An underground parking structure to accommodate about 212 cars, expandable to 282 vehicles with the use of parking attendants

Response to Comment No. 51-56

This comment summarizing the sections and appendices of the Draft EIR reviewed by the commenter and the Project components is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-57

In summary, additional study of the Proposed Project must be undertaken in the areas of traffic, access, and parking. Each of the various issues and concerns raised throughout this letter must be addressed in detail to properly disclose, analyze, and mitigate the environmental impacts of the Proposed Project. The Archer Forward: Campus Preservation and Improvement Plan DEIR must then be revised accordingly and recirculated for further public review and comment.
Response to Comment No. 51-57

As demonstrated in the detailed responses to the specific comments made by Mr. Brohard in Responses to Comment No. 51-59 through No. 51-91, Section IV.K, Traffic, Access, and Parking, of the Draft EIR and the Traffic Analysis Report provided in Appendix P.1 of the Draft EIR are in compliance with CEQA, the CEQA Guidelines, the City of Los Angeles 2006 CEQA Thresholds Guide, and LADOT Traffic Study Guidelines. CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states:

New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.

As demonstrated in this Final EIR, no new significant information (as defined by CEQA Guidelines Section 15088.5) that would require recirculation of the Draft EIR has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR. Neither the comments submitted on the Draft EIR nor the responses contained herein constitute new significant information warranting the recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Comment No. 51-58

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 45 years of professional engineering experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and now serve as the City Traffic Engineer for the City of Indio and as Consulting Transportation Engineer for the Cities of Big Bear Lake and San Fernando. I have
extensive experience in traffic engineering and transportation planning. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects. Several recent assignments are highlighted in the enclosed resume.

**Response to Comment No. 51-58**

This comment summarizing the education and experience of the traffic consultant hired by the commenter to review the Project’s traffic analysis, as presented in Exhibit A of Comment Letter No. 51, is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 51-59**

**Traffic, Access, and Parking Issues**

The following deficiencies, errors, and omissions were identified in the areas of traffic, access, and parking during my review of the documents associated with February 2014 Archer Forward: Campus Preservation and Improvement Plan Draft Environmental Impact Report (DEIR):

1) **Parking Generation Has Not Been Validated**—Page IV.K-10 of the DEIR indicates there are 109 parking spaces in the parking lots on campus plus six spaces available in front of the main building. The DEIR states “The School uses off-site parking at a surface parking lot south of Sunset Boulevard at Barrington Village to accommodate its demand for additional parking for visitors and student-driven carpools.” While technically not allowed, I understand from observations of residents that some on-street parking does occur at various times on the residential streets to the north of Archer School.

**Response to Comment No. 51-59**

Refer to Response to Comment No. 51-60 below regarding parking generation validation.

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, as part of Project Design Feature K-1, the Project shall include implementation of a comprehensive Traffic Management Program that would include, but not be limited to, a prohibition on parking on residential streets. To ensure implementation of the Traffic Management Program, the School shall continue to inform parents, students, faculty, and staff in writing on an annual basis of all rules regulating School traffic and parking. For example, to
enforce the prohibition on parking on residential streets, Archer will continue to prohibit guests from walking onto the campus without a walking permit issued by Archer. All guests would be required to check in with security upon arrival to the campus. The School shall maintain a progressive disciplinary system of enforcement to ensure compliance with the Traffic Management Program.

Comment No. 51-60

As indicated on Page IV.K-80, the DEIR relies on theoretical calculations to create the parking demand for the School. The DEIR states “Parking demand for the Project was also estimated using assumptions regarding student and employee travel modes of transportation and arrival and departure patterns.”

No actual parking occupancy field data has been collected or presented to validate the theoretical parking demand that has been calculated. The DEIR does not contain any observations of Archer School generated parking during a special event under existing conditions. Parking demand should have been observed and counted before, during, and after an existing event, and then analyzed. Without validation, the DEIR conclusions regarding actual parking demand with the Proposed Project lack foundation and cannot be supported.

Response to Comment No. 51-60

As discussed in the Traffic Analysis Report included as Appendix P.1 of the Draft EIR, assumptions regarding travel modes of transportation and arrival and departure patterns were based on the trip generation analysis and used to develop a parking accumulation model for the Project. The assumptions were based on existing driveway counts conducted in November 2011, mode split for students (e.g., students utilizing the fixed bus service versus those arriving in carpools), times of travel based on School operations, and the average vehicle occupancy (AVO). Since these assumptions were calibrated as part of the trip generation analysis, they are considered valid for use in the parking accumulation model to estimate Project parking demand.

In addition, parking demand estimates for events utilized AVO data for performing arts and athletic facilities throughout the Los Angeles region. Also, because event attendees have more ability to travel together (for example, as a family) on weekends and less ability on weekdays when parents may be arriving separately from different locations, lower AVOs were assumed for weekday events (1.5 persons per vehicle) than for weekend events (2.0 persons per vehicle).
**Comment No. 51-61**

2)Parking Structure Inconsistencies Must Be Resolved—Page IV.K-80 of the DEIR and Page 77 of the TAR both indicate that the parking structure will provide 212 designated parking spaces, expandable to 282 parked vehicles with attendants parking vehicles in certain aisles. Attendant parking of vehicles in aisles behind other parked vehicles will block parked vehicles, requiring that all events exceeding 212 parked vehicles must use attendants.

**Response to Comment No. 51-61**

The comment correctly states that the use of parking attendants will be required if more than 212 vehicles are in the parking structure. However, as described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced to 185 parking spaces. The on-site parking may be expanded to accommodate a total of 251 parking spaces when necessary with use of attendant assisted parking.

**Comment No. 51-62**

Use of the proposed attendant assisted parking scheme must be approved by emergency service providers before implementation. Discrepancies between Figure 8 on Page 77 of the TAR must be corrected so the layouts match the text in the TAR and the DEIR (Figure 8 shows 209 parking spaces and 79 attendant parking spaces, for a total of 288).

**Response to Comment No. 51-62**

As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced to 185 parking spaces. The on-site parking may be expanded to accommodate a total of 251 parking spaces when necessary with use of attendant assisted parking. Figure II-2 in Section II, Corrections and Additions to the Draft EIR, of this Final EIR shows the Conceptual Parking Layout Plan.

Project Design Feature K-7 requires that Archer develop an Event Parking and Transportation Management Plan that shall be employed for the Interscholastic Athletic Competitions and/or School Functions. The Event Parking and Transportation Management Plan shall include appropriate tools to manage and control traffic and parking for large events so that impacts to the surrounding areas are minimized. Potential
measures could include a parking reservation system to manage attendance, attendant-assisted parking, off-site parking, temporary increases in traffic management and parking personnel as needed, and other measures. The attendant-assisted parking scheme to be included as part of the Event Parking and Transportation Management Plan would be submitted to the Los Angeles Department of Transportation for review and approval prior to issuance of a certificate of occupancy for the Multipurpose Facility. The Los Angeles Department of Transportation would consult with other City departments, as necessary. It is further noted that pursuant to Project Design Feature J.1-1, prior to the issuance of a building permit, a plot plan for the Project shall be submitted to LAFD for approval.

Comment No. 51-63

3) Parking and Traffic for Back-to-Back Events Are Not Properly Evaluated—Page IV.K-15 provides information on starting and ending times for Middle School and Upper School interscholastic athletic competitions and school functions. The DEIR and TAR evaluate the traffic impacts of a 300-attendee weekday event starting between 3 and 4 PM with departure time between 5 and 6 PM as well as a 300-attendee weekday event starting between 5 and 6 PM. These events are evaluated separately.

Back-to-back 300-attendee weekday events with the first starting between 3 and 4 PM and ending between 5 and 6 PM and with the second 300-attendee event starting between 5 and 6 PM, cannot be accommodated in the parking structure. More than one hour will be needed to empty the parking structure and then refill it. In addition, the DEIR fails to recognize that people will linger after the conclusion of an event and that other people will arrive early for the next event to watch warm-ups and/or to get better seats.

The traffic impacts of one event ending between 5 and 6 PM with the next event starting between 5 and 6 PM have not been evaluated together to properly determine the traffic impacts of back-to-back events. Table IV.K-13 on Pages IV.K-48 and 49 of the DEIR clearly shows the two events separately. An evaluation must be conducted showing simultaneous departures and arrivals as long as Archer School plans to schedule 300-attendee events ending and starting between 5 PM and 6 PM. If Archer School is not going to hold back-to-back events, then enforceable mitigation measures must be developed to preclude one event from ending and another event from starting within the same hour.

Response to Comment No. 51-63

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional
operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

The additional mitigation measures limit the total number of vehicles that can arrive at the site for events (whether a single event or simultaneous events) to levels that would not generate significant traffic impacts. In addition, the additional mitigation measures prohibit guests arriving at the Archer campus to attend Functions and Interscholastic Athletic Competitions beginning at 5:30 P.M. or 6:00 P.M., which would eliminate the potential for overlap between guests departing events and guests arriving at events.

**Comment No. 51-64**

4) **Trip Distribution for Events Is Faulty**—Figure 5A on Page 28 of the TAR illustrates the zip codes of current Archer School employees. According to this illustration, 52% of employees live east of the I-405 and south of the I-10 Freeways. Figure 5B on Page 29 of the TAR illustrates the zip codes of current Archer School students, with 56% of the student population living in the area east of the I-405 and south of the I-10 Freeways. With this data, most trips to and from Archer School originate and terminate in the areas to the east and south of the Brentwood community.

The TAR relies on current zip code data to distribute future trips to and from Archer School for the enrollment expansion of 88 more students from 430 currently to 518 together with 37 more employees from 95 currently to 132. For these increases in enrollment and staffing, the TAR must provide further supporting evidence for the basic assumption that additional employees and students will not significantly change the current trip distribution patterns.

**Response to Comment No. 51-64**

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the geographic distribution of trips generated by the Project is dependent on characteristics of the street system serving the Project Site, the level of accessibility of routes to and from the Project Site, and the locations of residences for school employees and students from which employee or attendees of the Project would be drawn. The general distribution pattern for this study was developed in consultation with LADOT based on Archer student and employee ZIP Code data. The employee and student ZIP Code distribution is illustrated in Figures 5A and 5B, respectively, of the Traffic Study. See page IV.K-19 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. There is no evidence to suggest that the residential distribution of additional employees and students will be materially different from the current distribution. The availability of the data for the current distribution provides actual empirical data as a valid basis for future projections.
Comment No. 51-65

The trip distribution for events used in the TAR, the same as for the increase in Archer School population, does not properly reflect the origin of trips by parents leaving their employment location to attend an athletic event or school function. Furthermore, the use of zip code data for Archer School students and employees does not reflect the zip codes of visiting teams, the parents of visiting team members, or other visitors to Archer School.

Response to Comment No. 51-65

See Response to Comment No. 51-64. In addition, employment locations of Archer parents can be both within the West Los Angeles area and throughout the Los Angeles region, with the expectation that the majority would use regional routes to access the campus. The origins of trips to the Archer campus by visiting teams and parents of visiting team members will vary depending on the location of the visiting school, but again most would be expected to use regional routes to access the campus. The trip distribution developed for the Project estimated 30 percent to/from the east on Sunset Boulevard, 30 percent to/from the south on Barrington Avenue, and 40 percent to/from the west on Sunset Boulevard. Sunset Boulevard to/from the east and Barrington Avenue to/from the south encompass travel to/from the San Diego Freeway, Wilshire Boulevard, and other regional routes. Sunset Boulevard to/from the west encompasses travel to/from Pacific Palisades, Santa Monica, etc.). Since there are no other routes available serving the Project Site, this represents the potential distribution of trips generated by events on the campus.

Comment No. 51-66

5) Traffic Queuing Has Not Been Considered—Of the locations studied in the DEIR and TAR, two of the most congested intersections on weekdays between 3 PM and 7 PM are on Sunset Boulevard at Saltair Avenue just west of Archer School and on Sunset Boulevard at Barrington Avenue just east of Archer School. Table IV.K-2 on Page IV.K-24 of the DEIR indicates the intersection at Saltair Avenue experiences LOS F under existing conditions from 3 PM to 7 PM, with a V/C (volume to capacity) ratio between 1.215 and 1.318. The table indicates even more congestion at the intersection of Sunset Boulevard and Barrington Avenue with LOS F under existing conditions from 3 PM to 7 PM, with a V/C ratio between 1.292 and 1.425. As indicated in the DEIR and the TAR, LOS F with higher V/C ratios will occur in the future Year 2020. The addition of Archer School event traffic between 3 PM and 7 PM on weekdays on top of grid locked conditions will result in higher levels of traffic congestion, longer queues, and extended hours of gridlock.
When the V/C ratio exceeds 1.000 at LOS F, the vehicle demand to use an intersection exceeds the available capacity of the intersection to process and clear vehicle demand. Under these conditions, extensive queues develop as vehicles are left behind to wait for the next signal cycle until gridlock occurs. Under LOS F, the number of vehicles able to travel through an intersection actually decreases within the peak hours, the peak hours spillover into adjacent hours, and vehicular traffic seeks alternate routes to avoid gridlock.

Based on my review of the traffic count data provided in the TAR in Appendix B, all of the conditions noted immediately above are now occurring in the vicinity of Archer School. As examples, traffic volumes on Sunset Boulevard at Barrington Avenue counted between 3 and 6 PM on April 25, 2006 showed a total two-way traffic volume of 8,875 including 3,654 eastbound. In comparison to traffic counts made five years later on November 16, 2011 from 3 to 6 PM, the total two-way traffic volume on Sunset Boulevard at Barrington Avenue was 5,503 (down 38%) including 1,860 eastbound (down 49%). Similar reductions in traffic flow due to increasing congestion on Sunset Boulevard at Saltair Avenue have occurred (comparing May 4, 2006 traffic counts between 3 and 6 PM to those made on March 13, 2012), with Sunset Boulevard volumes decreasing by 33% in both directions and by 37% eastbound.

**Response to Comment No. 51-66**

The transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide, and the LADOT Traffic Study Guidelines. As required by the Traffic Study Policies and Procedures (LADOT, June 2013), the critical movement analysis (CMA) method of intersection capacity analysis was used to determined intersection volume-to-capacity (V/C) ratio and corresponding level of service (LOS) for study intersections.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

In accordance with LADOT Guidelines, analyses were not conducted to quantify potential Project impacts on travel times and delay along the Sunset Boulevard corridor. The LADOT Traffic Study Guidelines require the use of intersection volume-to-capacity ratio to determine intersection level of service. In other words, since the Project operational
impacts (after mitigation) are expected to be insignificant, it can be reasonably considered that impacts on travel time and delays would also be insignificant. See Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for further discussion of traffic impacts associated with proposed campus operations. The statements in the comment regarding the congestion on Sunset Boulevard is consistent with the information included in the Draft EIR.

Much of the reduction in throughput and increase in congestion may be attributed to the construction of the I-405/Sepulveda Pass Improvement Project, which involved major improvements to the Sunset Boulevard Bridge and I-405 Freeway On/Off Ramps. See Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for further discussion of traffic conditions along Sunset Boulevard.

Comment No. 51-67

Eastbound commuters are cutting through the neighborhood to the north to avoid Sunset Boulevard, with the November 9, 2011 traffic volume on Chaparal Street showing 887 eastbound vehicles between 3 and 7:30 PM. Assuming that local residential traffic is about 30 eastbound vehicles per hour, about 750 commuters are already using eastbound Chaparal Street over the 4½ hours, about 72% of all of the daily eastbound trips on Chaparal Street. During these hours, eastbound commuter traffic on Chaparal Street experiences significant queuing trying to enter Barrington Avenue (see Set #1 Traffic Photos enclosed).

Response to Comment No. 51-67

This comment does not address the adequacy of the analysis in the Draft EIR. The comment is noted for the record and will be forwarded to decision-makers for review and consideration.

The majority of the traffic volume counted on Chaparal Street in 2011 may be attributed an increase in cut-through traffic (as seen in the photos) as motorists attempted to avoid the increased congestion along Sunset Boulevard during the construction of the I-405 Sepulveda Pass Improvement Project. With improvement in conditions along Sunset Boulevard, this cut-through traffic is expected to reduce.

Comment No. 51-68

V/C ratios above 1.000 are theoretical since intersections cannot accommodate more vehicles than they can handle. When the V/C ratios keep growing to 1.200, 1.300, and even above 1.400 as occurs today, increasingly longer queues develop.
These V/C ratios are 20, 30, and 40 percent above the capacity of the adjacent intersections on Sunset Boulevard. With the extremely high V/C ratios at both of the adjacent intersections on Sunset Boulevard, both Archer School driveways are blocked by queuing and spillback from the nearby traffic signals on Sunset Boulevard on both sides (see Set #2 Traffic Photos enclosed).

Response to Comment No. 51-68

This comment does not address the adequacy of the analysis in the Draft EIR. The comment is noted for the record and will be forwarded to decision-makers for review and consideration.

Regarding the driveways at the Project site, primary access to the Project Site is from Sunset Boulevard. The School currently operates on the Project Site, and vehicles and buses currently access the Site via the driveways on Sunset Boulevard and have done so historically, including during the construction period of the I-405 Sepulveda Pass Improvement Project. Based on these existing operations, field observations, and driveway counts conducted in November 2011, the School driveways are not continuously blocked by traffic, and turns to and from the driveways on Sunset Boulevard occur.

Traffic queues do back up on eastbound Sunset Boulevard from the Sunset Boulevard and Barrington Avenue intersection. As discussed in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, however, field observations indicate that exiting vehicles are generally able to make the left-hand turn from the Archer exit driveway onto Sunset Boulevard, oftentimes utilizing the center left-turn lane that is present on Sunset Boulevard in front of the Archer campus and usually while westbound flows on Sunset Boulevard are stopped upstream by the traffic signal at the Sunset Boulevard and Barrington Avenue intersection. Observations also indicate that entering vehicles are able to successfully make the left-hand turn from eastbound Sunset Boulevard into the Archer entrance driveway by waiting in the center left-turn lane for a gap in westbound traffic flows on Sunset Boulevard.

Vehicles exiting the campus and making a left-hand turn onto Sunset Boulevard is demonstrated by the photographs shown as Set #3 in the comment letter. Although the caption on one of the photos states that a bus is “departing Archer and blocking westbound Sunset Blvd. as it turns to eastbound Sunset,” close inspection of the photographs reveals that no vehicles are present on westbound Sunset Boulevard while the bus is making the left-turn out, suggesting that the turn is indeed occurring while westbound flows on Sunset Boulevard are stopped by the upstream signal at Barrington Avenue. The caption on the following photograph states “Bus departing Archer completes turn onto eastbound Sunset,” thus demonstrating that the turn is indeed possible.
Observations also indicate that entering vehicles are able to successfully make the right-hand turn from westbound. Westbound traffic does not typically queue back from the Sunset Boulevard and Saltair Avenue intersection (the next closest signalized intersection to the west) to the School driveways.

**Comment No. 51-69**

With the existing queuing on Sunset Boulevard in front of Archer School, opportunities to turn left from the school’s exit driveway are extremely limited. School busses exiting the driveway attempt to turn left to go east, but block the westbound lanes on Sunset Boulevard before they can enter the two-way left turn lane. School busses must then wait in the two-way left turn lane on Sunset Boulevard before merging into eastbound traffic, Busses waiting in the two-way left turn lane before merging simultaneously block access to the school’s entrance driveway to the east, particularly during an event beginning immediately after dismissal (see Set #2 and Set #3 Traffic Photos enclosed).

**Response to Comment No. 51-69**

Refer to Response to Comment No. 51-68. In addition, the use of the two-way left-turn lane for left turns both into and out of the Project Site is legal and valid. Indeed, with the implementation of the mitigation measures identified in the 1997 Archer School for Girls Certified EIR, Archer made certain street improvements, including installing a two-way left turn lane in the center of Sunset Boulevard to aid Project access along the Sunset Boulevard driveways.

**Comment No. 51-70**

The DEIR and TAR do not consider existing or future queuing across the two Archer School driveways during the 3 PM to 7 PM event traffic. Figure 5C in the TAR assigns 60% of the new exiting trips from the Archer School driveway to the east on Sunset Boulevard and 40% of the new exiting trips to the west. The trip distribution for new trips associated with the Proposed Project is fatally flawed as left turns from the school driveway are blocked by queuing and cannot be made during most of the times when events are proposed to be scheduled. The trip distribution shown in Figure 5C must be revised.

**Response to Comment No. 51-70**

Refer to Responses to Comment No. 51-68 and No. 51-69.
Furthermore, as discussed in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, license plate matching surveys were conducted on May 22, 2014, to quantify the assumption that few Archer vehicles turn right out of the project driveway and then go around the block on Westgate Avenue, Chaparal Street and Barrington Avenue in order to avoid making left-turns out of the Project driveway. These surveys consisted of recording the license plates of vehicles observed to turn right from the Archer driveway onto westbound Sunset Boulevard and of vehicles observed to turn right from westbound Sunset Boulevard to northbound Westgate Avenue during the critical hours of 3:00 P.M. to 6:00 P.M. (which captures both the departure time immediately after school lets out and the departure time for after-school events), and then determining whether any of the license plates matched (thus indicating a vehicle potentially going around the block). During the observation period on May 22, 2014, no vehicles were observed to make this movement out of a total of 51 vehicles observed to make a right-turn exit from Archer. Only eight vehicles were observed to turn right from westbound Sunset Boulevard onto Westgate Avenue during the three-hour observation period, of which none matched a vehicle observed to exit from Archer. Since no vehicles exiting Archer were observed to turn right onto Westgate Avenue, it can be presumed that essentially all of the vehicles that turned right on exit were legitimately destined to the west. In other words, essentially all of the vehicles wishing to travel east on Sunset during the three-hour observation period did so by turning left onto Sunset, not by traveling around the block. Traffic counts conducted at the School driveways confirm that vehicles are able to make both left-turns into the entrance driveway from Sunset Boulevard and left-turns out from the exit driveway onto Sunset Boulevard.

As detailed in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, most attendees of School Functions are anticipated to depart after 9:00 P.M. when traffic volumes are substantially lower on Sunset Boulevard and left turns can be readily made.

In addition, as described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving in recent months as construction on the I-405/Sepulveda Pass project has neared completion, with the opening of the HOV lane on the northbound I-405 freeway and substantial completion of the I-405/Sunset Boulevard interchange modifications.

**Comment No. 51-71**

In addition, the DEIR must propose feasible and enforceable mitigation measures to provide access to and from the Archer School driveways during the times of event arrivals and event departures.
Response to Comment No. 51-71

Refer to Responses to Comment No. 51-68 through No. 51-70. No mitigation measures are required to provide access to and from the School driveways.

Comment No. 51-72

6) Access to and from Sunset Boulevard Has Not Been Evaluated—The DEIR and the TAR do not discuss, evaluate, or analyze the level of traffic control to be used to facilitate access to and from Archer School at the widened driveways on Sunset Boulevard. As discussed above and as shown in the enclosed photographs, busses leaving the exit only driveway on Sunset Boulevard experience difficulty merging into the solid queue in the two eastbound lanes on Sunset Boulevard, partially blocking the westbound lanes of Sunset Boulevard. Adding student and employee trips associated with increased enrollment up to 518 students plus traffic associated with events will only make these conditions worse. Construction trucks leaving the site and entering Sunset Boulevard to go east will experience similar conditions associated with the existing and future queuing.

Response to Comment No. 51-72

Refer to Responses to Comment No. 51-68 through No. 51-70. In addition, refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for further discussion of traffic impacts associated with proposed campus operations.

Construction trucks will be able to turn onto Sunset Boulevard. As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. Mitigation Measure K-5 requires development and implementation of a construction Traffic Management Plan. Among other things, the mitigation measure requires that flaggers be used to control trucks moving into and out of the Project Site. Exiting trucks would be able to utilize the existing center left-turn lane that is present on Sunset Boulevard in front of the Archer campus while westbound flows on Sunset Boulevard are stopped by the upstream traffic signal at the Sunset Boulevard/Barrington Avenue intersection. As described on page IV.K-82 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the haul and equipment/material delivery trips on weekdays would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) Monday through Friday and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize impacts during the weekday P.M. commute peak period and facilitate turning movements into and out of the Project site at the Sunset Boulevard driveways.
Comment No. 51-73

Mitigation Measure K-12 on Page IV.K-111 states “If necessary, appropriate traffic controls (signs and temporary signals) shall be installed to ensure pedestrian and vehicular safety during construction.” No analysis has been conducted of the resulting Level of Service at the existing Archer School exit driveway under STOP control or under traffic signal control either during construction or after completion of the Proposed Project. A complete study including the preparation of traffic signal warrant sheets is required to analyze the exiting traffic during construction and after completion of the Proposed Project so that all significant traffic impacts can be properly identified and analyzed, enabling feasible mitigation measures to then be developed and implemented.

Response to Comment No. 51-73

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. Among other things, the mitigation measure requires that flaggers be used to control trucks moving into and out of the Project Site. The reference to signs in Mitigation Measure K-12 is to signs that would be placed on School driveways, not on City streets. The driveways are effectively stop-controlled already, and any such signage would simply reinforce that condition.

The reference to temporary signals in Mitigation K-12 is in error and is hereby deleted from the Final EIR. There is no intent to utilize temporary traffic signals. See Section II, Corrections and Additions, of the Final EIR.

Comment No. 51-74

7) Event Trips Will Use Local Streets to Avoid Sunset Boulevard—From my review of the 2011 traffic counts on weekdays between 3 and 6 PM, eastbound traffic on the streets on both sides of Archer School includes 1,860 vehicles on Sunset Boulevard (78%) and 531 vehicles on Chaparal Street (22%). With jammed, gridlocked conditions on Sunset Boulevard as indicated by LOS F and the extremely high V/C ratios, event traffic from Archer School events will use local streets instead. Existing and future queues on Sunset Boulevard cause excessive delays for left turns out of the school’s exit driveway. Rather than heading east on Sunset Boulevard, traffic exiting Archer School will circle the perimeter of the School instead with right turns to go west on Sunset Boulevard, north on Westgate Avenue, east on Chaparal Street, and south on Barrington Avenue to rejoin Sunset Boulevard.
Table IV.K-24 beginning on Page IV.K-68 of the DEIR provides street segment traffic volumes for baseline conditions and Table IV.K-25 beginning on Page IV.K-71 of the DEIR provides future daily traffic volumes for Year 2020 conditions on the local streets. No event traffic whatsoever has been assigned by the DEIR to Westgate Avenue, Chaparal Street, or Barrington Avenue to account for the jammed, gridlocked conditions on Sunset Boulevard between 3 and 7 PM on weekdays. Clearly, the analyses of local street segment impacts provided by the DEIR are incorrect and the conclusion on Page IV.K-136 that “Project impacts related to neighborhood intrusion would be less than significant” is incorrect.

Response to Comment No. 51-74

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

Refer to Responses to Comment No. 51-68 through No. 51-70 regarding vehicles exiting the campus onto Sunset Boulevard. Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparal Street. As described in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, based on field observations and a license plate matching survey, few vehicles exiting Archer are anticipated to cut-through Chaparal Street. As determined in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, Project impacts related to neighborhood intrusion would be less than significant. Although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to $15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street. As determined in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. Project impacts related to neighborhood intrusion would be less than significant.

Comment No. 51-75

8) TAR “Project Improvements” Compared to DEIR Project Design Features—Beginning on Page 60, the TAR identifies “Additional Project Improvements” whereas the DEIR identifies several “Project Design Features” beginning on Page IV.K-45. Important differences and inconsistencies between these lists are noted as follows:
a) Pedestrian Safety Study Offer Is Limited—The TAR states “The Project proposes to fund the conduct and implementation of a pedestrian safety study in the immediate vicinity of the Project Site. The purpose of the study will be to identify improvements to sidewalks, crosswalks, traffic signal equipment, etc., to enhance the safety of pedestrians around the Project Site.” Project Design Feature K-4 states “The Project Applicant shall provide up to $10,000 for the conduct and implementation of a pedestrian safety study...” The DEIR limits the Project Applicant’s contribution to “up to $10,000”, an amount that may not even fund the study itself, let alone implement any of the recommended improvements.

Response to Comment No. 51-75

As set forth in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, Project impacts related to pedestrians would be less than significant. Even though the Draft EIR determined that Project impacts to pedestrians would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant shall provide up to $10,000 toward the conduct and implementation of a pedestrian safety study in the immediate vicinity of the Project Site, which would identify improvements to sidewalks, crosswalks, traffic signal equipment, etc., to enhance the safety of pedestrians around the Project Site.

Comment No. 51-76

b) Chaparal Street Traffic Calming Offer Is Limited—The TAR states “The Project proposes to work with the City of Los Angeles and neighborhood residents to fund the development and implementation of a traffic calming plan on Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street.” Project Design Feature K-5 states “The Project Applicant shall coordinate with the City of Los Angeles and neighborhood residents to provide up to $15,000 for the development and implementation of a traffic calming plan...” The DEIR limits the Project Applicant’s contribution to “up to $15,000”, an amount that may not be sufficient to even fund the study itself, let alone implement any of the recommended improvements. From my review of the traffic counts in the TAR Appendix, any study of cut-through traffic must also include Saltair Avenue between Sunset Boulevard and Chaparal Street, clearly part of the cut-through traffic route between 3 PM and 7:30 PM on weekdays.

Response to Comment No. 51-76

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparal...
Street. As described in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, based on field observations and a license plate matching survey, few vehicles exiting Archer are anticipated to cut-through Chaparal Street. Although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to $15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street. The Draft EIR determination that Project operational impacts on neighborhood streets would be less than significant includes Saltair Avenue between Sunset Boulevard and Chaparal Street.

Comment No. 51-77

c) Project Design Features Require Additional Monitoring and Enforcement—The TAR and the DEIR contain measures that are intended to reduce trips to and from Archer School but a formal monitoring program together with enforcement provisions and penalties for non-compliance have not been provided. Annual monitoring is insufficient and must be done at least once every semester as was required for five years when the Archer School relocated to the Sunset Boulevard site. Specific requirements, together with public review, must be adopted as enforceable Conditions of Approval for the following Design Features upon which the DEIR and the TAR have relied for their analyses:

i) Project Design Feature K-1, continuation of the Traffic Management Program including carpools, coordination with other schools to avoid peak drop-off and pick-up activity, and maintaining a progressive disciplinary system of enforcement.

ii) Project Design Feature K-6, increasing percent of employees will arrive outside of the 7 AM to 8 AM as enrollment increases to 470 students (20% outside AM peak) and 518 students (40% outside AM peak).

iii) Project Design Feature K-7, develop and implement an Event Parking and Transportation Management Plan for events requiring more than 212 parking spaces. Based on my professional experience, it would be much simpler to limit the number of attendees rather than the number of parked vehicles.

Response to Comment No. 51-77

All of the project design features and mitigation measures identified and analyzed in the Draft EIR and the Final EIR are included in the mitigation monitoring and reporting
program set forth in Section IV, Mitigation Monitoring and Reporting Program, of this Final EIR and would be mandatory elements of the Project. The Event Parking and Transportation Management Plan to be developed in accordance with Project Design Feature K-7 will include measures potentially including a parking reservation system to manage vehicle trips. Also refer to Mitigation Measure K-2.

**Comment No. 51-78**

d) Chayote Street Traffic Study Not Described or Identified in DEIR—Page 120 of the TAR indicates that the Project is also proposing to “...fund and facilitate implementation of a number of other measures to generally improve transportation conditions in the area...” including the Chayote Street Study. The purpose and goals of this study are not identified in the TAR and the Chayote Street Study is not identified in the DEIR.

**Response to Comment No. 51-78**

The reference to a “Chayote Street study” in the Summary and Conclusions chapter in the Traffic Analysis Report is an error and is hereby deleted from the Traffic Analysis Report. Refer to Section II, Corrections and Additions, of the Final EIR.

**Comment No. 51-79**

9) Chaparal Street Significant Impacts During Construction Require Mitigation—Chaparal Street is a local street about 20 feet wide between the outside edges. Speed humps have been installed along the roadway and multi-way STOP signs exist at intersections within the residential area north of Archer School. The roadway carries a significant volume of eastbound commuter traffic between 3 and 7:30 PM on weekdays seeking to avoid the extreme congestion on Sunset Boulevard. Of the daily volume of 1,425 recorded on November 9, 2011 and included in the TAR Appendix, about 750 eastbound motorists are commuters between 3 and 7:30 PM. Without commuters, traffic volumes on Chaparal Street would be about 675 vehicles per day.

Page IV.K-82 of the DEIR provides two options for Phase 2 of construction, with “Option A” involving construction of the Aquatics Center/Visual Arts Center followed by the Performing Arts Center, and with “Option B” involving construction of the Performing Arts Center followed by the Aquatics Center/Visual Arts Center. Under “Option B”, all haul trucks as well as equipment/material delivery vehicles would enter and exit the site via the Barrington Avenue driveway or the Chaparal Street driveway during construction of the Performing Arts Center, and
then all construction traffic would use Chaparal Street during construction of the Aquatics Center/Visual Arts Center.

During construction of Phase 2, Page IV.K-86 in Table IV.K-28 forecasts 16 daily haul truck trips and 72 other truck trips spread throughout the workday between 7 AM and 4 PM. A total of 78 worker trips are also forecast throughout Phase 2 with 39 trips arriving between 7 and 8 AM and 30 trips departing between 6 and 7 PM. From Pages 85 and 89 of the TAR, Phase 2 construction is expected to last 37 to 38 months, just over three years.

Under Baseline with Project Conditions, Table IV.K-31 on Page IV.K-94 of the DEIR indicates that the construction traffic increase on Chaparal Street between Barrington Avenue and Westgate Avenue during Phase 2 will be barely below the threshold of a significant traffic impact. With the baseline ADT of 1,425 vehicles per day and with 192 project construction trips, the percentage of additional project trips is 11.9%, or 0.1 % below the significant impact threshold. This amounts to only 2 daily trips, or one round trip by a construction worker to and from the site. Considering only the local traffic of 675 vehicles per day, the traffic increase of 192 construction trips, a 28% increase for over three years, must be considered to be a significant traffic impact on this 20’ wide residential street.

**Response to Comment No. 51-79**

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the City of Los Angeles CEQA Thresholds Guide identifies significance thresholds with regard to neighborhood intrusion impacts based on the increase in project trips on a local residential street. As provided in Table IV.K-31 on pages IV.K-93 and IV.K-94 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, construction traffic would result in less-than-significant traffic impacts at the analyzed street segments, which include Chaparal Street between Barrington Avenue and Westgate Avenue. As explained in Subsection IV.K.3.f in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, to be conservative, and to reflect potential conditions at the time the Project will potentially be under construction, the Draft EIR also includes a modified analysis of street segments. The modified analysis reduces the daily traffic volume on each street segment by 50 percent to reflect a conservative approximation of traffic conditions once construction of the I-405 Sepulveda Pass Improvement Project is complete. As provided in Table IV.K-33 on pages IV.K-97 and IV.K-98 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, construction traffic would result in less-than-significant traffic impacts at the analyzed street segments, which include Chaparal Street between Barrington Avenue and Westgate Avenue, during the North Wing Renovation and all of Phase 1. Construction traffic would result in a temporary significant impact at Chaparal Street between Barrington Avenue and Westgate Avenue during portions of Phase 2. It should also be noted that the highest level of truck
generation during Phase 2 would be for relatively short periods during Phase 2 construction activities (e.g., Phase 2 excavation activities and Phase 2 concrete pour). Truck generation at other times would be lower.

**Comment No. 51-80**

Under Future (Year 2020) with Project Conditions, Table IV.K-32 on Page IV.K-96 of the DEIR indicates that the construction traffic increase on Chaparal Street between Barrington Avenue and Westgate Avenue during Phase 2 will be just below the threshold of a significant traffic impact. With the cumulative base ADT of 1,496 vehicles per day and with 192 project construction trips, the percentage of additional project trips is 11.4%, or 0.6% below the significant impact threshold. This amounts to only 11 daily trips, or one round trip by five construction workers to and from the site. Considering only the local traffic of 700 vehicles per day in Year 2020, the traffic increase of 192 construction trips, a 27% for over three years, must be considered to be a significant traffic impact on this 20' wide residential street.

**Response to Comment No. 51-80**

Refer to Response to Comment No. 51-79.

**Comment No. 51-81**

The DEIR then reanalyzes construction traffic in the neighborhood assuming that completion of the 1-405 Sepulveda Pass Improvement Project will lower traffic volumes on neighborhood streets by 50%. If this assumption is correct, then there will be a significant traffic impact for over three years during Phase 2 construction on Chaparal Street between Westgate Avenue and Barrington Avenue. While Page IV.K-102 and Table IV.K-34 on Page IV.K-100 of the DEIR admit there will be significant traffic impacts caused by Phase 2 construction on Chaparal Street, Page IV.K-106 states this would be “a temporary significant impact” and no mitigation measures have been proposed in Section 9 beginning on Page IV.K-106. The large increase in the average daily traffic on Chaparal Street, a narrow residential street, caused by construction vehicles is significant, will last for over three years (37 to 38 months), cannot be considered “temporary”, [sic] and must be mitigated.

**Response to Comment No. 51-81**

See Response to Comment No. 51-79. It should also be noted that the highest level of truck generation during Phase 2 would be for relatively short periods during Phase 2
construction activities (e.g., Phase 2 excavation activities and Phase 2 concrete pour). Truck generation at other times would be lower.

Comment No. 51-82

Page 93 of the TAR and Page IV.K-3 indicate that work hours during construction will be between 7 AM and 9 PM on weekdays, between 8 AM and 6 PM on Saturdays and Holidays, and there will be no construction on Sundays. Work hours must be reduced to prohibit construction between 6 PM and 9 PM on weekdays and to prohibit construction on Holidays.

Response to Comment No. 51-82

As discussed on page II-39 in Section II, Project Description, and Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would comply with the LAMC, which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. Pursuant to the LAMC, no construction activities are permitted on Sundays. Construction hours may be extended with approval from the Executive Director of the Board of Police Commissioners. Archer may seek approval from the Executive Director to extend the construction hours for the Project to Sunday from 8:00 A.M. to 6:00 P.M. In addition, most, if not all, haul and equipment/material delivery trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.), Monday through Friday, and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize generating truck trips during the weekday P.M. peak hours.

Comment No. 51-83

In addition, alternate access that prohibits the use of Chaparal Street by construction vehicles must be made a mandatory and enforceable Condition of Approval.

Response to Comment No. 51-83

This comment does not address the adequacy of the analysis in the Draft EIR. The comment is noted for the record and will be forwarded to decision-makers for review and consideration.

As described in Section IV.K. Traffic, Access, and Parking, of the Draft EIR, access to the Project Site for haul trucks and equipment/material delivery trucks would vary between the different phases of construction. Project construction access is intended to minimize the use of Chaparal Street to the maximum extent possible. During the North
Wing Renovation, virtually all haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Sunset Boulevard east and west driveways. Occasionally, a haul truck or equipment/material delivery vehicle may be required to use the Chaparal Street driveway for access. For this reason, up to 5 percent of construction vehicles were assumed to enter and exit from the Chaparal Street driveway. During Phase 1, virtually all haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Sunset Boulevard east and west driveways, respectively. Occasionally, a construction vehicle may be required to use the Chaparal Street driveway for access. For this reason, up to 5 percent of construction vehicles were assumed to enter and exit from the Chaparal Street driveway during the Overlap between the North Wing Renovation and Excavation and Hauling for Phase 1 and the Remainder of Phase 1(a) periods. For the Remainder of Phase 1(b) through Phase 1(d) periods, haul and delivery ingress and egress would be similar, except that up to 20 percent of haul trucks and equipment/material delivery vehicles could use the Chaparal Street or Barrington Avenue driveways. Under Phase 2, all haul trucks and equipment/material delivery vehicles would be required to enter and exit the Project Site via the Barrington Avenue driveway or the Chaparal Street driveway.

Comment No. 51-84

10) Off-Site Parking Must Be Served by Shuttles—Page 91 of the TAR and Page IV.K-79 of the DEIR discuss the possible use of a shuttle to bring workers to and from Archer School during construction. The DEIR states “Construction worker parking would be provided on-and off-site depending on the phase of construction and the availability of on-site parking. Off-street construction worker parking facilities could include the parking lots along Constitution Avenue, San Vicente Boulevard, or Wilshire Boulevard. When construction worker parking is off-site, a temporary shuttle may be operated for construction workers to and from the designated off-site parking location.” While the TAR and DEIR state off-site parking “would” be provided, both documents indicate that a temporary shuttle “may” be used to transport workers. With the remote location of the temporary lots for Archer School, the use of a shuttle must be made a mandatory Condition of Approval, not just an idea that lacks an enforceable mitigation measure.

Page 92 of the TAR and Page IV.K-79 of the DEIR discuss the possible use of a shuttle to bring employees, students and visitors to and from Archer School during construction. As with remote construction worker parking, both documents indicate that off-site parking “would” be provided and that a temporary shuttle “may” be provided. With the remote location of the temporary lots for Archer School, the use of a shuttle must be made a mandatory Condition of Approval, not just an idea that lacks an enforceable mitigation measure.
Response to Comment No. 51-84

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, as set forth in Mitigation Measure K-6, construction worker parking would be provided on- and off-site depending on the phase of construction and the availability of on-site parking but no construction worker parking would be permitted within 500 feet of the nearest point of the Project Site except in designated areas. Off-street construction worker parking facilities could include existing parking facilities along Constitution Avenue, San Vicente Boulevard, or Wilshire Boulevard, and/or other existing facilities with available excess parking capacity. When construction worker parking is off-site, a temporary shuttle may be operated for construction workers to and from the designated off-site parking location. Archer would arrange parking for some or all of the employees, students, and guests in available nearby parking facilities. Options for off-site parking facilities could include the surface parking lot south of Sunset Boulevard at Barrington Village or private parking lots along San Vicente Boulevard and Wilshire Boulevard. During construction when School parking is off-site, Archer would provide a shuttle to facilitate access to and from the designated parking location(s) if they are beyond walking distance. Upon completion of the underground parking structure, employees, students, and guests would be able to park on-site.

Mitigation Measure K-6 requires preparation of a construction parking plan. As set forth in Mitigation K-6, during construction activities when construction worker parking cannot be accommodated on the Project Site, alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) would be identified for approval by the City 30 days before commencement of construction. In addition, Mitigation Measure K-6 provides that during the construction of the proposed parking garage, parking for the School would be arranged in nearby available off-site parking facilities.

Comment No. 51-85

11) Mitigation Measure K-2 Is Not Feasible or Practical—Mitigation Measure K-2 on Page IV.K-107 of the DEIR theoretically establishes limits on the number of trips generated by guests arriving at or departing from weekday and Saturday afternoon school functions and athletic competitions as follows:

- 3 to 4 PM Weekday Arrivals—No more than 72 vehicles
- 5 to 6 PM Weekday Departures—No more than 72 vehicles
- 1 to 2 PM Saturday Arrivals—No more than 244 vehicles
There is no feasible or practical way to limit vehicles from trying to reach Archer School for an event on a weekday or a Saturday afternoon. Trips and significant traffic impacts would still occur on the roadways in the area. For example, parents and guests from the visiting team would have no knowledge that they could not enter the Archer School parking structure until they arrived at the site. After making the trip, these parents and guests would circulate on the area streets while seeking parking nearby, likely within the residential neighborhood to the north, resulting in longer trips and higher congestion.

**Response to Comment No. 51-85**

As discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

The additional mitigation measures in the Final EIR limit the total number of vehicles that can arrive at the site for events (whether a single event or simultaneous events) to levels that would not generate significant traffic impacts. For example, as detailed in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, Mitigation Measure K-2 has been refined to further limit the number of vehicles generated by guests arriving and departing the Archer campus. Specifically, during the 3:00 P.M.—4:00 P.M. arrival period, the number of vehicles has been reduced from 72 to 44; during the 5:00 P.M.—6:00 P.M. departure, the number of vehicles has been reduced from 72 to 44; and on Saturday 1:00 P.M.—2:00 P.M., the number of number of vehicles has been reduced from 244 to 243. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, as part of Project Design Feature K-1, the Project shall include implementation of a comprehensive Traffic Management Program that would include, but not be limited to, a prohibition on parking on residential streets. To ensure implementation of the Traffic Management Program, the School shall continue to inform parents, students, faculty, and staff in writing on an annual basis of all rules regulating School traffic and parking. The School shall maintain a progressive disciplinary system of enforcement to ensure compliance with the Traffic Management Program. In addition, pursuant to Project Design Feature K-7, Archer will develop an Event Parking and Transportation Management Plan, which shall include appropriate tools to manage and control traffic and parking so that impacts to the surrounding areas are minimized. For example, to enforce the prohibition on parking on residential streets, Archer could prohibit guests from walking onto the campus without a walking permit issued by Archer. All guests would be required to check in with security upon arrival to the campus. The Event Parking and Transportation Management Plan
could also include measures such as a parking reservation system to manage vehicle trips generated by campus guests, including those from the visiting team.

**Comment No. 51-86**

Similarly, it is not feasible or practical to hold vehicles within the parking structure after an event concludes, particularly when Archer School proposes to hold back-to-back events on weekdays concluding between 5 and 6 PM and then starting either between 5 and 6 PM or between 6 and 7 PM. Holding vehicles in the parking structure after an event would be extremely difficult to implement and could expose drivers and their passengers to hazardous vehicle exhaust gasses.

**Response to Comment No. 51-86**

The Project does not propose to hold vehicles within the parking structure after an event concludes. Rather, the limitations on vehicles arriving for an event would limit the total number of vehicles present for an event, which in turn would limit the number departing after an event concludes.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

The additional mitigation measures limit the total number of vehicles that can arrive at the site for events (whether a single event or simultaneous events) to levels that would not generate significant traffic impacts. Furthermore, the additional mitigation measures prohibit guests arriving at the Archer campus to attend functions and interscholastic athletic competitions beginning at 5:30 P.M. or 6:00 P.M., which would eliminate the potential for overlap between guests departing events and guests arriving at events.

The parking structure meets the requirements to be considered “open” per California Building Code 2013, Section 406.3.2. As such, natural ventilation would provide sufficient air flow to prevent drivers and their passengers from unsafe air pollution concentrations.

**Comment No. 51-87**

Mitigation Measure K-2 is not feasible or practical; and will not be effective in limiting vehicle trips before or after events at Archer School. The DEIR must consider other enforceable mitigation measures such as reducing the attendance
at the various events, reducing the size of and seating at the various facilities being considered (particularly the proposed 41,400 square foot multi-purpose facility), and reducing the size of the proposed 212-space parking structure.

Response to Comment No. 51-87

Refer to Response to Comment No. 51-85.

As discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments, the Project's net new floor area would be reduced. The size of the Multipurpose Facility would be reduced from 41,400 square feet to 39,330 square feet. A Project objective is to provide separate gymnasium space for the Middle School and Upper School so there is a sufficient number of courts to allow both the Middle School and Upper School to practice and compete on the Archer campus. The number of vehicle trips generated by the use of the Multipurpose Facility does not depend on the size of the Multipurpose Facility but rather on the type and number of Interscholastic Competitions hosted in the Multipurpose Facility. Please refer to Appendix B-1 of the Draft EIR, which provides estimated attendance levels for the types of Interscholastic Athletic Competitions that may be hosted in the Multipurpose Facility.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. Mitigation Measure K-2 would limit the number of vehicles arriving at and departing from campus, regardless of the size of the Multipurpose Facility or the type and number of Interscholastic Athletic Competitions hosted in the Multipurpose Facility. Finally, as discussed in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, the Multipurpose Facility has been reduced from approximately 41,400 square feet to 39,300 square feet. In addition, the size of the Performing Arts Center would be reduced 22,600 square feet to 19,025 square feet, and the seating capacity would be reduced from 650 seats to 395 seats. As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced.

Comment No. 51-88

Even if Mitigation Measure K-2 could be implemented (which it cannot) plus Mitigation Measure K-3 which involves improvements at Saltair Avenue and Sunset
Boulevard, Table IV.K-38 on Page IV.K-116 of the DEIR indicates significant traffic impacts will occur under Baseline with Project Conditions for departures from weekday 300-attendee events between 5 and 6 PM at Bundy Drive/Sunset Boulevard and at Barrington Avenue/Sunset Boulevard. Table IV-K-128 of the DEIR indicates significant traffic impacts will also occur under Future (Horizon Year 2020) with Project Conditions with departures from weekday 300-attendee events between 5 and 6 PM at Bundy Drive/Sunset Boulevard and at Barrington Avenue/Sunset Boulevard.

Under both scenarios, the DEIR indicates there are no feasible mitigation measures possible to address these significant traffic impacts. This is not correct. For example if there were no event departures between 5 and 6 PM on weekdays through rescheduling, then there would be no significant traffic impacts at these two intersections. In addition to the alternatives to Mitigation Measure K-2 discussed above, the DEIR must examine rescheduling of events to preclude any and all departures between 5 and 6 PM on weekdays as a Mitigation Measure.

Response to Comment No. 51-88

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

The additional mitigation measures in the Final EIR limit the total number of vehicles that can arrive at the site for events (whether a single event or simultaneous events) to levels that would not generate significant traffic impacts. Further, with implementation of Mitigation Measure K-2, Mitigation K-3 providing the physical improvements at the intersection of Saltair Avenue and Sunset Boulevard would no longer be required and has been removed from the Project.

Comment No. 51-89

As contrasted with flawed Mitigation Measure K-2, a potentially effective mitigation measure that has not been considered involves limiting the availability of parking by a reduction in the size of the proposed 212-space parking structure. Reducing the number of regular parking spaces to 160 without attendants would accommodate the parking demand during school hours on weekdays as shown on Figure 7C of the TAR.
Response to Comment No. 51-89

As discussed in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced. The parking structure will provide 185 parking spaces.

Comment No. 51-90

With no more than 72 weekday departures between 5 and 6 PM and with 70 percent bussing, Table 5B in the TAR for Baseline plus Project conditions indicates the V/C increase at Barrington Avenue/Sunset Boulevard would be 0.012 and the V/C increase at Bundy Drive/Sunset Boulevard would be 0.016. With no more than 72 weekday departures between 5 and 6 PM and with 70 percent bussing, Table 6B in the TAR for Cumulative plus Project conditions indicates the V/C increase at Barrington Avenue/Sunset Boulevard would be 0.012 and the V/C increase at Bundy Drive/Sunset Boulevard would be 0.015.

To avoid significant traffic impacts at these two intersections, the increase in the V/C ratio is limited to less than 0.010. With the reduction in the parking structure to 160 regular parking spaces, about 50 net new exiting vehicle trips would occur between 5 and 6 PM on weekdays. The elimination of 22 weekday departures between 5 and 6 PM, down from 72 to 50, would be likely to eliminate the two remaining significant traffic impacts at Bundy Drive/Sunset Boulevard and Barrington Avenue/Sunset Boulevard as the V/C ratio increases would be less than 0.010.

Response to Comment No. 51-90

As discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

The additional mitigation measures in the Final EIR limit the total number of vehicles that can arrive at the site for events (whether a single event or simultaneous events) to levels that would not generate significant traffic impacts. With implementation of Mitigation Measure K-2, the number of guests departing weekdays between 5:00 P.M. and 6:00 P.M. after attending School Functions or Interscholastic Athletic Competitions would be no more than 44, which is less than the 50 suggested by Mr. Brohard.
Comment No. 51-91

12) Alternative 4 Must Be Evaluated in Further Detail—Chapter V includes a brief comparison of various alternatives to the Proposed Project. Alternative 4, the Reduced Program within Existing Campus Boundary, provides two options including a smaller Multi-Purpose Facility of 20,300 square feet (about half the size as in the Proposed Project) and a Performing Arts Center of 18,150 square feet (about 4,400 square feet less than the Proposed Project). Within Alternative 4, two variations are considered including Option A at 153,025 square feet and Option B at 150,850 square feet compared to the Proposed Project at 171,930 square feet. The discussion of Alternative 4 indicates that the duration of construction traffic impacts will be slightly shorter as less excavation is needed. The discussion also indicates certain interscholastic athletic events would still be required to be held elsewhere and that the frequency of events and the associated traffic would be reduced.

The discussion of Alternative 4 regarding Traffic, Access, and Parking in the DEIR is extremely brief (less than two pages). The DEIR should be expanded to more thoroughly evaluate and analyze the traffic, access, and parking aspects of Alternative 4 in more detail. Further limitations on the number of special events and their sizes must also be evaluated. Elimination of special events that do not directly relate to Archer School functions (such as weddings and private parties) must also be considered to limit the number of days when significant traffic impacts are forecast to occur.

Response to Comment No. 51-91

As set forth in CEQA Guidelines Section 15126.6(d), “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project... If an alternative would cause one or significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” Section V, Alternatives, of the Draft EIR includes a detailed description of each of the alternatives analyzed and includes an analysis of the potential environmental impacts of each alternative. As such, the Draft EIR appropriately provided sufficient information to allow for a comparison of impacts to the Project.

As discussed on page V-102 of Section V, Alternatives, of the Draft EIR, Alternative 4, the Reduced Program within Existing Campus Boundary Alternative, would result in a reduction in the frequency of events and associated traffic would be reduced, when compared to the Project. However, on days that the School would host events similar to those anticipated under the Project, Alternative 4 would generate a similar amount of traffic
and associated impacts to study intersections as the proposed Project. Therefore, as the amount of traffic and associated impacts would be similar to those of the Project on certain event days, the potential impacts of this alternative are already provided in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. This alternative could reduce the frequency of traffic impacts.

Refer to Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, for a description of the additional operational mitigation measures proposed to be implemented to reduce significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

As detailed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, the Project also proposes additional restrictions on its operations including additional limitations on the hours of operation; reducing the number of proposed School Functions from 98 to 86, including eliminating Interscholastic Athletic Competitions and two School Functions with up to 650 guests; and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses; thereby reducing traffic along the surrounding streets.

**Comment No. 51-92**

In summary, additional study of the Proposed Project must be undertaken in the areas of traffic, access, and parking. Each of the various issues and concerns raised throughout this letter must be addressed in detail to properly disclose, analyze, and mitigate the environmental impacts of the Proposed Project. The Archer Forward: Campus Preservation and Improvement Plan DEIR must then be revised accordingly and recirculated for further public review and comment. If you have questions regarding these comments, please call me at your convenience.

**Response to Comment No. 51-92**

As demonstrated in the detailed responses to the specific comments made by Mr. Brohard in Responses to Comment No. 51-59 through No. 51-91, Section IV.K, Traffic, Access, and Parking, of the Draft EIR and the Traffic Analysis Report provided in Appendix P.1 of the Draft EIR are in compliance with CEQA, the CEQA Guidelines, the City of Los Angeles 2006 CEQA Thresholds Guide, and LADOT Traffic Study Guidelines.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section...
15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states:

> New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.

As demonstrated in this Final EIR, no new significant information (as defined by CEQA Guidelines Section 15088.5) that would require recirculation of the Draft EIR has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR. Neither the comments submitted on the Draft EIR nor the responses contained herein constitute new significant information warranting the recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

**Comment No. 51-93**

See following page.
Tom Brohard, PE

Licenses:  
1975 / Professional Engineer / California – Civil, No. 24577  
1977 / Professional Engineer / California – Traffic, No. 724  
2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education:  
1969 / BSE / Civil Engineering / Duke University

Experience:  
45 Years

Memberships:  
1977 / Institute of Transportation Engineers – Fellow, Life  
1978 / Orange County Traffic Engineers Council - Chair 1982-1983  
1981 / American Public Works Association – Life Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. Since May 2005, he has served as Consulting City Traffic Engineer for the City of Indio. He also currently provides “on call” Traffic and Transportation Engineer services to the Cities of Big Bear Lake, San Fernando, and Tustin. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower ..................................................... 1997 - 1998
- Bell Gardens ................................................ 1982 - 1995
- Huntington Beach ........................................ 1998 - 2004
- Lawndale ..................................................... 1973 - 1978
- Los Alamitos ................................................. 1981 - 1982
- Oceanside .................................................... 1981 - 1982
- Paramount ................................................. 1982 - 1988
- Rancho Palos Verdes ....................................... 1973 - 1978
- San Marcos .................................................. 1981
- Santa Ana .................................................... 1978 - 1981
- Westlake Village ........................................... 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over $5 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.
In his service to the City of Indio since May 2005, Tom has accomplished the following:

- Oversaw preparation and adoption of the 2008 Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain conditions.

- Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street and on Monroe Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installations in Caltrans District 8 in Riverside County; reviewed plans and provided assistance during construction of both $2 million projects to install traffic signals and widen three of four ramps at these two interchanges under Caltrans encroachment permits.

- Reviewed traffic signal, signing, striping, and work area traffic control plans for the County’s $65 million I-10 Interchange Improvement Project at Jefferson Street.

- Reviewed traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvements of the I-10 Interchanges at Jefferson Street, Monroe Street, Jackson Street and Golf Center Parkway.

- Oversaw preparation of plans, specifications, and contract documents and provided construction assistance for over 50 traffic signal installations and modifications.

- Reviewed and approved over 1,000 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects.

- Oversaw preparation of a City wide traffic safety study of conditions at all schools.

- Obtained $47,000 grant from the California Office of Traffic Safety and implemented the City’s Traffic Collision Database System. Annually reviews “Top 25” collision locations and provides traffic engineering recommendations to reduce collisions.

- Prepared over 800 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping.

- Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 300 street segments.

- Reviewed and approved traffic impact studies for more than 35 major projects and special events including the Coachella and Stagecoach Music Festivals.

- Developed and implemented the City’s Golf Cart Transportation Program.

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.
Response to Comment No. 51-93

This comment transmits the attached curriculum vitae to the letter submitted by Tom Brohard, as presented in Exhibit A of Comment Letter No. 51. This attachment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-94

See following page.
Chaparal is a narrow street and queuing traffic during PM peak hour is not uncommon. Taken 3:21 pm, Oct. 27, 2011.

Traffic backed up on Chaparal Street during PM peak hour. Taken 6:05 pm, April 14, 2014.

SET #1 TRAFFIC PHOTOS
Response to Comment No. 51-94

Refer to Response to Comment No. 51-57.

Comment No. 51-95

See following page.
Eastbound Sunset traffic in front of Archer, with bus departing campus. Taken 3:16 pm, March 12, 2014.

Eastbound Sunset Blvd. traffic approaching Archer and Barrington Ave. Taken 3:22 pm, March 12, 2014.

Southbound traffic on Barrington turning eastbound to Sunset.

SET #2 TRAFFIC PHOTOS
Response to Comment No. 51-95

Refer to Responses to Comment No. 51-68 and No. 51-69.

Comment No. 51-96

See following page.
SET #3 TRAFFIC PHOTOS

Eastbound Sunset Boulevard traffic as seen from southwest corner of Barrington and Sunset. Taken 3:19 pm, March 12, 2014.

Bus departing Archer, attempting to turn onto eastbound Sunset. Taken 3:21 pm, March 12, 2014.
Bus departing Archer and blocking westbound Sunset Blvd. as it turns to eastbound Sunset. Taken 3:21 pm, March 12, 2014.

Bus departing Archer completes turn onto eastbound Sunset. Taken 3:21 pm, March 12, 2014.
Response to Comment No. 51-96

Refer to Response to Comment No. 51-69.

Comment No. 51-97

Exhibit B

As requested, we have reviewed various documents pertaining to the Archer Forward: Campus Preservation and Improvement Plan Draft Environmental Impact Report (DEIR), including, but not limited to:

1. Archer School for Girls Draft EIR (July 1997)
2. Archer School for Girls Final EIR (June 1998)
3. Archer School Conditional Use Permit [Case No. ZA-98-0158(CUZ)(PA4); July 2013]
4. Archer Forward Draft EIR, Section IV.1 Noise (February 2014)
5. Archer Forward, Assessment of Environmental Noise (February 2014)

Wilson Ihrig has practiced exclusively in the field of acoustics since 1966. During our 45 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have also peer-reviewed and critiqued many more noise studies. Wilson Ihrig has one of the largest technical laboratories in the acoustical consulting industry, and we routinely utilize industry-standard acoustical programs such as Environmental Noise Model (ENM), Traffic Noise Model (TNM), SoundPLAN, and CADNA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

Response to Comment No. 51-97

This introductory comment in Exhibit B of Comment Letter No. 51 is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-98

As the California legislation that establishes the need for an EIR states, “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” [Calif. Public Resources Code, Section
II.D Comment Letters

At 1,162 pages, the Archer Forward Noise Assessment report is by far the most comprehensive noise study for a project of this size that we have ever encountered, and it does, in fact, identify numerous “significant and unavoidable” noise impacts on the local community. Even at that, however, we believe it misstates the nature and understates the magnitude of those impacts. In this review, we will indicate what we believe are fundamental technical errors in the assessment and also provide commentary on why a project with significant and unavoidable impacts of the magnitude identified in the DEIR should not be approved by the City of Los Angeles.

Response to Comment No. 51-98

The comment is an introduction to the remaining comments in the Exhibit B of Comment Letter No. 51. As demonstrated by Responses to Comment No. 51-99 through No. 51-122, the noise analysis in the Draft EIR does not misstate or understate the magnitude of noise impacts associated with the Project.

Comment No. 51-99

TEMPORAL ASSESSMENT OF NOISE IMPACTS

Sound is produced by the mechanical propagation of pressure waves through the air. Like oceans waves, the airborne waves arrive at various frequencies and have a range of magnitudes, The frequency content is what makes various sounds discernable and, in the case of speech, gives the time-fluctuating signal intelligibility. The latter determines the loudness. Because sound transmission is a physical phenomenon, it may be measured and quantified. The frequency content may be determined by electrical circuits or modern digital signal processing techniques, and the magnitude may be quantified, usually in decibels, by calibrated microphones and associated electronics.

As noted in both the 1998 Archer DEIR and the 2014 Archer Forward DEIR, noise is fundamentally defined as “unwanted” or “undesirable” sound. As such, noise, in and of itself, cannot be quantified. While it is well established that sound levels (decibels) correlate somewhat with people perceiving a sound as “noise”, the situation is much more complex than captured by typical noise ordinances and noise policies. This is not to say that the latter are not useful as public policy, rather, it is to say that limiting noise assessment to only those aspects that can be quantified is to short-change the impact assessment on those impacted.

The non-decibel aspects of noise assessment are acknowledged in the Noise Assessment report supporting the 2014 Archer Forward DEIR:
Even though the A-weighted scale accounts for a person’s spectral response and, therefore, is commonly used to quantify individual events or general community sound levels, the degree of annoyance or other response effects also depends on several other perceptibility factors, including:

- Ambient (background) sound level
- Magnitude of the event sound level relative to the background noise
- Spectral (frequency) composition (e.g., presence of tones)
- \textit{Duration of the sound event}
- \textit{Number of event occurrences, repetitiveness, and intermittency}
- Time of day the event occurs.

[DEIR, Appendix N, p. 5, emphasis added]^{1}

\footnote{The “A-weighted scale” referred to in the passage is a filter commonly used in environmental and regulatory noise work to account for the manner in which humans typically hear frequencies between 20 and 20,000 Hz.}

The effects of noise on people fall into three general categories:

- Subjective effects of annoyance and nuisance
- Interference with activities such as speech, sleep and learning
- Physiological effects such as hearing loss

In most cases, the levels associated with environmental noise produce effects only in the first two categories.... There is no completely effective way to measure the subjective effects of noise or the corresponding reactions of annoyance, because of the wide variation in individual thresholds of annoyance and degrees to which people become acclimated to noise. Thus, an important way of determining a person’s subjective reaction to a new noise source is by comparison to the existing environment to which they are accustomed (the “ambient” environment). In general, the more the level of a noise event exceeds the prevailing ambient noise level, the less acceptable the noise source will be to those exposed to it [DEIR, Appendix N, p. 6]
Response to Comment No. 51-99

The comment reiterates several of the fundamentals of sound engineering as presented in Section IV.I, Noise, of the Draft EIR. The comment acknowledges that sound levels as measured in decibels correlate somewhat with people perceiving sound as “noise.” The comment also questions the usefulness of the decibel for typical noise ordinances and noise policies; however, the comment provides no technical issues associated with common use of decibels in determining noise impacts. The comment also indicates that an important way of determining a person’s subjective reaction to a new noise source is by comparison to the existing environment in which the person is accustomed (the “ambient” environment). Consistent with this comment, the noise impact analysis presented in Section IV.I, Noise, of the Draft EIR evaluates potential noise impacts for new noise sources based on the existing ambient environment, per the CEQA Guidelines.

Comment No. 51-100

The temporally-based assessment in this matter, which is largely ignored in the DEIR as it is largely ignored in most DEIRs, hinges on the fact that the campus expansion plans will lead to audible, unwanted sounds—noise—at neighboring residences during many more hours of the week and on many more days of the year than is currently the case.

Response to Comment No. 51-100

The comment is a general statement and provides no specific technical issue related to the adequacy of the analysis of noise within the Draft EIR. Refer to pages IV.I-77 through IV.I-112 in Section IV.I, Noise, of the Draft EIR for an analysis of the proposed campus operations provided in Section II, Project Description of the Draft EIR. In addition, refer to Topical Response No. 4, Additional Measures to Reduce Noise, regarding the proposed refinements to the Project to reduce noise associated with campus operations.

Comment No. 51-101

Condition #3 of the 2013 CUP states that “The authorized use shall be conducted at all times with due regard for the character of the surrounding district...” On the Chaparal Street side of the Archer campus, the character is strictly quiet residential. As stated in the 1998 DEIR,

...the northern portion of the site (Chaparal Street) is characterized by lower noise levels than are characteristic of the southern portion of the site (Sunset Boulevard). This is due both to the increased distance from Sunset Boulevard...
Boulevard and the barrier effect provided by structures on-site and adjacent properties. [1998 DEIR at p. 130]

...the northern end of the site is largely shielded from Sunset Boulevard traffic noise by intervening structures on the site and by apartment and condominium buildings immediately west of the site. Consequently, noise levels in the rear of the building are substantially lower [1998 DEIR at p. 131]

Prior to the 1998 conversion of the subject property to a school, it had historically been residential since 1931 as the Eastern Star Home for Women. While a school is a permissible use of the property under its zoning, the extensive expansion proposed by Archer Forward raises the legitimate questions by the neighbors, “When is enough, enough?” The strictly quiet residential character of Chaparal Street behind the school has been irrevocably altered by developments at Archer already, but does that portend that there no longer be due regard for the residential character remaining?

**Response to Comment No. 51-101**

Under CEQA Guidelines Section 15125(a), the baseline for environmental review is normally existing conditions. The existing noise conditions on the Project Site are described on pages IV.I-9 to IV.I-23 in Section IV.I, Noise, of the Draft EIR. As discussed therein, within the Project Site, existing noise sources include outdoor student activities such as softball, soccer, basketball, and volleyball practices and games, as well as School assemblies, special events, and groups of students congregating outdoors before and after School, during breaks, and at lunch time, mechanical equipment from the Main Building, and vehicular traffic associated with School operations. In accordance with the CEQA Guidelines, the existing ambient noise environment was measured and used as the baseline for the noise impact analysis presented in Section IV.I, Noise, of the Draft EIR. As described on pages IV.I-13 in Section IV.I, Noise, of the Draft EIR, measurements were taken to establish the existing ambient noise levels in the areas surrounding the Project site, including the residences along Chaparal.

**Comment No. 51-102**

From the perspective of residents who pre-date Archer’s occupancy, sounds heard today that historically were not present include students talking and, more prevalently, sounds from soccer, softball and basketball practices and games. During games, there is noise both from the play itself and from spectators. Under the Archer Forward program, swimming and field hockey sounds would be added to the environment. So, what was once a quiet residential area, would become an area that is subject to frequent and pervasive sports noise.
Response to Comment No. 51-102

Potential noise impacts associated with the athletics activities have been thoroughly evaluated in Section IV.I, Noise, of the Draft EIR. Basketball and volleyball activities, which currently occur outdoors, would be held within the Multipurpose Facility that would provide a minimum 40 dBA interior/ exterior noise attenuation and would effectively reduce the noise transmission at the off-site sensitive receptors. In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project is proposes to fully enclose the swimming pool within the Aquatics Center. This enclosure would eliminate the significant noise impacts associated with maximum noise levels during weekday Aquatics Center activities from between 6:00 P.M. to 8:00 P.M. Furthermore, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been revised to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M. See Response to Comment No. 51-107 for a discussion of how the existing noise levels were appropriately used as the baseline in the noise analysis in the Draft EIR.

Comment No. 51-103

Another example of unwanted noise comes from the 650 people who attend the 13 Special Events with that level of attendance. These people will park in the Underground Parking Structure and then make their way through the North Garden to other parts of campus. While the decibel levels from these people talking may not exceed the quantified decibel-based significance thresholds, to the extent that this noise is even audible in the yards of homes on Chaparal, it would be an unwanted annoyance to the local residents.

Response to Comment No. 51-103

As set forth in Section IV.I, Noise, of the Draft EIR, noise impacts associated with talking on the pedestrian pathways and access routes would be less than significant. In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has been refined such that use of the underground pedestrian pathway, which runs from the underground parking garage to the Multipurpose Facility and the Performing Arts Center, would be mandatory after 8:00 P.M.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, the Project has been revised to include additional restrictions on its operations including additional limitations on the hours of operation and reducing the number of proposed School Functions from 98 to 86. As discussed therein, of
the 86 proposed School Functions, Archer would be limited to 27 School Functions with up to 100 guests, 22 School Functions with up to 200 guests, 26 School Functions with up to 300 guests, 7 School Functions with up to 500 guests, 3 School Functions with up to 650 guests, and 1 School Function (Graduation) with up to 800 Guests.

**Comment No. 51-104**

Tables I and II attempt to capture the essential temporal aspects of the increase in unwanted sound that would be emitted from the Archer campus under the Archer Forward development program.

### TABLE I  INCREASE IN GENERAL OPERATIONS HOURLY USAGE

<table>
<thead>
<tr>
<th>Instruction</th>
<th>Monday – Friday</th>
<th>Saturday</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Buildings</strong></td>
<td>Current 7A – 6P</td>
<td>Not allowed</td>
</tr>
<tr>
<td>Proposed 7A – 6P</td>
<td>7A – 6P</td>
<td></td>
</tr>
<tr>
<td><strong>Increase</strong></td>
<td>No increase in hours</td>
<td>New 11 hour use</td>
</tr>
<tr>
<td><strong>Fields</strong></td>
<td>Current 7:40A – 6P</td>
<td>Not allowed</td>
</tr>
<tr>
<td>Proposed 7A – 6P</td>
<td>7A – 6P</td>
<td></td>
</tr>
<tr>
<td><strong>Increase</strong></td>
<td>40 morning minutes</td>
<td>New 11 hour use</td>
</tr>
<tr>
<td><strong>Aquatics</strong></td>
<td>Current Does not exist</td>
<td>Does not exist</td>
</tr>
<tr>
<td>Proposed 7A – 6P</td>
<td>7A – 6P</td>
<td></td>
</tr>
<tr>
<td><strong>Increase</strong></td>
<td>New 11 hour use</td>
<td>New 11 hour use</td>
</tr>
</tbody>
</table>

**Extracurricular Activities**

<table>
<thead>
<tr>
<th>Instruction</th>
<th>Monday – Friday</th>
<th>Saturday</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Buildings</strong></td>
<td>Current 7A – 6P</td>
<td>None</td>
</tr>
<tr>
<td>Proposed 7A – 10P</td>
<td>7A – 6P</td>
<td></td>
</tr>
<tr>
<td><strong>Increase</strong></td>
<td>4 evening hours</td>
<td>New 11 hour use</td>
</tr>
<tr>
<td><strong>Fields</strong></td>
<td>Current 6P – 7P</td>
<td>None</td>
</tr>
<tr>
<td>Proposed 6P – 8P</td>
<td>7A – 6P</td>
<td></td>
</tr>
<tr>
<td><strong>Increase</strong></td>
<td>1 hour in evening</td>
<td>New 11 hour use</td>
</tr>
<tr>
<td><strong>Aquatics</strong></td>
<td>Current Does not exist</td>
<td>Does not exist</td>
</tr>
<tr>
<td>Proposed 7A – 8P</td>
<td>7A – 6P</td>
<td></td>
</tr>
<tr>
<td><strong>Increase</strong></td>
<td>New 13 hour use</td>
<td>New 8 hour use</td>
</tr>
</tbody>
</table>

**Customary School Activities**

<table>
<thead>
<tr>
<th>Instruction</th>
<th>Monday – Friday</th>
<th>Saturday</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Buildings</strong></td>
<td>Current 7A – 9P</td>
<td>Not allowed</td>
</tr>
<tr>
<td>Proposed 7A – 10P</td>
<td>7A – 6P</td>
<td></td>
</tr>
<tr>
<td><strong>Increase</strong></td>
<td>1 evening hour</td>
<td>New 11 hour use</td>
</tr>
</tbody>
</table>
As is evident from Tables I and II, the utilization of the Archer property would increase markedly under the Archer Forward program. During the weekdays during the academic year, the largest imposition would stem from the additional evening hours and the tremendous increase in the number of events—potentially 161 more events than currently staged. 161 days represents 44% of the days in a year. Another weekday imposition would come from the six weeks of summer academics and camps.

Nearby residents already endure noise from the Archer campus during the weekdays, but currently, there are not many weekend activities at the school. Instruction is not allowed and athletics are allowed only four days per year. Under the Archer Forward program, this would change dramatically. Instruction would be allowed for up to 11 hours every Saturday, Interscholastic Athletic Competitions would be permitted on the fields and in the aquatic center for up to 11 hours every Saturday, outdoor Extracurricular Activities would be allowed for up to 4 hours every Saturday, and other Customary School Activities would be allowed for up to 11 hours every Saturday. The Archer Forward DEIR does not provide specific information about Special Events, but it is reasonable to assume that many of the 98 Special Events (aka, School Functions), 100 outdoor athletic games, 24 Community Use days, and 24 Rental days will occur on Saturdays.

<table>
<thead>
<tr>
<th>Table II</th>
<th>INCREASE IN EVENT USAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Special Events</strong> (School Functions)</td>
<td></td>
</tr>
<tr>
<td>Current</td>
<td>Proposed</td>
</tr>
<tr>
<td>31</td>
<td>98</td>
</tr>
<tr>
<td><strong>Athletics, Outdoors</strong></td>
<td></td>
</tr>
<tr>
<td>Current</td>
<td>Proposed</td>
</tr>
<tr>
<td>39 Games</td>
<td>100 Games</td>
</tr>
<tr>
<td><strong>Community Use</strong></td>
<td></td>
</tr>
<tr>
<td>Current</td>
<td>Proposed</td>
</tr>
<tr>
<td>0</td>
<td>24</td>
</tr>
<tr>
<td><strong>Rental Use</strong></td>
<td></td>
</tr>
<tr>
<td>Current</td>
<td>Proposed</td>
</tr>
<tr>
<td>0</td>
<td>24</td>
</tr>
<tr>
<td><strong>Summer Camps</strong> (Days of use)</td>
<td></td>
</tr>
<tr>
<td>Current</td>
<td>Proposed</td>
</tr>
<tr>
<td>0</td>
<td>30</td>
</tr>
<tr>
<td>None</td>
<td>None</td>
</tr>
</tbody>
</table>
Response to Comment No. 51-104

Table 1 in this comment contains several inaccuracies. For example, Saturday use of the athletic field is allowed under the existing CUP. Refer to Section I, Environmental Setting, Section II, Project Description, and Section IV.I, Noise, of the Draft EIR for information regarding the existing and proposed campus operations. The existing noise conditions on the Project Site are described on pages IV.I-9 to IV.I-23 in Section IV.I, Noise, of the Draft EIR. Also refer to Topical Response No. 1, Refinements to Proposed Operations, for additional information regarding proposed campus operations. As discussed therein, in response to comments on the Draft EIR, the Project has been refined to include additional restrictions on operations including additional limitations on the hours of operation, reductions in the number of proposed School Functions, and elimination of community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been refined to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of the additional mitigation the only remaining operational noise impacts would occur on Saturday. Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M. In addition, as part of the additional mitigation measures, the Project proposes to be fully enclose the swimming pool within the Aquatics Center, which would eliminate the significant noise impacts associated with maximum noise levels during weekday Aquatics Center activities from between 6:00 P.M. to 8:00 P.M. Therefore, with the enclosure of the Aquatics Center noise associated with Aquatics Center activities would be less than significant.

Comment No. 51-105

In conclusion on this point, noise is defined as “unwanted” or “undesirable” sound. To the residents on Chaparal Street, any audible sound from the Archer campus is a reminder that what was recently a quiet, residential enclave in the bustling City of Los Angeles is being transformed into an intensive use zone in which sport noise, talking, vehicles, and other sounds are pervasive. Regardless of the decibel level, these audible sounds are unwanted, undesirable noise to these residents and their impact should be assessed on the marked increase in exposure time in addition to the other quantified analyses presented in the 2014 Archer Forward DEIR.
Response to Comment No. 51-105

The noise analysis as presented in Section IV.I, Noise, of the Draft EIR, has been prepared in accordance with CEQA. As discussed on pages IV.I-5 through IV.I-9 and IV.I-27 through IV.I-30 in Section IV.I, Noise, of the Draft EIR, the significance thresholds for which noise impacts are assessed have been established based on the CEQA Guidelines, the City of Los Angeles CEQA Threshold Guides, the Los Angeles Municipal Code (LAMC) Chapter XI Noise Regulation, and applicable standards of other agencies. Specifically, under CEQA Guidelines Section 15125(a), the baseline for environmental review is normally existing conditions. The existing noise conditions and noise sources on the Project Site are described on pages IV.I-9 to IV.I-23 of the Draft EIR. As described on pages IV.I-13 in Section IV.I, Noise, of the Draft EIR, measurements were taken to establish the existing ambient noise levels in the vicinity of the Project site, including the residences along Chaparal, which are represented by monitoring location C. In addition, to provide a conservative analysis, the lowest measured ambient noise level over the proposed operation hours was used in the analysis.

The noise analysis includes numerous thresholds of significance to evaluate specific noise sources. With regard to general school operations, the Draft EIR sets forth that the Project would have a significant impact on noise levels from Project operations if:

- The Project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category or causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA in CNEL or greater; or

- Project-related operational (i.e., non-roadway) noise sources, such as outdoor building mechanical/electrical equipment, increase the ambient noise level ($L_{eq}$) at noise sensitive uses by 5 dBA; or

- The maximum noise ($L_{max}$) generated from the operation of the parking structure (e.g., a car alarm) exceeds the average ambient noise level ($L_{eq}$) by 10 dBA.

With regard to the public address system, the Draft EIR sets forth that the Project would have a significant impact on noise levels if:

- The operational changes or extension of operations for public address system use produces $L_{max}$ noise levels that exceed the lowest hourly $L_{eq}$ ambient noise levels at the property line of affected noise sensitive uses by 10 dBA.
With regard to athletic field activities, the Draft EIR sets forth that the Project would have a significant impact on noise levels if:

- A comparison of existing and proposed athletic field and Aquatics Center noise levels combined with monitored ambient noise levels cause the 1-hour $L_{eq}$ noise level to increase by 5 dBA or more at the property line of any receptor, analogous to an operational noise source causing a violation of the City Noise Ordinance; or

- Potential $L_{max}$ noise levels for athletic field activities occurring Monday through Friday up to 6:00 P.M. under the proposed site configuration exceed $L_{max}$ noise levels that occur under the existing site operating conditions by 5 dBA or more at the property line of any receptor.

- Potential $L_{max}$ noise levels for new activities and events exceeding the lowest existing hourly ambient $L_{eq}$ noise levels by 10 dBA or more at the property line of any receptor. This includes proposed athletic field activities that occur Monday through Friday after 6:00 P.M., Saturday athletic field activities, and Aquatics Center activities.

The first threshold associated with general project operations is specifically from the City of Los Angeles CEQA Thresholds Guide, which as explained on page IV.I-30 in Section IV.I, Noise, of the Draft EIR uses the CNEL noise metric. However, since CNEL characterizes a 24-hour average noise level, a relatively short duration operational noise event would have a negligible effect on CNEL, especially since these activities would occur during daytime hours when the evening and nighttime sensitivity weighing penalties are not applicable. In addition, the City of Los Angeles Noise Ordinance typically uses the hourly $L_{eq}$ noise metric. Therefore, the additional thresholds provided above have also been used to evaluate short-term events (using the $L_{max}$ metric), as well as the hourly $L_{eq}$ City Noise Ordinance impact criteria.

Comment No. 51-106

NO EFFECTIVE LIMIT: THE “AMBIENT PLUS” FALLACY

One of the fundamental purposes of a CEQA analysis is “to identify the significant effects on the environment of a project” [Calif. Public Resources Code, Section 21002.1(a)]. To do this effectively, it is necessary to establish significance thresholds. In the case of noise, these are usually quantified in terms of decibels, although, as the previous section established, decibel-based thresholds are not always sufficient by themselves.

In the Archer Forward DEIR, the stated significance thresholds are all based on decibels, and they are presented in Section 3.b of the noise section [DEIR at p. IV.I-27]. With only
one exception, each and every significance threshold is related to the existing ambient. For example, the three thresholds for athletics activities deem the noise to be significant if it “cause[s] the 1-hour $L_{eq}$ noise level to increase by 5 dBA”, “exceed[s] $L_{max}$ noise levels that occur under the existing site operating conditions by 5 dBA”, or if it exceeds “the lowest existing hourly ambient $L_{eq}$ noise levels by 10 dBA”. The one exception is if the operational noise causes the CNEL noise level in the area to cross the absolute limits of the “normally unacceptable” or “clearly unacceptable” categories of the City of Los Angeles Noise Compatibility Guidelines [DEIR at p. IV-I-29], something the DEIR admits is unlikely to happen in the case of athletics noise [DEIR at p. IV-1-30].

**Response to Comment No. 51-106**

As explained in Response to Comment No. 51-105, above, the Project’s significance thresholds were established based on the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide, and the Los Angeles Municipal Code (LAMC) Chapter XI Noise Regulation. In particular, the significance thresholds are based on the change in the ambient noise level, which is consistent with Appendix G of the CEQA Guidelines that poses the question of whether a Project would result in “A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.”

**Comment No. 51-107**

Figure 1 compares the measured $L_{eq}$ noise level at the northern property line of the subject property line in 1996 and 2011/2013. The former was taken from the original Archer School for Girls 1998 DEIR and the latter from the current 2014 DEIR. Note that the current DEIR provides much more information about the existing noise environment than did the 1998 DEIR. We do not know, for example, what time of day the 1996 measurement was made, but it is safe to assume that it was sometime during the period represented by the first 2011/2013 data point shown, namely, 7:00 AM to 9:00 PM on a weekday.

From the data presented in Figure 1, it is apparent that the average noise level has increased over the past 15 to 17 years. To the extent that future project noise significance is tied to the existing levels, there is effectively no limit as long as “existing ambient” is taken to mean whatever the noise environment has become after the last round of development. In the case of noise assessment along Chaparal Street, the most correct baseline to use with regards to all past, present, and future Archer School development would be the noise levels that existed when the property was last operated at the Eastern Star Home for Women. Any and all noise that is generated by the school itself only serves to allow more noise in successive rounds of development.
FIGURE 1  COMPARISON OF 1996 AND 2011/2013 NOISE LEVELS ON CHAPARAL
Response to Comment No. 51-107

Typically, in an urban setting, the ambient noise environment fluctuates with the time of day. The 1996 ambient noise level shown for Chaparal in Figure 1 of this comment appears to be based on one short-term noise measurement and is not representative of the fluctuations that occur throughout the day. In accordance with CEQA Guidelines Section 15125(a), the baseline for environmental review is normally existing conditions as they exist at the time the Notice of Preparation (NOP) is published. The Project’s NOP was published January 3, 2012 and the ambient noise levels (used as baseline levels) in the vicinity of the Project Site were collected in October 2011 and April 2013, as provided on Tables IV.I-6 and IV.I-7 in Section IV.I, Noise, of the Draft EIR. Therefore, the baseline (existing) ambient noise levels utilized in the noise analysis are consistent with CEQA guidelines. Furthermore, analysis of any future development within the Project Site beyond that proposed by the Project would be speculative.

Comment No. 51-108

A perfect example of this is presented by the soccer/field hockey noise analyses, summarized in Table III. Analyses are done for three distinct timeframes, only one of which is currently used for soccer games. The existing measured noise levels in the three timeframes vary slightly, but only within a 4 dB range. The future, predicted noise levels are, of course, the same for all three timeframes because a game is a game regardless of when it’s played. Two analyses are done for each timeframe: the average noise level ($L_{eq}$) and the maximum noise level ($L_{max}$).

<table>
<thead>
<tr>
<th>Table III</th>
<th>Summary of Soccer/Field Hockey Noise Impact Analyses</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>M-F 3P – 6P</td>
</tr>
<tr>
<td>Lowest Measured $L_{eq}$</td>
<td>51</td>
</tr>
<tr>
<td>Existing Sport $L_{eq}$</td>
<td>61</td>
</tr>
<tr>
<td>Future Sport $L_{eq}$</td>
<td>59</td>
</tr>
<tr>
<td>Baseline for Assessment</td>
<td>Existing</td>
</tr>
<tr>
<td>Increase Over Baseline</td>
<td>-2</td>
</tr>
<tr>
<td>Impact?</td>
<td>No</td>
</tr>
<tr>
<td>Existing Sport $L_{max}$</td>
<td>70</td>
</tr>
<tr>
<td>Future Sport $L_{max}$</td>
<td>70</td>
</tr>
<tr>
<td>Baseline for Assessment</td>
<td>Existing</td>
</tr>
<tr>
<td>Increase Over Baseline</td>
<td>0</td>
</tr>
<tr>
<td>Impact?</td>
<td>No</td>
</tr>
</tbody>
</table>
Despite the fact that the existing, non-game noise levels are similar in all three timeframes and that the future levels are exactly the same in all three timeframes, significant noise impacts are only identified during two of the timeframes. Why? Because in the timeframe in which games are already being played, the existing sports noise is used as the baseline ambient.

By repeated applications of this logic, there would effectively be no limit to how much sports noise could be produced over time, even though each discrete increase could be declared as less than significant.

Response to Comment No. 51-108

Noise associated with athletic activities is of a relatively short duration and fluctuates over time (i.e., there is not a constant noise source). Therefore, as discussed on page IV.I-30 in Section IV.I, Noise, of the Draft EIR, noise impacts associated with the athletic activities were evaluated in terms of both hourly $L_{eq}$ and maximum $L_{max}$ levels. In addition, as described on page IV.I-87 and IV.I 96 in Section IV.I Noise, of the Draft EIR softball and soccer are existing School athletic activities that currently occur on weekdays between 3:00 P.M. and 6:00 P.M.; therefore, noise impacts for these existing athletic activities were based on the change in the sound levels from existing to future conditions. As discussed in Responses to Comment No. 51-105 and No. 51-107, this methodology is consistent with CEQA Guidelines.

Comment No. 51-109

COMMENTS ON “DANCE” NOISE ANALYSIS

The Memo from Archer School in Appendix B of the DEIR indicates that there were three dances during the 2011–2012 Academic Year. These events occurred between the hours of 7:00 PM to 11:00 PM. The Memo goes on to say that of the 98 proposed School Functions, “eight School Functions... shall be permitted to conclude by 11:00 p.m. on Fridays and Saturdays.” [DEIR, Appendix B, p. 11]. Presumably, these eight School Functions would all be dances.

The DEIR Noise section states that in the Multipurpose Facility and the Performing Arts Center, “[t]he loudest planned event would be a dance or concert, which could generate interior maximum noise levels of up to 95 dBA.” The noise impact analysis of these dances is based on A-weighted decibels (dBA), and the conclusion is that the impact would be “less than significant”. [sic] [DEIR at p. IV.I-83. [sic] As stated in the DEIR, “[t]he term ‘A-weighted’ refers to filtering the noise signal in a manner that corresponds to the way the human ear perceives sound.” [DEIR at p. IV.I-1] A-weighting is ubiquitous in noise control
policy, and it works reasonably well for sounds that have a broad frequency content and that do not have strong tones. However, A-weighting does not work well when a sound contains only low frequencies.

As most people who have ever lived in a dormitory, apartment, or condominium know, it is much more difficult to contain bass sounds associated with amplified dance music than higher frequency sounds. In fact, A-weighting de-emphasizes bass notes so much so that it is essentially impossible for bass notes alone to violate most noise ordinance and significance thresholds that are cast in terms of dBA. Yet, many people find the constant, rhythmic beat of dance music bass lines to be highly annoying.

While the Archer Forward DEIR Noise analysts may have correctly analyzed the dance music noise within the A-weighted analysis framework established in the DEIR, we believe that for this particular issue, because it is the source of many noise complaints in residential districts, that this analysis should be re-done using an analysis technique that truly captures the essence of the noise annoyance, namely, bass notes. C-weighted decibels (dBC) could be used for this purpose (though not originally intended for it) or a more sophisticated 1/1 octave band or 1/3-octave band analysis should be undertaken.

Response to Comment No. 51-109

The noted eight School Functions proposed to conclude by 11:00 P.M. on Fridays and Saturdays may be used for dances, which would be held within the proposed Multipurpose Facility. As discussed on pages IV.I-82 and IV.I-83 in Section IV.I, Noise, of the Draft EIR, a dance could generate a maximum sound level of up to 95 dBA at the interior of the Multipurpose Facility. However, as provided by Project Design Feature I-4, the Multipurpose Facility building structure would be designed and constructed to provide a minimum composite noise reduction of 40 dBA. With the noise reduction provided by the building design and construction, noise impacts from dances within the Multipurpose Facility would be less than significant.

As explained in Response to Comment No. 51-105, above, the Project’s significance thresholds were established based on the CEQA Guidelines, the City of Los Angeles CEQA Thresholds Guide, the Los Angeles Municipal Code (LAMC) Chapter XI Noise Regulation, and applicable standards of other agencies. The significance thresholds are based on the A-Weighted decibels (dBA) level, as specified by the City of Los Angeles CEQA Thresholds Guide and the Los Angeles Municipal Code (LAMC) Chapter XI Noise Regulation. To account for the low frequency sound, such as musical drum bass beats associated with dance music, the Los Angeles Municipal Code (LAMC) Chapter XI Noise
Regulation imposes a 5 dB penalty with respect to the exterior noise standard. As presented in Table 39 (weekday) and Table 40 (weekend) of the Noise Study (Appendix N of the Draft EIR), the estimated noise levels from the Multipurpose Facility would be a minimum of 10 dBA below the lowest measured ambient noise levels (between 3 P.M. and 11 P.M.). In addition, the noise analysis of the Multipurpose Facility was performed using the 1/1 octave band analysis (sample calculations are provided in Appendix N of the Draft EIR), which as indicated by the Commenter is a more sophisticated analysis. Therefore, the noise analysis of dance events (i.e., music) meets the Los Angeles Municipal Code (LAMC) Chapter XI Noise Regulation as well as the more sophisticated 1/1 octave band methods suggested by the Commenter. Thus, the suggested additional analysis using the C-weighted (dBC) for the noise analysis is not warranted.

Comment No. 51-110

COMMENTS ON DEIR’S FINDINGS OF SIGNIFICANT NOISE IMPACTS

CEQA discourages the approval of projects with significant environmental impacts that cannot be mitigated. The Archer Forward DEIR’s noise technical study in Appendices N-1 and N-2 presents a clear, frank, and comprehensive discussion of the analyses undertaken and their results, and, to the credit of its preparers, acknowledges that the project’s construction and operation phases will have significant, unmitigable impacts due to the project’s noise generation. A summary of the key analyses extracted from the noise technical study and presented in the DEIR Noise section [DEIR at p. IV.I-1] is herein presented in Tables IV-A and IV-B. Table IV-A summarizes the construction noise impacts, whereas Table IV-B summarizes the outdoor sports noise impacts.

20 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).2.
### TABLE IV-A SUMMARY OF CONSTRUCTION NOISE IMPACTS

<table>
<thead>
<tr>
<th>DEIR Table No.</th>
<th>Analyzes</th>
<th>Sig Imp w/o Mit?</th>
<th>Sig Imp w/ Mit?</th>
<th>Highest (dBA)</th>
<th>dB Over Existing</th>
<th>Est. No. of Residences Impacted</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Construction Noise Levels—North Wing Renovation</td>
<td>Yes</td>
<td>Yes</td>
<td>86</td>
<td>28</td>
<td>14</td>
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<tr>
<td>12</td>
<td>Construction Noise Levels—North Wing Renovation and Temporary Classroom Village Installation</td>
<td>Yes</td>
<td>Yes</td>
<td>86</td>
<td>28</td>
<td>16</td>
</tr>
<tr>
<td>13</td>
<td>Construction Noise Levels—Property Line Shoring for Temporary Sound Barriers</td>
<td>Yes</td>
<td>No Mit</td>
<td>95</td>
<td>52</td>
<td>19</td>
</tr>
<tr>
<td>14</td>
<td>Construction Noise Levels—Property Line Shoring During Phases 1 and 2</td>
<td>Yes</td>
<td>Yes</td>
<td>95</td>
<td>37</td>
<td>18</td>
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<tr>
<td>15</td>
<td>Construction Noise Levels—Overlap of North Wing Renovation and Phase 1 Excavation and Haul</td>
<td>Yes</td>
<td>Yes</td>
<td>96</td>
<td>38</td>
<td>17</td>
</tr>
<tr>
<td>16</td>
<td>Construction Noise Levels—Phase 1 Excavation and Haul</td>
<td>Yes</td>
<td>Yes</td>
<td>93</td>
<td>35</td>
<td>17</td>
</tr>
<tr>
<td>17</td>
<td>Construction Noise Levels—Phase 1 Underground Parking Structure/Athletic Fields and Multipurpose Facility</td>
<td>Yes</td>
<td>Yes</td>
<td>93</td>
<td>35</td>
<td>17</td>
</tr>
<tr>
<td>18</td>
<td>Construction Noise Levels—Phase 1 Multipurpose Facility</td>
<td>Yes</td>
<td>Yes</td>
<td>80</td>
<td>22</td>
<td>17</td>
</tr>
<tr>
<td>19</td>
<td>Construction Noise Levels—Phase 2</td>
<td>Yes</td>
<td>Yes</td>
<td>98</td>
<td>33</td>
<td>10</td>
</tr>
<tr>
<td>20</td>
<td>Construction Noise Levels Due to Vehicle Queuing</td>
<td>Yes</td>
<td>No Mit</td>
<td>88</td>
<td>38</td>
<td>4</td>
</tr>
<tr>
<td>21</td>
<td>Temporary Classroom Village Noise Levels</td>
<td>No</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>Worst-Case Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Weekday</td>
<td>Yes</td>
<td>No Mit</td>
<td>63</td>
<td>5</td>
<td>TNM</td>
</tr>
<tr>
<td>23</td>
<td>Worst-Case Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Saturday</td>
<td>Yes</td>
<td>No Mit</td>
<td>63</td>
<td>6</td>
<td>TNM</td>
</tr>
</tbody>
</table>
### TABLE IV-A  SUMMARY OF CONSTRUCTION NOISE IMPACTS (CONTINUED)

<table>
<thead>
<tr>
<th>DEIR Table No.</th>
<th>Analyzes</th>
<th>Sig Imp w/o Mit?</th>
<th>Sig Imp w/ Mit?</th>
<th>Highest dB (dBA)</th>
<th>dB Over Existing</th>
<th>Est. No. of Residences Impacted</th>
</tr>
</thead>
<tbody>
<tr>
<td>24</td>
<td>Worst-Case Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Sunday</td>
<td>Yes</td>
<td>No Mit</td>
<td>63</td>
<td>8</td>
<td>TNM</td>
</tr>
<tr>
<td>25</td>
<td>Worst-Case Off-Site Construction Noise Levels for 30 Construction Workers Leaving Site as Compared to Lowest Measured Hourly Ambient—Weekday 6-7 P.M.</td>
<td>No</td>
<td>N/A</td>
<td></td>
<td></td>
<td>TNM</td>
</tr>
<tr>
<td>30</td>
<td>Construction Noise Levels Under Accelerated Construction Schedule</td>
<td>Yes</td>
<td>Yes</td>
<td>97</td>
<td>39</td>
<td>19</td>
</tr>
<tr>
<td>31</td>
<td>Temporary Classroom Village Noise Levels Under Accelerated Construction Schedule</td>
<td>No</td>
<td>N/A</td>
<td></td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>32</td>
<td>Worst-Case Accelerated Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Weekday</td>
<td>Yes</td>
<td>No Mit</td>
<td>57</td>
<td>6</td>
<td>TNM</td>
</tr>
<tr>
<td>33</td>
<td>Worst-Case Accelerated Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Saturday</td>
<td>Yes</td>
<td>No Mit</td>
<td>63</td>
<td>6</td>
<td>TNM</td>
</tr>
<tr>
<td>34</td>
<td>Worst-Case Accelerated Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Sunday</td>
<td>Yes</td>
<td>No Mit</td>
<td>63</td>
<td>8</td>
<td>TNM</td>
</tr>
</tbody>
</table>

† Table numbers refer to tables in DEIR Section IV.I Environmental Impact Analysis, Noise. As such, "11" refers to DEIR Table IV.I-11, etc.
TABLE IV-B SUMMARY OF OUTDOOR SPORTS NOISE IMPACTS

<table>
<thead>
<tr>
<th>DEIR Table No.</th>
<th>Analyzes</th>
<th>Sig Imp?</th>
<th>Highest Level (dBA)</th>
<th>dB Over Existing</th>
<th>Est. No. of Residences Impacted</th>
</tr>
</thead>
<tbody>
<tr>
<td>36</td>
<td>Leq Noise Levels during Weekday Softball Activities: 3 P.M.–6 P.M. (2-Hour Event Duration)</td>
<td>No (Note 1)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>37</td>
<td>Maximum Noise Levels during Weekday Softball Activities: 3 P.M.–6 P.M. (2-Hour Event Duration)</td>
<td>Yes (Note 2)</td>
<td>71</td>
<td>13</td>
<td>7</td>
</tr>
<tr>
<td>38</td>
<td>Leq Noise Levels during Weekday Softball Activities: 6 P.M.–8 P.M. (2-Hour Event Duration)</td>
<td>Yes</td>
<td>49</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>39</td>
<td>Maximum Noise Levels during Weekday Softball Activities: 6 P.M.–8 P.M. (2-Hour Event Duration)</td>
<td>Yes</td>
<td>71</td>
<td>28</td>
<td>7</td>
</tr>
<tr>
<td>40</td>
<td>Leq Noise Levels during Softball Activities: Saturday (2-Hour Event Duration)</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>41</td>
<td>Maximum Noise Levels during Softball Activities: Saturday (2-Hour Event Duration)</td>
<td>Yes</td>
<td>71</td>
<td>26</td>
<td>10</td>
</tr>
<tr>
<td>42</td>
<td>Leq Noise Levels during Weekday Soccer/Field Hockey Activity: 3 P.M.–6 P.M. (2-Hour Event Duration)</td>
<td>No (Note 1)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>43</td>
<td>Maximum (Lmax) Noise Levels during Weekday Soccer/Field Hockey Activity: 3 P.M.–6 P.M. (2-Hour Event Duration)</td>
<td>No (Note 1)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>44</td>
<td>Leq Noise Levels during Weekday Soccer/Field Hockey Activity: 6 P.M.–8 P.M. (2-Hour Soccer Event Duration)</td>
<td>Yes</td>
<td>54</td>
<td>11</td>
<td>5</td>
</tr>
<tr>
<td>45</td>
<td>Maximum (Lmax) Noise Levels during Weekday Soccer/Field Hockey Activity: 6 P.M.–8 P.M. (2-Hour Event Duration)</td>
<td>Yes</td>
<td>65</td>
<td>22</td>
<td>10</td>
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### TABLE IV-B  SUMMARY OF OUTDOOR SPORTS NOISE IMPACTS (CONTINUED)

<table>
<thead>
<tr>
<th>DEIR Table No.</th>
<th>Analyzes</th>
<th>Sig Imp?</th>
<th>Highest (dBA)</th>
<th>dB Over Existing</th>
<th>Est. No. of Residences Impacted</th>
</tr>
</thead>
<tbody>
<tr>
<td>46</td>
<td>Leq Noise Levels for Future Soccer/Field Hockey Activity: Saturday</td>
<td>Yes</td>
<td>59</td>
<td>12</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>(2-Hour Event Duration)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>47</td>
<td>Maximum (Lmax) Noise Levels during Soccer/Field Hockey Activity: Saturday</td>
<td>Yes</td>
<td>70</td>
<td>23</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>(2-Hour Event Duration)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>48</td>
<td>Leq Noise Levels during Future Weekday Aquatics Activities: 3 P.M. and</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>6 P.M. (2-Hour Event Duration)</td>
<td>(Note 3)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>49</td>
<td>Maximum (Lmax) Noise Levels during Future Weekday Aquatics Activities:</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3 P.M. and 6 P.M. (2-Hour Event Duration)</td>
<td>(Note 3)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>50</td>
<td>Leq Noise Levels during Future Weekday Aquatics Activities: 6 P.M. and</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>8 P.M. (2-Hour Event Duration)</td>
<td>(Note 3)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>51</td>
<td>Maximum (Lmax) Noise Levels during Future Weekday Aquatics Activities:</td>
<td>Yes</td>
<td>64</td>
<td>14</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>6 P.M. and 8 P.M. (2-Hour Event Duration)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>52</td>
<td>Leq Noise Levels during Future Aquatics Activities: Saturday</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2-Hour Event Duration)</td>
<td>(Note 3)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>53</td>
<td>Maximum (Lmax) Noise Levels during Future Aquatics Activities: Saturday</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(2-Hour Event Duration)</td>
<td>(Note 3)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Table numbers refer to tables in DEIR Section IV.I Environmental Impact Analysis, Noise. As such, "36" refers to DEIR Table IV.I-36, etc.

**Notes**
1. This would be an impact if not for the use of existing, elevated athletic noise levels as the baseline.
2. This is an impact despite the use of existing, elevated athletic noise levels as the baseline.
3. Even though the estimated noise levels for this sports event does not exceed the adopted significance threshold, it will nonetheless be clearly audible at some residences.
Response to Comment No. 51-110

The comment reiterates that the Project would result in noise impacts associated with the Project’s construction and operations. As acknowledged by the comment, the Draft EIR noise analysis was comprehensive. In accordance with CEQA, the EIR provides analyses and conclusions regarding environmental impacts of the Project to be used by the decision-makers in determining whether or not to approve the Project. The EIR does not make recommendations to approve or disapprove a Project. Tables IV-A and IV-B in this comment are intended to be based on data from Section IV.I, Noise, of the Draft EIR. However, several of the values shown in these tables are not accurately presented. For example, the values shown in the “Highest dBA” column of Table IV-A should be 15 dBA lower, to account for the noise mitigation. In addition, the estimated number of residences impacted as provided in both Tables IV-A and IV-B is not consistent with the number of affected residences shown in the Draft EIR.

Comment No. 51-111

A striking feature of the construction noise results in Table IV-A is that virtually every aspect of the construction creates a significant, unavoidable impact. The only two components of construction that don’t have a significant, unmitigable impact are the Temporary Classroom Village and workers leaving after normal work hours, neither of which is, strictly speaking, construction. Every other aspect of construction work—excavation, hauling, erecting, vehicle queuing will subject neighboring residents to significant and unavoidable impacts.

Many people often state that construction noise impacts should be largely discounted or disregarded because construction is “temporary”. [sic] According to the DEIR’s Project Description, full build out of all phases of the Archer Forward project would only occur “as early as 2020”. [sic] [DEIR at p. II-38]. For the neighboring residents, 6 years (minimum) of ongoing construction work could hardly be considered temporary. The City of Los Angeles CEQA Thresholds Guide cited by the DEIR reinforces this notion. As referenced on page IV.I-28 of the DEIR, construction activities are categorized as being either less than one day, more than one but less than 10 days in a 3 month period, or more than 10 days in a 3 month period. Construction of Archer Forward would require significantly more than 10 days over a 6 year period.

Response to Comment No. 51-111

As provided on page IV.I-34 in Section IV.I, Noise, of the Draft EIR because construction activities would occur over a period longer than 10 days for all phases, the threshold of significance for the Project’s construction activities, consistent with the guidance in Section I.1, Construction Noise, of the City of Los Angeles CEQA Thresholds
Guide, is an increase in the ambient $L_{eq}$ noise level of 5 dBA. Also refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. While the construction period would be reduced, the noise impacts would be similar to the noise levels presented in the Draft EIR.

**Comment No. 51-112**

Another striking feature of the construction noise analyses summarized in Table IV-A is the magnitude by which some of the predicted noise levels will exceed the significance thresholds. For many of the scenarios analyzed, the highest noise level at at least one noise sensitive receptor (i.e., residence) is at least 20 dB. Decibels are a logarithmic scale like the Richter scale, so 10 dB represents a 10-fold increase in acoustic energy and 20 dB represent a 100-fold increase in acoustic energy. From a perception standpoint, 10 dB increase in noise level is often characterized—as in the DEIR at page IV.I-2—as being “twice as loud”. [sic] Under this oft-cited perception rule of thumb, 20 dB would be considered “four-times as loud”, [sic] 30 dB as “eight-times as loud”, [sic] etc. The single largest construction noise level predicted over the existing ambient level is 52 dB which should be considered about “37-times as loud”. [sic] In terms of acoustic energy, this is about a 160,000-fold increase.

On an absolute basis, the predicted noise levels for construction shoring, Phase I excavation and hauling, Phase 1 building construction, and Phase 2 construction exceed 90 dBA at at least one residence. As Table IV.I-1 in the DEIR indicates, this is the noise produced by a gas-engine lawn mower at 3 feet [DEIR at p. IV.I-2]. An indication of the full impact of this noise level can be appreciated by considering the speech communication capabilities in the context of the background noise level. At 90 to 100 dBA, communication is only possible at distances up to 10 inches and only when using maximum voice level.2 Another way to gauge this noise level is to consider that “The loudest planned event would be a dance or a concert, which could generate interior maximum noise levels of up to 95 dBA” [DEIR at p. IV.I-82]. In short, noise levels above 90 dBA are very loud.


**Response to Comment No. 51-112**

The comment restates that the Project’s construction activities would exceed the significance thresholds. With regard to human hearing characteristics, the decibel is the standard for measuring sound as well as for describing the human perception of sound. The human hearing system responds to a very large range of sound levels, from approximately 0 dB (20 micropascal) to 120 dB (20,000,000 micropascals). While it is
technically correct that a 20-dB change in sound level represents a 100-fold change in acoustic energy, and an excess of 52 dB would be a 160,000-fold increase in acoustic energy, in terms of human perception (i.e., loudness), the increase in sound of 52 dB over the ambient would be considered 37 times louder. As discussed on pages IV.I-33 and IV.I-34 in Section IV.I, Noise, of the Draft EIR, noise levels from construction activities are representative of worst-case conditions, with the maximum number of pieces of construction equipment assumed to operate simultaneously, nearest to the analyzed receptor location. Under a typical construction day, the on-site construction equipment would be spread out (away from the property line) within the Project Site, which would result in approximately 10 to 20 dBA lower noise levels (than the presented worst-case maximum noise levels) at receptors adjacent to the Project Site. It is acknowledged that a 90-dBA background sound level is loud and that speech communication could be affected (masked) within this sound environment. However, it is important to note that 90 dBA is a typical noise level for any substantial construction activities.

Comment No. 51-113

The outdoor sports impact analyses results are summarized in Table IV-B. The table indicates that nine of 18 scenarios analyzed will result in significant noise impacts, but, as discussed in detail above, an additional three scenarios would be deemed to have significant noise impacts if the existing, elevated sports noise were not used as the baseline ambient. If the existing, non-sports noise level were used as the ambient for all scenarios, 12 of 18 would be deemed to cause a significant noise impact. These are primarily softball, soccer, and field hockey games.

The DEIR noise analysis finds that only the aquatics noise that would be significant is the maximum noise level during the late evening hours on weekdays (6:00 PM–8:00 PM). While all other aquatics scenarios are found to not create significant impacts based on the “ambient-plus” decibel thresholds, the data presented in Tables IV.I-48 to IV.I-53 show that the sports events will increase the noise level at some residences, indicating that the noise will be clearly audible at those residences. While the noise decibel level in and of itself may not be significant, the sports noise audibility does add to the continual and pervasive audibility of other Archer noises which should be assessed independently on a temporal exposure basis as discussed above.

Although the sports noises do not exceed the existing ambient by as much as the construction noises, they do, nonetheless, exceed them by substantial amounts. The highest predicted maximum noise level exceeds the existing non-sports ambient by 28 dB, about “7-times” louder than the ambient. The “typical noise levels” chart presented in the DEIR on page IV.I-2 characterize the existing, 43 dBA ambient as “quiet urban nighttime” whereas the predicted 71 dBA maximum is more like “noisy urban area, daytime”. The
other sports noises are less loud, but most are still found to create significant impacts on the neighbors.

**Response to Comment No. 51-113**

As discussed in Response to Comment No. 51-105, the noise analysis is consistent with the CEQA Guidelines and uses the appropriate baseline noise levels. Also refer to Response to Comment No. 51-99 regarding the comment associated with temporal noise exposure.

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been refined to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures, all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M. As part of these additional mitigation measures, the Project is proposed to fully enclose the swimming pool within the Aquatics Center, which would eliminate the significant noise impacts associated with maximum noise levels from the Aquatics Center.

**Comment No. 51-114**

Why does the Archer Forward development create so many significant construction and operational (sports) noise impacts on the school’s neighbors? Simply put, it’s because constructing a college-like, intensive use campus in what is essentially a quiet, residential enclave of Los Angeles is not in keeping with the character of the surrounding district.

Prior to the conversion from the Eastern Star Home for Women, the Main Building along with the large apartment buildings on Sunset Boulevard shielded Chaparal Street from the noise of the thoroughfare. Since 1998, some sports noise has been introduced into the neighborhood, but only at limited times of the week (weekday evenings). There has been no major construction at the site since the Easter Star Home added the North Wing in the early 1960s [DEIR at p. II-5].

The Archer Forward development proposes to reconstruct the North Wing and construct five major, entirely new facilities. Unlike the North Wing which is approximately 200 ft from Chaparal Street, each of the new structures would be anywhere from as close as 10 ft to a maximum of 45 feet from the nearest property line. It stands to reason that heavy construction equipment required to excavate and then build the Underground Parking Structure, the Multipurpose Facility, the Aquatic Center, the Visual Arts Center, and the
Performing Arts Center when operated for years on end in such close proximity to property lines in a quiet, established neighborhood will create significant noise impacts. The magnitude and pervasiveness of the impacts as revealed by the project’s own noise analysis in the DEIR provides a strong indication that this development is too large for the subject property.

Response to Comment No. 51-114

In response to comments, refinements associated with construction and operation of the Project as described in the Draft EIR have been proposed. Refer to Topical Response No. 11, Overview of Construction Refinements, and Topical Response No. 1, Refinements to Proposed Operations. The Commenter is correct that significant impacts would result from construction of the Project due to the distances of adjacent uses. Please refer to Topical Response No. 11, Overview of Construction Refinements, regarding the potential noise impacts related to Project construction activities.

In addition, as set forth in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been refined to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M.

Comment No. 51-115

While Archer School may wish to provide a variety of sports venues on campus for its students, the magnitude and pervasiveness of the significant noise impacts from those venues as disclosed by the DEIR noise analysis demonstrates conclusively that a major cost would be borne by the neighbors. One of the fundamental reasons for those impacts is that the key elements of the venues—home plate, the goals, the swimming pool, the bleachers—need to be built very near residential property lines to fit it all in. Once again, this is a manifestation of trying to do too much with the subject property.

Response to Comment No. 51-115

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been refined to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures including maintaining the softball field’s existing northwest orientation, concluding the use of the athletic field at 6:00 P.M. consistent with the existing use of the athletic field, limiting the use of the athletic field on Saturday, and enclosing the
Aquatics Center all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of the additional mitigation the only remaining operational noise impacts would occur on Saturday. Saturday significant impacts would be reduced to 10 days a year within a 4-hour timeframe between 10:00 A.M. to 6:00 P.M. In addition, under the refined Project described in Topical Response No. 4, Additional Measures to Reduce Noise, softball bleachers would be located in the same orientation as the existing softball bleachers. In addition, the proposed bleacher location for the soccer/field hockey field, as shown on Figure IV.I-7 in Section IV.I, Noise, of the Draft EIR, is also consistent with the existing condition.

Comment No. 51-116

CONCLUSION

Noise is defined as “unwanted” or “undesirable” sound. As noted in the Noise Assessment report for this project, a sound can be unwanted because of its level in and of itself, its level vis-à-vis the existing ambient, its spectral content, its duration, the number of times it occurs, and the time of day it occurs. A dripping faucet is not usually very loud, but in an otherwise quiet home, the steady “drip, drip, drip...” can become highly annoying, especially when one is trying to go to sleep.

The Archer School for Girls is already a more intensive use than the retirement home that was historically located at the property. Neighboring residences that are largely shielded from Sunset Boulevard noise now regularly experience sports noise, vehicle noise, and people noise, but these are somewhat limited in number, duration, time of day, and days of the week. Archer Forward would markedly change that.

Archer Forward would subject local residents to 6 years of loud, heavy construction.

Archer Forward would extend the school’s hours of operation much later in the evening.

Archer Forward would introduce extensive Saturday operations to the neighborhood.

Archer Forward would add sports activities at new venues that are close to residences.

The fundamental reason that all of these changes result in significant noise impacts for the neighbors—many, but not all, identified in the project’s own DEIR—is that the school is simply trying to squeeze too much infrastructure on their site. Each of the four new venues would be within 10 to 45 feet of the nearest property line. Three of the sports fields—softball, soccer, and field hockey—overlap each other. While it is understandable why the
school would like to consolidate all of its athletic instruction, team practices, and team competitions on campus, doing so would create scheduling issues that necessitate late evening and Saturday usage.

**Response to Comment No. 51-116**

As discussed in Response to Comment No. 51-105, in accordance with CEQA Guidelines Section 15125(a), the baseline for environmental review is normally existing conditions. The existing noise conditions on the Project Site are described on pages IV.I-9 to IV.I-23 in Section IV.I, Noise, of the Draft EIR. As discussed therein, within the Project Site, existing noise sources include outdoor student activities such as softball, soccer, basketball, and volleyball practices and games, as well as School assemblies, special events, and groups of students congregating outdoors before and after School, during breaks, and at lunch time, mechanical equipment from the Main Building, and vehicular traffic associated with School operations.

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been refined to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures including maintaining the softball field’s existing northwest orientation, concluding the use of the athletic field at 6:00 P.M. consistent with the existing use of the athletic field, limiting the use of the athletic field on Saturday, and enclosing the Aquatics Center all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of the additional mitigation the only remaining operational noise impacts would occur on Saturday. Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M.

In response to the comment regarding 6 years of construction, please refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years.

With regard to the hours of operations, please refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, the Project has been refined to include additional restrictions on its operations including additional limitations on the hours of operation including hours of operation on Saturday, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. As discussed therein, use of the athletic field would conclude by 6:00 P.M. consistent with the existing condition. In addition, Saturday use of the athletic field for
Instruction, Extracurricular Activities, and Interscholastic Athletic Competitions is proposed for 4 hours between 10:00 A.M. to 6:00 P.M. for 10 days per year. For reference, the Draft EIR proposed to permit Instruction, Extracurricular Activities, and Interscholastic Athletic Competitions on Saturday on the athletic field beginning at 7:00 A.M. on an unlimited number of Saturdays.

In addition, Saturday use of the School Buildings, Courtyards, and the Aquatics Center for Instruction, Extracurricular Activities, and Interscholastic Athletic Competitions is proposed from 9:00 A.M. to 6:00 P.M. and Instruction and Extracurricular Activities would be limited to no more than 30 percent of enrolled students. For reference, the Draft EIR proposed to permit Instruction, Extracurricular Activities, and Interscholastic Athletic Competitions in School Buildings, Courtyards, and the Aquatics Center beginning at 7:00 A.M. on Saturday, with no limit on the number of participating students. Instruction, Extracurricular Activities, and Interscholastic Athletic Competitions are not proposed for Sunday. Five School Functions would be permitted on Sunday from 12:00 P.M. to 7:00 P.M.

The comment states that Archer Forward would add sports activities at new venues that are close to residences. As discussed on page II-1 of Section II Project Description of the Draft EIR, the Project proposes to improve the existing fields to include regulation-size soccer and softball fields, a Multipurpose Facility, which would relocate basketball and volleyball activities indoor, and an Aquatics Center. As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments and consistent with Alternatives 3, 4, and 5 of the Draft EIR, the Project is proposed to be refined to maintain the softball field in its existing northwest orientation and located in the southeast corner of the athletic field to reduce the Project’s significant impact from softball activities on weekdays from 3:00 P.M. to 6:00 P.M. to less than significant with mitigation. In addition, in response to comments, the Project is proposed to fully enclose the swimming pool within the Aquatics Center consistent with Alternatives 3, 4, and 5 of the Draft EIR. The enclosure of the swimming pool at the Aquatics Center would eliminate the significant noise impacts associated with maximum noise levels during weekday Aquatics Center activities from between 6:00 P.M. to 8:00 P.M.

Further, as discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments, refinements have been included in the Project as described in the Draft EIR. These refinements include reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. For instance, Archer would plant additional trees along Chaparal Street and a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. The Project would also shift the athletic field approximately 7 feet 6 inches to the east. This expanded setback would allow for an
enhanced landscape buffer along the western property boundary of the campus. Archer would also provide an expanded landscape buffer along the southern property boundary of the campus.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 51-117**

The obvious ways to mitigate these impacts and give due regard to the remaining quiet, residential character of the neighborhood are:

- Maintain no Saturday use of outdoor fields
- Maintain minimal or no use of buildings on weekends
- Maintain the current number of Special Events, which includes limited use on weekends
- Require larger property line setbacks for new buildings
- Reduce the number of new buildings
- Keep some sports activities at off-site locations

Adhering to these restrictions would minimize the unmitigable impacts of noise generated by construction and operation of the project.

**Response to Comment No. 51-117**

Refer to Response to Comment No. 51-116 and Topical Response No. 1, Refinements to Proposed Operations, regarding the additional operational restrictions that have been proposed including additional limitations on the hours of operation including hours of operation on Saturday, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Refer to Response to Comment No. 51-116 and Topical Response No. 4, Additional Measures to Reduce Noise, regarding the additional measures that have been proposed to reduce noise associated with campus operations. With the incorporation of additional mitigation measures including maintaining the softball field’s existing northwest orientation, concluding the use of the athletic field at 6:00 P.M., limiting the use of the athletic field on
Saturday, and enclosing the Aquatics Center all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of the additional mitigation the only remaining operational noise impacts would occur on Saturday. Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M.

Further, as discussed in Response to Comment No. 51-116 and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, refinements to the Project have been proposed that include reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers.

Regarding off-site athletics, refer to Appendix B-1 of the Draft EIR. As discussed therein, by constructing a Multipurpose Facility and an Aquatics Center and enhancing its existing softball and soccer fields, Archer would be able to conduct more of its practices and host additional Interscholastic Athletic Competitions on campus. Archer would still host certain athletic team practices and competitions off-site. In particular, Middle School and Upper School equestrian, tennis, beach volleyball, cross-country, and track practices and/or competitions would remain off-site.

**Comment No. 51-118**

Finally, we are often asked about the sound isolation provided by trees and other vegetation, and have been told that these might be proposed on this project though not mentioned in the DEIR. Any practical amount of foliage would provide a negligible amount of sound level reduction as made clear by the following statement from *The Handbook of Noise Control*:

> Although foliage may provide a good visual shield, it provides significant barrier attenuation only at high frequencies... and at large distances; a typical value of barrier attenuation is 1 dB per 10 m (30 ft)..³


For any practical depth of trees that could be provided at the boundary of the Archer campus, the sound attenuation would be a few tenths of a decibel.
Response to Comment No. 51-118

It is acknowledged that trees and other types of vegetation do not provide significant sound attenuation, unless such vegetation provides a dense barrier. Thus, the noise analysis does not take into account or recommend trees or other types of vegetation as a means of reducing noise levels.

Comment No. 51-119

Please call us if you have any questions about this review or have any additional questions, comments, or concerns about the noise that would be produced by the Archer Forward development.

Response to Comment No. 51-119

This closing comment in Exhibit B of Comment Letter No. 51 is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-120

See following page.
DEREK L. WATRY, M.S.

Experience

Wilson, Ihrig & Associates, Inc. (1992 to Present)
Principal
Mr. Watry is experienced in all aspects of environmental acoustics, including noise measurement and prediction, regulatory analysis, environmental impact assessment, and noise control design. He is well versed in the requirements of NEPA and CEQA, and over the past 21 years has both prepared and critiqued hundreds of environmental noise studies. Mr. Watry's areas of practice include construction noise and vibration, traffic noise, HVAC noise, industrial noise, rail transit noise, architectural acoustics. Mr. Watry has also served as an expert witness at deposition and trial for numerous legal actions.

University of California, Berkeley (1988 - 1992)
Graduate Student, Research and Teaching Assistant
Teaching Assistant for "Fundamentals of Acoustics" course

Education
M.S. (1991) in Mechanical Engineering, University of California at Berkeley
B.S. (1988) in Mechanical Engineering, University of California at San Diego
M.B.A. (2000), Saint Mary's College of California, Moraga

Professional Associations
Member, Acoustical Society of America
Member, National Council of Acoustical Consultants

Academic Distinctions
Summa Cum Laude, Saint Mary's College of California (2000)
National Science Foundation Fellowship Recipient (1988 - 1991)
Summa Cum Laude, University of California, San Diego (1988)

Representative Projects
Patterson Ranch EIR, Fremont
Noise section of EIR for 428 acre project that included residential, educational, religious, community recreation, and commercial land uses.
Mare Island Dredged Material Disposal Facility EIR, Vallejo
_EIR noise study for proposed disposal facility to be built next to residential neighborhood._

Silva Ranch Annexation EIR, King City
_EIR noise study for development of new, large, primarily residential, district on the outskirts of King City._

525 Golden Gate Avenue Demolition, San Francisco
_Noise and vibration monitoring and consultation during the demolition of multi-story office building next to Federal, State, and Municipal Court buildings in San Francisco._

Tyco Electronics Annual Noise Compliance Study, Menlo Park
_Conducted annual noise compliance monitoring for Tyco Electronics in 2009 and 2010. Provided letter critiquing the regulatory requirements and recommending improvements._

Safeway Redevelopment, Sunnyvale
_Noise study of store redevelopment including loading dock, trash compactor, parking lot, and rooftop HVAC equipment._

Safeway Redevelopment, Los Altos
_Noise study of store redevelopment including loading dock, trash compactor, rooftop parking lot, rooftop HVAC equipment, and Foothill Expressway traffic noise._

Central Park Apartments Noise Study, Mountain View
_Noise study for new residential building development. Major noise sources included Central Expressway and Caltrain._

465 N. Whisman Road, Mountain View
_Noise control among suites in a low-rise office complex._

Caltrain Centralized Equipment Maintenance and Operations Facility, San Jose
_Noise study of impacts for new maintenance and operations facility built next to existing residential neighborhood. Included analysis of 16 ft sound barrier wall._

Conoco-Phillips Refinery Noise Control, Rodeo
_Environmental noise study and assessment of refinery noise at residential neighborhood._

Groth Winery HVAC Sound Barrier, Oakville
_Design of sound barriers to control noise from rooftop HVAC equipment._

Dahl Booster Pump Station, Palo Alto
_Design of sound barrier and specification of mufflers for pump station equipment._
Response to Comment No. 51-120

This comment transmits the attached curriculum vitae to the letter submitted by Derek L. Watry, as provided in Exhibit B of Comment Letter No. 51. This attachment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-121

Exhibit C

My name is James Benya. I am a professional lighting designer and consultant with 41 years of experience. I am a registered Professional Engineer in California (E12078), a Fellow of the Illuminating Engineering Society, and a Fellow of the International Association of Lighting Designers. My work includes the design of outdoor sports lighting and serving as an expert in many types of outdoor lighting cases. My Curriculum Vitae and specific outdoor lighting expert experience are attached for your reference.

I visited the Chapparal Street side of the site at night on March 24, 2014 and determined that the existing conditions were very dark and consistent with IES Lighting Zone 2 (see below). I then studied the DEIR, with focus on Aesthetics/Visual Quality, Views, Light/Glare, and Shading, and Appendix D, Lighting Study. My observations, notes and findings are:

Response to Comment No. 51-121

This introductory comment in Exhibit C of Comment Letter No. 51 is noted for the record and will be forwarded to the decision-makers for review and consideration.

As discussed further in the responses below, IES Lighting Zone 2 is intended for very low ambient light conditions, more similar to a rural community, and is not consistent with the lighting conditions along Chapparal Street as provided in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading of the Draft EIR.

Comment No. 51-122

1. The Lighting Study uses the improper threshold of significance, based on the following rationale.

a. The Illuminating Engineering Society of North America (IES) is the only American National Standards Institute (ANSI) accredited standards writing organization for lighting practices in the USA. Its recommendations are currently published in the

b. Chapter 26 of the Handbook is the most current publication of the IES concerning outdoor lighting practices. It is the only current document addressing good lighting design practices for outdoor lighting. I believe it is therefore the proper document to be used for environmental impact studies involving lighting.

Response to Comment No. 51-122


Comment No. 51-123

c. Beginning with the discovery of non-visual light receptors in the human eye made public in 2002, medical research has undertaken studying the circadian system of all living beings. The American Medical Association has recently raised significant concerns over then exposure to light at night in humans, stating:

“Biological adaptation to the sun has evolved over billions of years. The power to artificially override the natural cycle of light and dark is a recent event and represents a man-made self-experiment on the effects of exposure to increasingly bright light during the night as human societies acquire technology and expand industry. In addition to resetting the circadian pacemaker, light also stimulates additional neuroendocrine and neurobehavioral responses including suppression of melatonin release from the pineal gland improving alertness and performance. Low levels of illuminance in the blue or white fluorescent spectrum disrupt melatonin secretion. The primary human concerns with nighttime lighting include disability glare (which affects driving and pedestrian safety) and various health effects. Among the latter are potential carcinogenic effects related to melatonin suppression, especially breast cancer. Other diseases that may be exacerbated by circadian disruption include obesity, diabetes, depression and mood disorders, and reproductive problems.”

1 REPORT 4 of THE COUNCIL ON SCIENCE AND PUBLIC HEALTH (A-12): Light Pollution: Adverse Health Effects of Nighttime Lighting (Reference Committee D), American Medical Association, June 2012
I contend that lighting any environmental impact report must, for this reason alone, address the amount of light at night in the environment, and in particular the amount of light trespassing onto properties where people live and sleep. At this time, the reference standard must be the Handbook, Chapter 26, as the data supporting the AMA report was known to the IES Handbook authors and IES Board of Directors at the time of the Handbook’s writing.

Response to Comment No. 51-123

The comment quotes a report prepared by The Council on Science and Public Health and is acknowledged and has been incorporated into the Final EIR for the record and for review and consideration by the decision-makers. Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR for an analysis of the Project’s light and glare impacts. As demonstrated therein, the Project’s light and glare impacts would be less than significant.

Comment No. 51-124

d. In the Handbook, lighting zones are defined and used to differentiate neighborhoods and districts according to the amount of ambient light at night. This includes considerations for the amount of existing man-made lighting, whether lighting systems like street lighting are continuous, and the expectations of people regarding lighting in that environment. The “darkest” zone, LZ0 (zero) is described to include natural and wilderness areas. The “lightest” zone, LZ4, is described to include areas of relatively bright light such as industrial sites, ports, regional auto sales malls, and downtown districts of major cities. All IES outdoor lighting recommendations are based on this lighting zone system. These lighting zones were established in consideration of the potential health impacts of light at night on humans.

e. Per Handbook Table 26.4, the proper lighting zone for this neighborhood is Lighting Zone 2 (LZ2). I base this determination on personal observation including the lack of street lighting and the residential character of the neighborhood, especially to the north and northwest of the Archer School.

f. Per Handbook Table 26.5, the maximum allowable light trespass in LZ2 is 3 lux (0.3 foot-candles). The Handbook does not exempt sports lighting.

g. Both Handbook Tables 26.4 and 26.5 are included in the Lighting Study but are not applied to light trespass determinations of significance.
Response to Comment No. 51-124

d. The comment includes general statements regarding the *Illuminating Engineering Society Handbook, 10th Edition* and provides no specific technical issue related to the adequacy of the analysis of light and glare within the Draft EIR.

e. The comment states that the Project Site is located in IES Lighting Zone 2, which is defined as:

> Areas of human activity where the vision of human residents and users is adapted to moderate light levels. Lighting may typically be used for safety and convenience but it is not necessarily uniform or continuous. After curfew, lighting may be extinguished or reduces as activity levels decline. (IESNA Table 26.4, Nighttime Outdoor Lighting Zone Definitions.)

IES Lighting Zone 2 is intended for very low ambient light conditions, more similar to a rural community, and is not consistent with the lighting conditions in the area of the Project Site. The Project Site is located within the City of Los Angeles, which includes relatively high-density development and relatively high ambient light conditions. A summary of existing lighting levels in and around the Project Site were included in Table IV.A-1 on page IV.A-21 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR. Additional information on the existing lighting conditions is provided on pages 37–89 of the Lighting Study included in Appendix D of the Draft EIR. The existing lighting levels show that the area surrounding the Project Site is located in Lighting Zone 4 or Lighting Zone 3.

IES Lighting Zone 4 is defined as:

> Areas of human activity where the vision of human residents and users is adapted to high light levels. Lighting is generally considered necessary for safety, security and/or convenience and it is mostly uniform or continuous. After curfew, lighting may be extinguished or reduced in some areas as activity levels decline. (IESNA Table 26.4, Nighttime Outdoor Lighting Zone Definitions.)

In addition, IES Lighting Zone 3 is defined as:

> Areas of human activity where the vision of human residents and users is adapted to moderately high light levels. Lighting is generally desired for safety, security and convenience but it is not necessarily uniform or...
continuous. After curfew, lighting may be extinguished or reduced as activity levels decline.

There are 27 existing City of Los Angeles street lights flanking Sunset Boulevard, North Barrington Avenue, Chaparal Street, and Westgate Avenue surrounding the Project Site. As explained on page IV.A-19 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, at Receptor Site C, located on Chaparal Street across from the existing Archer School gate, the existing illuminance value is 2.680, which is associated with light trespass from municipal roadway lighting. The 2.680 foot-candle illuminance value is greater than the IES Lighting Zone 4 trespass standard of 1.5 foot-candles. In addition, lighting from existing residences along Chaparal Street exceeds the IES Lighting Zone 3 standards. As shown in Table 27 on page 72 of the Lighting Study included in Appendix D of the Draft EIR, the existing vertical illuminance condition for Receptor Site E is 1.139 foot-candles facing back, and the maximum vertical facing back calculation at Receptor Site E, located at the adjacent western property boundary, is 1.430 foot-candles. The 1.139 and 1.430 foot-candle measurements reflect the conditions in the area surrounding the Project along Chaparal facing away from the Project Site. These foot-candle measurements exceed the IES Lighting Zone 2 trespass standard of 0.3 foot-candle, as well as the IES Lighting Zone 3 trespass standard of 0.8 foot-candle. In addition, photographs included in the Lighting Study of the area surrounding the Project Site show existing lights and high-brightness glare sources. (Refer to Figure 18 on page 54, Figure 22 on page 58, and Figure 3 on page 66 of the Lighting Study included in Appendix D of the Draft EIR.) Therefore, the existing conditions in the area around the Project Site do not support the IES Lighting Zone 2 classification, and instead the area surrounding the Project Site would be more appropriately located in Lighting Zone 4 or Lighting Zone 3.

f. The comment includes general statements regarding the maximum allowable light trespass in Lighting Zone 2 and provides no specific technical issue related to the adequacy of the analysis of light and glare within the Draft EIR. However, as noted above, Lighting Zone 2 is intended for very low ambient light conditions, more similar to a rural community, and is not consistent with the lighting conditions along Chaparal Street as provided in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR.

g. The comment correctly states that the Lighting Study provided in Appendix D of the Draft EIR included Table 26.4 from the *Illuminating Engineering Society Handbook, 10th Edition*. Table 26.4 is provided on page 145 of the Lighting Study Appendix. The comment also references Table 26.5 from the *Illuminating Engineering Society Handbook, 10th Edition*. Table 26.5 was not included in the Lighting Study provided in Appendix D of the Draft EIR. As discussed in Response to Comment No. 51-15, Section IV.A,
Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR and the Lighting Study provided in Appendix D of the Draft EIR utilized the appropriate thresholds of significance for light and glare.

**Comment No. 51-125**

h. Los Angeles Municipal Code Section 93.0117 (hereinafter “LA Code”) permits 20 lux (2 foot-candles) of trespass regardless of where it might occur in the City; the same value is used for downtown and native areas such as the Santa Monica mountains. No current IES recommendation allows this much trespass under any condition. I contend that the LA Code is an absolute worst case regulation and is solely intended to help resolve light trespass disputes. Compared to the Lighting Zone system used by IES and CAL Green, the LA Code is clearly not based on environmental differences, thus making it inadequate for use in an environmental impact report.

In summary, although the Lighting Study recognizes the IES and the Handbook as the authority on good practice and and [sic] claims compliance with its recommendations, it cites the LA Code as the threshold of significance. Because the LA Code is a worst case regulation, I contend that for the threshold of significance should be values listed in Table 26.5 of the IES Handbook according to lighting zone. For the Archer School project, the proper lighting zone is LZ2 and the proper threshold for sports lighting trespass should be 0.3 foot-candles.

**Response to Comment No. 51-125**

As discussed in Responses to Comment No. 51-15 and No. 51-127, the Draft EIR used the appropriate significance thresholds, and IES Lighting Zone 2 is intended for very low ambient light conditions, more similar to a rural community, and is not consistent with the lighting conditions in the area surrounding the Project Site, as provided in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR.

In addition, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has removed the athletic field lighting from the Project. With the removal of the athletic field lighting, light and glare impacts from the Project would remain less than significant.
Comment No. 51-126

2. The Lighting Study does not properly calculate the light trespass at receptors D, D-I and E near the northwest property line, thus understating the impact of the project. My rationale and explanation follows:

   a. The Lighting Study is a long document (333 pages). Because there are no standards for luminance or contrast in any IES, CEQA, Coastal Commission or LA Code documents, the only useful discussions concern illuminance, measured in lux or footcandles. Illuminance can be measured in the horizontal plane (hereinafter abbreviated \(E_h\)), the vertical plane (hereinafter abbreviated \(E_v\)) and the perpendicular plane to the primary source of light (hereinafter \(E_p\)). Foot-candles will be abbreviated “fc” for brevity.

   b. IES recommendations for light trespass are measured in perpendicular plane illuminance, not vertical or horizontal planes. Thus, every calculation presented in the Lighting Study must be corrected to \(E_p\).

   c. Receptor Sites D and D1 represent the impact on homes on the north side of Chapparal [sic] Street. Measurements are taken at the same spot but at different elevations. Existing condition measurements indicate \(E_v = 0.4\) fc at 5’ above grade, \(E_v = 0.008\) at 10’ above grade, \(E_h = 0.008\) at 10’ above grade, and \(E_h = 0.011\) fc at 3’ above grade. This is consistent with expectations given the lack of street lighting in the neighborhood. I have found on other sites that the sky glow contribution throughout [sic] the Los Angeles metropolitan area is about .01 fc, and therefore the \(E_h\) values represent sky glow contribution with shading from trees.

   d. Receptor Site E represents the impact on the home on the south side of Chapparal [sic] Street abutting the Archer School property. Existing condition measurements indicate \(E_h = 0.004\) at 10’ above grade, and \(E_v = 0.000\) at 10’ above grade. This is consistent with expectations given the lack of street lighting in the neighborhood.

   e. The Lighting Study calculations appear to be standard outdoor lighting calculations. Outdoor lighting calculations account for the effect of the original rays of light from luminaires only. They do NOT account for reflected light from the field. Reflected light from grass will be between 15–25%. This will add to the direct light used in the vertical calculations, and makes horizontal calculations above grade misleading. When buildings abut lighted sports fields, vertical illumination from reflected light can easily reach 1 fc or more at the second story level.
f. At point D1, the maximum sports light level \( E_h = 0.15 \text{ fc} \). But the sports lights most likely to cause trespass are on the opposite side of the field (see Appendix A, Position 3a photo which shows that significant candlepower can be directed well over 200 feet away) with an incident angle to point D of about 88.3 degrees relative to horizontal. Correcting \( E_h \) to \( E_p \) results in \( \frac{0.15}{\sin 1.7^\circ} = 5.07 \text{ fc} \). However, because all lights contribute to the calculated value, \( E_p \) is expected to be between 1.5 and 5 fc. This does not include reflected light.

g. At point E, the maximum sports light level \( E_h = 0.96 \text{ fc} \). But the sports lights most likely to cause trespass are on the pole nearest the house (see Appendix A, Position 1a photo) with an incident angle to point E of about 45 degrees relative to horizontal. Correcting \( E_h \) to \( E_p \) results in \( \frac{0.96}{\sin 45^\circ} = 1.36 \text{ fc} \). However, because all lights contribute to the calculated value, \( E_p \) is expected to be between 1.36 and 1.5 fc. This does not include reflected light.

In summary, by failing to account for reflected light and by using horizontal and vertical illuminance rather than perpendicular plane illuminance to express values, the Lighting Study calculations are inaccurate and understate the light trespass onto adjacent sites at locations D, D1 and E. This outcome is consistent with other athletic field lighting measurements compared to calculations (see Exhibit A, Table 1). I contend that the light trespass from proposed sports lighting onto adjacent residential properties towards the northwest will definitely exceed the IES' threshold of 0.3 footcandles (perpendicular plane) and will probably exceed the LA Code threshold of 2.0 footcandles (plane unstated in code).

Response to Comment No. 51-126

a. The comment includes general statements regarding the Lighting Study included in Appendix D to the Draft EIR and the analysis of illuminance and provides no specific technical issue related to the adequacy of the analysis of light and glare within the Draft EIR.

b. As discussed on page IV.A-25 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR and pages 90–91 of the Lighting Study provided in Appendix D of the Draft EIR, to complete the Lighting Study, a computer model was used to calculate the potential lighting impacts of the Project. All calculations for the Lighting Study were produced using a software program (AGi32 version 2.30 by Lighting Analysts, Illumination Engineering Software, Boulder, Colorado) to model the site context and light fixtures proposed within the Project Site. The computer modeling software utilizes radiance and ray trace calculations to accurately predict the direct illumination of surfaces,
as well as the inter-reflect ed light from adjacent surfaces. The software is also a reliable predictor of sur face luminance. These calculation procedures follow the recommended practice procedures as prescribed by the *Illuminating Engineering Society Handbook, 10th Edition*, and utilize the most thorough and rigorous methods.

The comment states that Lighting Study calculations should have measured perpendicular plane illuminance. As described on page IV.A-26 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the illuminance analysis calculated horizontal illuminance at each Receptor Site and vertical illuminance at adjacent residential property boundaries, calculation points for the vertical illuminance were located on a coincident 40-foot vertical theoretical plane. The perpendicular plane method is the appropriate calculation method where luminaires will project light directly onto an adjacent property. However, in Francis Krahe & Associates’ professional opinion, where the lighting is designed to incorporate shielding and aiming to prevent glare, light spill, and the upward emission of light, such as the Project’s lighting, the vertical and horizontal illuminance calculation method is the more appropriate calculation method because it takes into account reflected light.

In addition, if the analysis were to have measured the perpendicular plane, the illuminance levels would be similar to or less than the horizontal illuminance values provided in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR. Table III-15 on page III-727 illustrates the comparison of the calculated data presented in Table IV.A-4 on page IV.A-70 in IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR compared to the perpendicular plane calculation method.

Therefore, Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR and the Lighting Study provided in Appendix D of the Draft EIR conducted a proper analysis of the impacts of the Project’s light and glare.

c. The comment includes general statements regarding the existing conditions at Receptor Sites D and D-1 and provides no specific technical issue related to the adequacy of the analysis of light and glare within the Draft EIR. As explained on pages 39–40 of the Lighting Study provided in Appendix D of the Draft EIR, Receptor Sites D and D-1 are representative of the view of the Project lighting from the north side of Chaparal Street, adjacent to 11835 Chaparal Street. The exiting horizontal and vertical illuminance conditions for Receptor Sites D and D-1 are provided in Table 21 on page 64 and Table 24 on page 68, respectively, of the Lighting Study. As explained on pages 39–40 of the Lighting Study, at Receptor Site D, horizontal Illuminance measurements are at 3 feet above grade, and vertical illuminance measurements are at 5 feet above grade. At Receptor Site D-1, horizontal and vertical illuminance measurements are at 10 feet above grade.
grade to simulate views from second floor windows or balconies. As shown in Table 21 on page 64 of the Lighting Study, the exiting horizontal illuminance condition for Receptor Site D is 0.011 foot-candle. The existing vertical illuminance condition for Receptor Site D is 0.400 foot-candle facing forward and 0.163 foot-candle facing back. As shown in Table 24 on page 68 of the Lighting Study, the existing horizontal illuminance condition for Receptor Site D-1 is 0.045 foot-candle. The existing vertical illuminance condition for Receptor Site D-1 is 0.008 foot-candle facing forward and 0.138 foot-candle facing back.

d. The comment includes general statements regarding the existing conditions at Receptor Site E and provides no specific technical issue related to the adequacy of the analysis of light and glare within the Draft EIR. As explained on page 40 of the Lighting Study provided in Appendix D of the Draft EIR, Receptor Site E is representative of the view of the Project lighting from the northwest edge of the athletic field and provides a view similar, but more conservative than, the views of neighboring residential property, such as 11840 Chaparal Street, 134 North Westgate Avenue, and 130 North Westgate Avenue, that have multiple levels and views not restricted by the fence. The existing horizontal and vertical illuminance conditions for Receptor Site E are provided in Table 27 on page 72 of the Lighting Study. As explained on page 40 of the Lighting Study, at Receptor Site E, horizontal and vertical illuminance measurements are at 10 feet above grade to simulate views from second floor windows or balconies. As shown in Table 27 on page 72, the existing horizontal illuminance condition for Receptor Site E is 0.004 foot-candle. The existing vertical illuminance condition for Receptor Site E is 0.000 foot-candle facing forward and 1.139 foot-candles facing back. The maximum vertical facing back calculation, located at the adjacent western property boundary, is 1.430 foot-candles. The 1.139 and 1.430 foot-candle measurements facing back reflect the conditions in the area surrounding the Project along Chaparal facing away from the Project Site. These foot-candle measurements along Chaparal exceed the IES Lighting Zone 2 trespass standard of 0.3 foot-candle, as well as the IES Lighting Zone 3 trespass standard of 0.8 foot-candle.

e. The comment states that the Lighting Study calculations appear to be standard outdoor lighting calculations. The analysis in the Lighting Study, included in Appendix D of
the Draft EIR, did not use standard outdoor lighting calculations. As explained above in Response to Comment No. 51-129(b), all calculations for the Lighting Study were produced using a software program (AGi32 version 2.30 by Lighting Analysts, Illumination Engineering Software, Boulder, Colorado) to model the site context and light fixtures proposed within the Project Site. The computer modeling software utilizes radiance and ray trace calculations to accurately predict the direct illumination of surfaces, as well as the inter-reflected light from adjacent surfaces. The software is also a reliable predictor of surface luminance. These calculation procedures follow the recommended practice procedures as prescribed by the Illuminating Engineering Society Handbook, 10th Edition, and utilize the most thorough and rigorous methods. Specifically, as explained on page 92 of the Lighting Study, the athletic field grass was included in the model and assumed 8-percent reflectance, which is consistent with the existing dark grass. Therefore, reflected light from the athletics fields was accounted for in the Lighting Study analysis.

f. The commenter’s proposed calculations for Receptor Site D assume that the Lighting Study calculations are standard outdoor lighting calculations, which only analyze direct illumination at a given point. However, the analysis in the Lighting Study, included in Appendix D of the Draft EIR, did not use standard outdoor lighting calculations. As explained above in Response to Comment No. 51-129(b), all calculations for the Lighting Study were produced using a software program (AGi32 version 2.30 by Lighting Analysts, Illumination Engineering Software, Boulder, Colorado) to model the site context and light fixtures proposed within the Project Site. The computer modeling software utilizes radiance and ray trace calculations to accurately predict the direct illumination of surfaces, as well as the inter-reflected light from adjacent surfaces. Therefore, the calculation adjustments made by the commenter misstate the perpendicular plane analysis. Response to Comment No. 51-129(c) provides the perpendicular plane calculation for Receptor Site D. As shown therein, the perpendicular plane illuminance levels are similar to the horizontal illuminance values provided in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR.

g. The commenter’s proposed calculations for Receptor Site E assume that the Lighting Study calculations are standard outdoor lighting calculations. However, the analysis in the Lighting Study, included in Appendix D of the Draft EIR, did not use standard outdoor lighting calculations. As explained above in Response to Comment No. 51-129(b), all calculations for the Lighting Study were produced using a software program (AGi32 version 2.30 by Lighting Analysts, Illumination Engineering Software, Boulder, Colorado) to model the site context and light fixtures proposed within the Project Site. The computer modeling software utilizes radiance and ray trace calculations to accurately predict the direct illumination of surfaces, as well as the inter-reflected light from adjacent surfaces. Therefore, the calculation adjustments made by the commenter misstate the perpendicular plane analysis. Response to Comment No. 51-129(c) provides
the perpendicular plane calculation for Receptor Site E. As shown therein, the perpendicular plane illuminance level is less than the horizontal illuminance value provided in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, in the Draft EIR.

As shown in responses a through g, Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR and the Lighting Study provided in Appendix D of the Draft EIR included a proper analysis of the impacts of the Project’s light and glare. Refer to Response to Comment No. 51-130 for a discussion of Exhibit A, which consists of a report prepared by Benya Burnett Consultancy regarding athletic field lighting at Hoover High School in San Diego. In addition, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has removed the athletic field lighting from the Project. With the removal of the athletic field lighting, light and glare impacts from the Project would remain less than significant.

Comment No. 51-127

3. Sports lighting as proposed at the Archer School will cause a significant and immitigable environmental impact that must be changed in the DEIR conclusions. I base this on:

a. The California CEQA standard asks whether a new light source would "create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?". Horizontal plane calculations at point E prior to sports lighting are .004 footcandles. With sports lighting, this increases to 0.96 footcandles, an increase of about 239 times or 23,900%. This is a substantial new source of light by any metric.

b. To residential property owners adjacent to the soccer field in the northwest corner of the Archer School property, by day the imposition of a 70 foot tall lighting tower within about 70 feet of the nearest residence significantly affects the the [sic] day view of the area.

c. At night, the increase in lighting onto the ground, fencing, and trespassing onto adjacent property will be about 239 times as much light as they presently have. This light will be generated by a light tower 70 feet tall equipped with 9,000 watts of high intensity discharge lighting that will spill light throughout the area, affecting a number of existing residential properties. The lighting levels that will be used for the sports lighting is similar to the light levels used for car sales lots. This is a significant impact by any standard or measure.
d. The Lighting Study infers that the shielding of sports lighting will contain light onto the field. Such is not possible with current technology as illustrated throughout Exhibit A, a report involving the outcome of athletic field lighting in a residential setting. The disruption of the night environment from sports lighting to the neighborhoods adjacent to lighted athletic fields is significant and trespasses much more than allowed by IES recommendations. Those needing a first hand experience can be easily witness the impact at other schools where sports lighting has been installed in once-dark neighborhoods.

In summary, the proposed sports lighting for the Archer School soccer and baseball fields will create a substantial new source of light with significant and immitigable impact on the day and night environment surrounding the Archer School, especially on residential neighbors to the north and west. The Lighting Study performed inaccurate calculations, used an improper metric of significance, and ignored the results of its own calculations to justify the current DEIR report conclusion.

Response to Comment No. 51-127

As discussed in responses to comments above, Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and the Lighting Study provided in Appendix D of the Draft EIR utilized the appropriate threshold of significance for light and glare and conducted a proper analysis of the impacts of the Project’s light and glare.

In addition, pages IV.A-48 through IV.A-49 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR included a detailed analysis of the impact of the athletic field lighting’s six 70-foot-tall, pole-mounted luminaires. As discussed therein, one of the proposed pole-mounted luminaires would be slightly visible from Sunset Boulevard, just past the rooftop of the West Wing of the Main Building. However, the top of the pole-mounted luminaire visible from Sunset Boulevard would be a very minimal and distant component and would be in character with the existing street lamps along Sunset Boulevard. In addition, while portions of the pole-mounted luminaires would be visible along Chaparal Street and along adjacent properties through breaks in landscaping, the pole-mounted luminaires would be in character with similar features in the area consistent of an urban environment, including existing utility poles and associated overhead power lines and street lamps along Chaparal Street and the surrounding area. Therefore, the impact of the athletic field lighting’s six 70-foot-tall, pole-mounted luminaires related to aesthetics/visual quality and views would be less than significant.

The comment refers to Exhibit A, which consists of a report prepared by Benya Burnett Consultancy regarding athletic field lighting at Hoover High School in San Diego. The athletic field lighting detailed in Exhibit A is not consistent with the Project’s athletic
field lighting design. The athletic field lighting discussed in Exhibit A appears to be designed for an area more than twice the size of the Project’s athletic field and uses only four pole-mounted lights, compared to the Project’s proposal of six 70-foot-tall, pole-mounted luminaires. The resulting illuminance values at the site boundary and the observed brightness of the field lighting at Hoover High School are the result of low mounting heights relative to the length and width of the field. In addition, as provided in Project Design Feature A-8 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the Project’s athletic field lighting would be designed to incorporate shielding and aiming to prevent glare, light spill, and the upward emission of light and would be aimed so that light is contained within the Project Site.

In addition, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has removed the athletic field lighting from the Project. With the removal of the athletic field lighting, light and glare impacts from the Project would remain less than significant.

**Comment No. 51-128**

See following page.
Curriculum Vitae

JAMES ROBERT BENYA, PE, FIES, FIAlD

Principal, the Benya Burnett Consultancy

Winner of the 2008 Edison Award

“At the leading edge of light” Metropolis, 1999

“One of the top lighting designers in the US”, Departures by American Express, 1999

“Top 25 Retail Lighting Designers in US”, Display and Design Ideas, 2002

“Hot designer”, SNAP Magazine, 2011

“Jim has been at the forefront from the start, specializing in integrated daylighting strategies and sustainable lighting approaches long before most designers knew what that was,” Architectural Lighting, 2011

Inaugural member of the Michigan Lighting Hall of Fame, 2013

Jim Benya is a professional lighting designer, educator and consultant with 40 years of experience. He is a Registered Professional Electrical Engineer, Fellow of the Illuminating Engineering Society of North America (FIES), and Fellow of the International Association of Lighting Designers (IALD). A member of the legendary Smith Hinchman & Grylls Lighting Group, he established and led California’s seminal lighting design firm Luminae Souter Lighting Design as Principal and CEO before starting Benya Lighting Design in 1994 in Portland, Oregon. His design work has been published in every major lighting design and architectural journal, including Architecture, Architectural Record, Architectural Lighting, Progressive Architecture, LD&A, Lighting Dimensions, Interiors, Interior Design, Designers West, Northern California Home and Garden, Architectural Digest, and Building Design and Construction. He has won numerous lighting design awards, including a two time recipient of the EDISON AWARD, the Edison Award of Excellence (7 times), the Edison Award for Environmental Design (thrice), the International Illumination Design Award of Excellence, and the Source Awards First Place Award.

He is the author of Lighting Design Basics (Wiley 2012) and Lighting Retrofits and Relighting (Wiley 2011) and his work is featured in nine books, including the Best of Lighting Design. In 2012 he returned to northern California to continue the groundbreaking work of the Benya Burnett Consultancy with partner Deborah Burnett in Davis, California and to work with the California Lighting Technology Center on projects. Along with Deborah he is co-author on a new Wiley Publication (expected release date May 2014) entitled Evidence Based Lighting Design: connecting the dots between scientific discovery, human wellness, and economic ROI.
**PROFESSIONAL DESIGN AND ENGINEERING HISTORY**

<table>
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<tbody>
<tr>
<td>Principal, the Benya Burnett Consultancy</td>
<td>2010-present</td>
</tr>
<tr>
<td>Principal, Benya Lighting Design, West Linn, OR</td>
<td>1994-2013</td>
</tr>
<tr>
<td>Principal, Pacific Lightworks, Portland, OR</td>
<td>1996-1998</td>
</tr>
<tr>
<td>Associate and Chief Electrical Engineer, the Smith Group, Detroit</td>
<td>1980-1983</td>
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<td>Electrical Engineer and Project Manager, the Smith Group, Detroit</td>
<td>1973-1980</td>
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**EDUCATIONAL HISTORY**

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<tr>
<th>Degree</th>
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<tr>
<td>BSE, University of Michigan, Electrical Engineering</td>
<td>University of Michigan</td>
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<td>BS, University of Michigan, Computer Science</td>
<td>University of Michigan</td>
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<tr>
<td>Graduate work in Computer Science, University of Michigan</td>
<td>University of Michigan</td>
<td>1973</td>
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<td>Professional Development Work in Building Energy Systems, Iowa State</td>
<td>University of Michigan</td>
<td>1978</td>
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<td>Professional Development Work in Daylighting, Harvard Graduate School</td>
<td>University of Michigan</td>
<td>2009</td>
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**ACADEMIC TEACHING HISTORY**

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<tr>
<td>Adjunct Professor of Architecture, Lawrence Technological Institute</td>
<td>1974-1978</td>
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<tr>
<td>Adjunct Professor of Architecture, Wayne State University</td>
<td>1979</td>
</tr>
<tr>
<td>Adjunct Professor of Design, University of Michigan</td>
<td>1980-1983</td>
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<tr>
<td>Adjunct Professor of Architecture, University of California at Berkeley</td>
<td>1984-1985</td>
</tr>
<tr>
<td>Adjunct Professor of Architecture, California College of Art</td>
<td>1986-1995</td>
</tr>
<tr>
<td>Artist in Residence, University of Nebraska School of Architecture</td>
<td>1998</td>
</tr>
<tr>
<td>Adjunct Professor of Interior Design, Marylhurst University</td>
<td>2002</td>
</tr>
<tr>
<td>Guest Lecturer, Oregon State University Interior Design Lighting Class</td>
<td>1999-2010</td>
</tr>
<tr>
<td>Special studio in Daylighting, Daylectric Lighting, Ball State University</td>
<td>2007-2009</td>
</tr>
<tr>
<td>Director of the Advanced Lighting Design Program, UC Davis</td>
<td>2012-2013</td>
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**PROFESSIONAL PRESENTATIONS and COURSE DEVELOPMENT**

**National and International Venues**

<table>
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<tr>
<td>LightFair International (39 presentations)</td>
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<td>Professional Lighting Design (Alingsås, Copenhagen, Wismar, Venice)</td>
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International Dark Sky Association Annual Meeting
AIA Annual Conference
ASID Annual Conference
Green Build
Neocon Chicago
Strategies in Light (LED and OLED conferences)
LED Show
LightShow West
LED Specifier Summit

Local and Regional Venues
Designers Saturday, New York 1992
Lighting Academy, Southern California Edison (5 classes, multiple times) 2007-2011
AIA Professional Development Classes Presented 20 programs local level 2001-2011
ASID Professional Development Classes presented (82 programs local level) 1983-2009
APEM Professional Development Classes presented (local level) 1983-1995
IES Regional and Sectional Meetings -75 programs 1975-2011

Professional Development Classes for Commercial Clients 1983-2011
Commercial presentation and programs clients include Acuity Brands Lighting, Cooper Lighting, GE Lighting, Sylvania Lighting, Lutron Electronics, ELP Lighting, Efficiency Vermont, Southern California Edison, Pacific Gas & Electric, LA DWP, Southern California Gas Co, San Diego Gas & Electric, California Lighting Technology Center, Oklahoma Gas & Electric, Edison Electric Institute, American Lighting Association, Oregon Energy Trust. Pacific Power Company, BC Hydro, Connecticut Power and Light, Con Edison, Com Edison, Atlantic Electric, Georgia Power, Lucifer Lighting, NEEA, NEEP, CHPS, ASHRAE, Energy Center of Wisconsin, ACEEE, NRDC, Professional Lighting Design magazine, Architectural Lighting magazine, Architect magazine, AMC Trade Shows, the Atlanta Mart, the Merchandise Mart, LA Design Center, SF Mart, the Miami Merchandise Mart, Dallas Mart, Specs Retail Conference, the Electric Show, Electric West, EWEB, IIDA

College Lectures 1983-2011
Programs include University of Oregon, Oregon State University, Mt. Hood Community College, University of Washington, University of California Davis, University of California Berkeley, Cal Poly Pomona, Cal Poly San Luis Obispo, University of California Santa Barbara, University of California San Diego, Cal State Chico, Cal State Sacramento, California Art Institute, La Canada College, UCLA, University of Nevada, Las Vegas, University of Texas, UT San Antonio, Venice School of Architecture, Hochschule Wismar, University of Montana, University of Idaho, Arizona State University, Oklahoma State University, University of Nebraska, Lawrence Technological Institute, University of Alabama, Memphis State University,
Rhode Island School of Design, Louisiana Tech, University of Colorado, University of Virginia, University of Hawaii, Fashion Institute of Design, University of Vermont, University of Wisconsin, University of Minnesota, Parsons School of Design, University of Rochester, Chaminade College, Ball State University.

**Paper Presentations**
IES, IALD, ASHRAE, USGBC, ACEEE, AIA, various programs.
IES Light Up Philadelphia Conference  2012
NECA Annual Conference, Las Vegas  2012
IES Conference Australia New Zealand, Auckland  2011
IES Conference Australia New Zealand, Queenstown  2008
International Daylighting Conference, Bilbao  2007
Trade Commission of Spain, Barcelona  2005
IES Annual Conference  1997

**Internet Classes and Webinars**
Bonneville Power ETC Program  2013
Focus on Energy Webinars (Wisconsin)  2013

**MEMBERSHIPS**
Illuminating Engineering Society (IES)
  Board of Fellows  1975-2012
  2003-2007
  1994-1998
ASHRAE AEDG Schools  2005-2007
  2007
Technical review committee  1998-2002
Spectral effects committee  1992-1997
ASHRAE/IES90.1 representative  1991
Elected Fellow  1983-2008
Energy Management committee  1979-1983
Health Care Committee  1985
Chair, annual meeting program committee
  1975
  1987-2012
  2010-2012
  2005
International Association of Lighting Designers (IALD)
  Fellows Selection Committee  2003
  Elected Fellow  2005
  Special presidential citation  2002-2004
  LightFair Management Board
Page III-735
NCQLP Board 2002-2003
Member of Board, Director of External Affairs 2002-2003
Member of Board, Director of Education 2001
LightFair Program Committee 1998-2001
Elected Professional Member 1987

International Dark Sky Association (IDA) 2001-2012
Chair, Model Lighting Ordinance Task Force 2001-2012
Board of Directors 2001-2011
Treasurer 2008-2009
Technical Committee 2001-2011

American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) 2001-2012
Member, SPC 189.1 2009-2010
Member SPC 90.1 1992-1997
AEDG Schools 2005-2007

US Green Buildings Council (USGBC) 2002-2012

Institute of Electrical and Electronic Engineers (IEEE) 2005-2009

National Council on Qualifications for the Lighting Professions (NCLQP) 2000
Chairman, Examination Committee 1997-1999
Chairman, Test Committee 1995-1996
Member, organizing committee 1998-2010
Lighting Certified 1998-2010

General Electric Consumer Advisory Council (GE CAC) 2001-2012

California Energy Commission (CEC) 1987-1994
Advanced Lighting Professional Advisory Committee 1995-1998

PUBLICATIONS

Books (Author and Co-Author)
Lighting Retrofits and Relighting, Wiley 2011
Lighting Design Basics Wiley 2004
Lighting Fundamentals, EPRI 1997
Lighting Retrofit Handbook, EPRI 1997
Daylighting Fundamentals, EPRI 1998
Contributing Editor and Author
Lighting Controls Patterns for Design, EPRI 1997

Author and Columnist
Architectural Lighting Magazine 1988-1992
Architectural Lighting Magazine 2001-2012
Lighting Design and Application Centennial

Articles and papers
Architectural Lighting 53 articles and columns
Architectural Record 16 articles and columns
Progressive Architecture 1 article (1983)
Building Operating Management 3 articles
Better Bricks Website 4 articles
EC&M (McGraw Hill) 2 articles
Building Design and Construction 2 articles

Published White Papers
Lighting Calculations Using LED, Cree Website 2011
GaN on GaN LED Technology, SORAA Website 2012

REGISTRATIONS AND CERTIFICATIONS
Professional Engineer, California 12078 1984-2013
Professional Engineer, Michigan 24679 1977-1983
Class A Energy Auditor, Iowa 1978
Certified Lighting Efficiency Professional (CLEP) 1992-1995
Lighting Certified (NCQLP) 1998-2010

LIGHTING DESIGN AND OTHER AWARDS
2011 Edison Award for Environmental Design, UNIVERSITY OF ARIZONA SIXTH STREET HOUSING
2008 THE EDISON AWARD, SACRAMENTO MEMORIAL AUDITORIUM
2008 Edison Award for Environmental Design, SACRAMENTO MEMORIAL AUDITORIUM
2002 Edison Award for Environmental Design, LEWIS AND CLARK LAW LIBRARY
1996 Award of Merit, IL FORNAIO PORTLAND
1992 Award of Merit, ESPRIT DE CORP
1989  Award of Excellence, RUSS BUILDING
1989  Award of Excellence, BANK OF THE WEST
1989  Award of Merit, BROWN AND BAIN
1984  THE EDISON AWARD, FRANCO FERINI
2008  Guth Award of Merit and Lumen Award, SIDWELL FRIENDS SCHOOL
2003  Guth Award of Merit, WEST LINN LIBRARY
2003  Guth Award of Merit, SYMANTEC SPRINGFIELD
2003  Guth Award of Merit, LEWIS AND CLARK LAW LIBRARY
2000  Guth Award of Merit, THE HOTEL PATTEE
2000  Guth Award of Merit, THE STREET OF DREAMS
1997  Guth Award of Merit, HARRAH'S MARDI GRAS CASINO
1996  Guth Award of Merit, CITY OF PHOENIX STREET LIGHTING
1995  Guth Award of Merit, PALACE CASINO
1994  Guth Award of Merit, CITY OF MEMPHIS TROLLEY AND MAIN STREET
1993  Guth Award of Merit, ESPRIT DE CORP
1993  Guth Award of Merit and EPRI Efficiency Award, BEECH RESIDENCE
1992  Guth Award of Merit, STANFORD CHILDREN'S HOSPITAL
1991  Guth Award of Merit, WOLF RESIDENCE/MARIN DESIGNERS SHOWCASE
1991  Guth Award of Merit, THE RESORT AT SQUAW CREEK
1991  Guth Award of Merit, THE MARIN CIVIC CENTER
1990  Guth Award of Merit, HILLSBOROUGH RESIDENCE
1989  Guth Award of Merit, EMBASSY SUITES KAANAPALI, MAUI
1988  Award of Excellence, ST. MARY'S CATHEDRAL
1987  Guth Award of Merit, PAN PACIFIC LIGHTING EXPOSITION
1987  Guth Award of Merit, FRANCO FERINI
1986  Guth Award of Merit, RESIDENCE IN MARIN
1984  Guth Award of Merit, COMPREHENSIVE HEALTH SERVICES OF DETROIT
1984  Guth Award of Merit, AYLA FOR MEN
1981  Guth Award of Merit, ATLANTA INTERNATIONAL AIRPORT
2012  Beyond Green Honor Award - First Place for a New Academic Complex, REDDING SCHOOL FOR THE ARTS
2012  Design Excellence Award, AIA Educational Facility Design Awards, REDDING SCHOOL FOR THE ARTS
2011  Beyond Green Advanced Building Citation, PORTLAND COMMUNITY COLLEGE
2011  Design Excellence Award, Community Facilities, HAVEN FOR HOPE
2009  AIA COTE Top Ten, THE CHARTWELL SCHOOL
2006  AIA COTE Top Ten, THE SIDWELL FRIENDS SCHOOL
2004  IALD Presidential Special Service Citation
2003  Better Bricks Professional Services First Runner Up
2003  IALD International Lighting Design Awards Special Citation, SYMANTEC
1998  AIA Award, Architecture+Energy Program
1995  US Department of Transportation and Endowment for the Arts
      Design for Transportation Award of Merit
1994  IESNA Presidential Citation
1990  IESNA South Pacific Coast Vice-President's Award
1990 Halo/ASID First Place Commercial, BANK OF THE WEST
1980 Michigan Governor’s Award
1976 Electrical Consultant Energy Efficiency Design Award

HIGH PERFORMANCE AND EFFICIENT BUILDINGS INCLUDING LEED (COMPLETED)

(3) Zero Net Energy Buildings (Fort Huachuca Colonel Smith Middle School, Redding School for the Arts, the Chartwell School)
(14) LEED Platinum Buildings
(20) LEED Gold Buildings
(15) LEED Silver and Qualified Buildings

PATENTS

INT. # 8502480 (2013) for a complex lighting control system that choreographs the lighting of environments and apparel, with emphasis on LED’s.

US# Y20080005044 (2008) for an electronic signaling system to reduce power demand in buildings.

CONTACT INFORMATION

James R Benya
The BENYA BURNETT CONSULTANCY
Davis, CA 95616-6663
Cell/SMS +1 (503) 519-9631
jabenya@benyaburnett.com
jabenya@benyalighting.com
http://www.benyaburnett.com
http://www.benyalighting.com
Qualifications for Outdoor Lighting Expert

James Benya is a professional electrical engineer and lighting designer with over 40 years of experience. He is a Fellow of the Illuminating Engineering Society and a Fellow of the International Association of Lighting Designers. His primary work is in the field of illumination, as a designer, educator, researcher, and expert witness, with a career-long emphasis on environmentally responsible lighting. He started work for the US National Park Service (NPS) in 1990 at Sequoia National Park, working on outdoor lighting and reducing light pollution and in 1997, undertook a 14 year project to develop outdoor lighting guidelines and standards for Yosemite National Park. Current NPS projects include the Grand Canyon and the Presidio.

In 2002, Benya was invited to join the Board of the International Dark Sky Association (IDA) with a primary assignment to lead the development of a standards-quality Model Lighting Ordinance (MLO). After his nine years as Task Force Chair, in 2011 both IDA and IES jointly published the MLO. The MLO is the first national standard for controlling light pollution that is formally recognized by the lighting industry.

Benya's recent expert work includes environmental impact assessments, zoning and planning matters, and assisting communities in developing lighting ordinances. Recent projects include sports lighting issues in Malibu, San Diego, Seattle, Vancouver BC, Austin, Los Angeles, Medford (OR), Tucson and Mattawan (NJ) petrochemical projects in Edmonton, AB; rural light pollution problems in western Michigan, southern Washington and Oregon near Salem; community ordinance efforts in La Quinta (CA), State of Oregon, Lake Oswego (OR), Wilsonville (OR), Malibu and Tucson; and a number of legal/tort cases in Washington, Oregon, California, Idaho, British Columbia and Texas.

Mr. Benya continues to practice architectural lighting design. His work includes two projects winning IDA Awards for Dark Sky Design and two Edison Awards of Environmental Design for exterior lighting. He has designed master street lighting programs for San Jose, CA and Tucson, AZ, and an award winning program of new lighting for downtown Phoenix.
**Response to Comment No. 51-128**

This comment transmits the attached curriculum vitae to the letter submitted by James Robert Benya, as presented in Exhibit C of Comment Letter No. 51. This attachment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 51-129**

EXHIBIT “A” to ARCHER SCHOOL LETTER

Light Trespass and Glare Observations
And
Comments Concerning the Environmental Impact Report
Herbert Hoover High School, San Diego
Football Field Lighting
11/8/13

Measurements and Observations Made During Football Game, September 6, 2013
After 8:13 pm (Nautical Twilight Ends 8:03 pm, Astronomical Twilight Ends 8:32 pm, day after new moon) until end of game and lights turned off

James R Benya, PE, FIES, FIALD
E12078

**Equipment**

Illuminance measurements using Minolta T-1
Luminance measurements using Minolta LS-100
Photos using Kodak V570 set for 23 mm/1 to 4 seconds at f2.8 NO FLASH

**Introduction**

Lighting was installed for the football field of Herbert Hoover High School in October 2011, permitted by a Mitigated Negative Declaration (“MND”). The MND relied upon representations of the environmental impact contained in a Lighting Impact Study (“LIS”), dated October 9, 2009. More recently, a draft Environmental Impact Report (“EIR”) was prepared in October 2013 employing the LIS and an addendum to the LIS (“LISA”) dated October 11, 2013. The EIR states: “Based on the results of the 2009 LIS for the project, it was concluded that implementation of the project would not result in significant lighting impacts requiring mitigation.” When the lighting was installed, the trees that were to provide mitigation were not. This caused LISA and EIR to express some minor concerns.
Nonetheless, the overall concern for lighting in the EIR, LIS, and LISA were relatively minor, and the EIR concludes:

“3.1.1.5 Significance of Impacts.

C. Light/Glare

Based on the physical characteristics of the area surrounding the project site and the design of the proposed light fixtures, implementation of the proposed project would result in no impact associated with sky glow, glare, or light trespass. No homes would be exposed to lighting levels in excess of 0.8 foot-candles, as measured on the vertical plane and horizontal plane during pre-curfew hours. No residential homes would be exposed to lighting levels exceeding 0.2 horizontal foot-candles during post-curfew hours because all stadium lighting elements would be extinguished by 10:00 P.M. daily. Therefore, there would be no impact due to light trespass during post-curfew hours (i.e., 11:00 P.M. [sic] to 7:00 A.M.) as measured on the horizontal plan. As such, a less than significant impact is identified for this issue area.

3.1.1.6 Mitigation Measures

No significant impact relating to aesthetics and/or lighting has been identified; therefore no mitigation measure is required for implementation of the proposed project.

3.1.1.7 Conclusion

As a result of this analysis, it has been determined that the proposed project would result in no significant adverse impacts related to aesthetics/lighting, due to the urbanized character of the Project area, the proposed design of the lighting system, and the distance between proposed light standards and light sensitive receptors (i.e., existing residential development). In addition, all athletic field lighting elements would be extinguished by 10:00 P.M. in order to avoid light trespass impacts during post-curfew hours. As such, implementation of the proposed project would result in a less than significant aesthetic/lighting impact, and no mitigation would be required.

Surprisingly, although the lighting system had been installed and made operational, the consultants did not take in-situ field measurements in preparing the LISA; they continued to rely on the calculated lighting results provided by the lighting system vendor.
Lighting Measurements

An in-situ lighting study was conducted September 6, 2013 during the course of a Herbert Hoover High varsity football game. Illuminance measurements were taken in the horizontal plane at the property line, in order to be compared to the calculated values predicted by the lighting system vendor. However, as a general rule, the potential off-site impact of lighting is measured in the perpendicular plane to the line of sight from the meter to the light source (Perpendicular plane illumination or PPI)\(^1\). The perpendicular plane is very nearly the vertical plane, allowing at least some comparison with vertical plane criterion established by the EIR, LIS and LISA.

\(^1\) *IES Lighting Handbook, 10th Edition, Page 26-14, Table 26-5 note a.*

Measurements were taken during the game, starting about 8:13 PM and continuing over a period of about 105 minutes, until after the game ended and the lights were finally extinguished. With no moon and most of the period after astronomical twilight, the only lights being measured were the football field lights, street lights, and lights on homes\(^2\). Care was taken to eliminate streetlights from impacting the measurements\(^3\), resulting in measurements comprised of almost exclusively sports field light impact. In several locations lighting measurements were not taken because this was not possible, due to street or house lighting.

\(^2\) *Sky glow seldom causes measureable light levels exceeding 0.01 to 0.02 footcandles, well below the light levels being measured and therefore insignificant.*

\(^3\) *This was generally accomplished by taking measurements with the streetlights sufficiently to the side and/or behind the meter as practical.*

In addition to illuminance measurements, luminance measurements of some of the lights were taken for a possible discussion of glare. Luminance itself does not cause glare, but the contrast between the luminance source and the background (in this case the almost-dark sky) was significant. At least two luminaires were measured having significant luminance, but due to a lack of standards involving glare, the topic was suspended from future study.

The locations of the measurements and/or photographs are shown in Figures 1 and 2. The results are presented and compared to the representations in LIS and LISA in Table 1.
Figure 1: Aerial Photo of Field and Immediately Adjacent Residences

Measurements 1b, 2b, 3b, and 4b were made on the sidewalk on the school side. All other measurements were made on the sidewalk adjacent to private property.
## Table 1: In Situ Lighting Measurements

<table>
<thead>
<tr>
<th>Positions</th>
<th>Location</th>
<th>Type of Measurement and Value</th>
<th>LIS Report LISA Figure 4</th>
<th>LISA Report LISA Figure 6</th>
<th>Photos Included in this Report</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>4474 Highland on property at sidewalk</td>
<td>PPI 1.15 fc</td>
<td>1.32 fc vertical middle of street</td>
<td>1.18 fc vertical</td>
<td>Yes</td>
<td>End luminaires aimed at property line measured 19, 230 cd/m² and 21830 cd/m² from SW and NW poles</td>
</tr>
<tr>
<td>1b</td>
<td>On school side of sidewalk</td>
<td>PPI 3.32 fc</td>
<td>1.75 fc horizontal</td>
<td>Not presented</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>2a</td>
<td>4440 Monroe on property at sidewalk</td>
<td>PPI .393 fc</td>
<td>.37 fc vertical</td>
<td>.50 fc vertical</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>2b</td>
<td>On school side of sidewalk</td>
<td>PPI .820 fc</td>
<td>0.35 fc horizontal</td>
<td>Not presented</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>3a</td>
<td>4484 Monroe at curb</td>
<td>PPI 2.05 fc</td>
<td>0.82 fc vertical</td>
<td>0.69 fc vertical</td>
<td>Yes (2)</td>
<td>Measurement at curb to avoid street light contribution</td>
</tr>
<tr>
<td>3b</td>
<td>On school side of sidewalk</td>
<td>PPI 1.65 fc</td>
<td>1.29 fc horizontal</td>
<td>Not presented</td>
<td>No</td>
<td>Partially blocked by stands</td>
</tr>
<tr>
<td>4a</td>
<td>4521 45th Street at curb</td>
<td>PPI 1.13 fc</td>
<td>0.51 fc vertical</td>
<td>0.56 fc vertical</td>
<td>No</td>
<td>Measurement at curb to avoid street light contribution</td>
</tr>
<tr>
<td>4b</td>
<td>On school side of sidewalk</td>
<td>PPI 1.38 fc</td>
<td>0.46 fc horizontal</td>
<td>.57 fc vertical</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>At front door of property</td>
<td>Not taken due to street lights</td>
<td>.05 fc horizontal</td>
<td>.21 fc vertical</td>
<td>Yes</td>
<td>Approx. 300 ft from field</td>
</tr>
<tr>
<td>6</td>
<td>At back deck of house</td>
<td>Not taken</td>
<td>Not presented</td>
<td>Not presented</td>
<td>Yes</td>
<td>Photo by homeowner</td>
</tr>
<tr>
<td>7</td>
<td>Street adj. to 4548 44th St.</td>
<td>PPI .045 fc</td>
<td>Not presented</td>
<td>Not presented</td>
<td>Yes</td>
<td>~150 meters/500 ft from field</td>
</tr>
<tr>
<td>8</td>
<td>Street, intersection of Van Dyke Ave and Van Dyke Place</td>
<td>Not taken</td>
<td>Not presented</td>
<td>Not presented</td>
<td>Yes</td>
<td>~220 meters/1000 ft from field</td>
</tr>
<tr>
<td>9</td>
<td>Street adj. to 4580 Highland Ave.</td>
<td>Not taken</td>
<td>Not presented</td>
<td>Not presented</td>
<td>Yes</td>
<td>~150 meters/500 ft from field</td>
</tr>
</tbody>
</table>

Values in red exceed environmental report's proposed limits. See discussion.
Figure 2 Distant observation points

The orange cross hatched area is the "multi-habitat conservation area", which is defined as core biological resource areas and corridors targeted for conservation. It has similar exposure to view position #9 and is about 500 feet away from the field.
Findings

1. **The impacts of lighting presented in the EIR are based on the wrong rating system**

In the IES Lighting Handbook, Tenth Edition, Table 26.4 “Nighttime Outdoor Lighting Zone Definitions”\(^4\), an updated lighting zone characterization system was introduced and should have been used in the LISA. The system used in the LIS was correct when the LIS was developed, but the science of light pollution control continues to evolve and change, and LISA should have been brought up to current standards.


2. **The impacts of lighting presented in the EIR use the wrong lighting zone rating.**

Lighting Zone 2 (LZ2)\(^5\) best describes the character of the neighborhood surrounding Herbert Hoover High on the north and west. The LISA is based on lighting zone E3 (now Lighting Zone 3 or LZ3), which is intended for neighborhoods with “moderately high light levels”. Driving through all of the impacted neighborhoods during and after the varsity game, these neighborhoods are far more accurately described at the most as “moderate light levels”. [sic] Typical street lighting levels in the neighborhoods average well less than 0.5 footcandle and are not uniform. Moderately high light levels and uniformity of light are more typical of commercial districts where street lighting levels are more than 0.5 footcandles and uniform by design.

\(^5\) *Op cit*

3. **The thresholds used to determine lighting impacts should be lower than those used in the EIR, LIS and LISA**

Using the proper zoning (LZ2), the limits of pre-curfew light trespass levels per IES Handbook Table 26.5 “Recommended Light Trespass Illuminance Limits”\(^6\) should be 3 lux and post curfew light trespass should be 1 lux. Converting lux to footcandles translates these values into .2787 footcandles and .0920 footcandles, respectfully. By convention, IES generally allows rounding to 0.3 footcandles and 0.1 footcandles respectfully. Note that this is still a lot of light: 0.3 footcandles is 30 times the full moon, and 0.1 footcandles is 10 times the full moon.

\(^6\) *Op cit*
4. The EIR ignored potential lighting impacts to a multi-habitat planning area, when in fact impacts are apparent to the naked eye and should have been noted and recorded in the EIR.

Based on IES recommendations\(^7\), the pre-curfew light trespass for this space should be less than 0.1 lux and the measured value is 0.45 lux. Consideration for this land use type was totally ignored in the lighting portion of the EIR.

\(^7\) Op cit Table 26-5

5. The lighting calculations of impact were performed incorrectly.

Light trespass should be measured or calculated in the plane perpendicular to the line of sight from the observer to the luminaire(s)\(^8\). Both LIS and LISA err by using vertical (plane) footcandles or horizontal (plane) footcandles. These understate the impact of lighting onto adjacent properties. For the purposes of following comments, the calculated vertical illumination will differ the least from the perpendicular plane illumination (PPI), and while slightly understating the impact, for the purposes of comparison the two can be considered reasonably close to one another. Use of horizontal plane illumination is however substantially different from PPI and cannot be used in any meaningful way to help assess lighting impact.

\(^8\) Op cit, Table 26-5 note a.

6. Using the proper lighting zone, based on the lighting calculations used by LIS and LISA, the EIR should have concluded that the lighting impact would have been very significant.

With a pre-curfew limit of 0.3 footcandles taken per IES recommendations, the calculated vertical plane illumination impact on residential properties along Monroe range from 0.19 footcandles to 0.72 footcandles, with 78% of the calculated points exceeding the IES’ recommended maximum. Along Highland, 87% of the calculated points exceed the IES’ recommended maximum. The worst case calculated point is along Highland where the calculated value is 4.3 times the IES recommended maximum.
7. Even using Lighting Zone 3, most measured points exceed the criterion light levels used in the LIS and LISA.

Lighting Zone 3 (LZ3) allows up to 0.8 footcandles of light trespass. Our field measurements demonstrate that the installed lighting exceeds even this value at 3 of the 4 homes at which measurements were taken. The applicant should have taken in situ measurements and included them in the EIR with an explanation of why trespass light levels exceeded calculations and self imposed criteria, but failed to do so.

8. Lighting calculations used in the LIS and LISA underreported the lighting impact.

Of the four residences at which lighting measurements were taken at the sidewalk line, only one calculated value (4400 Monroe) was close to the in-situ measurements. All others exceeded the calculated results by as much as 197%.

9. The calculated and measured light levels exceed maximum values determined by the County of San Diego to cause “significant impact to dark skies or from glare... as a result of project implementation”.

Guidelines published by the County of San Diego[^9] clearly state that light trespass of 0.2 footcandles or more measured 5 feet onto the adjacent property “…will generally be considered to have a significant effect..”[^10]. In fact, light levels more than 5 times this amount were predicted by Musco Lighting and included in the LIS and LISA. Yet both documents and the MND concluded there was no significant impact from the lighting.

[^9]: County of San Diego, Guidelines for Determining Significance, Dark Skies and Glare, July 30, 2007 Modified January 15, 2009
[^10]: Ibid, Page 13, Section 4.0

10. The completed lighting system adversely affects a large area by creating light pollution and a “light dome” that is extremely bright and easily visible from a radius of at least 1000 feet from the football field.

Photographs from several locations around the football field follow in this report. While most significant impacts occur on immediately adjacent streets and properties, a significant impact affecting the quality of the neighborhood and overall night quality including view could easily be detected from any vista point allowing view in the direction of Herbert Hoover High. The severity of the impact is easily reviewed in situ by anyone at this point.
11. The current lighting impact will not diminish or be mitigated by lamp depreciation.

The system manufacturer, Musco, employs a “constant light” circuit that compensates for lamp aging, thus ensuring the same performance over the life of the system. Lamps are typically replaced every 5–6 years, and the system is re-set.

12. For a number of years, trees will not significantly mitigate the lighting impacts. In some cases, trees will not help at all.

Trees can mitigate lighting impacts if densely populated, mature and heavily leaved. Given the narrow areas for tree planting and the relative immaturity of trees that are likely to be employed, mitigation of the lighting systems will take years to be beneficial if at all. From many viewpoints such as spot “5”, trees cannot be planted where they would have any impact, as they would have to be in the middle of the street to do so.

Summary

I conducted a technical review of lighting-related documents (LIS and LISA) attached as appendices to the MND and EIR. I then conducted a detailed field study of the project. In my opinion, both the LIS and LISA use the wrong lighting zone to determine lighting impact. I believe that the neighborhood adjacent to the High School is Lighting Zone 2 per the latest IES Handbook, and the trespassing light from the sports lighting system is much greater than the maximum recommended amount for that lighting zone. Moreover, even if the more lenient maximum light trespass of Lighting Zone 3 is permitted, the installed lighting system exceeds these values, too.

CSD’s lighting guidelines, which were written “...to provide a consistent, objective and uniform evaluation of significant impacts...”, were not addressed. If they had been, the LIS and LISA would have to explain why light levels more than 5 times the county’s maximum guideline were not significant.

Illustrated in the attached photographs, measured in-situ and capable of being viewed in person, this lighting installation has an undeniably significant, adverse and immittigable impact on the local environment and aesthetics that should have been identified and admitted to in the EIR and appendices, and should have prevented the MND from being granted.

Table of Acronyms Used in this Report
MND  Final Mitigated Negative Declaration  
December, 2010 Prepared by BRG Consulting

LIS  Lighting Impact Study  
October 9, 2009 Prepared by T & B Planning Consultants

EIR  Draft Environmental Impact Report  
October, 2013 Prepared by BRG Consulting

LISA  Addendum to the Lighting Impact Study  
October 11, 2013 Prepared by T &B Planning Consultants

IES  Illuminating Engineering Society of North America  
New York, NY USA

CSD  County of San Diego
Photo taken from Position 3a facing home. Illumination on house is from football field lights. No flash was used.
Position 5 photo from private property facing field. Vertical illumination not measured because it could not discriminate between sports lighting and street lighting.
Position 6 photo from private back yard facing field. Light level not measured because streetlights could not be differentiated from sports lights.
Position 7 photo from street facing field. PPI ~ .045 fc
Position 8 photo from street facing field. Localized light pollution and light dome visible.
Response to Comment No. 51-129

The exhibit, consisting of a report prepared by Benya Burnett Consultancy regarding lighting at Hoover High School in San Diego, is acknowledged and has been incorporated into the Final EIR for the record and for review and consideration by the decision-makers. As discussed in Response to Comment No. 51-130, the athletic field lighting included in the Hoover High School report appears to be designed for an area more than twice the size of the Project’s athletic field and uses only four pole-mounted lights, compared to the Project’s former proposal of six 70-foot-tall, pole-mounted luminaires. Thus, the resulting illuminance values and the observed brightness of the field lighting at Hoover High School are not applicable to the Project.

Comment No. 51-130

Exhibit D

We have reviewed the February 2014 Revised Final Environmental Impact Report (DEIR) for the Archer Forward Campus Preservation and Improvement Plan (“Project”). The Project will result in 75,930 square feet of improvements to the existing Archer school campus including the replacement of the North Wing of the Main Building, and the construction of a Multipurpose Facility, a Performing Arts Center, a Visual Arts Center, and an Aquatics Center. Additionally, existing outdoor athletic fields would be improved to include soccer and softball fields with a new underground parking structure below for 212 cars. Two adjacent properties currently owned by Archer would be incorporated into the Archer campus and the existing residences on those properties would be removed to accommodate the Project.

Response to Comment No. 51-130

This introductory comment in Exhibit D of Comment Letter No. 51 is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 51-131

We have found the DEIR to inadequately address issues related to air quality and greenhouse gas emissions. The DEIR should be revised to address and mitigate, as necessary, these issues.

Response to Comment No. 51-131

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. The air quality and
greenhouse gas emissions analyses were also prepared in accordance with SCAQMD methodology. As demonstrated in the responses to the specific comments regarding the air quality and greenhouse gas analyses of the Draft EIR below, no new significant information (as defined by CEQA Guidelines Section 15088.5) that would require recirculation of the Draft EIR has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR.

**Comment No. 51-132**

NOx Emissions During Construction are Inadequately Mitigated

Emissions of NOx during construction will constitute a significant and unavoidable impact. The DEIR states (p. 1-37):

> The maximum regional emissions would exceed the SCAQMD daily significance thresholds for NOX during periods of heavy construction equipment use. Therefore, regional construction emissions resulting from the Project would result in a significant short term impact. It is anticipated that an exceedance of the SCAQMD regional NOX threshold could occur for an approximate 10-month duration and would include the following construction activities and time periods: (1) three months of overlap between completion of North Wing Renovation and Phase 1—Excavation and Grading; (2) one month of overlap between Phase 1—Excavation and Grading and Phase 1—Building Construction; and (3) six months of Phase 1—Building Construction. Please note that this would occur during overlap between building construction of Phase 1—Parking Structure/Athletic Fields and Phase 1—Multipurpose Facility.

Mitigation identified in the DEIR does not go far enough to address the NOx emissions. Even with mitigation, NOx emissions will exceed the South Coast Air Quality Management District (SCAQMD) threshold for almost a year during construction. To meet air quality standards required by 2023, NOx emissions must be reduced by approximately two thirds beyond existing rules and regulations. The largest source of NOx emissions in the SCAQMD are heavy duty trucks, like those used for Project construction. Without meeting air quality standards, the Southern California area faces federally mandated sanctions, including possible loss of transportation funding. The DEIR needs to be revised to identify
additional mitigation measures to address the significant impact that is represented by the NOx emissions during construction.

As mitigation, the DEIR estimates the following measures to reduce localized NOx emissions “between 55 and 60 percent” (DEIR, p. IV.B-60):

- Inventory of off-road fleet equipment and limited use of Tier 3 (Mitigation Measure B-4);
- Requirement to tune and maintain construction equipment (Mitigation Measure B-5);
- Requirement to use contractors for soil import/export with a minimum of 80 percent of haul trucks meeting EPA Model Year 2007 NOx emissions levels (Mitigation Measure B-6);
- Requirement to limit trucks and vehicles in loading and unloading queues to a maximum time for idling of five minutes (Mitigation Measure B-7); and
- Use, when possible, electricity from power poles as a power source (Mitigation Measure B-9).

These measures, estimated in the DEIR to reduce NOx emissions, “between 55 and 60 percent,” are not as rigorous as those measures which are commonly employed when NOx emissions thresholds are exceeded.

Because construction emissions will exceed SCAQMD thresholds, the DEIR should be revised to include all feasible mitigation to reduce NOx emissions. A revised DEIR should be prepared to contemplate additional mitigation, including:

- Require, post-January 1, 2015, all off-road diesel-powered construction equipment greater than 50 hp to meet Tier 4 emission standards (available on the market now\(^1\)). Use of such engines has been cited by the US EPA to reduce NOx emissions by up to 90%\(^2\) as compared to the limited use of Tier 3 technology that is specified in mitigation measures in the FEIR.


\(^2\) http://www.epa.gov/otaq/nonroad-diesel.htm

- Substitute gasoline-powered equipment in place of diesel-powered equipment, where feasible.
• Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

• Outfitting all construction equipment with BACT devices certified by CARB to achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy.

**Response to Comment No. 51-132**

As discussed in Section IV.B, Air Quality, of the Draft EIR, with the exception of regional construction NO\textsubscript{X} emissions, the Project would not exceed SCAQMD recommended thresholds. As described in the Draft EIR, the exceedance of the SCAQMD regional significance threshold for NO\textsubscript{X} would only occur during the most intense construction period for an approximate 4-month duration and would include the following construction activities and time periods: (1) three months of overlap between completion of the North Wing Renovation and Phase 1—Excavation and Grading; and (2) one month overlap between Phase 1—Excavation and Grading and Phase 1—Building Construction. It should be noted that emissions presented in the Draft EIR were conservative (i.e., higher than would be actually expected) because emission reductions from implementation of Mitigation Measure B-6 (requirement to use contractors for soil import/export with a minimum of 80 percent of haul trucks meeting EPA Model Year 2007 NO\textsubscript{X} emissions levels) was not quantified in the Draft EIR since the emissions inventory model (CalEEMod) used in the analysis of construction emissions only provides emission reduction measures for off-road equipment (e.g., Tier 3). However, in response to comments regarding mitigation measures that would reduce the Project’s emissions, subsequent additional analysis has been conducted to quantify the emission reduction related to Mitigation Measure B-6 using the Air Resources Board’s recommended EMFAC model for calculating emission factors for on-road vehicles. Based on this refined analysis included in Appendix F-2, of this Final EIR, Mitigation Measure B-6 would reduce peak daily NO\textsubscript{X} emissions by approximately 25 pounds such that maximum daily emissions would be reduced to 101.4 pounds or 1.4 pounds over the SCAQMD threshold. In addition, based on this refined analysis, the exceedance would be expected to be reduced from four months to two months during the overlap between completion of the North Wing Renovation and Phase 1—Excavation and Grading.

Additional consideration was also given to potentially feasible mitigation measures to reduce the construction regional NO\textsubscript{X} impact to less than significant. In has been determined that the front end loaders used for Phase 1—Excavation and Grading would be able to meet Tier 4 Interim Standards. This additional mitigation would reduce maximum regional construction NO\textsubscript{X} impacts to 95 pounds per day and less than the SCAQMD’s 100 pound per day regional NO\textsubscript{X} significance threshold. Please note that requiring the use of
Tier 3 on-site construction equipment would also serve to reduce overall exhaust emissions from construction activities over the duration of construction. Refer to Section II, Corrections and Additions to the Draft EIR, of this Final EIR, for the revised mitigation measures.

**Comment No. 51-133**

Exceedances of Local Significance Thresholds are Inadequately Mitigated

Construction emissions will exceed localized significance thresholds (LSTs) and create a significant short-term impact. The DEIR fails to adequately mitigate these impacts and a revised DEIR should be prepared to identify additional mitigation measures to reduce emissions of CO, NOx, PM10, and PM2.5.

The DEIR states (p. 1-37):

> However, localized emissions [of CO, NOx, PM10, and PM2.5] could potentially exceed the applicable screening-level LST during the following construction activities and durations: (1) three months during Phase 1—Excavation and Grading; and (2) the same three months during Phase 1—Excavation and Grading with overlap of completion of the North Wing Renovation. Therefore, localized construction emissions resulting from the Project would result in a significant short-term impact.

To address exceedances of the LSTs for NOx and PM10 and PM2.5, the DEIR identifies the following “Regulatory Compliance Measure B-1” which provides for the following dust control measures, “in accordance with SCAQMD Rule 403” (p. IV.B-32):

- Use watering to control dust generation during the demolition of structures;
- Use of watering and/or street sweeping for on-site paved roads used for construction activities;
- Clean-up mud and dirt carried onto paved streets from the site;
- Install wheel washers for all exiting trucks, or wash of f the tires or tracks of all trucks and equipment leaving the site;
- All haul trucks would be covered or would maintain at least 6 inches of freeboard;
- Suspend earthmoving operations or additional watering would be implemented to meet Rule 403 criteria if wind gusts exceed 25 mph; and
An information sign shall be posted at the entrance to the construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. A construction relations officer shall be appointed to act as a community liaison concerning on-site activity, including investigation and resolution of issues related to fugitive dust generation.

We have found that the measures identified in the DEIR is not inclusive of all applicable measures identified in SCAQMD Rule 403. Additional mitigation is available and feasible to implement to address the significant impact that is represented by exceedances of the LSTs. In addition to the measures we identified above to address NOx emissions, a revised DEIR should be prepared to include additional mitigation to address PM10 and PM2.5 emissions, consistent with Rule 403, as follows:

- Prohibit dust emissions that exceed 20 percent opacity, as determined through use of an appropriate monitoring method or prohibit any dust that remains visible in the atmosphere beyond the property line;
- Prohibit PM10 levels to exceed 50 micrograms per cubic meter when determined, by simultaneous sampling, as the difference between upwind and downwind samples collected on high-volume particulate matter samplers;
- Install controls at entry/exit points to limit dust generation;

Rule 403 also states that active operations cannot be conducted unless all applicable best available control measures included in Table 1 are included. Table 1 provides mitigation measures for trenching, cut-and-fill, truck loading, road maintenance, and earth-disturbing activities. Project construction will involve these types of activities. A review of the DEIR shows that not all measures listed in Table 1 are included as mitigation. A revised DEIR should be prepared that includes all applicable measures in Table 1 in Rule 403.

Response to Comment No. 51-133

Contrary to what is stated in the comment, Table IV.B-14 in Section IV.B, Air Quality, of the Draft EIR clearly demonstrates that potential localized impacts as a result of construction activities were concluded to be less than significant with incorporation of mitigation measures. It appears that this comment only accounts for the unmitigated...
condition. Refer to Table IV.B-14, Project with Mitigation—Estimate of Localized Construction Emissions, on page IV.B-62 in Section IV.B, Air Quality, of the Draft EIR, which demonstrates that the Project would not result in an exceedance of Localized Significance Thresholds. No changes to the construction air quality analyses or incorporation of additional mitigation measures are warranted based on this comment. Refer to Response to Comment No. 27-60 for additional information regarding compliance with SCAQMD Rule 403 and dust control mitigation measures.

As stated on page IV.B-31 in Section IV.B, Air Quality, of the Draft EIR, the Project would comply with SCAQMD Rule 403 which is a regulatory compliance measure. Applicable fugitive dust control measures are provided in Table 1 of SCAQMD Rule 403. As provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, mitigation measures applicable to the Project would reduce potential regional and localized construction impacts to less than significant. However, in response to comments on the Draft EIR, Regulatory Compliance Measure B-1 has been revised. Refer to Section II, Corrections and Additions, of this Final EIR for the revised Regulatory Compliance Measure B-1.

Comment No. 51-134

Diesel Particulate Matter Emissions are Likely Significant

We have conducted a screening level evaluation that indicates risk from diesel particulate matter exceeds the SCAQMD threshold. Our finding is in contrast with the DEIR which states (p. 1-39):

Based on an assessment of diesel particulate emissions conducted to determine the potential for a health risk, construction of the Project would yield a maximum incremental increase in off-site individual cancer risk of 9.1 in a million over the duration of construction and an excess cancer burden of 0.2, where the maximum impact occurs at residential uses directly northeast of the Project Site. The chronic hazard index is approximately 0.01 and is less than the SCAQMD significance threshold of 1.0. As the Project will not emit carcinogenic or toxic air contaminants that individually or collectively exceed the maximum individual cancer risk often in one million or result in an excess cancer burden of 0.5 or more, Project-related toxic emission impacts from construction activities would be less than significant and no mitigation would be required.

Instead, our screening level evaluation indicates diesel particulate matter (DPM) emissions from construction of the Project to result in significant air quality impacts to nearby...
residential receptors. The DEIR’s conclusion that DPM construction impacts are less than significant, is based on an exposure calculation using an average ambient DPM concentration of 0.35914 µg/m³ during construction. However, the source of this concentration is not provided in the air quality discussion, and we believe it may have been inappropriately low given that the maximum modeled off-site concentration was 36.41 µg/m³ according to the modeling output file in Appendix F to the DEIR.

Our evaluation that follows provides a screening-level assessment of air quality impacts from construction-related DPM emissions with the Project. The Project site is surrounded by residential receptors, some of which are located directly adjacent to the Project boundary. We have prepared a screening level evaluation of DPM emissions estimated for the Project and our analysis concludes that exposure to nearby receptors will exceed the CEQA threshold often cancers per million.

Response to Comment No. 51-134

This comment references specific comments provided in a screening level analysis prepared by SWAPE and included as Exhibit D. Specific comments regarding this screening level analysis are provided below. As demonstrated in each response below, no new significant information (as defined by CEQA Guidelines Section 15088.5) that would require recirculation of the Draft EIR has been identified. Specifically, upon review of all of the comments received and analyzed, there are no new significant environmental impacts from the Project or from a mitigation measure that were identified subsequent to circulation of the Draft EIR. In addition, upon review of all comments received and analyzed, there are no substantial increases in the severity of any of the significant environmental impacts identified in the Draft EIR.

The SWAPE analysis and related technical appendices were carefully reviewed for purposes of considering the potential of the Project to result in health risk impacts. Based on this evaluation, multiple methodological flaws were identified that substantially undermine the relative accuracy of the SWAPE results compared with the much more refined, site-specific analysis that was included in the Draft EIR. The most important of these issues are detailed here and then discussed as needed in other specific responses to comments.

A key limitation with the SWAPE analysis is that it relied on a “screening level” model to evaluate health risks. A screening level analysis can be appropriate to assess whether more detailed, refined modeling assessment is needed. Screening models typically rely on rough, very conservative assumptions to check if a project could cause a significant health impact. If, based on the screening, there is no potential for a significant impact, then no additional analysis is required. In this way, screening models can help
save time and money by eliminating the need for some projects to complete more expensive, time-consuming dispersion modeling.

This use of screening models is consistent with industry standard and agency guidance. As recommended by the Office of Environmental Health Hazard Assessment (OEHHA), page 4-25 of *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* states “Screening models are normally used when no representative meteorological data are available and may be used as a preliminary estimate to determine if a more detailed assessment is warranted.”

As noted above, screening level results that show a potential significant impact are only relevant to the extent that to demonstrate that SWAPE should have then conducted additional analysis using a refined mode, which, notably, is exactly what was provided in the Draft EIR to evaluate potential health risk impacts. As discussed in the Draft EIR at Page IV.B-43, health risks were analyzed consistent with SCAQMD methodology and used AEROMOD to complete refined dispersion modeling. AEROMOD accounts for a variety of refined, site-specific conditions that facilitate a more accurate assessment of Project impacts compared to the less refined AERSCREEN screening model. The most important differences between AERSCREEN and AERMOD are the following:

- Meteorological Data—The AERSCREEN model uses User-defined conditions, which typically assume worst-case meteorological conditions occurring 24 hours per day, 365 days per for the entire construction duration along with the maximum daily emissions occurring each of those days. The HRA provided in the Draft EIR instead used AERMOD which allows for SCAQMD representative meteorological data (Los Angeles–VA Hospital Station) to be used in calculation of annual concentrations. This SCAQMD meteorological data provides hourly conditions (e.g., wind speed, wind direction, and stability class) over a five year period (43,800 hours). With these conditions, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.

- Site Specific Conditions—AERMOD allows for analysis of multiple volume sources and to account for complex terrain in the area (elevation) which is required to adequately represent Project construction. The use of a single rectangular source to represent construction activities provided in the SWAPE analysis does not adequately represent the Project site and does not account for complex terrain conditions and likely overstates emissions because of the plume interaction with terrain. In addition, a volume source and not an area source is

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the type of source recommended by the SCAQMD for modeling construction equipment exhaust emissions (SCAQMD LST Guidelines). By accounting for the complex terrain around the Project site, the AERMOD model is more representative of likely Project impacts compared to the AERSCREEN model.

Consequently, the coarser AERSCREEN evaluation provides a much less accurate assessment of Project health risks compared to the refined AERMOD evaluation. Moreover, as discussed in the specific comments below, the SWAPE screening level analysis was not performed in accordance with requirements included in SCAQMD’s LST methodology and OEHHA’s guidance. The analysis also did not account for the following: (1) site specific conditions; (2) use of a refined dispersion model; and (3) use of SCAQMD mandated meteorological data from the closest/most representative meteorological monitoring site within the Project area. If the SWAPE analysis accounted for the guidance and data discussed above, then the results would have been similar to the findings of the Draft EIR.

Accordingly, potential health risk impacts from the Project to nearby sensitive uses (e.g., Archer’s students and adjacent and nearby residences) as the result of proposed construction activities is more accurately identified by the AERMOD evaluation presented in the Draft EIR. As discussed in Section IV.B, Air Quality, of the Draft EIR, the Project would not result in a significant health risk impact during construction or operations with incorporation of mitigation measures. In addition, as provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, Mitigation Measure B-4 has been revised to require off-road diesel-powered equipment to meet Tier 3 standards during construction of the proposed Project and to require front end loaders used for Phase 1—Excavation and Grading to meet California Air Resources Board Tier 4 Interim Standards (Title 13, CCR, Section 2423, Table 1b) which would further reduce Project impacts related to diesel particulate matter, with impacts continuing to remain less than significant.

The comment provides a concern regarding how the DPM concentration of 0.35914 µg/m³ during construction was determined. For simplicity, the modeled concentration reflects an emission rate of 1 gram per second. Thus, the modeled concentration is then multiplied by the actual emission rate (0.0122 g/s) to calculate the project-specific pollutant concentration (29.3333 µg/m³ x 0.0122 gram per second ÷ 1 g/s = 0.35914 µg/m³). Please see below for additional information regarding how this modeling approach is consist with OEHHA Guidance.

Consistent with OEHHA’s The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, the modeling conducted for the HRA was calculated at 1 g/s. Specifically, page 5-2 of the guidance states, “The air dispersion modeling results are expressed as an air concentration or in terms of (Chi over Q) for each
receptor point. \((\chi/Q)\) is the modeled downwind air concentration based on an emission rate of one gram per second. \((\chi/Q)\) is expressed in units of micrograms per cubic meter per gram per second, or \((\mu g/m^3)/(g/s)\). \((\chi/Q)\) is sometimes written as \((\chi/Q)\) and is sometimes referred to as the dilution factor.” This same modeling approach is used in CARB’s Hotspot Analysis Reporting Program (HARP) used for compliance with California’s Toxics “Hot Spots” Program (AB 2588).

Based on this guidance, the Draft EIR, Appendix F provides a concentration isopleth modeled at 1 gram per second. The 1 gram per second was then adjusted consistent with OEHHA guidance to reflect the project-specific pollutant emission rate of 0.0122 gram per second.

In addition, the commenter incorrectly identifies the maximum impact at an off-site sensitive receptor. The maximum off-site impact at a sensitive receptor was 29.33 \(\mu g/m^3\) modeled at 1 gram per second \((\chi/Q)\). Thus, the HRA provided in the Draft EIR appropriately used a DPM concentration of 0.35914 \(\mu g/m^3\) \((0.0122 \text{ gram per second multiplied by } 29.3333 \mu g/m^3 \div 1 \text{ g/s})\).

In response to this comment, a note has been added in the concentration isopleth graphic to make it clear that the pollutant concentrations are based on an emission rate of 1 gram per second. Refer to Appendix F-2 of this Final EIR.

**Comment No. 51-135**

Construction Schedule

There is no concise summary of a construction activities schedule presented in the DEIR. In order to evaluate DPM emissions during construction activities, we made some assumptions due to lack of consistency in the information provided in the DEIR and supporting Appendices. Construction is expected to take place five days per week, and equipment will be used for up to eight hours each construction day\(^6\). The table below was constructed using assumed construction schedule information provided in Transportation Analysis Report\(^7\).

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6 Appendix F, Air Quality Worksheets, Archer Forward: Campus Preservation and Improvement Plan DEIR, February 2014.

By calculations presented in the table, construction of the Project will occur over a total of 1,575 days. However, data given in the air quality worksheets suggest that the number of construction days may be as high as 1,848. For the purposes of the screening model analysis conducted in this evaluation, we considered both scenarios. In a revision to the DEIR, the lead agency must clearly present the anticipated construction schedule and number of days in each phase so that evaluation of the emission estimation methodologies may be performed.

<table>
<thead>
<tr>
<th>Phase</th>
<th>Start</th>
<th>End</th>
<th>Work Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Wing Renovation</td>
<td>5/5/2014</td>
<td>2/23/2015</td>
<td>211</td>
</tr>
<tr>
<td>Phase 1 Excavation/Haul</td>
<td>3/2/2015</td>
<td>8/24/2015</td>
<td>126</td>
</tr>
<tr>
<td>Phase 1a Parking &amp; Multipurpose Const.</td>
<td>8/31/2015</td>
<td>12/7/2015</td>
<td>71</td>
</tr>
<tr>
<td>Phase 1b Parking &amp; Multipurpose Const.</td>
<td>12/14/2015</td>
<td>4/25/2016</td>
<td>96</td>
</tr>
<tr>
<td>Phase 1c Parking &amp; Multipurpose Const.</td>
<td>5/12/2016</td>
<td>8/29/2016</td>
<td>78</td>
</tr>
<tr>
<td>Phase 1d Multipurpose Const.</td>
<td>9/5/2016</td>
<td>5/29/2017</td>
<td>191</td>
</tr>
<tr>
<td>Phase 2 Performing Arts Center Const.</td>
<td>6/12/2017</td>
<td>7/7/2020</td>
<td>802</td>
</tr>
<tr>
<td><strong>Total Days</strong></td>
<td></td>
<td></td>
<td><strong>1,575</strong></td>
</tr>
</tbody>
</table>

In a revision to the DEIR, the schedule of construction activities—with duration of each phase and potential for phase overlap—should be presented in an easily reviewable manner. Estimates of emissions associated with each phase as produced by CalEEMod should accompany the updated schedule in the revised document. The CalEEMod files should be updated with the accurate estimated phase start and end dates corresponding to the anticipated Project schedule. In the iteration of CalEEMod output files provided in the DEIR, the phase start and end dates were not included, and it was impossible to devise the length of each phase from these files.

**Response to Comment No. 51-135**

In response to the comment about construction schedules for the Project, the Draft EIR provides a detailed summary of the construction schedule and activities in Appendix C.1 (Construction Activity Schedule) and Appendix C.2 (Round Trips per Vehicle Classification) of the Draft EIR. The Draft EIR is internally consistent because the different sections of the Draft EIR (e.g., traffic, noise, and air quality) relied upon the construction schedules provided in Appendix C.1 and Appendix C.2. Appendices C.1 and C.2 specifically provide the requested information in this comment—schedule of construction activities, with duration of each phase and potential for phase overlap. Further, Appendix
C.1 provides the following additional information for the peak condition for each month over the entire duration of construction activities: (1) primary activities; (2) workers on-site; (3) parking location; (4) large deliveries and exports; and (5) large equipment on-site. Appendix C.2 of the Draft EIR also provides peak daily round trips by vehicle classification (e.g., personnel, deliveries, concrete ready-mix, and hauling) for each week over the entire duration of construction activities.

It appears that the table presented in this comment misconstrues the construction schedule information provided in Appendix H (Construction Activity Information) of the Traffic Analyses and Los Angeles Department of Transportation Assessment Letter (Appendix P) of the Draft EIR Transportation Analysis Report. Appendix H (Construction Activity Information) of the Traffic Study provides the same information as Appendix C.2 of the Draft EIR. It is not clear why SWAPE selected specific traffic construction assumptions that were used in the Traffic Study to show periods of peak traffic instead of using Appendix C.1 and C.2 of the Draft EIR for construction schedule and duration information. As an example, the construction assumptions referenced above in the SWAPE table show North Wing Renovation from 5/5/14 through 2/23/15. However, from 3/2/15 through 8/24/15 construction activities would include both North Wing Renovation and Phase 1 Excavation. Based on this information, SWAPE determined that North Wing Improvements would only occur for approximately 10 months, whereas Appendix C.1 of the Draft EIR and the health risk assessment provided in Appendix F of the Draft EIR show 16 months because of the overlap with Phase 1 Excavation. SWAPE correctly identified that the health risk assessment prepared for the Draft EIR is consistent with Appendices C.1 and C.2 of the Draft EIR and used 16 months and not 10 months. When considering the length of each of the construction tasks/phases included in Appendix C.1, use of 1,848 days is correct since emissions were calculated for each of the individual tasks/phases and then summed to determine the total emissions.

The comment also raises several points regarding the CalEEMod files. Total DPM emissions for the HRA were calculated on page 110 (HRA-Summary of CalEEMod Output-Construction Analysis—Conversion of Maximum Daily DPM to Annual DPM Emissions) of Appendix F of the Draft EIR. Peak daily emissions for each phase of construction, provided in the CalEEMod output file for purposes of evaluating construction air quality impacts, were calculated based on the reduction of emissions from peak to average daily conditions. The estimated average emissions from each phase were then multiplied by the number of days of construction during that phase to calculate total DPM emissions. Therefore, it was not necessary for the CalEEMod output files to provide the estimated phase start and end dates since the calculations were based on peak daily activities per phase.
In response to comments on the Draft EIR, including this comment, the HRA has been updated to include analysis of each month of construction activity based on the peak daily construction activity for that month (Appendices C.1 and C.2 of the Draft EIR). A summary of the construction emissions is also provided in this Final EIR, which shows the construction phase, construction month, start and end date, number of days per week, number of days per month, and unmitigated and mitigated DPM emissions from the accompanied CalEEMod output files. While this additional analysis is not necessary for purposes of evaluating project impacts, it is provided in the Final EIR for informational purposes. Note that Phase 2 construction emissions reflect concurrent construction of the Aquatics Center/Visual Arts Center and Performing Arts Center since this assumption would provide the earliest construction year (i.e., more conservative emission factors) for both construction areas and that the analysis assumed no reduction in equipment or trips that would occur if these buildings were constructed concurrently.

The Final EIR includes other updates to the HRA to address public comments. Subsequent to completion of the Draft EIR, AERMOD (the refined dispersion model used in the Draft EIR and recommended by SCAQMD for performance of health risk assessments) and the meteorological data representative of the Project area have both been updated. Therefore, the updated health risk assessment provided in this Final EIR reflects use of the most recent version of AERMOD (Version Date 14134) and SCAQMD meteorological data.22

The methodology for the updated HRA is consistent with the approach taken in the Draft EIR. Specifically, the HRA was conducted in accordance with CARB’s Air Toxics Hot Spots Program Risk Assessment Guidelines23 and is consistent with risk assessment guidance documents by USEPA24 and Cal/EPA’s Department of Toxic Substances Control (DTSC).25 Modeling assumptions were obtained from the South Coast Air Quality Management District risk assessment guidelines26 and LST Guidelines. Toxicity factors for each TAC were obtained from Attachment L of the SCAQMD’s Risk Assessment

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Procedures for Rules 1401 and 212. TAC modeled concentrations were used to calculate cancer risk and chronic hazard index at each relevant receptor. The acute hazard index was not quantified since no inhalation Reference Exposure Level (REL) has been determined by OEHHA for DPM.

As discussed above, the construction DPM emissions inventory was calculated using CalEEMod for each month of construction activity consistent with construction activity for that month included in Appendices C.1 and C.2 of the Draft EIR. In order to assess the impact of DPM on individuals who may live within the Project vicinity or work and/or attend classes at the Project Site, air quality modeling utilizing the SCAQMD preferred refined model (AERMOD) was performed. The model is a steady state Gaussian plume model and is used by California Environmental Protection Agency for estimating ground-level impacts from volume, area, point, and fugitive sources in simple and complex terrain. Consistent with SCAQMD LST Guidelines, exhaust emissions from construction equipment were treated as a set of side-by-side elevated volume sources. The release height was assumed to be 5 meters, which represents the mid-range of the expected plume rise from frequently used construction equipment during daytime atmospheric conditions. A fenceline receptor grid was placed around the Project Site along with a uniform cartesian grid across the Project Site and the Project vicinity to quantify maximum pollutant concentrations. Elevations for both sources and receptors were included using the AERMOD terrain processor with a geocoded aerial.

The potential excess cancer risk associated with exposure to a carcinogen was then estimated to be the product of the annual average concentration (AvgC) and the cancer potency (CP) for that carcinogen, the daily breathing rate (DBR), and the exposure value factor (EVF). The equation used to calculate the potential excess cancer risk is:

\[
\text{Risk} = \text{AvgC} \times \text{CP} \times \text{DBR} \times \text{EVF}
\]

Where:

- \( \text{Risk} \) = Lifetime excess cancer risk from exposure to chemical (unitless)
- \( \text{AvgC} \) = Annual average concentration for chemical (µg/m³)
- \( \text{CP} \) = Cancer potency for chemical (mg/kg-day)^{-1}
- \( \text{DBR} \) = Daily breathing rate (L/kg body weight-day)
- \( \text{EVF} \) = Exposure value factor (unitless)

The Final EIR also incorporates mitigation measures included in the Draft EIR and this Final EIR into the HRA. Specifically, the HRA incorporates Mitigation Measure B-4, which requires the use of Tier 3 construction equipment throughout the duration of proposed construction activities and front-end loaders used for Phase 1—Excavation and Grading which would meet Tier 4 interim standards. Mitigation Measure B-7 was also quantified in the HRA, which minimizes exhaust emissions by requiring trucks and vehicles in loading and unloading queues to have their engines turned off after five minutes when not in use. While Mitigation Measure B-7 would also serve to reduce DPM emissions from on-road trucks, this mitigation measure was not quantified in the HRA. Based on refined assessment, the HRA demonstrates that health risks from the Project would be 5.0 in a million for off-site receptors, which is below the applicable significance threshold. For potential on-site student and staff exposure at the School, the maximum mitigated cancer risk is 8.2 and 4.9 in a million, respectively, which is below the applicable significance threshold. It is noted that this risk assumes an outdoor exposure for the entire length of construction and does not account for any reductions from the time spent indoors where air quality tends to be better. Consistent with the results of the health risk assessment included in the Draft EIR, potential impacts to sensitive receptors within the Project area (i.e., nearby residences and Archer’s students) would be less than significant with incorporation of mitigation measures included in the Draft EIR. The above calculation of student health risk conservatively assumes that student programs would be provided on campus during the summer months of construction. However, given the construction schedule, no extended student activities are planned for the Project Site during the summer months of North Wing Improvements and Phase I Excavation and Grading and on-site student risk would decrease to 7.4 in a million.

Comment No. 51-136

Model Setup

The Air Quality Worksheets provided as Appendix F to the DEIR were poorly organized, which made identifying the most reliable estimates of Project construction emissions difficult. In the revised DEIR the air quality worksheets be labeled with start and end dates to assist in understanding the chronology of phase-specific emissions. One iteration of calculations from the air quality worksheets estimate that the total pounds of DPM generated by Project construction will be approximately 1,271.2 pounds. This is the value that we have selected to incorporate into our screening-level assessment. The estimates that were used to arrive at this total DPM emission value are presented in the summary table below, extracted from Appendix F to the DEIR.

To arrive at an emission rate during construction hours in grams per second for the screening model, the total pounds of DPM emissions were converted by the following equation:

$$Emission \ Rate \ (\frac{g}{s}) = \frac{1,271.2 \ lb}{Project} \times \frac{1 \ Project}{1,848 \ days} \times \frac{1 \ day}{8 \ hours} \times \frac{1 \ hour}{3,600 \ sec} \times \frac{453.6 \ g}{lb} = 0.0108 \ \frac{g}{s}$$

The emission rate above was calculated assuming that the duration of Project construction would be 1,848 days, as provided in the table. An alternative emission rate was derived using the estimated total number of construction hours from the Traffic Analysis Report (1,575).

$$Emission \ Rate \ (\frac{g}{s}) = \frac{1,271.2 \ lb}{Project} \times \frac{1 \ Project}{1,575 \ days} \times \frac{1 \ day}{8 \ hours} \times \frac{1 \ hour}{3,600 \ sec} \times \frac{453.6 \ g}{lb} = 0.0127 \ \frac{g}{s}$$
Both of these emission rates are greater than the emission rate calculated for the exposure assessment. The table above that was extracted from the Air Quality Worksheets (Appendix F) estimated the grams per second emission rate assuming an eleven hour work day. However, this would result in a lower emission rate during construction hours than is expected, given that the maximum anticipated daily use of any piece of construction equipment is eight hours as presented in Appendix F.

**Response to Comment No. 51-136**

The health risk assessment prepared for the Draft EIR was conducted consistent with the detailed construction information (schedule, equipment mix, and trip data) provided in Appendices C.1 and C.2 of the Draft EIR. The comment stated that the commenter had difficulty identifying Project construction emissions and asked that the the air quality worksheets be labeled with start and end dates to assist in understanding the chronology of phase-specific emissions. The HRA was provided beginning on page 109 in Appendix F, Air Quality Worksheets, of the Draft EIR and was organized per the table of contents which included: (1) annual diesel particulate calculations; (2) AERMOD concentration isopleths; and (3) a health risk calculation summary. Total DPM emissions for the HRA were calculated on page 110 (HRA—Summary of CalEEMod Output-Construction Analysis—Conversion of Maximum Daily DPM to Annual DPM Emissions) of Appendix F of the Draft EIR. Peak daily emissions for each phase of construction, provided in the CalEEMod output file for purposes of evaluating construction air quality impacts, were calculated based on the reduction of emissions from peak to average daily conditions. The estimated average emissions from each phase were then multiplied by the number of days of construction during that phase to calculate total DPM emissions. Therefore, it was not necessary for the CalEEMod output files to provide the estimated phase start and end dates since the calculations were based on peak daily activities per phase. The durations presented in the health risk assessment reflect the construction duration for specific construction activities (e.g., North Wing Renovation) and the duration of these activities. As an example, DPM emissions from the North Wing Renovation were calculated based on a 16-month duration consistent with Appendices C.1 and C.2 of the Draft EIR as opposed to a 10-month duration suggested by SWAPE. The health risk assessment prepared for the Draft EIR used the correct number of days, as previously discussed.

The emission rates in the Draft EIR were appropriately calculated for on-site heavy-duty construction equipment operating eight hours per day and reflect a five day work week consistent with the refined dispersion modeling requirements (i.e., correction factor since AERMOD models 365 days per year, but construction would only occur five days per week). To explain this a different way, if a project emitted 1 pound per day of emissions and construction activities occurred five days per week, then the total annual emissions would equal 261 pounds per year (5 days per week x 52 weeks per year x 1 pound per
day). AERMOD models the daily emissions all 365 calendar days per year, so the total emissions would equal 365 pounds per year. Therefore, from an annual standpoint AERMOD would model 365 pounds per year rather than 261 pounds per year. If this correction factor was not applied for calculation of an annual concentration, then AERMOD would over-predict the pollutant concentration by 29 percent. Therefore, this comment erroneously assumes that calculations were based on on-site heavy-duty construction equipment operating 11 hours per day (a reduction from 11 hours to 8 hours or a reduction of approximately 28 percent) instead of accounting for the dispersion model correction factor and no changes to the health risk assessment provided in the Draft EIR are necessary based on this comment. Note that this correction factor would not be applied to a screening model analysis, since only 1-hour pollutant concentrations are generated using AERSCREEN.

This comment also purports that multiple iterations of DPM calculations were provided in the air quality worksheets. As shown on page 110 of Appendix F (Appendix F.1, Construction Impacts), of the Draft EIR, two scenarios were provided: (1) the unmitigated condition was reported as 1,942.5 pounds per year and the mitigation condition was reported as 1,271.2 pounds. No discrepancies in the Draft EIR would occur based on this comment.

In response to comments on the Draft EIR, including this comment, the HRA has been updated to include analysis of each month of construction activity based on the peak daily construction activity for that month (Appendices C.1 and C.2 of the Draft EIR).

A summary of the construction emissions is also provided in this Final EIR, which shows the construction phase, construction month, start and end date, number of days per week, number of days per month, and unmitigated and mitigated DPM emissions from the accompanied CalEEMod output files. While this additional analysis is not necessary for purposes of evaluating project impacts, it is provided in the Final EIR for informational purposes. Note that Phase 2 construction emissions reflect concurrent construction of the Aquatics Center/Visual Arts Center and Performing Arts Center since this assumption would provide the earliest construction year (i.e., more conservative emission factors) for both construction areas and that the analysis assumed no reduction in equipment or trips that would occur if these buildings were constructed concurrently.

**Comment No. 51-137**

Furthermore, we acknowledge that the Phase 2 Building Construction may take place under different construction sequences: Option A would entail construction of the Aquatics Center and Visual Arts Center, followed by the Performing Arts Center; and Option B would entail construction of the Performing Arts Center and subsequent construction of the
Aquatics Center and Visual Arts Center. Therefore, the two emission rates derived above were over-estimates of total Project emissions. In the table extracted from Appendix F, the total pounds of emissions for both options were included. To account for this over-stating of emissions, we calculated emission rates including only emissions from Phase 2 Option A or Phase 2 Option B, using the total number of anticipated days for each phase from the Appendix F table:

**Phase 2 Option A** (1,004.8 total pounds DPM emissions over 1,430 days):

\[
Emission\ Rate\ (g/s) = \frac{1,004.8\ lb}{Project} \times \frac{1\ Project}{1,430\ days} \times \frac{1\ day}{8\ hours} \times \frac{1\ hour}{3,600\ sec} \times \frac{453.6\ g}{lb} = 0.011\ g/s
\]

**Phase 2 Option B** (883.5 total pounds DPM emissions over 1,430 days):

\[
Emission\ Rate\ (g/s) = \frac{883.5\ lb}{Project} \times \frac{1\ Project}{1,430\ days} \times \frac{1\ day}{8\ hours} \times \frac{1\ hour}{3,600\ sec} \times \frac{453.6\ g}{lb} = 0.00973\ g/s
\]

These emission rates represent the average emission rate of DPM from Project construction during hours when the equipment is in operation. It is during these times that the maximum concentrations of DPM will be generated and dispersed to the neighboring community.

**Response to Comment No. 51-137**

Contrary to what is stated in this comment, the health risk assessment provided in the Draft EIR evaluated construction emissions consistent with the construction schedule provided in Appendices C.1 and C.2 of the Draft EIR. Each component (Aquatics Center/Visual Arts Center and the Performing Arts Center) would each require approximately 19 months of construction. Since each of these components could occur first under the two options, the maximum construction emissions of each component were conservatively applied to the 19 months required to complete each component. Thus, this comment correctly identifies that the HRA provided in the Draft EIR reflects a more conservative estimate of overall emissions from Phase 2 construction.

It is not clear how the commenter derived average emissions from Phase 2 construction. Regardless, as stated above, the comment correctly identifies that the HRA provided in the Draft EIR reflects a more conservative estimate of overall emissions from Phase 2 construction. No changes to the Draft EIR are necessary based on this comment.
Comment No. 51-138

Due to the geometric complexity of the Project boundary, only a portion of the construction site was considered for our screening-level Health Risk Assessment. Using Google Earth™, a rectangular area within the Project boundary was measured for the screening model. The rectangle used for the area source measured approximately 90 meters by 215 meters, or about 4.78 acres. To account for the proportion of the Project area considered, the average emission rate over the duration of Project construction—calculated for Option A and Option B above—was multiplied by the fraction \( \frac{4.78 \text{ acres}}{7.31 \text{ acres}} = 0.654 \). Therefore, only 65.4% of total Project emissions as calculated in the DEIR were included in the screening-level assessment. The approximate area source boundary is shown on the figure below, superimposed upon the Project boundary displayed in Figure IV.B-3 of the DEIR.

Response to Comment No. 51-138

The comment correctly identifies the geometric complexity of the Project boundary. The health risk assessment prepared for the Draft EIR used a refined dispersion model (AERMOD) which allows for analysis of multiple sources and to account for complex terrain in the area (elevation). The use of a single rectangular source to represent construction emissions as suggested by the commenter is flawed for several reasons. First, the actual construction area is a complex shape consisting of multiple sources which cannot be
handled using AERSCREEN, which decreases the accuracy of the AERSCREEN results. Second, AERSCREEN does not account for complex terrain conditions when a rectangular area source is used, which leads to significant overestimation of results. Third, a volume source and not an area source is the type of source recommended by the SCAQMD for modeling construction equipment exhaust emissions (SCAQMD LST Guidelines) because a volume source is able to more accurately reflect site conditions, improving the quality of the results. Therefore, for these reasons, the commenter’s use of a rectangular source within AERSCREEN overestimates Project impacts and is less accurate than sources modeled in the DEIR.

It is unclear from a modeling standpoint as to why the SWAPE analysis would proportion the Project area versus the Project construction area to arrive at some scalar. Once again this erroneous methodology further supports why a refined dispersion model was used for the health risk assessment provided in the Draft EIR, consistent with SCAQMD, ARB, and OEHHA guidance.

**Comment No. 51-139**

The EPA-recommended screening model AERSCREEN was utilized to estimate maximum downwind concentrations of DPM generated by the average emission rate from the area depicted over the duration of Project construction. AERSCREEN replaced SCREEN3 in 2011 due to its enhanced ability to simulate near-field dispersion of air pollutants. AERSCREEN is appropriate for use in screening-level Tier 1 health risk assessment (HRA) as a conservative model of maximum air quality impacts from stationary sources such as construction sites.

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**Response to Comment No. 51-139**

Although the comment is technically correct that screening models such as AERSCREEN are appropriate for use in screening-level Tier 1 health risk assessments as a conservative model of maximum air quality impacts from stationary sources such as construction sites, the commenter neglects to recognize that screening tools are not nearly as accurate as refined dispersion modeling as was done for the Draft EIR. The SWAPE screening analysis only supports a conclusion that refined dispersion modeling should be performed, which is what is presented in the Draft EIR. The SWAPE analysis is fundamentally flawed compared to the Draft EIR analysis because the modeling assumptions required in a screening model are extremely conservative and not site-specific. Instead, impacts that do not pass a screening level analysis should be further evaluated using refined dispersion modeling, which is what was provided in the Draft EIR.
This industry standard methodology is recommended by the Office of Environmental Health Hazard Assessment, which is cited in Response to Comment No. 51-143. Specifically, page 4-25 of *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*\(^{28}\) states, “Screening models are normally used when no representative meteorological data are available and may be used as a preliminary estimate to determine if a more detailed assessment is warranted.” In addition, page 4-28 of *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* also states that “Refined air dispersion models are designed to provide more representative concentration estimates than screening models. In general, the algorithms of refined models are more robust and have the capability to account for site-specific meteorological conditions.”

The most important difference between AERSCREEN and refined models such as (AERMOD) is the meteorological data used to estimate pollutant concentrations. The AERSCREEN model uses User-defined conditions, which can assume worst-case meteorological conditions. The user-defined conditions for the SWAPE analysis were not provided in this comment and, therefore, a more detailed discussion regarding the validity of the meteorological conditions used in the SWAPE analysis for screening purposes is not feasible. The SWAPE analysis assumes these worst-case conditions occur 24 hours per day, 365 days per for 4.5 years (worst-case hourly wind speed, same direction, and stability condition) along with the maximum daily emissions occurring each of those days, assumptions that are likely to substantially overestimate actual Project emissions. A correction factor was applied in the SWAPE analysis to convert the maximum 1-hour concentration average to an annual concentration. However, even then the SWAPE screening analysis applied the maximum factor of 0.1 instead of an average of 0.08 recommended in OEHHA guidance (Table 4.3, Recommended Factors to Convert Maximum 1-hour Concentration to Other Averaging Periods, *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*). Consequently, the already conservative screening analysis was made more conservative (higher concentration) because SWAPE did not follow the OEHHA guidance.

The HRA provided in the Draft EIR instead used AERMOD which allows representative meteorological data to be used in calculation of annual concentrations. The meteorological monitoring station most representative of the Project Site is the Los Angeles–VA Hospital Station, located at the intersection of Wilshire Boulevard and Sawtelle in the City of Los Angeles, approximately 1.3 miles south of the Project Site. This

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SCAQMD meteorological data provides hourly conditions (e.g., wind speed, wind direction, and stability class) over a five-year period (43,800 hours).

In summary, use of AERSCREEN in the SWAPE analysis does not adequately characterize potential impacts from the Project and any conclusions made based on these screening results are flawed as less accurate than the more refined dispersion modeling completed for the Draft EIR. No changes to the health risk assessment provided in the Draft EIR are necessary based on this comment.

**Comment No. 51-140**

**Screening-Level Health Risk Assessment**

We prepared preliminary screening-level HRA calculations using the Phase 2 Option A and Phase 2 Option B emission rates scaled by the area fraction. The tables below present the cancer risk calculations for adult and child sensitive receptors at the downwind distance with the maximum modeled concentration (108 meters). Using Google Earth™ we verified the presence of residential receptors at this distance from the Project boundary. Consistent with EPA methodologies\(^\text{11}\) for screening-level air quality assessments, the maximum single-hour concentration output by the model was multiplied by a scaling factor of 0.1 to simulate the maximum reasonable estimate of annualized DPM concentration throughout the Project’s construction.


Estimates for average daily breathing rates were obtained from OEHHA guidance on preparation of Health Risk Assessments (HRA)\(^{12}\). The total exposure duration in years (4.5) was taken from the mitigated exposure scenario provided in Appendix F to the DEIR.

Our calculations show cancer risk for adults to be as high as 30.8 in a million for adults and 51.3 in a million for children under mitigated construction scenario Phase 2 Option A, well in excess of the SCAQMD threshold of 10 in a million. Results of the health risk assessment constitute a significant air quality impacts from DPM generated by Project construction even with proposed mitigation. Results of exposure assessment calculations in the DEIR arrived at a different conclusion, however the methodologies employed to estimate the ambient concentration of DPM at off-site receptors are unclear.

The maximum calculated cancer risk in the DEIR was 9.1 in one million for the unmitigated construction scenario. It is unclear how the concentration used in the DEIR unmitigated exposure calculations—0.35914 µg/m³—was derived, given that the maximum concentration at an off-site receptor was 36.41 µg/m³ at the Project boundary according to modeling performed by the lead agency. The concentration used in the unmitigated exposure calculations that produced the 9.1 in one million excess cancer risk was over two orders of magnitude smaller—or less than one percent—of the maximum concentration at
the Project boundary generated by the lead agency’s model. However, the concentration used in the calculations does not appear anywhere else in the DEIR or Appendices. In a revision to the DEIR and air quality appendix, the lead agency should present a succinct summary of the methodology behind their health hazard assessment calculations.

Response to Comment No. 51-140

The SWAPE screening level analysis was conducted using a screening level model (AERSCREEN) which inherently provides overly conservative results for the reasons discussed above. The results of the screening level analysis are not analytically relevant except to demonstrate that SWAPE should have then conducted additional analysis using a refined model (AERMOD), which is exactly what was provided in the Draft EIR to evaluate potential health risk impacts.

As discussed in the specific comments above, the screening level analysis was not performed in accordance with requirements included in SCAQMD’s LST methodology and OEHHA’s guidance, which makes it substantially less accurate than the refined dispersion modeling completed in the Draft EIR. The analysis also did not account for the following: (1) site specific conditions; (2) use of a refined dispersion model; and (3) use of SCAQMD-mandated meteorological data from the closest/most representative meteorological monitoring site within the Project area. If the SWAPE analysis accounted for the guidance and data discussed above, then the results would have been similar to the findings of the Draft EIR.

As discussed above, the HRA has been updated to include analysis of each month of construction activity based on the peak daily construction activity for that month (Appendices C.1 and C.2 of the Draft EIR). A summary of the construction emissions is also provided in this Final EIR, which shows the construction phase, construction month, start and end date, number of days per week, number of days per month, and unmitigated and mitigated DPM emissions from the accompanied CalEEMod output files. While this additional analysis is not necessary for purposes of evaluating project impacts, it is provided in the Final EIR for informational purposes. Note that Phase 2 construction emissions reflect concurrent construction of the Aquatics Center/Visual Arts Center and Performing Arts Center since this assumption would provide the earliest construction year (i.e., more conservative emission factors) for both construction areas and that the analysis assumed no reduction in equipment or trips that would occur if these buildings were constructed concurrently.

Subsequent to completion of the Draft EIR, AERMOD (the refined dispersion model used in the Draft EIR and recommended by SCAQMD for performance of health risk assessments) and the meteorological data representative of the Project area have both
been updated. Therefore, the updated health risk assessment provided in this Final EIR reflect use of AERMOD Version Date 14134 and SCAQMD meteorological data. Refer to Appendix F-2, of this Final EIR, for the updated health risk assessment.

The Final EIR also incorporates mitigation measures included in the Draft EIR and this Final EIR into the HRA. Specifically, the HRA incorporates Mitigation Measure B-4, which requires the use of Tier 3 construction equipment throughout the duration of proposed construction activities and front-end loaders used for Phase 1—Excavation and Grading would meet Tier 4 interim standards. Mitigation Measure B-7 was also quantified in the HRA, which minimizes exhaust emissions by requiring trucks and vehicles in loading and unloading queues to have their engines turned off after five minutes when not in use. While Mitigation Measure B-7 would also serve to reduce DPM emissions from on-road trucks, this mitigation measure was not quantified in the HRA. Based on refined assessment, the HRA demonstrates that health risks from the Project would be 5.0 in a million for off-site receptors, which is below the applicable significance threshold.

For potential on-site student and staff exposure at the School, the maximum mitigated cancer risk is 8.2 and 4.9 in a million, respectively, which is below the applicable significance threshold. It is noted that this risk assumes an outdoor exposure for the entire length of construction and does not account for any reductions from the time spent in indoors where air quality tends to be better. Consistent with the results of the health risk assessment included in the Draft EIR, potential impacts to sensitive receptors within the Project area (i.e., nearby residences and Archer’s students) would be less than significant with incorporation of mitigation measures included in the Draft EIR. The above calculation of student health risk conservatively assumes that student programs would be provided on campus during summer months of construction. However, given the construction schedule, no extended student activities are planned for the Project Site during the summer months of North Wing Improvements and Phase I Excavation and Grading and on-site student risk would decrease to 7.4 in a million.

The commenter indicated some uncertainty about how the concentration used in the Draft EIR unmitigated exposure calculations—0.35914 µg/m^3—was derived and the concentration calculations do not appear in the Draft EIR or related appendices. For simplicity, the modeled concentration reflects an emission rate of 1 gram per second. Thus, the modeled concentration is then multiplied by the actual emission rate (0.0122 g/s) to calculate the project-specific pollutant concentration (29.3333 µg/m^3 x 0.0122 gram per

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second \( \div 1\ g/s = 0.35914\ \mu g/m^3 \)). Please see below for additional information regarding how this modeling approach is consistent with OEHHA Guidance.

Consistent with the Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, the modeling conducted for the HRA was calculated at 1 g/s. Specifically, Page 5-2 of the guidance states “The air dispersion modeling results are expressed as an air concentration or in terms of (Chi over Q) for each receptor point. (Chi over Q) is the modeled downwind air concentration based on an emission rate of 1 gram per second. (Chi over Q) is expressed in units of micrograms per cubic meter per gram per second, or \((\mu g/m^3)/(g/s)\). (Chi over Q) is sometimes written as \((\chi/Q)\) and is sometimes referred to as the dilution factor.” This same modeling approach is used in CARB’s Hotspot Analysis Reporting Program (HARP) used for compliance with California’s Toxics “Hot Spots” Program (AB 2588). Thus, page 111 of Appendix F of the Draft EIR provides a concentration isopleth modeled at 1 gram per second. The 1 gram per second was then adjusted consistent with OEHHA guidance to reflect the Project-specific pollutant emission rate of 0.0122 gram per second (1,942.5 total pounds of DPM \( \div 1,848\) construction days \( \times 0.6\) average/peak day factor (equipment used for less hours on an average day) \( \times 0.6\) average/peak equipment factor (more heavy-duty equipment used during grading versus erecting structures) \( \div 8\) hours per day \( \div 3,600\) seconds per hour \( \times 453.54\) grams per second \( \times 261\) construction days per year \( \div 365\) calendar days). In addition, the commenter incorrectly identifies the maximum impact at an off-site sensitive receptor. The maximum off-site impact at a sensitive receptor was 29.33 \(\mu g/m^3\) modeled at 1 gram per second (Chi over Q). Thus, the HRA provided in the Draft EIR appropriately used a DPM concentration of 0.35914 \(\mu g/m^3\) (0.0122 gram per second multiplied by 29.3333 \(\mu g/m^3\) \(\div 1\ g/s\)).

**Comment No. 51-141**

Furthermore, the emission rate utilized in the DEIR modeling was an underestimate based on the assumption that construction equipment would be in use for eleven hours each day, as opposed to eight hours as evidenced by the data in Appendix F. The inappropriately low emission rate produces downwind concentrations of DPM in model output that are lower than if the correct emission rate were used, as maximum downwind concentrations will be generated during hours of construction equipment use. A revision to the DEIR should reevaluate the modeling methodology to address these air quality impacts associated with Project construction in consideration of the health of nearby communities.

**Response to Comment No. 51-141**

As discussed above in Response to Comment No. 51-139, the emission rates in the Draft EIR were appropriately calculated for on-site heavy-duty construction equipment operating eight hours per day and reflect a five day work week consistent with the refined
dispersion modeling requirements (i.e., correction factor since AERMOD models 365 days per year, but construction would only occur five days per week). To explain this a different way, if a project emitted 1 pound per day of construction and construction activities occurred five days per week, then the total annual emissions would equal 261 pounds per year (5 days per week x 52 weeks per year x 1 pound per day). AERMOD models the daily emissions all 365 calendar days per year, so the total emissions would equal 365 pounds per year. Therefore, from an annual standpoint AERMOD would model 365 pounds per year rather than 261 pounds per year. If this correction factor was not applied for calculation of an annual concentration, then AERMOD would over-predict the pollutant concentration by 29 percent. Therefore, this comment erroneously assumes that calculations were based on on-site heavy-duty construction equipment operating 11 hours per day (a reduction from 11 hours to 8 hours or a reduction of approximately 28 percent) instead of accounting for the dispersion model correction factor) and no changes to the HRA provided in the Draft EIR are necessary based on this comment. It is noted that this correction factor would not be applied to a screening model analysis, since only 1-hour pollutant concentrations are generated using AERSCREEN.

**Comment No. 51-142**

If our estimates that impacts to neighboring residents exceed the SCAQMD threshold are confirmed in a revised DEIR, mitigation should be identified, to include:

- Prohibit diesel idling within 1,000 feet of sensitive receptors; and
- Prohibit staging and queuing areas within 1,000 feet of sensitive receptors.

**Response to Comment No. 51-142**

As discussed in the specific comments above, the screening level analysis was not performed in accordance with requirements included in SCAQMD’s LST methodology and OEHHA’s guidance. The analysis also did not account for the following: (1) site specific conditions; (2) use of a refined dispersion model; and (3) use of SCAQMD mandated meteorological data from the closest/most representative meteorological monitoring site within the Project area. If the SWAPE analysis accounted for the guidance and data discussed above, then the results would have been similar to the findings of the Draft EIR. Instead the results of the SWAPE screening level analysis grossly overestimate potential health risk impacts Potential health risk impacts from diesel particulate matter to nearby sensitive uses (e.g., Archer’s students and adjacent and nearby residences) as the result of proposed construction activities remain less than significant with incorporation of mitigation measures identified in the Draft EIR. No additional analysis or mitigation measures are necessary based on this comment.
Comment No. 51-143

The DEIR calls for construction truck staging in the driveway areas along either the eastern or western boundary of the Project Site (p. 11-41), well within 1,000 feet of sensitive receptors.

Additional mitigation to consider in a revised DEIR includes:

- Regular preventive maintenance on diesel engines to reduce emissions; and
- Install temporary electrical service to avoid the need for diesel powered equipment (e.g. compressors).

Response to Comment No. 51-143

The emissions presented in the Draft EIR were conservative (i.e., higher than would be actually expected) because emission reductions from implementation of Mitigation Measure B-6 (requirement to use contractors for soil import/export with a minimum of 80 percent of haul trucks meeting EPA Model Year 2007 NO\textsubscript{X} emissions levels) was not quantified in the Draft EIR since the emissions inventory model (CalEEMod) used in the analysis of construction emissions only provides emission reduction measures for off-road equipment (e.g., Tier III). However, in response to comments regarding the mitigation measures that would reduce the Project’s construction exhaust emissions, subsequent additional analysis has been conducted to quantify the emission reduction related to Mitigation Measure B-6 using the Air Resources Board’s recommended EMFAC model for calculating emission factors for on-road vehicles and includes on-road vehicles idling in the construction staging area. As provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, Mitigation Measure B-4 has been supplemented to further reduce construction emissions from off-road construction equipment.

In response to comments on the Draft EIR, including this comment, the HRA and construction localized criteria pollutant analysis has been updated to include analysis of each month of construction activity based on the peak daily construction activity for that month (Appendices C.1 and C.2 of the Draft EIR) and includes construction equipment and on-road vehicle exhaust emissions from construction truck staging in the driveway areas. Supporting calculations are provided as Appendix F.1-1 and include CalEEMod Output file for the updated mitigated construction scenario along with the methodology and calculation of NO\textsubscript{X} reduction for use of haul trucks meeting EPA Model Year 2007 NO\textsubscript{X} emissions levels.

Potential health risk impacts from diesel particulate matter to nearby sensitive uses (Archer’s students and adjacent and nearby residences) as the result of proposed
construction activities remain less than significant with incorporation of mitigation measures identified in the Draft EIR and this Final EIR. No additional analysis or mitigation measures are necessary based on this comment.

**Comment No. 51-144**

See following page.
Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:
M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certification:
California Professional Geologist
California Certified Hydrogeologist
Qualified SSWPP Developer and Practitioner

Professional Experience:
Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:
- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – present;
- Senior Environmental Analyst, Komex H2O Science, Inc (2000 – 2003);
• Executive Director, Orange Coast Watch (2001 – 2004);
• Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
• Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
• Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
• Instructor, College of Marin, Department of Science (1990 – 1995);
• Geologist, U.S. Forest Service (1986 – 1998); and

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of numerous environmental impact reports under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions and geologic hazards.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
• Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:
As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:
As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

• Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
• Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
• Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

• Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
• Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.
• Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

• Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
• Reviewed and wrote "part B" permits for the disposal of hazardous waste.
• Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
• Wrote contract specifications and supervised contractor’s investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

• Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
• Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
• Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
• Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
• Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
• Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
• Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:
Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

• Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
• Shaped EPA’s national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
• Improved the technical training of EPA’s scientific and engineering staff.
• Earned an EPA Bronze Medal for representing the region’s 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
• Established national protocol for the peer review of scientific documents.
**Geology:**
With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

**Teaching:**
From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt currently teaches Physical Geology (lecture and lab) to students at Golden West College in Huntington Beach, California.

**Invited Testimony, Reports, Papers and Presentations:**


**Hagemann, M.F.,** 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

**Hagemann, M.F.,** 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.


Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.


Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.


Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.


Other Experience:
Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.
Response to Comment No. 51-144

This comment transmits the attached curriculum vitae to the letter submitted by Matthew F. Hagemann, as presented in Exhibit D of Comment Letter No. 51. This attachment is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 52

Stacia Thompson  
Upper Riviera Homeowners Assn.  
1515 Umeo Rd.  
Pacific Palisades, CA  90272

Comment No. 52-1

I am writing on behalf of the Upper Riviera Homeowners Association, which comprises approximately 65 homes north of Sunset in the Pacific Palisades. Its official mission is “to promote the quality of life and safety in the Upper Riviera.” The four streets included in this association are: Umeo, Casale, San Onofre, and Alta Mura, in addition to some houses on Capri. Sunset Boulevard is the main artery to and from our community. Adding more cars to the already congested Sunset Boulevard is not acceptable. However, it appears Archer’s proposed expansion plan will do just that. We are concerned about the potential adverse affects Archer’s expansion will have on our community due to the resulting increase in traffic.

Response to Comment No. 52-1

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

Comment No. 52-2

With an expanded campus that would include five buildings instead of one, Archer proposes an increase in other activities that will lead to more visitors and car trips. Archer’s plan would bring over 30,000 new visitors to an already congested area. To accommodate this increased use, Archer proposes building a 212 car-parking [sic] garage that would be utilized during school hours at capacity for staff and students and then again from 3:30pm to 10:00pm for visitors coming to campus for athletic events, special events, and performing art events. This represents more than a 100% increase in the number of cars currently exiting onto Sunset Boulevard during peak hours.
The Los Angeles Department of Transportation (LADOT) analyzed Archer’s proposal and states in the DEIR that the proposed project will create SIGNIFICANT impacts at the following six intersections that CANNOT be physically mitigated. The LADOT goes on to say that even with the proposed mitigation measures, should the Project be built out, the impact at these intersections during various event-day scenarios will remain significant and unavoidable.

- Bundy Drive and Sunset Boulevard
- Saltair Avenue and Sunset Boulevard
- Barrington Avenue and Sunset Boulevard
- Barrington Avenue and Montana Avenue
- Barrington Avenue and Wilshire Boulevard
- Barrington Place and Sunset Boulevard

For the last five years we have had to endure the effects of the I-405 widening project. Even now with the Sunset Bridge open and the project close to ending, traffic is regularly backed up to Paul Revere. Oftentimes Sunset Boulevard is the only way for our residents to reach the freeway and it can take hours when it should in reality take minutes.

**Response to Comment No. 52-2**

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced. As described therein, the parking structure will not be utilized at capacity during instruction or for the majority of Interscholastic Athletic Competitions and School Functions.
Comment No. 52-3

Now we will have to endure another six years of construction with Archer’s overly ambitious plan that will make traffic unbearable, an impact the DEIR says will be significant and unavoidable. While construction traffic may appear to be temporary, the reality is that it is not. With one project ending, another begins—widening of Wilshire Boulevard near the VA for the Wilshire Bus Rapid Transit Project; California Incline Replacement; large projects approved in Santa Monica; Archer School Expansion. With lane closures on Pacific Coast Highway because of the California Incline Replacement, Sunset Boulevard is the only option to travel out of our community. And with cars being diverted from Wilshire to Sunset and from PCH to Sunset, traffic will be even more unbearable. The effect is that “temporary” traffic from construction becomes permanent as more cars alter their routines and do not revert to standard traffic patterns because of the endless construction projects on their normal routes.

We stand with the Residential Neighbors and support a downsized alternative project. If Archer reduces the size and number of buildings, traffic will be mitigated through reduced programming—less events means less cars coming to campus.

Response to Comment No. 52-3

As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments, the Project has been refined to reduce the construction period from six years to five years.

In response to comments, other refinements have been incorporated into the Project, including a reduction in the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

As detailed in Topical Response No. 1, Refinements to Proposed Operations, the Project has also been refined to include additional restrictions on operations including additional limits on the hours of operation, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Further, as evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.
The Draft EIR considered the effects of related infrastructure improvements including traffic diversions due to the Wilshire Bus Rapid Transit Project. Refer to page IV.K-21 of Section IV.K. Traffic, Access, and Parking, of the Draft EIR. In regard to the pending California Incline reconstruction, since the California Incline primarily carries traffic destined to the downtown Santa Monica area, the primary effect of its temporary closure would be to divert traffic to Chautauqua/Channel and to Moomat Ahiko Way in Santa Monica, not to Sunset Boulevard in Brentwood. The traffic analysis also explicitly took into account traffic generated by known development projects in the Brentwood area and included a background growth factor to represent traffic generated by other growth outside of Brentwood but within the Westside. Refer to page IV.K-20 of Section IV.K, Traffic, Access, and Parking, of the Draft EIR.

The comment states a concern that temporary traffic diversions during construction become permanent. As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving since spring of 2014 as a result of construction on the I-405/Sepulveda Pass project nearing completion, the opening of the HOV lane on the northbound I-405 freeway, and substantial completion of the I-405/Sunset Boulevard interchange modifications.

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative for a detailed response to the alternative proposed by the Residential Neighbors of Archer.

**Comment No. 52-4**

Thank you. Yes, please add me to your mailing list. My address is:

Stacia Thompson  
1515 Umeo Road  
Pacific Palisades,  
CA 90272

**Response to Comment No. 52-4**

In response to this comment, the addresses provided by the commenter will be added to the EIR mailing list.
Comment Letter No. 53

Nora Malone
Head of School
Village School
780 Swarthmore Ave.
Pacific Palisades, CA  90272-4355

Comment No. 53-1

I currently serve as the Head of School at Village School in the Palisades and I am writing to you today to ask for your support for Archer’s campus enhancement project as the plan moves through to a final approval.

As I’m sure you’re aware, Archer does a tremendous job of balancing the needs of its students with the needs of the community. Archer offers a cutting-edge education for girls of all backgrounds and its students volunteer and contribute regularly to the Brentwood community. The school also complies with the obligations set forth in its CUP with extensive transportation management and community outreach programs that have been recognized as models for all schools across Los Angeles.

I believe Archer’s proposed plan is the right decision for the school and a wise move for the community. These improvements are solely designed to enhance and enrich the education that the school offers while being sensitive to the needs of local residents. I know that traffic is a major issue in the area and I’m proud to see that the school has included significant modifications and commitments in this plan to reduce its impacts. In addition, the design promotes pedestrian access and sustainability.

I hope you’ll agree that this plan is thoughtful and responsive to the needs of the community. This truly is the right step forward for Archer and I hope they can count on your support.

Response to Comment No. 53-1

This indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 54

H. John Walter III  
Head of School  
The Wesley School  
4832 Tujunga Ave.  
North Hollywood, CA 91601

Comment No. 54-1

Please accept my letter below in support of The Archer School and its Archer Forward initiative. Thank you.

Response to Comment No. 54-1

This introductory comment expressing support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 54-2

As Head of School at The Wesley School in North Hollywood, I lend my support to Archer's campus improvement plan, Archer Forward.

Schools strengthen neighborhoods, and I believe that the City of Los Angeles needs first-rate schools. Archer is a great asset to the Brentwood community on the Westside and an important part of the independent school community in L.A. The school enrolls students from more than 140 feeder schools across the city and commits millions of dollars in financial aid to families who are seeking a single-sex education for their daughter.

The components of Archer Forward will help the school advance its mission by providing the necessary facilities that students need, including climate-controlled classrooms, space for the arts, and athletic facilities. This plan is essential and embraces the needs of the school while respecting the Brentwood community.

I know this is an important step forward for the school, and I hope you’ll join us in support of Archer Forward.
Response to Comment No. 54-2

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 55

Scott Moran
Head of School
Westland School
16200 Mulholland Dr.
Los Angeles, CA 90049

Comment No. 55-1

I currently serve as the Head of School at Westland School. I am writing to you today to ask for your support for Archer’s campus enhancement project, Archer Forward.

As I’m sure you’re aware, the school does a tremendous job of balancing the needs of its students with the needs of its community. As one of the city’s few all-girls schools, Archer offers a cutting-edge education for students of all backgrounds. In fact, I think it’s fair to say that Archer provides a model for all-girls schools that is not only unique in Los Angeles, but also serves as a model nationally. Archer is a true asset to the educational landscape—and, therefore, one that I am compelled to support wholeheartedly. Archer students volunteer and contribute regularly to the Brentwood community. Additionally, the school has always complied with the obligations set forth in its CUP. Its extensive transportation management and community outreach programs have been recognized as models for both public and private schools across Los Angeles.

I have taken the Archer Forward plan under consideration and believe it is truly the best step forward for the school. These improvements are designed to enhance and enrich the education that students receive while striving to reduce any burden on local residents. I know first-hand that traffic is a major issue on the Westside and I’m pleased to see that Archer Forward includes significant modifications and commitments to reduce its impacts where possible.

I believe that this plan is truly the best for Archer and is thoughtful and responsive to the needs of the community. Your support for Archer Forward would be greatly appreciated.

Response to Comment No. 55-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 56

Bradley Zacuto
Head of School
Westside Neighborhood School
5401 Beethoven St.
Los Angeles, CA  90066

Comment No. 56-1

Attached please find a letter of support from Brad Zacuto, Head of School at Westside Neighborhood School.

Response to Comment No. 56-1

This introductory comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 56-2

As the head of a private school in Los Angeles, I know the importance of educational institutions in any community. I am writing to you today to request your support for Archer Forward, Archer’s campus improvement plan.

Archer has done its best to be a good neighbor in the Brentwood community. It enforces one of the strictest traffic control programs of any school in the city. Over eighty percent of students are bussed to school and the rest use carpools. All students, parents and faculty are strictly forbidden from parking in the surrounding residential neighborhood. Archer students also participate in a number of community service activities and go on to become leaders and contributing citizens in their own right.

Archer strives to offer its students the very best opportunities possible, from coursework to performing arts to competitive athletics. The school’s current facilities cannot accommodate all of these activities on campus and Archer Forward aims to provide these activities onsite. This is a major and necessary step forward for any well-established school and I strongly support it.

I hope you will also join me in supporting Archer Forward as it continues to move through the public review process.
Response to Comment No. 56-2

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 57

Landis Green
Head of School
Wildwood School
11811 Olympic Blvd.
Los Angeles, CA 90064

Comment No. 57-1

Thank you, in advance, for including the attached letter of support with materials submitted on behalf of Archer School's current process.

Thank you. If it's appropriate, please send the updates to the address immediately below.

Landis Green
Head of School
11811 Olympic Boulevard
Los Angeles, CA 90064
www.wildwood.org

Response to Comment No. 57-1

This introductory comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below. The address provided by the commenter will be added to the EIR mailing list.

Comment No. 57-2

As Head of School at Wildwood School, I write in support of the Archer Forward Campus Preservation and Improvement Plan proposed by The Archer School for Girls.

I have great respect for the leadership and work going on at Archer, a school with which we at Wildwood School share multiple families. The school administration does everything in its power to ensure that the student body, parents and teachers abide by the restrictions outlined in its CUP in order to make good on its promises to its neighbors.

So that it can continue to be an institution of which the Brentwood community can be proud, the school is now focusing its efforts on improving its campus. Archer requires new athletics facilities, larger classrooms, dedicated space for the arts, and a parking facility
with sufficient space for faculty, student carpools, and visitors. Also included in these plans are measures to preserve its historic building on Sunset Boulevard.

Archer has dedicated numerous hours to educating its neighbors and local community groups about the plan and will continue to do so in the weeks and months ahead. As both a school leader in Los Angeles and as a resident and homeowner in Brentwood, I sincerely hope that you will join us in the support of this plan.

**Response to Comment No. 57-2**

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 58

Tom Gilder
Head of School
Windward School
11350 Palms Blvd.
Los Angeles, CA  90066

Comment No. 58-1

Schools are important to communities and I am writing today to request your support for Archer Forward, the school’s campus improvement plan.

Archer has a reputation for being a good neighbor in the Brentwood community. The school holds regular meetings with its neighbors to address their needs and concerns. Archer also enforces one of the strictest traffic control programs of any school in the city with eighty percent of students taking the bus to school every day. All students, parents and faculty are strictly forbidden from parking in the surrounding neighborhood. For many events, guests are encouraged to carpool to campus. Archer cares about being a good neighbor and works hard to enforce their transportation regulations.

The school strives to offer its students the very best opportunities possible, but its current campus facilities can be limiting. The Archer Forward plan will provide students with state-of-the-art academic, athletic, and arts facilities, all designed to support the Archer curriculum and experience. This is a major and necessary step forward for any well-established school and I strongly support it.

As this important public review phase continues, I hope you will join us in supporting Archer Forward.

Response to Comment No. 58-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 59

Leslie Aghili

Comment No. 59-1

I graduated from Archer and I'd like to personally urge the city to support the school's improvement project, Archer Forward. It is a good step forward for the community and more importantly, it is in the best interest of the girls who attend the school.

As a former Archer student, I remember my peers who were involved in sports having to spend hours commuting all over the city just to practice. I know current Archer girls are doing the same thing and it is time for a change. In order for the girls to have a well-rounded middle school and high school experience, they need to have the facilities that every other school in this area is fortunate enough to have.

Archer prides itself on being a responsible and active member of the community. I hope you will do the right thing and support the school's plan.

Response to Comment No. 59-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 60

Karen and Dale Alberstone
karenalberstone17@gmail.com

Comment No. 60-1

I am writing this letter in support of Archer’s Campus Preservation and Improvement Plan which is currently moving throughout the Draft EIR phase of the city approval process. My daughter is currently a 10th grade student at Archer School for Girls and has been attending Archer for the past 4 years.

Archer is a wonderful school for girls on the westside of Los Angeles. It provides a great education and builds confidence in girls that they might not realize at a another coed school on the westside. Archer is essential to provide a well-rounded choice for girls seeking an excellent education at an independent school in Los Angeles. Archer's continued growth and expansion is essential to meet the needs of upcoming middle and high school girls.

The Archer Forward plan is essential for the future of Archer and girls’ education, so that girls in Los Angeles have a choice of a great education with other girls. Archer has always been mindful of their impact on the surrounding community and has issued strict guidelines for its students and their families to comply so as not to disturb the neighbors. Archer would continue to do this in the future as well. They have fully complied with their Conditional Use Permit, have preserved the historic main building, have protected the iconic view from Sunset Blvd., have developed a plan that is sympathetic to the residential character of the neighborhood, have such an exemplary traffic management program that they are a model for other school’s traffic management program, and they have engaged in early and extensive outreach to provide information and solicit feedback to the community.

The new campus allows Archer to provide a 21st century education to girls in Los Angeles.

Thank you for your consideration of Archer's request. We hope you will allow Archer to continue its great work educating our daughters who are the future leaders of this wonderful city and state.

Response to Comment No. 60-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 61

Pamela Alexander
11901 Sunset Blvd.
Los Angeles, CA  90049

Comment No. 61-1

Please see the attached letter in response to the Archer school's planned expansion. I strongly oppose this effort and feel you need to consider the issues which will impact our neighborhood.

Response to Comment No. 61-1

This introductory comment expressing opposition to the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 61-2

I am writing you at this time to express my deep concern over the planned expansion of the Archer School and the negative impact it will have on our neighborhood. I have been a resident for over 27 years and have raised my family on what was once quiet streets north of Sunset Boulevard. While Sunset was always busy, kids could bike, dogs could be walked and it was possible to have a leisurely stroll anytime during the day or evening all along the side streets. Now it is a traffic nightmare. Not only is Sunset a complete parking lot in the early morning hours and afternoon (3–8), frustrated drivers have discovered short cuts up all the side streets (Barrington, Westgate, Saltair) and particularly on Chaparal which borders the North side of the Archer School. These are residential streets which have now become extremely dangerous with angry drivers running stop signs and speeding to avoid Sunset. From Barrington Place to Saltair there are currently five schools contributing to the congestion on Sunset. This is a little over a two block area. The Archer School must be held to their original promises to this neighborhood and not add to what is already an intolerable situation. It is only a matter of time before something very, very tragic happens. I have personally witnessed 6 traffic accidents since August in front of my home on Sunset Blvd as people attempted to make a left hand turns heading south onto Westgate. Right now, the only respite we currently have is on the weekends when the neighborhood returns to a quite peaceful rhythm.
Response to Comment No. 61-2

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving as construction on the I-405 Sepulveda Pass Improvement Project has neared completion, with the opening of the HOV lane on the northbound I-405, and substantial completion of the I-405/Sunset Boulevard interchange refinements. The surrounding streets saw an increase in cut-through traffic as motorists attempted to avoid the increased congestion along Sunset Boulevard during the construction of the I-405 Sepulveda Pass Improvement Project. With improvement in conditions along Sunset Boulevard, this cut-through traffic is expected to reduce. Although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to $15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street.

Refer to Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, for a discussion of the proposed changes to Archer’s existing CUP. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding the compatibility of the School’s operations and its facilities with the surrounding neighborhood.

Comment No. 61-3

I have read Archer’s proposal to expand and am frightened with what an expanded use of their property will do to this neighborhood. Why in the world don’t they just move to a more suitable location to accommodate their needs rather than negatively impact the surrounding neighborhood? When the Archer School sought to purchase the property years ago, they made a lot of promises to this neighborhood to gain the necessary permits to rehab the Eastern Star Home. The city put into place restrictions that balanced residents’ rights to
the quiet peaceful enjoyment of their homes with the school's ability to successfully operate. They did a great job of blending in and have been great neighbors. We believed their intent then but now they are pushing their boundaries beyond what is acceptable to this neighborhood. They must be told NO and honor their Original promises....

**Response to Comment No. 61-3**

In response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the proposed buildings, a reduction in the number of seats within the Performing Arts Center, and a reduction in the number of events and athletic activities. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential and character of the community. Also refer to Topical Response No. 15, Alternative Locations, for an analysis of alternative locations to the Project Site.

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A CUP is a discretionary approval issued after environmental review and a public process. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 61-4**

Specifically, I am concerned about the following:

- Significant Traffic Impacts due to their proposed plans that have been studied and proven it is not possible to be physically mitigated

**Response to Comment No. 61-4**

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic
impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

Comment No. 61-5

- Increased Use of Facilities for school operations as well as allowing outside commercial use of the property which will negatively impact the residential feel to our neighborhood with the added congestion and traffic and weekend use

Response to Comment No. 61-5

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Regarding filming, as further discussed in Topical Response No. 1, Refinements to Proposed Operations, filming on the campus for commercial purposes would continue to be prohibited except when the School is not in session. Filming would be permitted for no more than 24 days per year. All trucks and equipment would be required to use the School’s underground parking structure and parking on neighborhood streets would be strictly prohibited. Hours would be restricted, with filming beginning no earlier than 9:00 A.M. and concluding no later than 6:00 P.M.

Comment No. 61-6

- The elimination of two residences which eliminates the current buffer between the school and current homeowners and will create an entrance on Barrington for their Aquatic Center and parking garage
  
  - the existence of the school already negatively impacts property values which was heard over and over by prospective buyers for a property recently on the market neighboring the school on Westgate

Response to Comment No. 61-6

With regard to buffers, as evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. The Project would also include the use of architectural features that add visual interest and reduce massing to maintain the residential street character when viewed from Chaparal Street and Barrington Avenue. It is noted that with the refinements proposed to the Project,
the Performing Arts Center is now proposed to be developed within the Chaparal Parcel and the Aquatics Center is proposed to be developed within the Barrington Parcel. With these refinements, the 25-foot front yard setbacks along Chaparal Street and Barrington Avenue would remain.

The Project proposes enhanced landscaping buffers to provide privacy and reduce noise to nearby properties. As described in more detail in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, along Chaparal Street is a solid cinderblock wall and wrought iron gate covered in vines. Also along Chaparal Street is a row of existing pine trees. In response to comments, Archer would plant additional trees along Chaparal Street and a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. In response to comments, the Project has also been refined to shift the athletic field approximately 7 feet 6 inches to the east. Shifting the athletic field would move the athletic field further away from the neighbors to the west of the campus property boundary while still maintaining regulation size soccer and softball fields. This expanded setback would allow for an enhanced landscape buffer along the western property boundary of the campus. In addition, in response to comments, the Project would add a row of landscaping along the southern boundary of the Barrington Parcel.

Regarding the entrance on Barrington Avenue, as described in Section II, Project Description, of the Draft EIR, primary access to the Project Site, including all student drop-off and pick-up, would be unchanged and would continue to be from Sunset Boulevard. In addition, service and delivery vehicles would continue to access the Archer campus primarily from Sunset Boulevard. With the Project, Barrington Avenue and Chaparal Street would be used for limited service, delivery, and emergency vehicle access. The Project would not include access to the Aquatics Center or the underground parking structure from Barrington Avenue.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 61-7**

- creating an entrance/exit to the school onto Barrington just north Of the Sunset intersection is INSANE! There is not a way to modify the area to handle the increased traffic and the elimination of this home will dramatically change the residential feeling for our neighborhood! Anyone who lives in the area can tell you this intersection could not possibly handle another vehicle!
Response to Comment No. 61-7

As described in Section II, Project Description, of the Draft EIR, primary access to the Project Site would be unchanged and would continue to be from Sunset Boulevard. Barrington Avenue would be utilized only for limited campus service and deliveries and for emergency vehicle access. In addition, a temporary driveway would be used on the Barrington Parcel during construction.

Refer to Topical Response No. 13, Use of Existing Residential Properties, for a discussion of the use of residential properties for school uses.

Comment No. 61-8

In closing, please don’t allow this plan to move forward. The neighbors in good faith have proposed alternative efforts for Archer to expand. Please adopt the reasonable alternative that has been proposed by the neighborhood group:

- Expand and renovate the campus within the current footprint of the school, thus preserving the two residences and creating a needed buffer between the neighbors and the institutional use of the school,
- Increase the current size of the school by adding two new buildings, not four, which includes one gym, and one multi-use building,
- Add more landscaping to provide an attractive buffer between the school and residences,
- Increase the set back of the buildings placed adjacent to Chaparal Street,
- Maintain the number of special events and athletic events at the current level,
- Maintain the current condition of no lights on the athletic field,
- Follow the guidelines of the current Conditional Use Permit regarding hours of operation and limits on the use of the facilities at night, on the weekends and for outside use,
- Improve the school’s facilities with only one phase of construction.

Response to Comment No. 61-8

Refer to Topical Response No. 14, Residential Neighbors’ Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the
Residential Neighbors of Archer have been incorporated into the Project. In addition, the Project has been refined to reduce the overall construction timeframe for the Project from six years to five years.
Comment Letter No. 62

Jamee Alperovich  
877 S. Tremaine Ave.  
Los Angeles, CA 90005

Comment No. 62-1

My daughter is a student at The Archer School for Girls and I am writing to you in order to show my support of the Archer Forward plan.

Archer’s commitment to the community starts with its traffic management plan, which is the strictest in the city. This plan ensures that the school is not imposing a burden on the neighborhood. Furthermore, Archer girls give back so much to this community due to the school’s extensive volunteer service program. Archer girls are involved in issues and organizations that serve our community in many different ways. Through service projects and after-school partnerships with organizations like the Daybreak Women’s Shelter in Santa Monica and Brentwood Green, Archer helps make our West LA community a better place.

Archer Forward is a necessary next step in the improvement of our campus, providing crucial academic, arts and athletic facilities, while moving parking to an underground garage to reduce noise and traffic in the neighborhood. Currently, students must use offsite facilities for arts and athletics programs, and it would be extremely beneficial for the school and the community if Archer was able to provide these opportunities on campus.

This plan has been reviewed by community leaders and neighbors for many months, and I believe that it is both a good balance for the neighborhood and the school. Thank you.

Response to Comment No. 62-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 63

Lynn K. Altman
382 N. Saltair Ave.
Los Angeles, CA  90049

Comment No. 63-1

It seems to me that before there is any consideration to the demands of Archer's development plan, a study for and improvement of, the existing traffic problems in this immediate area must be done. I have become a prisoner in my own home, due to the heavy traffic on North Barrington. I live four blocks from North Barrington and Sunset. Too many times it has taken me in access [sic] of one hour to reach that intersection. Santa Monica has embarked on grand scale building. More traffic. So back to Archer.

Response to Comment No. 63-1

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

Comment No. 63-2

Archer knew the limitations given to it when it agreed to enter this neighborhood. I, as a high school teen, circa 1950, lived at 199 N. Barrington. That lot, now with two homes and a Chaparal address, is surrounded by two R-1 properties now owned by Archer. It leaves a nasty taste in my mouth now realizing they were purchased for use other than residential. Archer has embarked on a very selfish expansion plan with no consideration of this area of very expensive homes, some of which have been here since the 1920’s. We, as very concerned property owners, do not want to see increased traffic on Sunset or Chaparal, a large underground parking structure enabling enormous growth of traffic to the school during their hoped for increased hours and days of use. And, if other of their wishes are granted, we will experience an unnecessary decrease of property values, noise, light, dirt and visitor pollution. I have heretofore not seen any mention of what should be added security for the school's added activities at all hours of the days and weekends. And, of
course, there is always the question of how many more students will they wish to enroll to help pay for all of these “improvements”?

**Response to Comment No. 63-2**

Refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

With regard to traffic, refer to Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, for a description of the additional operational mitigation measures proposed to reduce significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. Regarding noise, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional measures to reduce noise associated with campus operations are also proposed. In addition, as described in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has been further refined to remove the athletic field lighting. In response to the comment regarding security, as set forth in Project Design Feature J.2-7 on page IV.J.2-9 of Section IV.J.2, Public Services—Police Protection, of the Draft EIR, as part of the Project, Archer would continue to maintain a closed campus requiring all visitors, guests, and vendors to have appointments prior to being granted access. In addition, full-time security guards would continue to be provided during all campus hours, including events. In addition, as provided by Project Design Feature J.2-4, the Project would include the installation of new security fences and an emergency alert system.

Regarding enrollment, as discussed on page II-2 of Section II, Project Description, of the Draft EIR, the existing CUP (ZA 98-0158(CUZ)(PA4)) provides for a maximum total enrollment at 518 students. The Project does not propose to increase the maximum enrollment cap of 518 students.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 63-3**

If the Archer School deems its needs are not met in this residential area, perhaps it should consider moving to an area where it would be a better match.
Response to Comment No. 63-3

Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives, particularly those related to improving the existing Archer campus and ensuring the continued preservation of the historic Main Building.
Comment Letter No. 64

Phillipa Altmann
2118 Pelham Ave.
Los Angeles, CA  90025

Comment No. 64-1

The Archer School for Girls has been an outstanding neighbor since moving into the Brentwood neighborhood in 1998, going above and beyond what the City requires of it. I am writing in support of Archer Forward, a plan that will benefit both the school and the neighborhood, and requesting that the City and Councilman Bonin work together to help Archer move through the approval process.

Archer goes beyond what is required in their traffic management program while being subject to the most restrictive regulations of any independent school in the City. Over 50% of girls arrive on campus by bus; the remaining students arrive by carpool. Parking in the neighborhood is explicitly disallowed, and the school’s community outreach coordinator ensures strict compliance with all of these rules.

Archer Forward is the next step in ensuring that Archer continues to be a leading school, while maintaining its commitment to the community. The school has conducted extensive outreach about the plan so far, and will continue to do so throughout the public process. I hope that the City will recognize this leadership and help Archer secure approval for the plan. Thank you.

Response to Comment No. 64-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 65

Erika Amaya  
7418 Gaynor Ave.  
Van Nuys, CA  91406

Comment No. 65-1

I am the mathematic department chair at the Archer School for Girls. I was drawn to Archer for its unique mission to support and challenge young women to discover their passions and realize their true potential. Our classrooms are filled with wonderful young ladies eager to become aerospace engineers, writers, dancer, [sic] etc. and make their mark on the world. Our teachers are truly dedicated to their craft and go above and beyond to teach our girls not only their subject matter, but also how to be outstanding citizens by being involved in their communities.

Archer’s campus plan would give teachers larger classrooms allowing us to create more collaborative and exciting lessons. At the moment most of our math classrooms do not have enough space to comfortably allow teachers to freely move about and direct students during the lesson. I personally do not have a desk in my classroom because having a teacher desk would take up too much space in my small room, and would not allow me to get to all of my students.

Most of all, I am looking forward to having air-conditioning in my classroom. This may not seem like such a big deal, but when you are trying to teach students how to solve a differential equation on a hot summer day, in a hot stuffy classroom, all you wish for is a nice cool room in which the students would really appreciate this wonderful lesson on the applications of mathematics.

The Archer School for Girls seeks to make a positive impact on the community and we are asking for your support. As teachers, we will be forever grateful for your support in giving us what we need to do outstanding teaching. Thank you for taking the time to read this letter. I would highly encourage you to come and visit our school so that you can experience first hand our supportive, caring, innovative and inspiring learning environment.

Response to Comment No. 65-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 66

Vanessa Anderson

Comment No. 66-1

I am proud to call myself a graduate of The Archer School for Girls and I am writing to you today to express my support for the Archer Forward Plan.

I chose to attend Archer because the school is truly unique and I believe that the school is educating future leaders who are poised to tackle the issues of tomorrow. However, in order for Archer to fully deliver on its mission, it needs adequate facilities to create a 21st-century campus.

Ask any Archer alum and they will say that the education they received was exemplary. The teachers were, and continue to be, among the best in the country. When I went to college I was more prepared than most of my peers for the work load and the expectations of a university. However, most alums will also tell you that they wished they had a gym or a theatre or a place to gather as a community. If this plan is approved, the school will finally have a performing and visual arts centers, a regulation-sized field to practice and play on, and even an aquatics center for the swimmers to finally hold meets on campus. These facilities would make an Archer education even better and I firmly believe the school deserves these enhancements.

I don’t believe the school is asking for much—just the same kind of facilities that most other schools have. I hope that you support this plan and move it through the city process quickly.

Response to Comment No. 66-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 67

Lisa Angel
jisaangel.416@gmail.com

Comment No. 67-1

I am writing this as a parent of two Archer students currently in eighth and tenth grades. We began when my tenth grader was in seventh grade. To say that we have been happy with the school would be understating our level of satisfaction. When looking for a school for our daughters, we considered all aspects of education and evaluated the whole life experience that they would be encountering over the course of their middle and upper school journeys.

The Archer School for Girls offers an amazing combination of dynamic academics, performing arts, athletics and social action. The school is dedicated to preparing girls to becoming better human beings and to make positive contributions to the community and world.

We are grateful to the dedicated faculty and staff for their commitment to the school and to our girls.

While one of my many favorite things about the school is the facility itself, (this historic building won my heart at first sight), I believe the school is in desperate need of basic updates to provide comparable elements as other public and independent schools offer. I believe this is all possible while preserving the historical importance of the building.

Here are some of the benefits that would result in a renovation:

By increasing the classroom sizes and provide [sic] air conditioning will allow the girls to properly focus and benefit from the classes.

To be able not to have to travel when participating in athletics will be so beneficial to everyone.

Additionally, a performing arts facility will get the girls out of the current “black box” that they currently use and offer the families and community a venue to attend and appreciate their artistic endeavors.

A place where everyone can assemble together is very important.
There are many more reasons that this would be good for the school and for the Brentwood community.

We are going to remain positive that this essential plan will be approved and that we can all look forward to a great school becoming even better.

**Response to Comment No. 67-1**

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 68

Laura Applegate
153 N. Saltair Ave.
Los Angeles, CA  90049

Comment No. 68-1

Archer Forward Expansion plan includes the following:

- Doubling the number of special events allowed in its current Conditional Use Permit, which would bring over 20,000 visitors to the campus during the school year;
- Allowing outside rental use of the facilities for weddings and private parties for up to 200 guests, 24 times a year, Monday through Saturday, 8:00am to 10:00pm;
- Adding 30 more days of use with a summer school program;
- Moving the majority of the athletic activities onto campus, thus increasing the number of games and visitors coming into our area during peak traffic periods (3:30pm to 7:00pm);
- Constructing a 96,000 square foot underground parking garage to hold, at capacity, 282 cars, from its current 109 parking spaces;
- Building its project in three phases of construction that will last over six years with large trucks entering and exiting onto Sunset and smaller residential streets from 7:00am to 9:00pm Monday through Friday and Saturdays 8:00am to 6:00pm;
- Extending the school’s operational hours to include every Saturday from 7:00am to 6:00pm, which is currently not allowed;
- Hosting extracurricular activities until 10:00pm Monday through Friday, requiring cars to enter and exit the campus onto Sunset Boulevard during peak hours;
- Adding lights to the field, setting a precedent for other private schools in the Brentwood Community Plan area;
- Building two gyms instead of one, setting a precedent for other private schools in the Brentwood Community Plan area;
- Doubling the size of the campus by adding over 80,000 additional square feet;
• Constructing four large scale buildings that could be used at the same time after school 3:30pm to 10:00pm
  – a 41,400 sq ft Multi-Purpose Facility that would include two gyms plus a stage and seating for 600,
  – a 7,400 sq ft Visual Arts Center,
  – a 9,675 sq ft Aquatic Center,
  – a 22,600 sq ft Performing Arts Center with 650 seats, more seats than the Geffen Playhouse, the Wallis Annenberg Center for the Performing Arts Center and the Broad Stage;
• Tearing down two residences to place over 80,000 square feet of buildings for institutional use right next to residential houses;
• Eliminating substantially all of the critical protections painstakingly negotiated in the school’s original Conditional Use Permit (e.g. hours of operation, no lights on the field, limited weekend use, setback of proposed gym) without which Archer would never have received approval to operate in a quiet residential neighborhood.

Response to Comment No. 68-1

This comment describing the various components of the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

Regarding campus operations, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation on Saturday, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Regarding traffic, as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, the Project is incorporating additional operational mitigation measures to reduce operational significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

Also refer to Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, and Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s
consistency with the residential scale and character of the neighborhood. As discussed therein and described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the proposed buildings, a reduction in the number of seats within the Performing Arts Center, a reduction in the number of events and athletic activities, and a reduction in the number of parking spaces. Specifically, the Multipurpose Facility would be reduced from approximately 41,400 square feet to 39,300 square feet and the Performing Arts Center would be reduced from 22,600 square feet to 19,025 square feet. With the reduced Performing Arts Center, the maximum seating capacity would be reduced from 650 seats to 395 seats. In addition, the North Wing Renovation would be reduced by approximately 8,671 square feet. A reduction in the number of parking spaces from 212 spaces to 185 spaces, which would be expandable to 251 spaces with attendant assisted parking, is also proposed. To reduce noise to the adjacent uses, the Project has been further refined to fully enclose the proposed Aquatics Center. This refinement would increase the square footage of the Aquatics Center from approximately 2,300 square feet to 9,675 square feet. The Visual Arts Center would remain at approximately 7,400 square feet. Overall, the Project’s net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet.

Regarding noise, refer to Topical Response No. 4, Additional Measures to Reduce Noise, which provides that in response to comments on the Draft EIR, additional measures would be implemented to reduce noise associated with campus operations.

Regarding lighting, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has been refined to remove the athletic field lighting. With the removal of the athletic field lighting, light and glare impacts from the Project would be reduced.

Regarding construction, refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years.

Also refer to Topical Response No. 13, Use of Existing Residential Properties, for an analysis of the use of residential properties for school uses. As described therein, school uses are permitted in the RE and R3 zones with a conditional use permit. As further discussed in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A CUP is a discretionary approval issued after environmental review and a public process. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the
School to a new set of conditions of approval, including conditions regarding compatibility of the School’s operations and its facilities with the surrounding neighborhood.

**Comment No. 68-2**

Residential Neighbors of Archer support a reasonable alternative that would:

- Increase the current size of the school by adding two new buildings, not four, which includes one gym, and one multi-use building,
- Expand and renovate the campus within the current footprint of the school, thus preserving the two residences and creating a needed buffer between the neighbors and the institutional use of the school,
- Add more landscaping to provide an attractive buffer between the school and residences.
- Increase the set back of the buildings placed adjacent to Chaparal Street,
- Maintain the number of special events and athletic events at the current level,
- Maintain the current condition of no lights on the athletic field,
- Follow the guidelines of the current Conditional Use Permit regarding hours of operation and limits on the use of the facilities at night, on the weekends and for outside use,
- Improve the school’s facilities with only one phase of construction.

**Response to Comment No. 68-2**

Refer to Topical Response No. 14, Residential Neighbors’ Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project. In addition, the Project has been refined to reduce the overall construction timeframe for the Project from six years to five years.

**Comment No. 68-3**

As a concerned neighbor of Brentwood for 23 years, I think this plan is atrocious. Already there is too much traffic coursing through Saltair and Chaparrel with current Sunset backup in the afternoons and mornings. I live on Saltair and it is no
longer safe to walk on the streets during traffic because of the speeding cars racing through our neighborhood.

**Response to Comment No. 68-3**

As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving as construction on the I-405 Sepulveda Pass Improvement Project has neared completion, with the opening of the HOV lane on the northbound I-405, and substantial completion of the I-405/Sunset Boulevard interchange refinements. The surrounding streets saw an increase in cut-through traffic as motorists attempted to avoid the increased congestion along Sunset Boulevard during the construction of the I-405 Sepulveda Pass Improvement Project. With improvement in conditions along Sunset Boulevard, this cut-through traffic is expected to reduce. Although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to $15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street.

**Comment No. 68-4**

Why should a school be allowed to have paid outside events come to our residential neighborhood?

**Response to Comment No. 68-4**

As described in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including eliminating community use of the facilities and the rental, lease, and non-School Use of the facilities.

**Comment No. 68-5**

Lights at night blaring in home windows should never be a consideration. This is a residential neighborhood!!!

**Response to Comment No. 68-5**

As described in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, impacts related to lighting would be less than significant. Notwithstanding the less than significant impacts associated with the athletic field lights, in
response to comments on the Draft EIR, the Project has been refined to eliminate the athletic field lighting.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 68-6**

And to make matters worse, Archer went back on their agreement. This should not be allowed.

**Response to Comment No. 68-6**

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A CUP is a discretionary approval issued after environmental review and a public process. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 68-7**

153 N Saltair Ave
Los Angeles 90049

**Response to Comment No. 68-7**

In response to this comment, the commenter will be added to the EIR mailing list.
Comment Letter No. 69

Joseph and Ellen Aragon
429 N. Oakhurst Dr.
Beverly Hills, CA  90210

Comment No. 69-1

This is not a form letter, but we are proud to identify ourselves as the parents of an Archer graduate, class of 2011.  We fully support Archer, the bright and endlessly curious young women that it nurtures, and of course, the school's campus improvement plan, Archer Forward.  Words can express how wonderful Archer is, and the amazing impact it had on our daughter, but it would take much longer than a letter to tell you everything.  We hope that we can count on your sense of fairness and professional judgment in assisting Archer in completing the campus improvements.  We want to see Archer continue as a unique alternative and as one of the best schools in the City of Los Angeles.

It was very important to us that our daughter was able to go to an "all girls" school.  While this is not for everyone, it can be critically important for young women who need to find their confidence, voice and individuality.  Many people have the mistaken belief that “all girls” means that parents want to “protect” their daughters and keep them cloistered.  To the contrary, we wanted our daughter to expand her vision, push herself and speak up in class.  At Archer, she was willing to assume leadership roles and to expose her fears.  This made her stronger.  Moreover, thanks to the generosity of so many parents and the vision of Archer’s founders, our daughter’s schoolmates were economically, racially and geographically diverse, giving her more perspective on life than she might have had in the Beverly Hills schools.

Archer attracts teachers who work well together, who encourage the students to see their learning in a holistic framework, and to work together on projects.  Studies show that this is the way that girls learn best.  Math lessons tie in with Geography and History, not only with Science.  Photography and Literature complement each other.  Theater and foreign languages can be used to explore the values of other times and cultures.  The girls respect their teachers, but can speak to them as colleagues too.  A new idea is always welcome.

Archer helped our daughter grow into an independent, creative and adventurous spirit who is now taking a “gap year” from NYU to travel and live in Budapest, continuing to learn fearlessly and find her place in the world.  We truly believe we have Archer to thank for this transformation.
Our daughter no longer rides the bus to and from Archer each day. We will not directly benefit from this campus plan, but we still fully support the school’s proposal. The school’s leadership is simply asking to give Archer girls the same facilities that each other school in this area already has on campus, including: on-site parking, a performing and visual arts center, and a regulation-sized field. That really isn’t that much to ask.

The school has been a team player and has kept its neighbors up-to-date with any changes to their plans, despite what is being said otherwise. Please do the right thing and allow Archer to build the facilities they need and deserve.

**Response to Comment No. 69-1**

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 70

Bonnie Arnold
P.O. Box 49851
Los Angeles, CA 90049

Comment No. 70-1

I am a parent of a student at the Archer School for Girls. I am writing in support of the Archer Forward Campus Preservation and Improvement Plan—a plan that I believe will pave the way for a facility that matches the excellent education provided by the School for the next generation of female leaders.

As the only girls’ school on the Westside, Archer is an asset to both the Brentwood community and the greater Los Angeles area. The school has made a significant impact through its diversity and scholarship programs, its’ commitment to educating young women, and maintaining its’ important historic building in Brentwood. I’m sure you will agree that these are very tangible benefits to the Los Angeles community.

Archer does a fantastic job of balancing the needs of its students with the needs of the community. Archer is a top school, offering a high quality education to students who go on to contribute to this Very community. They have also managed to create transportation and community outreach programs that are models for what schools, both public and private, should be striving for across Los Angeles.

From my experience, I believe that Archer is a committed and conscientious member of the community. As a parent, I am deeply invested in the school’s mission and its success, and strongly support Archer Forward.

Response to Comment No. 70-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 71

Paul Arrow
230 N. Bundy Dr.
Los Angeles, CA 90049

Comment No. 71-1

For the past 12 years I have lived at 230 N. Bundy Dr. in Brentwood. My house is about two blocks North of Sunset, and about a half mile west of the Archer School. I have read Archer’s current expansion plan and I am deeply troubled by it. As you may know, traffic in the area is already a nightmare most of the time. Sunset and the crossing streets near the Archer school are gridlocked for a good portion of each weekday. To get home in the evening, I drive north on Bundy and have to fight my way across the Bundy / Sunset intersection. On a number of occasions, I have come very close to being hit due to the gridlock and the number of people trying to cross and turn onto Sunset. In the mornings, I travel east on Sunset to the 405 freeway. While that is a mere 1.2 miles, it has taken as long as 20 minutes to travel that distance. In the evenings, that 1.2 mile trip can take even longer. The biggest hang up is at Barrington, right at the Archer School.

Undoubtedly, Archer’s proposed expansion will make a truly terrible and dangerous situation much worse. Our neighborhood simply cannot absorb the additional traffic. We should not have to endure it, and I urge you both to do whatever you can to prevent this from happening.

Response to Comment No. 71-1

This comment is noted for the record and will be forwarded to decision-makers for review and consideration.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.
Comment Letter No. 72

Linda Arzt
linda@thearztgroup.com

Comment No. 72-1

We are parents of a sophomore at The Archer School for Girls. The Archer School for Girls has had such a positive influence on our daughter, and we cannot say enough about this incredible school and the all girls learning environment. The Archer staff is caring and supportive, and has created an environment that our daughter has thrived in for the past 5 years. We feel lucky that she has had the opportunity to attend this school, and will graduate from there in two years receiving an amazing education and a unique experience.

We feel so strongly and fully support the Archer Forward plan. As a parent of a daughter who participates in Archer's performing and visual arts program, the Archer Forward plan is so essential for the school. This new space is needed so badly, as well as the improved modern classrooms, and athletic facilities. These new facilities are necessary for the future of this wonderful school to be able to continue to do what The Archer School for Girls does best ... to encourage every girl to get involved and find their passion, as well as provide the onsite facilities to do so. The availability of onsite parking is also greatly needed, as crossing Sunset is a huge safety factor.

Thank you in advance for your time and attention to the Archer Forward Plan.

Response to Comment No. 72-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 73

Chad Attie

**Comment No. 73-1**

I am an art teacher at The Archer School for Girls. I have been teaching for over 20 years and have truly never taught at another school that matches Archers [sic] environment of excellence. I am confident that with Archers [sic] new campus plan the school will become even more a beacon for education in the 21st century. Specifically, I know that with a new facility for the arts, our department’s teachers and students will benefit greatly. As it is now we make the most of what we have, but if we were able to have better light, more open space, proper storage and work stations, the girl’s [sic] ability to create freely would be magnified immeasurably. As a teacher a new facility would definitely make teaching more fluid and efficient. The students would also benefit greatly. For instance, natural light and accessibility to the outdoors is critical to an art class, and as it is now, our classrooms have neither of these conditions.

I ask you kindly to support this campus plan. I am confident that it will facilitate teaching and aid in expanding the possibilities and knowledge of a whole new generation of artists.

**Response to Comment No. 73-1**

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 74

Katie Baral
katie@baralfamily.com

Comment No. 74-1

My name is Katie Baral and I am a part of the Archer School for Girl's 2012 graduating class. Today I am a University of Michigan Wolverine, but at heart I will always be a Panther. As a member of the Ambassador Leadership Team at Archer, I can say that I have always been and always will be committed to making Archer the best place it possibly can be. We are a group of diligent, hard-working and motivated girls who enter the world as confident and inspiring leaders. After spending a year at a school of 30,000+ students, I don’t feel like a number, and that is because of the confidence and direction Archer has provided me with. When you walk through the doors of Archer you feel the spirit and hear the happiness radiating from the students. But when you walk outside to watch a soccer match, there are not nearly enough people in attendance. People are strewn across the grass and squeezed on small metal benches, but what if there was a larger space for people to gather and watch games, on a regulation sized field. What if we could go outside to watch a swim meet, rather than struggle to find transportation to cheer on our amazing swimmers? As an avid dancer, I can confidently say that Archer’s dance program is superb, but the shows do not generate nearly enough attention. It because too difficult to coordinate rides to the off-campus facilities we are forced to watch the shows at and thus attendance is severely lacking. With Archer Forward, the enthusiasm and eagerness that Archer students carry with them every day will be strengthened even more. Students won’t waste time in the beginning of class struggling to find a seat they can see the board from and aspiring artists will have a workspace that will inspire them and allow them to develop even further. We are a 21st century school, so why shouldn’t we have a 21st century campus?

Thank you for your time.

Response to Comment No. 74-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 75

Julie Bardin  
16668 Calle Jermaine  
Pacific Palisades, CA  90272  

Comment No. 75-1  

I am a parent of a student at The Archer School for Girls and I am writing to show my support for the Archer Forward Plan. I also live in Council District 11.

Since coming to Brentwood, Archer has been a model institution, strictly complying with the conditions mandated by the City, and in many cases going beyond what is required. Under Archer Forward the School will again make numerous commitments to reduce any burdens on its neighbors, including raising the number of students riding the bus to school from 50 to 70 percent, preserving “silent Sundays,” and planting ample mature trees around the campus to green the area and block noise from campus. Archer Forward was crafted carefully and thoughtfully, with enormous input from the Brentwood community.

Most of the peer independent schools in the area already have or are permitted to build the facilities that Archer is requesting to add to its campus. Archer Forward will allow Archer to take a big step forward by permitting the School to provide its excellent curriculum and extracurriculars on campus. As a parent who has to drive around the City to see my daughter compete or perform, this is an enormous plus.

Archer and its students deserve to have this plan. I fully support it and hope that the Planning Department and Councilmember Bonin will do everything they can to move this forward quickly and secure City approval. Thank you.

Response to Comment No. 75-1  

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 76

Jennifer Barnhill
3616 Cardiff Ave. Apt. 107
Los Angeles, CA 90034

Comment No. 76-1

I am a French teacher at The Archer School for Girls. I am very happy to have started my career here at this amazing school. Over the past year, I have come to love my work here and embrace Archer’s mission. As the only secular girls’ school on the West Side of Los Angeles, and a school that supports diversity through an annual conference and enrolling girls from all over Los Angeles, it is vital that Archer continue to fulfill its mission through campus expansions.

Archer is a special school with students that excel and will become the leaders of Los Angeles in the future. We need better facilities. The campus improvement plan would provide our students with those facilities. We need space and comfortable classrooms, just as every other school does. We need bigger spaces for our sports and performing arts programs. My room is cramped and doesn’t have air conditioning, and in the heat we often find ourselves holding class in the library, which makes teaching languages especially challenging.

The Archer School for Girls has become an important part of the Brentwood and greater Los Angeles community. Our students deserve the best, and they certainly deserve better than what our campus can currently offer them. I ask that the City of Los Angeles please support Archer’s campus improvement plan. It will benefit our students and the community for years to come.

Response to Comment No. 76-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 77

Marissa Bass
8217 Beverly Blvd., Ste. 7
Los Angeles, CA  90048

Comment No. 77-1

I am an Archer graduate and I am writing to you today to express my support for the Archer Forward Campus Preservation and Improvement Plan. I hope the school can count on your support as well.

The school changed my life and helped me become a successful woman in life and in business. Hundreds of girls in Los Angeles have benefited from an Archer education and the school continues to give girls the confidence and skills they need to succeed in college and beyond.

I will not benefit directly from Archer Forward but I think it is important to invest in future Archer girls so that they too have the opportunity to thrive. As a graduate, I am deeply invested in the school’s mission and its success and I strongly support the plan.

Response to Comment No. 77-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 78

Richard L. Benfield
735 Alma Real Dr.
Pacific Palisades, CA 90272

Comment No. 78-1

Please reply to confirm receipt.

Response to Comment No. 78-1

This introductory comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 78-2

I am writing to register my support for The Archer School for Girls Campus Preservation and Improvement Plan (ENV-2011-2689-EIR). While I am integrally involved as an Archer employee in the effort to bring the plan to fruition, I’m also a parent of an Archer 7th grader and a constituent of CD 11 living in Pacific Palisades. In fact, I’ve lived essentially my entire life in CD 11 and am a graduate of a local independent school.

Archer’s plan is responsible and reasonable in that it doesn’t seek to build an “empire.” It simply provides adequate space for athletics and the arts for decades to come. My daughter and all future Archer girls deserve facilities on par with all comparable local schools.

Archer engaged the community in dialogue about this plan in an unprecedented approach that included sharing details about the essential buildings and their uses earlier than any school applicant in City of Los Angeles history. Over the past year, the Archer plan has been informed by and improved from the input of numerous community stakeholders, including the Brentwood Community Council, Brentwood Homeowners Association, Brentwood Village Chamber of Commerce, and immediately adjacent neighbors.

Most notably, as part of this plan Archer is not seeking to increase enrollment and will make a long-term commitment to this position. In addition, the School cares about traffic on Sunset Blvd. and is part of the solution, not part of the problem. Brentwood is a better place to live because Archer exists and is thriving.
This plan provides girls access to the facilities they need and deserve. When this campus has been fully built, it will be a source of pride in Brentwood and will be a community treasure. I look forward to your support of the Archer plan so that generations of girls in Los Angeles are able to benefit from a school that believes in equal access and fair treatment of all, while providing a top notch education regardless of all the protected status categories. Archer girls truly reflect the face of greater Los Angeles and deserve everyone's support. Thank you for your consideration.

**Response to Comment No. 78-2**

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 79

Kristen Benjamin

Comment No. 79-1

I am the Assistant Athletic Director as well as the Fitness and Wellness Department chair at Archer and am in my seventh year here. I also coach volleyball, basketball, and softball. I have watched the school grow tremendously over the past seven years and am really excited about the direction the school is going with the campus master plan.

As a coach, I have watched girls travel each day to off campus locations for practices and games, which is definitely challenging. The girls get home late after practices and do not get to have the excitement of a true “home game.” Although we have been lucky to have access to such facilities as Santa Monica College and UCLA, it is not the same as being able to play on their own campus. These athletes put in many hours of work for their teams and have a huge amount of pride in what they are doing, but they deserve to have facilities just like every other school in Los Angeles. I cannot wait for the day that we can have a pep rally on campus during the day with all students involved and then lead into a home game, where faculty and students will be able to stay and support the teams.

Not only am I writing on behalf of the athletics program, but I am also writing as an openly gay faculty member at Archer. I moved here from a school in Texas, where I was forced to stay closeted with both the faculty and the students. Being at Archer has been amazing, as I have felt completely supported by the administration, faculty and students. Archer truly supports the mission of being a diverse and inclusive environment. This is such a unique and amazing school for these girls and I really do think that they deserve to have the facilities they need for activities such as diversity day, where it is necessary to have one space to come together to meet.

I am writing to ask for the city of Los Angeles’ support for our campus master plan. I feel passionately about the mission of this school and know that we need and deserve these facilities.

Response to Comment No. 79-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 80

Sharma Bennett  
125 N. Barrington Ave., No. 205  
Los Angeles, CA 90049

**Comment No. 80-1**

As a longtime Brentwood resident, I am writing to implore the city to stop the Archer School Expansion plan.

The extreme traffic in this section adjacent to Brentwood Village is presently so backed up, it can take hours to travel a mile. There are numerous schools in the area and a already congested bedroom community has been severely impacted by the backup of cars for miles on Sunset Boulevard attempting to reach the 405 off Sunset as well as homeowners trying to get home. Every side street around Archer School to packed with cars literally inching their way in different directions.

The community surrounding the school including old homes and two apartment buildings would either have to be torn down or driven out. The additional traffic and enormous building plans would be taking over a treasured, already impacted area.

**Response to Comment No. 80-1**

This comment is noted for the record and will be forwarded to decision-makers for review and consideration.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.

In response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the proposed buildings, a reduction in the number of seats within the Performing Arts Center, and a reduction in the number of events and athletic activities. Refer to Topical Response No. 12, Site Plan Consistency
with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the community.

As discussed therein, in response to comments, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet, leaving 229,547 square feet of open space, approximately 72 percent of the campus. Upon full build-out of the Project, the School would comprise approximately 159,937 square feet. Thus, at build out, the Project's floor area would comprise approximately 22 percent of the total allowable floor area for the Project Site.

**Comment No. 80-2**

This neighborhood IS A RESIDENTIAL community and we suggest Archer School look for further space where there is some, as Crossroads and other schools have done.

**Response to Comment No. 80-2**

As discussed in Section V, Alternatives, of the Draft EIR, an alternative site was considered but rejected as infeasible. Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives, particularly those related to improving the existing Archer campus and ensuring the continued preservation of the historic Main Building.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 81

Marc Berger
233 S. Barrington Ave., Apt. 303
Los Angeles, CA  90049

Comment No. 81-1

I write today to respectfully request your support for Archer and their campus improvement plan. Although our daughter no longer attends Archer, we still live in CD 11 and this project is important to us. My daughter graduated in 2013 and was involved in many activities at Archer. This includes: Peer Mediation, Class Ambassador, Best Buddies, and JV Swimming just to name a few. Her time at Archer still plays a large role in her life today. She is currently attending The University of British Columbia, Vancouver BC, which Archer prepared her for with Archer's excellent college preparatory curriculum, caring and supportive teachers, as well as a sisterhood that cultivated life long friendships.

Archer graduates girls who go on to become leaders in their communities. They set the standard for what community service should look like. My daughter volunteered with Best Buddies and several community service organizations while she was at Archer, and other Archer girls volunteered with several other organizations too. Archer is dedicated to doing so much to make this community better and I believe they deserve the facilities they are asking for. Especially considering what they are asking for is in line with what pretty much every other school in the area already has.

I have looked at the plan on the ArcherForward.org and I do not think what they are asking for is unreasonable. I hope you recognize how valuable this school is to the community and you support their plan.

Response to Comment No. 81-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 82

Tracy Berglass
berglass@aol.com

Comment No. 82-1

I am writing in opposition to the Archer expansion plan. I am a resident of Santa Monica whose child attends school in the Valley. I pick up carpool 5 days a week and am forced to endure the snarled nightmare each day at 4:30 pm. It take me 40 min to go from San Vicente to the freeway and then just 15–20 once I am on the 405. Please consider the neighbors and the responsibility you have to us as public officials in protecting our right to a safe, hassle free drive thru our neighborhoods.

Response to Comment No. 82-1

As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has recently been improving as construction on the I-405 Sepulveda Pass Improvement Project has neared completion, with the opening of the HOV lane on the northbound I-405, and with substantial completion of the I-405/Sunset Boulevard interchange modifications.

This comment does not address the adequacy of the analysis in the Draft EIR. The comment is noted for the record and will be forwarded to decision-makers for review and consideration.

Comment No. 82-2

Archer has not been honest with the neighborhood in terms of their expansion plans. They are being truly selfish and disrespectful to all of us who should be their greatest allies. Many thanks for your support in blocking their proposed expansion program.

Response to Comment No. 82-2

Refer to page I-19 of Section I, Executive Summary, of the Draft EIR and Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, for a discussion of the public review process for the Project.

This comment expressing opposition to the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 83

Bruce Berman
750 Malcolm Ave.
Los Angeles, CA  90024

Comment No. 83-1

The Archer School for Girls has been a responsible and dedicated member of the Brentwood community for the past 15 years. As an Archer parent, I am writing to ask for the City’s support for the school’s upcoming campus enhancement plan, Archer Forward.

Archer’s commitment to the community starts with its traffic management plan—the strictest in the city, to ensure that the school is not imposing an undue burden on the neighborhood—and also extends to its extensive volunteer service program. Archer girls are involved in issues and organizations that serve our community in many different ways. Through service projects and after-school partnerships with organizations like the Daybreak Women’s Shelter in Santa Monica and Brentwood Green, Archer helps make our West LA community a better place.

Most of the other independent schools in the area already have the facilities that Archer is asking for, including gymnasiums, performing arts and visual arts facilities, regulation fields and aquatics centers. These improvements will greatly enhance the value of our daughters’ education, and will also save the school and the girls the time and resources they currently waste commuting around town to access the facilities they lack.

The school has done an excellent job of thinking this plan through completely, and I am confident that it is the best move forward for our girls and for the community that they will be a part of in the years to come. I hope that the City will join us in support of this project.

Response to Comment No. 83-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 84

Marcia R. Berman
11922 Iredell St.
Studio City, CA 91604

Comment No. 84-1

I am the Director of the Annual Fund at The Archer School for Girls and am writing in strong support of the Archer Forward Plan. I hope that the Los Angeles Planning Department will move the project forward quickly so that Archer can create the 21st century campus that its students genuinely deserve.

The Archer Forward plan proposes only the facilities that most public and independent schools already have: modern gyms, playing fields, and performing and visual arts facilities. Archer has made sure that the proposed facilities are designed with limited impact on the neighbors in [sic] and the new buildings will be fully consistent with the residential feel of the community.

I also think it is very important for the City to recognize the tremendous effort that Archer put into its community outreach for this plan. The School has been meeting with its neighbors and other community members for over two years, and has made significant changes in its original plan in order to meet the concerns of its neighbors. The modifications in the plan will make a quieter, greener campus, which benefits both the School and the community.

While Archer continues to work with the community on this plan, it is important to keep the process moving forward. I hope that you will help Archer move quickly through the City process so that Archer girls will soon have the facilities they need and so greatly deserve.

Response to Comment No. 84-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 85

Phyllis Bernard
1433 Georgina Ave.
Santa Monica, CA 90402

Comment No. 85-1

I have lived in Santa Monica continuously from 1967 to the present day, March 19, 2014. For many years I traveled via Sunset Blvd. to work in Hollywood 5 days a week. The Sunset corridor became increasingly problematic with long delays and congestions at key times in the day. 5 years ago I retired and on a regular basis find now that at certain times of the day, Sunset, in spite of its widening last year, is often backed up, and virtually impassible.

Response to Comment No. 85-1

This comment does not address the adequacy of the analysis in the Draft EIR. The comment is noted for the record and will be forwarded to decision-makers for review and consideration.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Comment No. 85-2

The institutional bldgs. proposed: the swimming pool, the 96,000 sq. foot parking garage, the 650 seat playhouse within a residential neighborhood: all these proposals constitute an enormous infringement within this neighborhood; an encroachment on the rights of the residents and on the rights of all those traveling on the thru-streets of the area.

Response to Comment No. 85-2

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City’s residential neighborhoods. In response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the proposed buildings. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a
discussion of the Project’s consistency with the residential scale and character of the neighborhood. As summarized therein and described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, the Multipurpose Facility would be reduced from approximately 41,400 square feet to 39,300 square feet and the Performing Arts Center would be reduced from 22,600 square feet to 19,025 square feet. The reduced Performing Arts Center would provide a maximum seating capacity of 395 seats, reduced from 650 seats. In addition, the North Wing Renovation would be reduced by approximately 8,671 square feet. The Project has been further refined to reduce the number of parking spaces from 212 spaces to 185 spaces, which would be expandable to 251 spaces with attendant assisted parking. To reduce noise to the adjacent uses, the Project has also been refined to fully enclose the pool within the Aquatics Center. This refinement would increase the square footage of the Aquatics Center from approximately 2,300 square feet to 9,675 square feet. The Visual Arts Center would remain at approximately 7,400 square feet. Overall, the Project’s net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet.

Additionally, as evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, during operation, the Project would not result in a significant impact on the 10 nearby analyzed neighborhood street segments.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

**Comment No. 85-3**

Traffic will be double-gridlocked and passage through will be made virtually impossible. The Residential Neighbors of Archer should be given the attention their reasonable alternative suggestions will be taken seriously.

**Response to Comment No. 85-3**

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance.
Refer to Topical Response No. 14, Residential Neighbors’ Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.
Comment Letter No. 86

Russell L. Berney, Esq.
Berney Law Corporation
11693 San Vicente Blvd., Ste. 320
Los Angeles, CA  90049

Comment No. 86-1

I have lived on Barrington Avenue in Brentwood, within a half a mile of the Archer School for Girls (“Archer”), for the past 20 years; and, I lived in another house near to my present home for the previous seven (7) years. In my experience, Archer has been a responsible neighbor and has truly gone above and beyond in its efforts to serve the community.

I know that Archer enforces a strict traffic management program, which means that Archer school traffic is not the problem in the already congested Brentwood area.

I am a firm supporter of Archer’s proposed campus plan, Archer Forward, and believe that Archer should be allowed to build on the residential lots that the school already owns.

Almost every other independent school in Los Angeles has been granted permission to expand in order to support their programs, and the girls’ school in Brentwood should be no different. These girls deserve to have the facilities that boys and girls from other schools already enjoy.

I know that some people in the community are hesitant about the plan, but Archer has proven that the school cares about it’s [sic] location in a residential neighborhood and I am confident that Archer will continue its record of CUP compliance.

Cities grow, communities grow, and schools should be encouraged and allowed to grow. This project is an important step forward for an institution that serves the needs of hundreds of girls from across the city, not just girls in Brentwood.

I truly hope the city of Los Angeles will agree that this is a responsible plan and a necessary step for Archer.

Response to Comment No. 86-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 87

Shane Berning
2211 Overland Ave.
Los Angeles, CA 90064

Comment No. 87-1

I am a chemistry teacher and the Science Department Chair at the Archer School for Girls. I started teaching here in August 2011, and in that time, I have been blown away by the unique educational experience that the girls receive here. Archer’s teachers are passionate educators who design engaging curriculum that caters to how girls learn best. The students are excited to learn, but they are also interested in a wide array of extra-curricular activities. Unfortunately, the school does not have many of the facilities needed to support every student in athletics and performing and visual arts.

The basketball and volleyball teams have had unbelievable records the past few years, and they have earned the right to practice and play on a home court. The theatre department puts on some of the most outstanding performances, and could benefit from a performing arts facility to seat a larger audience and expand the possibilities of the kinds of shows they are able to perform. Our girls are remarkably talented, and it is time to offer them the wide range of facilities for which most schools already have access.

In addition to extra-curricular facilities, the majority of the common classrooms are outdated. At the beginning and end of the year, in the midst of the summer heat waves, the students are unable to focus in most of the classrooms due to a lack of climate control. Teachers are also limited by the size of the classrooms, which do not accommodate the specific learning needs of every girl.

The Archer School for Girls has had a positive impact on the community. We offer the only secular all-girls school in West Los Angeles, and we provide financial assistance for a quarter of the students who attend. In light of the extreme traffic on Sunset Blvd, we are committed to bussing in more students than any school in Los Angeles. Many of my colleagues walk to work, ride the bus, bike, and carpool in an effort to help minimize the traffic to the neighborhood. I believe fully in the Archer’s mission to provide a safe place for girls to take risks and become life-long learners, and I ask that you support Archer’s Campus Preservation and Improvement Plan.
Response to Comment No. 87-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 88

Robert D. Beyer

Comment No. 88-1

Our neighbors Bob Beyer and Patrick Cole copied us on the attached letters that were sent to Councilman Mike Bonin in support of Archer’s Campus Plan and address, among other things, support for the use of residential properties for school purposes.

We wanted to make sure you saw them for EIR purposes.

Response to Comment No. 88-1

This introductory comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 88-2

I have lived directly across the street from The Archer School for Girls since 2005, and I am writing to express my support for the Archer Forward Campus Preservation and Improvement Project. I understand that the Draft Environmental Impact Report for the project is going to be released soon, and as one of the school’s closest neighbors, I am arguably among the most impacted. That said, I fully support the school’s efforts to modernize its campus in a manner that also benefits the community.

I also want to be clear that I support Archer’s proposed use of two residential parcels for school purposes, a parcel on North Barrington Avenue and another property on Chaparral Street, which is also across the street from my home. This project represents an important step forward for the school and I believe this plan should be approved. It will allow Archer to build the facilities necessary to continue to provide a top-notch education for young girls from around the City—meeting an important need on the Westside and all of Los Angeles.

Archer deserves these new facilities; they also deserve to be treated fairly. The school’s traffic management program is second to none, and their willingness to expand the number of students who take the bus will only help the traffic in the area. Archer has demonstrated its strong commitment to strict adherence with its Conditional Use Permit over the years and has truly been a great neighbor.
I am pleased to support Archer Forward and hope that we can count on your support in moving the plan forward through the City process. Thank you.

**Response to Comment No. 88-2**

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 89

Natalie Blake and Steven Schwartz
2810 Mandeville Canyon Rd.
Los Angeles, CA  90049

Comment No. 89-1

Our daughter is a proud graduate of the Archer class of 2008 and we live in Brentwood. While our daughter did subsequently attend Archer, we supported Archer’s mission to use the former Easter Star Home property for a school long before we ever anticipated that our own daughter would benefit from such an institution—when Archer was originally seeking its first CUP. As Brentwood neighbors, we firmly believed then, and still do now, that using space in our community to benefit the youth of Los Angeles is a value that far outweighs other potential uses for the space. And, indeed, Archer has given so much to so many young women, including our daughter, since it’s [sic] doors opened. Even though it has been 6 years since our daughter graduated, Archer still holds a very special place in her heart and ours.

We can still remember my daughter coming home bursting with excitement about what she learned in school that day, how grateful she was to have such wonderful peers, and how happy she was to return to school the next day. It can be difficult for children to actually enjoy going to school daily, but we can honestly say most of the girls at Archer felt the way our daughter did. Everyone at Archer made it a positive place to be and encouraged the girls to follow their passions and learn new things.

Although our daughter was extremely happy at Archer, all students felt the impact from the lack of adequate space. With the Archer Forward Campus Improvement Plan that will all be changed. The school is simply asking to add facilities that they do not currently have. The new facilities would allow the girls to have a more enjoyable experience at school with the facilities they deserve. Furthermore, the changes on the campus will help improve pedestrian safety, as there will be underground parking, and students and parents will no longer have to park in lots across the street in order to attend school events.

We hope you can see that this plan is great for the school, the community, and even the neighbors. We ask you to please support this plan and move it through the city process quickly.
Response to Comment No. 89-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 90

Terry Blecher  
1516 Oak St.  
Santa Monica, CA  90405

Comment No. 90-1

As a parent of a girl attending Brentwood’s Archer School for Girls, I am writing in strong support of the Archer Forward plan. I hope that you and the Los Angeles Planning Department will work with the school to move the project along in the City process.

As one of the most diverse independent schools in the area, Archer is an important piece of this city’s educational landscape. Archer awarded nearly $3 million in financial aid last year, and has a student body that comes from a wide range of cultural and socioeconomic backgrounds. In order for Archer to continue to thrive, however, it needs the critical facilities that most other schools already have, including gyms, assembly spaces, improved classrooms, regulation-sized fields, a pool and performing and visual arts facilities.

As Archer continues to meet with their neighbors, the school has made numerous changes to the plan to reflect the priorities of the community, even though these modifications come at a financial cost to Archer.

I hope that you will recognize Archer’s commitment to the community and creating a good plan and help the school by moving the project through the City process as quickly as possible. Thank you.

Response to Comment No. 90-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 91

Tracy Blum
2573 Greenvalley Rd.
Los Angeles, CA  90046

Comment No. 91-1

The Archer School for Girls is one of the top Schools in the City, providing a high-quality education for girls in a diverse environment. The only thing it lacks is the modern facilities Archer students need to learn, compete and perform on campus. Archer Forward takes the necessary step to fulfill those needs. I am writing to request that the City and the Councilmember assist Archer in moving the Archer Forward plan through the City review process.

Archer students are bright, engaged and driven. They participate in community service activities all across the City and in many Brentwood-based organizations. They are involved in the arts and athletics in incredibly high numbers, but the current campus facilities do not allow for these activities to occur on campus. Archer Forward would bring all Archer activities onsite, while also prioritizing a green, sustainable and open campus with underground parking and lush landscaping.

Archer has conducted a wide-ranging outreach program for Archer Forward—even before the Draft EIR was released. The School has held dozens of meetings with neighbors and community stakeholders to create the best plan for the entire community. It plans to continue these meetings through the public process, but I hope that the City will help Archer by moving the project forward quickly. The sooner we achieve a consensus plan that is approved by the City, the sooner we can begin to ensure Archer girls have the facilities that they need.

Response to Comment No. 91-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 92

Matthew Bombeck
mattbombeck@gmail.com

Comment No. 92-1

I am an Archer parent writing in support of the Archer Forward plan. I also live in the 11th District.

As a parent, I have followed carefully the evolution of this plan, and have been very impressed by Archer’s willingness to modify the project to ensure that it is the best plan not only for the School but for the community as well.

I know that Archer has looked carefully at all aspects of the plan. They have made modifications to the site plan to ensure the least impacts on neighbors, and have proposed a schedule of hours and operations that will minimize disruption in the community. Because of the current level of traffic congestion in Brentwood, I understand that very few cars trigger an impact under the City’s analysis, but I know Archer has and continues to look at ways to ensure that its impact on traffic is minimal. Already the School complies with the most extensive traffic management program of any independent school in Los Angeles. And it has gone beyond what his [sic] required by the City of Los Angeles to minimize its impact on local traffic.

My daughter is thriving at Archer, but the School simply needs the facilities in the Archer Forward plan to stay competitive. The Archer School for Girls provides an environment and an education that is beautiful and unique in the City. I hope that you will help move this project forward so that future generations of girls in Los Angeles can benefit from Archer’s high-quality curriculum, along with critical, 21st century facilities.

Response to Comment No. 92-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 93

Stephen D. and Barbara Bomes
12548 Promontory Rd.
Los Angeles, CA  90049

Comment No. 93-1

Please see the attached letter.

Response to Comment No. 93-1

This introductory comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 93-2

Our daughter graduated from Archer in 2009 and we are writing in support of the Archer Forward Plan.

As a close neighbors of the school and former Archer parents, we have carefully followed the evolution of this plan. Archer’s willingness to modify the project to ensure that it is the best plan not only for the school, but for the community as well has truly impressed us.

We believe Archer has thoroughly reviewed all pieces of the plan. They have made changes to the project to make sure that it has the least impact on neighbors like us.

As you likely know, the Brentwood area has some of the worst traffic in Los Angeles. However, Archer contributes very little to that problem. This is due in part to their strict traffic management program. The school requires all students to use the school bus or carpools to get to campus. Archer has and will continue to look at ways to ensure that its impact on traffic is minimal.

We hope you will support this plan and move it through the city process quickly.

Response to Comment No. 93-2

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 94

Ginger Bower
gbower01@gmail.com

Comment No. 94-1

I am writing to you to encourage you to approve the Archer Forward Plan.

Currently, I am a parent of an enrolled student at Archer and an active community member. It is rare to see organizations and institutions create real compelling results and Archer is doing it every day in how they are preparing young women to excel to be future leaders.

You merely need to step on campus and hear a girl answer a question to know the magic that is occurring there. Sounds corny, but it is true. I remember going to visit three years ago, walking in with sticker shock on tuition prices and leaving feeling that the tuition ($$$!!!) was a bargain—for the smart, imaginative, and focused education they are providing girls.

The Archer Forward plan is essential for the future of Archer to ensure that the students can utilize all the amazing space the campus has for sporting events and art programs that they currently are shuttled all over town to enjoy. For classroom innovations, to ensure that we are preparing women in Los Angeles for careers in math, science and engineering.

It would be devastating to harness the growth of Archer, and I am sincerely hoping you will be putting your full support behind this project.

Response to Comment No. 94-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 95

Susan H. Brin
8336 W. Fourth St.
Los Angeles, CA  90048

Comment No. 95-1

My daughter is enrolled at the Archer School for Girls, and as a member of the Archer Parent Association I am writing in support of the Archer Forward Campus Preservation and Improvement Plan.

Archer Forward will allow the school to continue to provide excellent, research-based education that allows girls from all kinds of backgrounds and neighborhoods in our city to succeed in the classroom and beyond. The plan will not increase enrollment and the school will continue to enforce its strict traffic management standards, requiring all students to use carpools or the school bus to get to campus.

Archer takes an active approach in its integration with the community. The school leadership has met frequently with stakeholder groups in the community in the development of Archer Forward, soliciting feedback and responding to concerns to ensure that it lives up to its commitment to be a responsible neighbor.

Archer Forward will allow the school to deliver on its mission for generations of young female leaders for years to come, and is the result of several years of planning and compromise. Archer is true asset to the neighborhood and to the City of Los Angeles. I fully support this plan.

Response to Comment No. 95-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 96

Michael Brodsky
11980 San Vicente Blvd., Ste. 612
Los Angeles, CA  90049

Comment No. 96-1

I write to you to express my strong support of the Archer Forward: Campus Preservation and Improvement Plan. I am a former resident of Brentwood, a business owner in Brentwood, a resident of West Los Angeles, and the parent of an Archer student. This plan for Archer will provide essential facilities that nearly all comparable local public and independent schools already have - including gymnasiums, performing and arts facilities, and regulation athletic venues. These spaces are critical to Archer being able to provide the programs that are integral to the school’s high-quality curriculum. The Archer Forward plan details a strategy to implement renovations and improvements while minimizing the impact on the surrounding community where I live and work.

I hope you will support this initiative.

Response to Comment No. 96-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 96-2

Thank you. My address is reprinted below. Please add me to the mailing list.

Michael Brodsky
11980 San Vicente Blvd.
Suite 612
Los Angeles, CA  90049
(310) 622-4140

Response to Comment No. 96-2

In response to this comment, the commenter will be added to the EIR mailing list.
Comment Letter No. 97

Noelle Brooks
1116 S. Highland Ave.
Los Angeles, CA  90019

Comment No. 97-1

I am the mother of twin daughters who have attended Archer School for Girls since the sixth grade. They are now Juniors. They have grown academically and as individuals so much, and have been so encouraged by their experiences at Archer. The instructors and advisors are all extremely qualified, generous with their time, and engage well with the students. In short, it has been a wonderful school environment for my daughters. In addition, I really have grown to appreciate an all-girl school with uniforms! It removes any unnecessary obsession with fashion and personal appearance, and encourages them to focus, rather, on their education and personal strengths. The school also has a wide range of socio-economically, religiously, culturally, and racially diverse students, and is a wonderful example for public and private schools alike. Honestly, I wish this school had been around when I was growing up!

Although my daughters will not directly benefit from the Archer Forward plan, as they will be at university way before the time when construction will hopefully begin, I believe that the improvements will be supremely beneficial for future Archer School for Girls students. The current building is beautiful, but outdated in terms of the classroom size, performance and presentation facilities, and athletic facilities. If they wish to remain competitive with other private schools, they truly will need to make these improvements. School should be a beautiful, spacious, engaging place for learning, activities and events. The Archer Forward plans are superb, and will really have a minimal impact on the surrounding area during construction. When the construction is finished, the Archer Forward plan will actually leave the Brentwood area better than when the school was founded. The Archer School for Girls will preserve the historic original building, which I think is very important when considering the Archer Forward plan. They are making a great location even better.

It is my hope that you will seriously consider and approve these additions and improvements to Archer School for Girls.

Response to Comment No. 97-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment No. 97-2

I understand. Certainly. My address is 1116 S. Highland Ave. Los Angeles, Ca. 90019

Response to Comment No. 97-2

In response to this comment, the commenter will be added to the EIR mailing list.
Comment Letter No. 98

Lindsay Browder

Comment No. 98-1

My name is Lindsay Browder. As the science and engineering teaching associate at the Archer School for Girls, I teach eager young women about physics and creative applications of electrical circuits.

It is with great pride and honor that I teach at Archer because of its unique approach to education. Over the past year, Archer has made great strides in promoting science and engineering education for young women. This is highly significant considering the growing job market for STEM careers yet the continued dearth of women in the field. As a female engineer myself, I can personally attest to the importance of supporting and mentoring young women in science and engineering as early as possible.

The Archer Forward plan is critical to the continued success of the school and in particular the growing engineering department. The construction will provide our students with the same facilities that their peers at other schools already enjoy: sufficient classroom space, modern classroom technology, performing and visual arts facilities, gymnasiums and regulation-size athletic fields, to name a few.

The Archer Forward plan will also benefit the way I personally teach my own students. Due to a shortage of available classrooms, I currently borrow a classroom from another science teacher in order to teach my Interactive Arts class. This has created a difficult organizational and logistical problem for me, as I have to transport boxes of circuit materials to and from the room every time my class meets. The added stress and less efficient use of class time would easily be ameliorated by the Archer Forward plan. With the additional and larger classroom space, I will be able to better maximize my impact on the girls in their science and engineering education.

As you can see in the photos below, the girls have responded to the new engineering curricula with great enthusiasm and engagement. With deep sincerity, and with the hope that this engagement will continue to grow in the future, I humbly request that you support the Archer Forward plan.
Response to Comment No. 98-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.
Comment Letter No. 99

Rachel Brown
3122 Grand View Blvd.
Los Angeles, CA  90066

Comment No. 99-1

I am a parent of a current student at the Archer School for Girls and an 11th District resident. I am writing in support of the Archer Forward Campus Preservation and Improvement Plan—a plan that will truly pave the way for the school to provide an excellent 21st century education for the next generation of female leaders.

Archer is an asset to both the Brentwood community and the greater Los Angeles area. The school has made a significant impact through its diversity and scholarship programs, commitment to educating girls and maintenance of an important historic building in Brentwood. These are real and tangible benefits to the Los Angeles community.

Archer does a fantastic job of balancing the needs of its students with the needs of the community. It is a top school, offering a high quality education to students who go on to contribute to this very community. They have also managed to create transportation and community outreach programs that are models for what schools, both public and private, should be striving for across Los Angeles.

From my experience, I believe that Archer is a committed and conscientious member of the community. As a parent, I am deeply invested in the school’s mission and its success, and strongly support Archer Forward.

Response to Comment No. 99-1

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.