



# City of Los Angeles

Department of City Planning • Major Projects  
6262 Van Nuys Boulevard, Room 351 • Van Nuys, CA 91401



## FINAL ENVIRONMENTAL IMPACT REPORT

### BRENTWOOD–PACIFIC PALISADES COMMUNITY PLAN AREA

Appendices

## Archer Forward: Campus Preservation and Improvement Plan

Case Number: ENV-2011-2689-EIR  
State Clearinghouse Number: 2012011001

**Project Location:** 11725 West Sunset Boulevard / 11728 West Chaparal Street / 141 North Barrington Avenue, Los Angeles, California, 90049

**Council District:** 11

**Project Description:** The Project proposes improvements to the existing Archer campus totaling 75,930 square feet of net new floor area, including a 39,071-square-foot North Wing Renovation, a 41,400-square-foot Multipurpose Facility, a 22,600-square-foot Performing Arts Center (seating 650), a 7,400-square-foot Visual Arts Center, and a 2,300-square-foot open-air Aquatics Center. The existing outdoor athletic field would be improved to include a regulation-size soccer and softball field and athletic field lighting. Parking would be provided in a new underground parking structure located below the athletic field to accommodate 212 parking spaces, expandable to 282 spaces with the use of an attendant.

Based on comments received during circulation of the Draft EIR, the Project was refined. The Project now consists of improvements to the existing Archer campus totaling 68,989 square feet of net new floor area, including a 30,400-square foot North Wing Renovation, a 39,330-square-foot Multipurpose Facility, a 19,025 square-foot Performing Arts Center (seating 395), a 7,400-square-foot Visual Arts Center, and a 9,675 square-foot enclosed Aquatics Center. The existing outdoor athletic field would be improved to include a regulation-size soccer and softball field without athletic field lighting. Parking would be provided in a new, reduced underground parking structure located below the athletic field and would accommodate 185 parking spaces, expandable to 251 spaces with the use of an attendant. The two adjacent properties currently owned by Archer would be removed to accommodate the Project.

**APPLICANT:**  
The Archer School for Girls

**PREPARED BY:**  
Matrix Environmental, LLC

**ON BEHALF OF:**  
The City of Los Angeles  
Department of City Planning

NOVEMBER 2014

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## Final EIR Appendices

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Appendix FEIR-B	Proposed School Functions
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## Added Draft EIR Appendices

Appendix C-4	Supplemental Construction Assumptions
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Appendix E-2	Tree Report Addendum
Appendix F-2	Supplemental Air Quality Worksheets
Appendix J-2	Supplemental Geotechnical Memorandum
Appendix L-2	Supplemental Hydrology Memorandum
Appendix P-4	Updated LADOT Traffic Assessment

# Appendices

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# **Appendix FEIR-A**

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Draft EIR Comment Letters





Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

April 30, 2014

RECEIVED  
CITY OF LOS ANGELES

MAY 06 2014

ENVIRONMENTAL  
UNIT

Adam Villani  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Subject: Archer Forward: Campus Preservation and Improvement Plan  
SCH#: 2012011001

Dear Adam Villani:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on April 29, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

**Document Details Report**  
**State Clearinghouse Data Base**

**SCH#** 2012011001  
**Project Title** Archer Forward: Campus Preservation and Improvement Plan  
**Lead Agency** Los Angeles, City of

**Type** EIR Draft EIR  
**Description** Note: Extended Review Per Lead.

The Project consists of improvements to the existing Archer campus totaling 75,930 sf of net new floor area, including the replacement of the existing 30,071 sf North Wing of the Main Building with a 39,071 sf renovated North Wing, and the development of an approximately 41,400 sf Multipurpose Facility, a 22,600 sf Performing Arts Center, a 7,400 sf Visual Arts Center, and an Aquatics Center with a 2,300 sf support facility. The existing outdoor athletic fields would be improved and would include regulation-size soccer and softball fields. Parking would be provided in a new underground parking structure to accommodate approximately 212 cars. The two residences within the adjacent properties currently owned by Archer would be removed to accommodate the Project.

**Lead Agency Contact**

**Name** Adam Villani  
**Agency** City of Los Angeles  
**Phone** 818 374 5067  
**email**  
**Address:** 200 N, Spring Street, Room 750  
**City:** Los Angeles  
**State** CA **Zip** 90012  
**Fax**

**Project Location**

**County:** Los Angeles  
**City:** Los Angeles, City of  
**Region**  
**Lat / Long** 34° 3' 53" N / 118° 28' 16" W  
**Cross Streets** Sunset Boulevard and Barrington Avenue  
**Parcel No.** 4402009-013/ 014/ 016/ 002/ 003  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I-405  
**Airports**  
**Railways**  
**Waterways**  
**Schools** Several  
**Land Use** R3-1; General Plan Designation: Very Low II Residential / Medium Residential.

**Project Issues** Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board; Air Resources Board, Major Industrial Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received** 02/27/2014 **Start of Review** 02/27/2014 **End of Review** 04/29/2014



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer Forward Campus Plan - LACMTA Comments**

3 messages

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**Sullivan, Marie** <SullivanMa@metro.net>  
To: "adam.villani@lacity.org" <adam.villani@lacity.org>

Tue, May 6, 2014 at 3:14 PM

Greetings,

Attached, please find comments from our agency regarding the proposed project. A hard copy will follow via U.S. Mail.

Thanks,

Marie Sullivan

Transportation Planner | Countywide Planning

Los Angeles County Metropolitan Transportation Authority

One Gateway Plaza | Mail Stop: 99-23-4 | Los Angeles, CA 90012

P: 213.922.5667 | F: 213.922.2849

E: sullivanma@metro.net



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 **Archer Forward Campus Plan - LACMTA Comments Updated DEIR 2014.pdf**  
117K

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**Adam Villani** <adam.villani@lacity.org>  
To: "Sullivan, Marie" <SullivanMa@metro.net>

Mon, May 12, 2014 at 10:26 AM

Thank you for your comments. Although they were received after the deadline of April 29, 2014, they will nevertheless will be included and responded to in the Final EIR. You will receive mailed notice as this project moves forward through the City process.



[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Sullivan, Marie** <SullivanMa@metro.net>  
To: Adam Villani <adam.villani@lacity.org>

Mon, May 12, 2014 at 11:15 AM

Excellent. Thank you for your leniency.

**From:** Adam Villani [mailto:adam.villani@lacity.org]  
**Sent:** Monday, May 12, 2014 10:27 AM  
**To:** Sullivan, Marie  
**Subject:** Re: Archer Forward Campus Plan - LACMTA Comments

[Quoted text hidden]



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

May 6, 2014

Adam Villani  
City of Los Angeles  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**RE: Archer Forward: Campus Preservation and Improvement Plan**

Dear Mr. Villani:

The Los Angeles County Metropolitan Transportation Authority (LACMTA) appreciates the opportunity to comment on the proposed project located at 11728 West Chaparral Street. In fulfillment of our statutory obligation, this letter conveys recommendations pertaining to the proposed project and potential impacts it may have on our facilities and services.

LACMTA submitted a letter in response to the Notice of Preparation (NOP) for the proposed project on January 27, 2012. The previous letter informed the project sponsor of the Congestion Management Program (CMP) requirements for traffic analysis. We appreciate the careful analysis that was performed in the Draft Environmental Impact Report (DEIR). In addition, we would like to make the project sponsor aware of the following concerns related to Metro bus operations and transit rider amenities.

Metro bus lines operate on Sunset Boulevard, adjacent to the proposed project. One Metro bus stop on the corner of Sunset Boulevard and Beverly Court is directly adjacent to the proposed project. The following comments relate to bus operations and the bus stop:

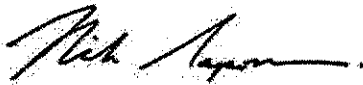
1. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. (For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5190). Other municipal bus may also be impacted and should be included in construction outreach efforts.
3. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site.

4. Final design of the bus stop and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

LACMTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at [SullivanMa@metro.net](mailto:SullivanMa@metro.net). Please send the Draft EIR to the following address:

LACMTA Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,



Nick Saponara  
Development Review Manager, Countywide Planning

April 10, 2014

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ENVIRONMENTAL  
UNIT

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Supporting the Archer School for Girls

Dear Mr. Villani:

I currently serve on the Board of Trustees at The Archer School for Girls in Brentwood and I am the chairperson of the master plan task force committee. I am writing to you today to request your support for our Archer Forward Campus Preservation and Improvement Plan. Your support is very important to us and we hope that you will agree that this is the best plan for our school and our neighborhood.

We deeply respect our school's commitments to the city and our community. In fact, Archer's stringent compliance to its CUP has become ingrained into the culture and character of the school. Every day, our students are taught the importance of community and being a good neighbor, and this value of responsible stewardship is translated into a true spirit of community service. Through the many service opportunities that our school offers, students learn to dedicate themselves to sustainability. They understand that making their immediate neighborhoods a better place helps make their world a better place. I believe that most, if not all, of our neighbors would agree with me that Archer has shown itself to be a good and responsible neighbor over the years.

The Archer Forward Campus Preservation and Improvement Plan is the product of many months of conversations, analyses, and meetings with our neighbors and local community organizations. We have provided numerous opportunities for community members to hear about the project and voice their questions and concerns. Our current design includes numerous modifications that we included at the request of our neighbors.

With the recent release of the Draft EIR, it is our intent to continue to meet with our neighbors and expand our outreach efforts whenever possible. We hope to have your

Mr. Adam Villani  
April 10, 2014  
Page 2

support as we move into this review process. We welcome your suggestions and guidance in the weeks and months ahead.

Sincerely,

A handwritten signature in cursive script that reads "Scott R. Lord (ad)".

SCOTT RICHARD LORD  
Archer School for Girls  
Board of Trustees

SRL:ad

cc: Hon. Mike Bonin  
Brentwood Homeowners Association

ADMIN10.001/241656.1



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward ENV-2011-2689-EIR

2 messages

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**Barbara Natterson-Horowitz** <barbhorowitz@gmail.com>

Wed, Mar 26, 2014 at 5:57 PM

To: adam.villani@lacity.org

Cc: councilmember.bonin@lacity.org

March 26, 2014

Re: Archer Forward – In Support

Dear Mr. Villani:

As a Trustee at The Archer School for Girls, I am happy that plans to improve our historic campus are moving through the city process. As the process progresses, I hope that we can count on your support to see this plan through to final approval.

Archer is one of the leading independent schools in the city and offers an excellent education for young girls. Using an extensive transportation management outreach program that has been recognized as a model for both public and private schools in Los Angeles, our student body is currently made up of girls from 92 different zip codes from all backgrounds across Los Angeles.

The board has carefully considered the Archer Forward Plan and believes it is truly the best step forward for our school and for the Brentwood community. These improvements are geared to enhance and enrich our girls' education and well being, while also reducing any burden on the local area. We know that traffic is a major concern and have made every effort to reduce our impact on the neighborhood. In addition, the entire design promotes pedestrian access and sustainability.

While we believe that this plan is truly the best for our school and responsive to the needs of the surrounding community, we are open to dialogue and compromise to ensure that the needs of both the school and area residents are addressed. Hopefully, we can count on your support for "Archer Forward".

Sincerely,

Barbara Natterson-Horowitz, M.D.

Co-Chair, Archer Board of Trustees

Professor, Department of Medicine Cardiology, Ecology and Evolutionary Biology

Cc: Councilmember Bonin

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Mar 27, 2014 at 2:07 PM

To: Barbara Natterson-Horowitz &lt;barbhorowitz@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—

Adam Villani

Planning Assistant

4/24/2014

City of Los Angeles Mail - Support for Archer Forward ENV-2011-2689-EIR

City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

**Elizabeth English** <eenglish@archer.org>

Mon, Apr 28, 2014 at 7:45 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

RE: ENV-2011-2689-EIR

Dear Mr. Villani:

Please see my attached letter of support for the Archer School for Girls Campus Preservation and Improvement Plan.

Sincerest thanks and regards for your consideration,

Elizabeth

Elizabeth English  
Head of School  
The Archer School for Girls  
11725 Sunset Blvd.  
Los Angeles, CA 90049

www.archer.org  
ph. 310-873-7003

@MsEnglishTweets

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 **EEnglishArcherSupportLetter.pdf**  
144K

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:57 PM

To: Elizabeth English &lt;eenglish@archer.org&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454





# A R C H E R

THE ARCHER SCHOOL FOR GIRLS

April 28, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

ENV-2011-2689-EIR

**Re: In Support of The Archer School for Girls and Archer Forward**

Dear Mr. Villani:

As the Head of The Archer School for Girls, the parent of an Archer girl, and a resident of Brentwood, I am writing to ask for your support for the Archer Forward Campus Preservation and Improvement Plan. There are many compelling reasons to support Archer's need to provide its students with modern facilities. Strictly speaking from a land use perspective, Archer has a proven track record of exemplary compliance with its Conditional Use Permit, widely regarded as one of the most restrictive in the City of L.A. For the past 15 years, Archer has gone to great lengths to operate in a way that is fundamentally respectful of the immediate neighborhood and the community at large.

For example, Archer's traffic management program, under which roughly 80% of students come by bus and the rest by carpool, stands as a model for other institutions. As a result, Archer contributes only 3% of peak hour traffic. We are proud of our longstanding commitment to busing and carpooling, because it is the right thing to do for the environment and the neighborhood. As the City looks for ways to reduce traffic, please know that The Archer School for Girls is the solution, not the problem.

With regard to use of our facilities, Archer has demonstrated a thorough commitment to living in harmony with our community, responsibly managing events to mitigate impacts on our most immediate neighbors. The Archer Forward Plan offers several benefits to neighbors such as underground parking, which will contain noise from arrival and departure activity, and indoor athletic facilities, which will contain noise from volleyball, basketball, and P.E. classes, which now occur outdoors. From the earliest stages, Archer has worked carefully with our architects to design a campus sensitive to the needs and concerns of our neighbors.



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THE ARCHER SCHOOL FOR GIRLS

What is more, Archer has been a devoted steward of our beautiful historic building that was once the Eastern Star Home for Women and will maintain the iconic view from Sunset Blvd.

Over the past two years Archer has held over 70 meetings, sent over 10,000 pieces of mail, and knocked on 100 neighborhood doors to solicit input on Archer Forward. Much of this feedback has been extremely helpful in our efforts to address concerns and has resulted in more than 30 changes to the original project. Moreover, we are immensely grateful for the good-faith collaboration and thoughtful contributions of many neighbors and community groups whose input over the past two years has been invaluable.

A city's educational and cultural institutions are ultimately what distinguish and elevate it. Over the past 18 years Archer has emerged as a national leader in girls' education. Through research partnerships with UCLA, Stanford, UPenn, and others, Archer has helped inform the national conversation about how girls learn and thrive. It is clear that girls' school graduates emerge with the competence and confidence to ascend to the highest levels of leadership in college and beyond.

Indeed, Archer's very mission is to educate the future female leaders of this country and ensure that women achieve parity in every sector. An Archer education is steeped in the experiential so that girls develop the confidence to become drivers of their own learning and achievement. The Archer Film Festival, Honors Research in Science/STEM Symposium, Gallery Management Program, Integrated Design and Engineering Arts (IDEA) Lab, and the NOLS Outdoor Education programs empower girls to take risks and take charge. These are signature programs that require both talented faculty and modern facilities.

Over the past decade, Archer has established itself as one of the premier girls' schools in Los Angeles, providing a top-tier education to a wide range of students from across the city. Currently Archer girls come from 92 zip codes and 146 different feeder schools, and Archer awards \$3 million in financial assistance to ensure educational access to girls of all socio-economic backgrounds. The Archer community is committed to providing its girls, including those on scholarship, those from diverse communities, and those supportive of LGBT values, with equal access to modern on-campus arts and athletic facilities. The choice to attend a non-sectarian



# A R C H E R

THE ARCHER SCHOOL FOR GIRLS

single-sex school where every girl, regardless of her background, can flourish should not require forfeiture of such opportunities.

Archer has unveiled its Campus Preservation and Improvement Plan to meet the needs of girls now and in the future. The plan is designed to provide our students with on-site access to essential facilities enjoyed by students at independent and public schools throughout Los Angeles while remaining sympathetic to the residential character of the neighborhood. In short, The Archer School for Girls is a tremendous and unique asset to West L.A. We have kept our commitment to being a good neighbor and will continue to engage with key stakeholders about Archer Forward in the weeks and months ahead. I hope that the school can count on your support. Thank you for your consideration.

Sincerely yours,

Elizabeth English  
Head of School



A R C H E R  
THE ARCHER SCHOOL FOR GIRLS

March 6, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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MAR 11 2014

RE: ENV-2011-2689-EIR  
**I Support Archer's Campus Plan**

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Dear Mr. Villani:

I am the Director of the Middle School at The Archer School for Girls and a passionate supporter of our campus master plan. Archer has been my professional home for over 14 years, initially as a faculty member and now as an administrator. When I started at Archer, we had just moved into this historic building amid horror stories of neighbors chaining themselves to our fence in an effort to keep girls from learning in this space. And yet, over the years I have had the pleasure of seeing many of those same early opponents ultimately send their daughters to Archer and become strong supporters of the stellar work we do--the ultimate compliment.

Innovative education is rare and special. As a young school, Archer has embraced this vision: our classrooms are alive with hands-on learning; bleeding-edge technology transports our students onto the global stage; and engineering, computer science, and design theory are integrated throughout the curriculum. Consequently, we have emerged as a leader in 21<sup>st</sup> century education.

Currently, our dynamic program is corralled in the converted dorm rooms of a convalescent home, so our program is literally bursting at the seams. The challenges are numerous: active learning is held in classrooms too small to walk around; our new engineering program can only enroll eight girls due to size limitations; our broadcasting studio for video and sound design is held in what used to be a closet; and our winning athletic teams practice without a gym. Yet despite the cramped classrooms and lack of facilities, teachers and administrators from all over the city come to observe our program as part of their professional development. Moreover, Archer teachers contribute to research on how girls learn best and present at national conferences on flip teaching, hands-on learning, and integrated curriculum design.

We don't want to build an empire; we just aim to create a flexible learning space that supports the valuable work we do here. I sincerely hope that you will join us in supporting our Campus Preservation and Improvement Plan. Let us continue to be both considerate neighbors and pedagogical leaders who educate future female leaders for the challenges of our 21<sup>st</sup> century.

Warmly,

Karen Pavliscak

cc: Councilmember Mike Bonin



ARCHER  
THE ARCHER SCHOOL FOR GIRLS

April 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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APR 29 2014

ENVIRONMENTAL  
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Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

It is reported that there are over 60,000 people in Los Angeles living with HIV/AIDS. With those numbers on the incline, it is important that people are educated about the disease. It is also important for those who are living with HIV/AIDS to have advocates. As members of the Archer AIDS Ambassadors Club we do just that. We are writing today to express our support for our school's campus improvement plan.

We are an advocacy group of 16 Archer girls whose mission is to raise awareness about the disease among the Archer and Los Angeles communities. We do this by giving presentations on the biology, spread, and current state of HIV and AIDS at different schools. Additionally, every year we plan and implement a World AIDS Day program on campus to teach the Archer community about current issues relating to HIV and AIDS. In previous years, we have hosted an Archer Diversity Day seminar, bringing in guest speakers and showing documentaries to engage the high school students in discussion about the AIDS epidemic.

As a group, we also participate in activities outside of campus. Every year we are involved in AIDS Walk LA. This year we partnered with the organization *Keep a Child Alive*. We held a fundraiser selling homemade hair ties and baked goods. We were able to raise \$216.50 for that organization. We also continue to be involved with *Keep a Child Alive* by writing letters to children affected with AIDS in Africa.

As members of a club that is doing so much to educate the community about HIV/AIDS we ask that you support our campus plan, Archer Forward. Thank you.

Sincerely,

*Arielle Ghaf*

*Elea Angel*

*Notre O.*

*Ali M Koh*

*Soph*

*[Signature]*

*Preban Tashig*

*Leilani Houston*

*Kate Heck*

*Chloe Halliwell*

*[Signature]*

*[Signature]*

Archer AIDS Ambassadors

*[Signature]*



ARCHER  
THE ARCHER SCHOOL FOR GIRLS

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CITY OF LOS ANGELES

APR 24 2014

ENVIRONMENTAL  
UNIT

April 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani:

At The Archer School for Girls we value diversity in all of its forms and promote inclusion on a daily basis. As students of Archer, and members of "Best Buddies," we wanted to write you a letter to show our support for our campus improvement plan, Archer Forward.

Best Buddies is in place so that students with and without intellectual and developmental disabilities can form strong relationships with one another. We currently have 40 members in our group, including the buddies. We meet once every two weeks and play games, dance, and simply have fun with one another.

On top of the meetings that we have on campus, we also participate with the larger bodies of Best Buddies, including Best Buddies California and Best Buddies International.

We currently have 40 members in our club and that number continues to grow every year. As we continue to grow, we would like to have our facilities grow with us.

Archer's plan will help us achieve this goal because we will have larger arts and athletic facilities to support a diverse range of activities. Currently, we are limited to a few small areas that restrict our ability to host fundraisers and grow as a chapter.

We hope you will support our campus plan and help us make the Best Buddies club at Archer stronger.

Sincerely,

*McLorain*  
*Nicole Redmond*  
*garcia*  
*Alexandra Lamm*  
*Kimia*  
*Evans*  
*Alexander*  
*Eva Bombeck*  
*Christina*

Members of Best Buddies



**A R C H E R**  
THE ARCHER SCHOOL FOR GIRLS

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CITY OF LOS ANGELES

APR 29 2014

ENVIRONMENTAL  
UNIT

April 26, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
I Support Archer Forward

Dear Mr. Villani:

As members of Archer's Black Student Union (BSU) we are writing to voice our support for our school's campus improvement plan.

BSU is an open diversity forum where Archer girls are able to speak their minds in a respectful way. During meetings the ten of us discuss issues/topics that are relevant to the African American community. We watch video clips and movies that are relevant to the topics and also discuss the opposing views. In our latest meeting, we collaborated with Archer's Diversity Club to have a discussion about the use of the N-word. The discussion broke a BSU attendance record and sparked further discussion. BSU plans on continuing the conversation because of how well it went. The teacher and student support have inspired us to delve further into the topics that are not always talked about.

We currently meet in a small classroom that doesn't provide our group with enough space to meet comfortably. However, with Archer Forward some classrooms in the school will be renovated and we would finally be able to have the space we need for meetings - especially as our club continues to grow. Furthermore, we would be able to have more meetings with other Archer clubs that share common goals and interests.

We hope you support the plan so that BSU and other Archer girls can have the same opportunities that our peers are experiencing at other schools.

Sincerely,

Archer's Black Student Union members

Milan Cross April 26



# ARCHER

THE ARCHER SCHOOL FOR GIRLS

April 26, 2014

RECEIVED  
CITY OF LOS ANGELES

APR 29 2014

ENVIRONMENTAL  
UNIT

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

We are members of Archer's Classics Club and we are writing to express our support for our school's campus improvement plan, Archer Forward.

Our club consists of about 30 girls who are interested in studying ancient civilizations and classical languages. In our meetings we participate in various activities, including: mosaic making and re-creating Roman recipes. However, most of the year is spent preparing for Archer's Greco-Roman Feast and two Junior Classical League conventions, in which we have won 2<sup>nd</sup> place once and 3<sup>rd</sup> place twice for overall small school. We won these awards by competing in athletic, academic, and artistic activities related to the classics.

As our club grows it would be nice to have more room for our members. Please support our campus plan.

Sincerely,

*Emily Ware*

*Sophia D...*  
*Carina B...*

*Aranda Mihalke*

*Anna Brodsky*

*Sage Orr*

*Lola Vesco*

*Maddie Fenster*

Classics Club

*Maddie Egger*

*[Signature]*

*Kelly Trapan*

*Cybele Zhang*

*Athena Schlereth*

Elizabeth Endo

*[Signature]*

*Alorath...*

*Emma Tappi*

*Chi M. Lufer*

*[Signature]*

*Saskia Wong-Suata*

*[Signature]*

*Helena Larson*

*[Signature]*  
*Zoe webb-mack*

*[Signature]*

*Maren Osullivan*





ARCHER  
THE ARCHER SCHOOL FOR GIRLS

April 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 24 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

We are members of Archer's Debate Club and we are writing today to express our support for Archer Forward.

In Debate Club, we debate both sides of current events and discuss the ethical and political issues that are relevant to our everyday lives. Additionally, we write cases, practice public speaking, and prepare to compete at tournaments throughout California, which we were very successful at this year.

If our campus plan is approved, we would be able to continue our string of success on our own campus because we might be able to host tournaments for our league. Most importantly, we would have additional facilities in order to practice, which would accommodate our growing club number.

We hope you will support us. Thank you!

Sincerely,

Cecilia Bobbitt

Sarah W...

Michelle Chung

Archer's Debate Club

Emma Hill



ARCHER  
THE ARCHER SCHOOL FOR GIRLS

April 23, 2014

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CITY OF LOS ANGELES

APR 24 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

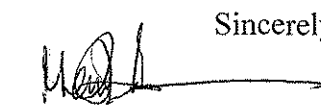
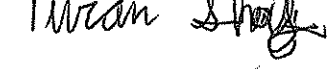




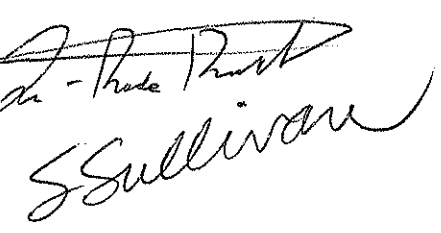
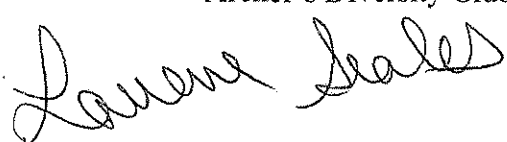
As Los Angelenos, we are so lucky to be able to walk around the city and see a variety of different cultures and hear multiple languages daily. Celebrating our differences is important to students at Archer, and even more important to those of us involved in Archer's Diversity Club. As a collective group, we are writing you today to show support for our campus plan, Archer Forward.

Our club currently has about 20 students who meet every other week to discuss issues about social justice, equity and inclusiveness at Archer and in the world at-large. In addition, our club plans Archer's annual Diversity Day – an entire day that consists of student, faculty and community-run seminars on diversity. We plan the opening presentation and help pick the topics that will be covered. In the future, we hope to be able to open our seminars to other schools as well so that they can share in the celebration.

However, in order for us to do that, we would need an indoor group-gathering place where students can watch a presentation. Fortunately, this is being proposed in our campus plan. With an auditorium, we can have our entire community sit together and learn about different types of diversity that exist in this community.

Archer Forward is a great plan for students, our neighbors, and the community at large. We hope you support it.

Sincerely,

Archer's Diversity Club



A R C H E R  
THE ARCHER SCHOOL FOR GIRLS

April 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

The Future Culinary Artist of America would greatly benefit from Archer's Campus Preservation and Improvement Plan, and are therefore asking for your support.

Our club only began last year, but several of the students at Archer have shown an interest in joining the club. It's safe to say this is the fastest growing club at our school with 70 student sign-ups this past year! Around fifteen students meet once a week at lunch to cook and enjoy delicious treats, ranging from s'mores to microwaved apple pie to pumpkin smoothies.

Archer allows each club to have one fundraiser per year, and the LA Food Bank was instantly our top choice for a donation; for we wanted to support a local charity related to our club, and we strongly support all of the work done by the Food Bank. This year we decided to support the LA Food Bank. We held a bake sale and were able to raise \$258.50 for the food bank.

We all love this club, but there is one big problem with it – we don't have a kitchen on campus to be able to effectively practice our culinary art skills and share them with the rest of the Archer community. But this could change with the proposed campus plan. If approved, a kitchen would be able to be built right here on campus! That way, those of us in the club will be able to dabble in other areas of culinary arts, which could help inspire future careers in the culinary arts.

We hope you choose to support this plan.

Sincerely,

*Marisa London* *Cathy Ulrich*

Archer's Future Culinary Artists of America Club founders

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Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

As members of Archer's Gay/Straight Alliance, we are writing today to voice our support for our school's campus improvement plan.

Archer's Gay/Straight Alliance is in place to educate and promote acceptance of different sexual orientations both within Archer and in the greater community. The club provides a forum to celebrate the Lesbian, Gay, Bisexual, Transgender, and Queer communities and to discuss the issues facing them. The GSA also plans events to raise awareness, contributes to charities, and most importantly, we create a welcoming atmosphere for all students.

Our club has been around since 2007 and is made up of 15 students. There are many girls at our school who come from same-sex households. On top of that, there are several faculty members who openly identify as gay or lesbian. Furthermore, our "Archer Dads" parent group has a written policy to include any "father figures" regardless of gender to ensure inclusivity.

On top of the activities we have on-campus, our club participates in several off-campus activities, including: the national Day of Silence, volunteering at the Los Angeles Gay and Lesbian Center, and even collaborating with GSAs at other schools.

We believe our club is a major asset to Archer and the community at-large. We hope you will support us by supporting Archer Forward.

Sincerely,

Archer's Gay/Straight Alliance



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April 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

As members of Peer Academic Work Support (PAWS), a joint faculty and student run organization, we are writing you today to show our strong support for our school's campus improvement plan.

PAWS is a committed group of faculty and trained students who provide tutoring to strengthen study skills for our fellow Archer students. The purpose of PAWS is to give Middle School and Upper School students an opportunity for academic support, guidance and mentorship.

We currently have ten peer tutors, and have about 30 regular tutees that utilize PAWS weekly after school. PAWS would be most effective with proper space for small group work, one-on-one tutoring, and a quiet area for studying. Although we work with the space we have using a French classroom, it is evident that more space is needed to provide a comfortable and effective place for learning. The Archer Forward plan will provide us with this extra space so that we can continue serving as peer tutors and welcome all tutees who would benefit from our successful program.

We hope you can see what a great school Archer is and that you will support our campus plan, Archer Forward.

Sincerely,

*Cecilia Robbitt*  
*moylegger*  
*Evan Ditt*  
*Catie R Chase*  
*L Brown*  
*Morisa London*  
*Reanna Wauer*  
*Morinda Jonathan*

The PAWS Team



A R C H E R  
THE ARCHER SCHOOL FOR GIRLS

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APR 24 2014

ENVIRONMENTAL  
UNIT

April 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

As members of Archer's photography club, we are writing to ask that you support our school's campus improvement plan. In Photography Club we get the opportunity to learn everything about film and digital photography, including: developing film, editing film, and ways to make the lighting for film even better.

We all love to take pictures, but the one thing we are missing is a large enough space to develop those pictures. With Archer Forward, that will no longer be the case, because we will be able to have a darkroom that will be large enough to accommodate the members of our club and the rest of the students at Archer.

We respectfully ask that you help support our club by supporting Archer Forward.

Sincerely,

*Olivia Kohn, Allison, Billie Lin,  
Malia Bouri, Natasha Oregio, Hannah Goldstone  
Archer*

Archer's Photography Club



# A R C H E R

THE ARCHER SCHOOL FOR GIRLS

April 26, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

The female presence in Science, Technology, Engineering, and Math (STEM) fields is extremely low. It is our hope as members of the Robotics Club to change that and encourage young girls to join these fields. As a club, we are writing you today to ask that you support the future of these fields and allow us to build the space we need so that the program can prosper.

There are currently 18 Archer students in the Robotics Club and we meet once a week to build robots, a challenging yet fun process. This spring we plan on building a painting and drawing robot, which is so exciting for us!

Archer holds the title for being the first all-girls US FIRST Robotics Team east of the Mississippi. Not only that, but this year we competed in the US FIRST FTC competition and won the PTC Design Award at the Lancaster FTC Qualifying tournament.

If our campus plan is approved, we will be able to continue on this path to success because we will have additional workspace to build robots that could do bigger and better things. As the future leaders in STEM, we ask that you support our campus plan.

Sincerely,

Archer's Robotics Club

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Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani:

Using technology to write computer programs and teach others to write their own programs will help to make this world a better place. As members of Archer's Scratch Club, this is what we believe to be true. We are writing you today to ask that you help keep an inspiring program moving forward and support our school's campus improvement plan.

Ten of us meet once every week and develop programs in Scratch, a programming language developed by the MIT Media Lab for kids ages 5-14. The Scratch language has been used to author over four million projects, most of which have been shared on the official Scratch site.

Our group has won many awards for our skills, including: two of our members being featured on the Scratch website, the group as a whole serving on a panel with a member of MIT's Scratch Team, and hosting Los Angeles' Scratch Day in 2013 in partnership with the LA Makerspace. In addition to what we do on campus, we also volunteer in the community and teach kids from all over the city programming skills.

In order to continue the work we are doing, we need more space to accommodate our technology needs. Archer Forward provides that space for our club and others like it. We hope you approve the plan.

Sincerely,

*Lola Wolf*

*Marie Chorpita*

*Caroline Ediger*

Archer's Scratch Club

*Joe A-S*      *Chin*

*Aniva Centveld*





ARCHER  
THE ARCHER SCHOOL FOR GIRLS

April 16, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 21 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Student Support for Archer Forward

Dr. Mr. Villani:

We are members of the middle school cast of "Seussical," a musical by Lynn Ahrens and Stephen Flaherty based on the books of Dr. Seuss that debuted on Broadway in 2000. The play's story is somewhat complex and combines many of Dr. Seuss's most famous books.

With a cast and tech crew totaling 40 girls, it is sure to be a great show! We are really looking forward to performing in our Blackbox theatre this May. While our current theatre space is small and intimate, it only seats 75 people so as you can imagine, there isn't a lot of room, and sometimes we aren't able to have all of our family and friends attend the performances.

The Archer Forward plan will allow us to have a performing arts center that will include a proper stage and enough seating for our community. Not only will this allow us to grow as artists, but it will allow all of our families and friends to come and see us perform.

We hope that you choose to support Archer Forward.

Sincerely,

Hannah Levy Zoë Webb-Mace

Vivian Shay

Livia Blom

Noa Diamond

Rachel Kozminski

aloha. Dani Baumgardner

Lily Price

Landon L

Rose Shulman-Litwin

Amanda R.

Sophie Evans-Katz

Leila Mirdamadi

Uma Halstead

Kathleen Kelso Dominique Cadenas

HOPE MOTHERS BALGH

Carly Feldman Langston Stahler Julianna Goldsmith

SARA FRIEDMAN Javier Hernandez

Audrey Choate

Sage Brand-Walker

The 2014 Middle School Cast and Crew of "Seussical"



A R C H E R  
THE ARCHER SCHOOL FOR GIRLS

April 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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APR 24 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani:

When you are a student at Archer you know you are being prepped for life in the real world. This school not only gives us the confidence to succeed, but also the skills and knowledge that are needed to go along with it. A perfect example of this is Archer's Student Store, which prepares Archer girls to be successful businesswomen. We are writing you today to express our support for Archer Forward.

The student store operates under the leadership of an Executive Board. As a member of the Executive Board, under the direction of a faculty advisor, students learn essential business skills, such as business management, marketing, economics, Human Resource management and financial management. The day to day operations of the store are managed by this Executive Board as well as shift managers who oversee a shift of 3-5 students. The store provides a range of food products to the Archer Community with an emphasis on healthy snacks and environmental consciousness. All profits generated from the Student store go directly to Archer's Flexible Tuition program which provides need-based tuition assistance.

Our proposed campus plan will allow us to continue on this path to success. With more room on campus we will be able to sell more products in our stores, which will open up the doors for future Archer girls to follow their entrepreneurial passions.

As future businesswomen of Brentwood and beyond, we ask that you support our campus improvement plan. Thank you.

Sincerely,

Archer Student Store Executive Board

April 25, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 29 2014

Re: ENV-2011-2689-EIR  
Support for Archer Forward

ENVIRONMENTAL  
UNIT

Dr. Mr. Villani

There are 17 of us that make up the Swim Team at Archer. We want to let you know how much we support our school's campus improvement plan and we hope that you choose to support it too.

We practice five days a week for about an hour, however, average teams practice for about 2 full hours in the pool. While our Middle School team is 3 time Pacific Basin League Champions, our Junior Varsity and Varsity teams struggle to find adequate practice time to hone our skills.

Although we have been successful as a team, if we had an aquatics center on campus we would be even better. Having our own pool would be beneficial because we would be able to host meets and have support from our peers and faculty member. Currently we commute to and from UCLA for training, which is about two and a half miles away yet it takes us thirty minutes each way. The future of Archer swim depends on this pool.

We hope you choose to help us by supporting the proposed plan.

Sincerely,

Alana O'Malley Kate Heck Marwa Mohammed

Archer's Swim Team

Grace Heck Kaia Turowski

Shelby Mumford

Kimia Khatibi Camille Gouzon

Stephanie J Ferri

Liv Hojan

4/25/14

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

Re: ENV-2011-2689-EIR  
Support for Archer Forward

APR 29 2014

ENVIRONMENTAL  
UNIT

Dr. Mr. Villani

As members of Archer's basketball team, we are writing to express our strong support for the Archer Forward,

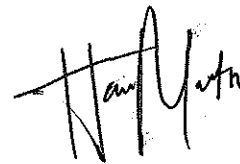
There are 11 girls on our team and we practice five days a week. Because we do not have a gymnasium, or a proper basketball court to practice on, we travel off-campus in order to be on the team. As you can imagine, this is difficult for us because the bus ride to and from Santa Monica College is about 30-45 minutes, which cuts into our practice time. Given the college team at Santa Monica College has priority of their gym, our team cannot use the gym until 5:30, which means that practice does not end until about 7pm.

Our team has had an outstanding season finishing 3<sup>rd</sup> in league with an overall record of 11-15. We had an athlete compile a career high of over 1,700 points and earned a Full Scholarship to play basketball in college, which is great for our program.

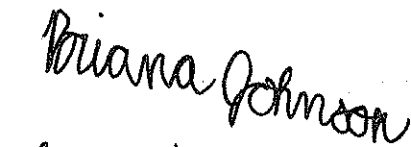
Although it sounds spectacular, with the Archer Forward, we will be able to host games on our own campus. We would also be able to gain support from our family and friends without them having to drive all over Los Angeles. Having a gymnasium will also help us hone on our skills as basketball players.

Thank you for your consideration.

Sincerely,



Archer's Varsity Basketball Team



April 25, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani

The 16 of us proudly play on the Varsity Soccer Team at Archer. We want to voice our support for our school's Campus Preservation and Improvement Plan, Archer Forward.

This year our team made Archer history by making it to the Final Four of the CIF Southern Section Playoffs, which no Archer soccer team has ever done before. We also were Liberty League champions, going undefeated in league, winning the Liberty League play.

In order to achieve these statistics, we had to practice several days a week. Unfortunately, that wasn't easy. Because we do not have a regulation-sized field on campus, we travel to other locations to have practice and games. While it is nice to play on a regulation field at Santa Monica College, not having the lights turned on in time, the goals already put in place or even able to use the scoreboard poses as an obstacle not only for our team but for our opponent as well. Due to the distance we travel, many of our supporters cannot attend our games. Furthermore, travel time is an issue as the bus takes away from precious practice time. If we had a proper field on campus this would better prepare us for our games as well as support from our peers.

We hope you choose to support our campus plan and give us an opportunity to have the facilities that every other school in the area already has.

Sincerely,

*Hilary O'Connor*  
Archer's Varsity Soccer Team

*Yasmeen Januzic Daniela Jimenez*

*Isador Solomon*

*Frederick Clayton*

*Butterfield*



*Matthew*

*Andrew Palmer*

April 25, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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CITY OF LOS ANGELES

APR 29 2014

ENVIRONMENTAL  
LITIG

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani

Archer Softball has had a terrific season this year thus far. We've had some big wins against local rivals, which has led us to a 8-4 overall record. Not only that, but we have the most athletes, new and returning, than we have had in past years. We wanted to take a moment to write you a letter and show our support for our campus plan.

While Archer already has a softball field, we find that having a facility has helped improve our team dynamic as well as the peer support that we get from faculty, staff and other students. We feel it is necessary to support our other Archer sports.

We hope you will see the benefit in this plan and support Archer Forward.

Sincerely,

Archer's Varsity Softball Team

Mario Delabod

Allie Sir

Mario Delabod

Mario Delabod

Papa

Archer Softball Team

[Signature]

Archer Softball Team

Archer Softball Team

Archer

April 25, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
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Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dr. Mr. Villani

Archer's Volleyball team is currently ranked 2<sup>nd</sup> in the Liberty League and we finished with an overall record of 12-8-3. We had four outstanding athletes make the all tournament team leading our team into the CIF Playoffs. We are writing to you today to ask you to support Archer Forward.

As you know, we do not have a gymnasium on campus to practice our craft. Instead, we have to practice offsite at Santa Monica College. This is extremely difficult because the bus ride to and from Santa Monica College is about 30-45 minutes, which cuts into our practice time. Given the college team at Santa Monica College has priority of their gym, our team cannot use the gym until 5:30, which means that practice does not end until about 7pm. Additionally, we have to bring our own score board and pole pads to make sure that we do not injure ourselves during practices and matches.

With Archer Forward, our team would be able to hold practices earlier, which means that we would have a significantly greater amount of time to do homework. Because most of us do not live in the same area, this would make it easier on our parents to pick us up from practice and or ride the late bus home.

We hope you see benefit in this plan and support Archer Forward.

Sincerely,

*Kristen Majors*

Archer's Varsity Volleyball Team

*Sudam Solomon*

*Shirley Shouk*

*Alycia Ponce*

*[Signature]*  
*[Signature]*

*[Signature]*

*Halley Kerner*

*Marley Rice*

*Christion Lumbow*



April 22, 2014

Mr. Adam Villani  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**Re: Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)**

Dear Mr. Villani,

I am writing on behalf of the Bel Air Skycrest Property Owners' Association (BASPOA) which represents the residential neighborhood immediately adjacent to the west end of the Mulholland Institutional Corridor and which is in the Brentwood zip code of 90049. BASPOA is concerned about Archer School for Girls' proposed expansion in Brentwood and the potential adverse affects this expansion will have due to the intensification of use of the school and its new facilities. We are especially concerned about the precedent setting nature of the lights on the athletic field and two gyms as proposed in Archer's Draft EIR.

Like the Residential Neighbors of Archer, who are in close proximity to eight educational institutions within a short two miles, we have decades of experience living with nine (or ten, depending how you count) schools that operate adjacent to our community in the Mulholland Institutional Corridor. We know first hand the impact of traffic and noise from these schools' operational use and the importance of Conditional Use Permits. That is why we are especially alarmed at Archer's request for lights on the field, outside use of the facilities, extended hours of operation and the aggressive expansion of the physical plant with four new buildings, including two gyms, on a small parcel of land situated in a densely populated residential neighborhood.

If Archer is permitted to expand its campus in the way it proposes, the result would be devastating for our community since it would set a new standard for Mulholland schools. Just in the last seven years there have been applications submitted to the City for Stephen S. Wise Preschool, Middle School and High School, Mirman School, Bel Air Presbyterian Pre-School and now Curtis School regarding large expansions. It is interesting to note that Curtis School is requesting an 80,000 square foot expansion on 27 acres vs. Archer's request of 90,000 square feet on six acres. To-date no school has been allowed to have lights on their field or two gyms.

We also share the same concerns of the Residential Neighbors of Archer regarding the continued expansion of private schools at the expense of the residential neighborhoods in which they operate. Whether they operate in Brentwood, Pacific Palisades or Bel Air, there is a trend for private schools to agree to conditions in the first instance only to loosen them at subsequent Plan Approvals or through EIR's as they seek to expand their campuses. Conditions designed to insure that the school's operations were compatible and consistent with its residential zone are discarded in this race of private schools to build bigger campuses that resemble colleges rather than elementary or secondary schools. And it is the neighbors that bear the burden of this bigger is better philosophy.



Over 15 years ago Archer School for Girls went through this same process by submitting an EIR and agreeing to certain conditions as part of that process. The Conditional Use Permit (CUP) issued at that time was an agreement between the City, the school and the neighbors that balanced residents' rights to the quiet peaceful enjoyment of their homes with the school's ability to operate successfully. Critical features of the CUP under which Archer currently operates, include:

- Hours of operation that limit night time use and weekend use and outside use of facilities
- A set number of special events that take place at night and on the weekends
- Limited use of the field and no lights on the field
- Noise restrictions that include no amplified or loud music outside
- Allowance for the building of one gymnasium, whose size and location was carefully chosen

Now Archer proposes a substantial expansion of the school's facilities and operations with no commitment to keep the existing use restrictions in place. (See table below)

	Current CUP	Proposed Project
Enrollment	450	518
Proposed Gym	1 12,000 sq ft	2 41,400 sq ft
Number of Buildings	2	5
Size of physical plant	95,000 sq ft	174,253 sq ft
Outside Use	No rental, lease or summer school	24 days of outside use of all facilities plus 30 day summer school
Number of Special Events	47	98
Instructional Hours of Operation	Monday through Friday 7:00am to 6:00pm	Monday through Saturday 7:00am to 6:00pm
Lights on field	No lights	Addition of lights on the field
Parking on campus	109	212 (max of 282)
Amplified Music or Loud Music Outside	No amplified music or loud non-amplified music	Amplified or Loud Music allowed

If approved, Archer's proposed project would fundamentally alter the character of the neighborhood and place additional burdens on an already overburdened neighborhood. The need for new buildings and updated facilities does not justify nor require Archer to throw out the existing CUP and unwind all of the protections that were put in place that allowed them to come into the neighborhood in the first instance.

A Conditional Use Permit (CUP) is meant to balance the needs of the residents with the needs of the school. There is a certain level of trust that is necessary since it is very difficult for neighbors to initiate hearings regarding CUP compliance as well as to police the School's compliance with the conditions. If Archer succeeds in changing the majority of its original conditions, it will set another dangerous precedent for all schools that operate with a CUP. How will any of the residents in Los Angeles have confidence in this planning process and

the integrity of CUP's if Archer is allowed to basically break the contract it made when it first moved into the neighborhood? Adding lights to the athletic field, adding two gyms to the campus, extending the school week to every Saturday and more than doubling the number of Special Events, as well as using amplified music outside and increasing the use of the facilities by renting them out for private parties and weddings are part of a Campus Expansion Plan that the DEIR shows will put the burden on the neighborhood because of the significant and unavoidable impact of operational noise and traffic.

Bel Air Skycrest Property Owners' Association stands with the Residential Neighbors of Archer in supporting a downsized alternative, specifically Alternative 4 Option B (Reduced Program within Existing Campus Boundary, No Aquatic Center) with modifications. (See [www.archerneighbors.com](http://www.archerneighbors.com) for the details of this alternative.) However, we strongly urge the City to do the following:

- Maintain the current condition of no lights on the athletic field,
- Follow the guidelines of the current Conditional Use Permit regarding hours of operation for school instruction and functions,
- Allow no outside use for rental or lease, as required by the current Conditional Use Permit, which would eliminate and/or reduce noise, aesthetic, and traffic impacts;
- Increase the current size of the school by adding two new buildings, not four, including one gym underground, and a Performing Arts Center that seats 300 instead of the 650 proposed.

We urge the City not to approve precedent setting conditions that would harm all neighborhoods in which schools operate.

Sincerely,



Barbara Dohrmann, President  
Bel Air Skycrest Property Owners' Association

cc: Mike Bonin, Councilmember CD-11



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Oppose Archer Forward Plan as Proposed (ENV-2011-2689 EIR)**

2 messages

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**Bel Air Skycrest** <belairskycrest@gmail.com>

Wed, Apr 23, 2014 at 3:20 PM

To: adam.villani@lacity.org

Cc: Mike Bonin &lt;mike.bonin@lacity.org&gt;

Dear Mr. Villani,

Attached please find a letter from Bel Air Skycrest Property Owners' Association expressing our concerns regarding the Archer Forward Plan as Proposed.

Thank you.

Barbara Dohrmann, President  
Bel Air Skycrest Property Owners' Association

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 **Archer-Bel Air Skycrest.pdf**  
236K

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**Adam Villani** <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 4:18 PM

To: Bel Air Skycrest &lt;belairskycrest@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer School DEIR**

2 messages

**Sandra Genis** <slgenis@stanfordalumni.org>

Tue, Apr 29, 2014 at 3:26 PM

To: adam.villani@lacity.org

Cc: Bryan Gordon &lt;BGordon@pacequity.com&gt;, Larry Watts &lt;twatts@seyfarth.com&gt;

Attached are comments regarding the Draft Environmental Impact Report on the Archer Forward Campus improvement and Preservation Plan (SCH# 2012011001). These comments are submitted on behalf of the Brentwood Community Council.

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Sandy Genis

"The EIR...is a document of accountability...The EIR process protects not only the environment but also informed self-government." (County of Amador v. El Dorado County Water Agency)

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 **eir letter, archer 4-29.pdf**  
87K**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 5:22 PM

To: Sandra Genis &lt;slgenis@stanfordalumni.org&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

-

Adam Villani  
Planning Assistant  
City of Los Angeles  
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Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

February 18, 2014

Adam Villani  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012

Subject: DEIR for the Archer Forward (SCH# 2012011001)

Dear Mr. Villani,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Archer Forward Campus Preservation and Improvement Plan (SCH# 2012011001) in the Brentwood-Pacific Palisades area of the City of Los Angeles in Los Angeles County. These comments are submitted on behalf of the Brentwood Community Council.

The project is located on an approximately 7.31 acre site fronting on Sunset Boulevard on the southerly side and adjacent to Chaparal St. on the northerly side which is designated for residential use by the City of Los Angeles. The site is comprised of the existing Archer campus and two adjacent residences which will be removed.

Private schools are permitted within residential areas upon approval of a use permit. The applicant is requesting an amendment to the existing use permit (ZA 98-0158(CUZ)(PA4)) to allow for expansion of the school and for changes in the school's operational characteristics. no increase in the existing enrollment cap of 518 is proposed.

Improvements to the existing Archer campus would total 75,930 square feet of additional floor area. The existing 30,071-square-foot North Wing of the Main Building will be replaced with a 39,071-square-foot renovated North Wing. New development includes an approximately 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. The existing outdoor athletic fields would be remodeled and would include regulation-size soccer and softball fields. This includes the installation of six light standards up to seventy feet in height to provide for evening use of the fields. Parking would be provided in a new underground parking structure, located below the athletic fields, to accommodate approximately 212 cars.

The existing use permit includes numerous conditions on school operations including limitation on hours of use, implementation of a traffic management plan and a ban on filming or other outside users with the exception of the Los Angeles Conservancy which is permitted to utilize

the facility once every five years. As described in the DEIR (p. II-35, 36) the hours of operation for the school would be extended with several activities now ending at 9:00 pm to be permitted to continue until 10:00 pm, including extracurricular activities and parent conferences. Use of the facilities would commence as early as 7:00 am on Saturdays versus the current start time of 10:00 am. Allowable school functions would increase to 98 and, as described in the DEIR, would be permitted to occur on an unlimited number of Sundays (p. II-36). This would include use of athletic fields. Rental of the facility for non-school related activities would be permitted up to 24 days per year and filming would be permitted when school is not in session. It is not clear if the applicant is seeking an increase in the current cap of forty-seven school related special events per year.

Currently, no outdoor public address system is permitted on the property. With the exception of once a year for graduation ceremonies, no amplified music is permitted. The proposed project would include an emergency alert system with speakers in the parking garage and in the exterior corridors and courtyards (p. II-38). Non-permanent public address systems and amplified music would be permitted outdoors in conjunction with classroom instruction, interscholastic athletic competitions, and school functions.

The project entails approval of the following:

- Vesting Conditional Use Permit for Private Schools;
- Modification of height regulations to permit the North Wing Renovation at a height of 41 feet 4 inches with a roof slope of 25 percent whereas a limit of 36 feet would otherwise be required.
- Modification of height regulations to permit the Multipurpose Facility at a height of 36 feet plus 10 feet (a total of 46 feet) including the sunken North Garden whereas a limit of 30 feet would otherwise be required;
- Modification of area regulations to permit reduced yards requirements and encroachments into yards.
- Modification of area and height regulations to permit the location and height of lighting for the proposed outdoor athletic fields;
- Zoning Administrator's Adjustment to permit fences/gates/walls up to 8 feet in height within the required front yards along Chaparal Street and Barrington Avenue whereas a maximum of 3.5 feet would otherwise be permitted;
- Zoning Administrator's Adjustment to permit fences/gates/walls up to 8 feet in height along the Chaparal Street side and rear yard, the Sunset Boulevard side yard, and the Barrington Avenue side yards whereas a maximum of 6 feet would otherwise permitted;
- Site Plan Review;
- Haul Route Permit;
- Board of Police Commissioners permit for extended construction hours;
- Grading, excavation, demolition, and building permits;

As noted in the DEIR, the project may also involve "additional actions as may be deemed necessary or desirable" (p. II-43). It is not clear whether a lot merger or parcel map will be included in order to assure that the site is held as one for the life of the structures.

City departments, commissions, and others that may use this EIR in their decision-making process include the Department of Building and Safety, the Planning Department, the Department of Public Works, the Planning Commission, and the City Council.

The EIR is intended to provide environmental information to public decision makers and the public generally which may be required to grant approvals and permits (DEIR p. I-1). As noted in the DEIR (p. II-42) other agencies exercising authority over the project include South Coast Air Quality Management District and Regional Water Quality Control Board which oversees storm water pollution protection plans and water quality management plans.

### **Mitigation Measures Use of PDFs**

The DEIR notes in a number of sections that the potential impact will be mitigated due to project design features. Although Section 15126 of the CEQA Guidelines states that mitigation measures proposed by an applicant must be distinguished from other measures, they are all still mitigation measures that need to be discussed and considered contemporaneously in the DEIR to be meaningful and lawful. They are not.

A design feature would typically be some physical aspect of project development which is part of the very fabric of the project as currently articulated. An example would be provision of landscape screening or a sound wall. However, project design features identified in the DEIR often have nothing to do with the actual design of the project, but address such non-design issues as dust control or carpooling.

In accordance with Section 21081.6 of the California Public Resources Code (CEQA), if a proposed action is adopted as a mitigation measure, it must be included in a mitigation monitoring program with specific agency responsibility assigned to see that the measure is implemented. This is designed to increase the likelihood that the mitigation will actually occur. A project design feature may change or be deferred. Unless the change were to be determined by a public agency to be so significant that a new EIR would be required, the impact the feature was intended to address could remain unmitigated.

The use of "design features" could be -- and is -- utilized as a means of doing an end run around requirements for mitigation monitoring. It is thus essential and required to formally include in the monitoring program all measures identified as reducing the potential negative effects of a project, including "design features". This will assure decision makers and the general public that all actions said to reduce the significance of a potential impact in an EIR will actually be implemented. Thus, all "design features" -- as design features is truly understood -- must be included in conditions of approval for the project and must be included in the mitigation monitoring program.

## **Project Objectives**

In accordance with Section 15124(b) of the CEQA Guidelines:

A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

Project objectives must be stated clearly enough to be useful when considering project alternatives and stated broadly enough to allow for consideration of alternative means of achieving the broader purposes of the proposed project.

An agency cannot define its objectives in unreasonably narrow terms such that reasonable alternative to a proposed project would be excluded. For example, one project objective is:

Maximize the functionality and use of existing and proposed athletic facilities;

This would allow consideration of a number of options to achieve the objective. However, a later objective is:

Provide lights for the outdoor athletic fields so soccer practice and games held during the winter soccer season at Archer can continue when natural light is no longer sufficient;

This precludes from consideration other means of maximizing functionality of athletic facilities.

The DEIR states that it is a project objective to:

Provide new facilities on the Archer campus that can accommodate the entire Middle School and Upper School separately and simultaneously, at two locations: the Multipurpose Facility and the Performing Arts Center.

An objective to provide facilities to accommodate the entire school population separately and simultaneously at two locations allows for consideration of a range of alternatives. Specifying that those locations would be the Multipurpose Facility and Performing Arts Center precludes a good faith consideration of other alternatives for accommodating the school population.

## **Project Description**

A vague or incomplete project description will render all further analyses and determinations ineffectual. As stated in *McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District* (202 Cal.App.3d 1136, 1143; 249 Cal.Rptr. 439), “An accurate project description is necessary for an intelligent evaluation of potential environmental effects of a proposed activity”.



In setting aside the approval of an EIR by the City of Los Angeles for water development facilities in Inyo County, the court stated: “An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR” (*County of Inyo v. City of Los Angeles* (71 Cal.App.3d 193) [139 Cal.Rptr. 401]). A stable, complete, and accurate project description is the most basic and important factor in preparing a lawful EIR. It is the denominator of the document and, thus, of the public’s and decision-maker’s review.

The DEIR includes no dimensioned site plans, no circulation plan, nor other information regarding key aspects of the physical improvements contemplated. Renderings and plans for the project are at such a small scale as to be useless, and on-line documents are at inadequate resolution to enable one to increase the scale to make the renderings useful, and elevations are not found until the analysis section of the DEIR starting at page IV.A-42. The information provided is not adequate for a reviewer to determine whether all aspects of the proposed project have been fully evaluated and all impacts mitigated to the extent feasible.

As currently proposed, the project entails numerous revisions of adopted conditions for ZA 98-0158, yet these are not clearly identified in the project description. While use for filming and non-school activities is identified in the project description (p. II-37) it is not clear from the DEIR whether or not this would be currently be permitted. One must glean information regarding changes in proposed operating hours by flipping back and forth in the DEIR (pp. II-12, II-35). A listing of all proposed changes in existing conditions for ZA 98-0158 must be included in the EIR.

In addition, the following specific concerns and questions must be addressed:

1. (p. II-16) How do the height of existing and proposed fences differ?
2. (p. II-16) How would food service be provided in the period after demolition of the existing kitchen and prior to re-construction? Would temporary facilities be established or would catering trucks be utilized? Any vehicles utilized to provide temporary food service must be included in project traffic studies.
3. (p. II-20) After Phase I, where will construction activities be staged?
4. (p. II-22) What will be the maximum seating for the Multipurpose Facility?
5. (p. II-22) It appears that all ventilation of the parking structure will occur along the southerly side of the structure, about ten feet from residential properties. Is that correct?
6. (p. II-26) What will be the maximum seating for the Performing Arts Center?
7. (p. II-28) How many trees will be removed and of what size?
8. (p. II-31) What is the height of the soccer bleachers?
9. (p. II-31) How will views of the soccer bleachers and occupants be screened?
10. (p. II-31) What will be the total height of the Aquatics Center scoreboard above the deck? Is the 6 feet above deck the bottom or the top of the scoreboard?
11. (p. II-31) Where will buses park, both on ordinary school days and during athletic competitions with visiting teams? Will buses be able to access the parking garage?
12. (p. II-32) Will the off-site parking area continue to be available for parking?
13. (p. II-33) Why is use of solar being put off to the future?
14. (p. II-35) To what extent does “instruction” occur on Saturdays?

15. (p. II-35) To what extent are athletics considered learning, and thus permitted as early as 7:00 am on a Saturday, and to what extent are they extracurricular and not permitted until 10:00 am?
16. (p. II-35) Under what circumstances would instruction occur on the athletic fields before 10:00 am on a Saturday?
17. (pp. II-35,36) How does a school function differ from an extracurricular activity? This must be defined inasmuch as school functions may occur on Sundays and start as early as 7:00 am and last as late as 10:00 pm on Saturdays.
18. (p. II-36) Do interscholastic athletics occur on holidays?
19. (p. II-36) How many days a year would use of the fields occur before 10:00 am?
20. (p. II-36) How many days a year would use of the fields occur as early as 7:00 am?
21. (p. II-36) Are there any portions of the site which would be excluded from activities from 7:00 am until 10:00 pm Monday through Friday and noon until 7:00 pm Sundays?
22. (p. II-36) Would the four hour limit on Saturday activities apply to school functions, including athletic tournaments, or just to extracurricular activities?
23. (p. II-37) Are the 24 days of community use intended to be the same as the non-school uses, including weddings?
24. (p. II-37) Is it proposed that more than one event be permitted on any of the 24 days allotted to non-school events?
25. (p. II-37) How many days a year would filming be proposed?
26. (p. II-38) How much “flexibility” would be needed for over time? What is the latest use of the fields would be anticipated?
27. (p. II-39) How often, specifically, would “occasional” use of Chaparal for construction access occur?
28. (p. II-41) What off-site staging areas would potentially be used? Any staging areas must be identified and impacts on the staging areas must be addressed.
29. (p. II-43) What is the maximum extent to which construction hours would be extended outside of the hours normally permitted?
30. (p. II-43) How many days is it proposed that construction hours be extended?

### **Aesthetics**

The proposed project includes various outdoor facilities such as bleachers, scoreboards, and ball netting for athletic fields. All such accoutrements must be shielded from view from nearby residential properties, preferably with landscaping.

Under existing conditions of approval for ZA 98-0158, outdoor lighting is to be designed such that the light source would not be seen from adjacent properties and lighting of athletic fields is limited to low level security lighting. The field lighting represents a significant departure from existing site conditions which will alter the overall ambience of the neighborhood and should be deleted from project planning.

In addition, the following specific concerns and questions must be addressed:

1. (pp. IV.A-10 through 16) A key map should be provided showing the location from which each of the various photographs was taken.

2. (p. IV.A-20, Fig. A-6) Why are residential uses south of the athletic fields not considered sensitive receptors for light and glare? Impacts on these residential properties must be addressed including impacts on any balcony space and upper floor windows.
3. (p. IV A-32) How many trees will be removed?
4. (p. IV A-32, IV A-36) The EIR must include a map of trees to be removed and trees to be retained. Although a tree report is included in Appendix E, no mapping is provided.
5. (p. IV A-32, IV A-36) How many years will it take for replacement trees to provide visual screening of on-site facilities to at least as great an extent as currently exists?
6. (p. IV A-32, IV A-36) The planting strip between the depressed access to the parking structure and the adjacent property appears to be quite narrow. Will trees have adequate soil to grow in this area?
7. (p. IV A-32, IV A-36) Will trees be able to grow at the perimeter of the underground parking or the depressed Multipurpose Facility? How will the structures affect roots?
8. (p. IV A-32) Will any of the proposed facilities have large expanses of glass which may create glare or allow light to escape at night?
9. (p. IV A-36) What is considered “appropriately scaled”? Will replacement trees ultimately reach a similar height as existing trees or will they be smaller in scale?
10. (p. IV.A-37) It appears from Figure IV.A-10 that a portion of the athletic fields will be above existing grade. What portion of the athletic fields be at a higher elevation than at present and to what extent will the parking be depressed sufficiently that the parking structure as well as all fill for the fields is at or below existing ground contours?
11. (p. IV A-46) Would the FAR on any individual lot within the site exceed the allowable floor area if considered independently? If so, which lots?
12. (p. IV A-46) In order to assure that overall lot floor areas are not exceeded in the future, the various lots should be merged or a covenant recorded which would require that all lots within the 7.31 acre project site would be held as one for the life of the structures.
13. (p. IV.A-46) What will be the height of the top of the bleachers, including any occupants?
14. (p. IV A-46) How will views of the bleachers be screened?
15. (p. IV.A-48) In order to ensure that the ball netting will not be visible through breaks in the landscaping, a double row of vegetation must be provided.
16. (p. IV.A-48) It appears from Figure IV.A 10 that a portion of the proposed athletic fields will be significantly higher in elevation than at present this must be clarified and addressed in the EIR.
17. (p. IV A-48, 49) What is the typical height of street lamps in the area? How does this compare to the height of the proposed field lights?
18. (p. IV.A-49) Impacts on upper stories and balconies of residential structures must be addressed
19. (p. IV.A-65) What architectural features would integrate the Performing Arts Center with the campus and be compatible with surrounding uses?
20. (p. IV.A-66) How many years would it take for landscaping to grow in order to provide adequate screening?
21. (p. IV.A-67) What portion of the athletic field would be set lower and what portion would be set higher and by how much?
22. (p. IV.A-68) Project approvals include a request for extended construction hours. The EIR must address how this would affect impacts due to light and glare.

23. (p. IV.A-68) Even fixed lighting may require several adjustments before light spillover is minimized to the extent feasible. How could it be guaranteed that the portable lights will not result in light spillage?
24. (p. IV.A-69) Light and glare impacts south of the proposed athletic fields must be addressed.
25. (p. IV.A-69) Light and glare impacts on upper floor windows and balconies must be addressed.
26. (p. IV.A-76) The proposed project would result in shadow impacts on adjacent property for at least a few hours per day during the winter solstice. The DEIR has chosen to consider an impact to shade and shadow to be significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October) on any sensitive uses, i.e. a residence.

The source of the threshold is the City of LA Thresholds Guide. However, while the threshold makes sense in addressing impacts on solar facilities, no rationale has been presented for use of this threshold to analyze aesthetic impacts in residential areas. The threshold addresses only the middle of the day when, many, if not most, residents are elsewhere in the middle of the day.

The stated threshold virtually guarantees that almost no individual projects would ever meet the threshold of significance. Shade and shadow move progressively from west to east as the sun moves from east to west throughout the day. Due to the City's location north of the equator, shadows do not generally fall due east or west, but slightly in a northwesterly or northeasterly direction. Before noon, shadows are cast in a westerly/northwesterly direction. After the noon hour, shadows are cast in an easterly/northeasterly direction.

Thus, areas to the west could be in shadow as early as dawn, but in no case would areas to the west be shaded past solar noon, i.e. 12:00 p.m. during winter and 1:00 p.m. during Daylight Savings Time. Within the time frame specified in the threshold, this would equate to no more than the hours between 9:00 a.m. and noon Pacific Standard Time between late October and early April, i.e. three hours maximum. Thus, no area to the west/northwest could ever be in shadow in excess of the specified threshold. Any actual analysis of shadowing in these areas becomes moot, seemingly designed not to actually evaluate potential impacts but to simulate evaluation of impacts already known to be impossible due to the design of the chosen threshold.

Similarly, areas to the east could be in shadow as late as sunset, but in no case would areas to the east be shaded before solar noon, i.e. 12:00 p.m. during winter. Within the time frame specified in the threshold, this would equate to no more than the hours between noon and 3:00 p.m. Pacific Standard Time between late October and early April, i.e. three hours maximum, and would equate to no more than the hours between 1:00 p.m. and 5:00 p.m. Pacific Daylight Savings Time between early April and late October, i.e. four hours maximum. Thus, no area to the east/northeast could ever be in shadow in excess of the specified threshold. Any actual analysis of shadowing in these areas also becomes moot.

The threshold is geared to the hours when the sun is highest in the sky and shadows are at their smallest, when few areas would be affected, as opposed to the worst case situation just after dawn or just before dusk, when shadows can extend over large areas. For example, at the winter solstice, shadows at 8:00 a.m., about an hour after dawn, are two times longer than those at 9:00 a.m., and shadows at 7:00 a.m., just after dawn, are ten times longer than shadows at 8:00 a.m. and twenty times longer than those at 9:00 a.m. Even if the required minimum time for casting shadows under the chosen threshold were reduced, the threshold would still improperly limit the scope of impacts to be examined. Outdoor recreation areas of residences are often heavily used in the late afternoon hours. The EIR must examine impacts on shade/shadow during hours when many residents would be most affected, i.e. 7:00am to 9:00 am in the morning and 5:00 pm to 8:00 pm in the evening during the summer and 7:00 am to 5:00 pm in the winter.

### **Air Quality**

This section must address vehicle emission from the parking garage which will all be ventilated in a southerly direction. Any impacts on adjacent residents must be identified and mitigated.

In addition, the following specific concerns and questions must be addressed:

1. (p. IV.B-27, 43) If any extended hours for construction are anticipated, air analyses for the extended day must be analyzed and presented in the EIR. The DEIR states that additional equipment would not be used, resulting in no change in daily emissions. However, one might logically conclude that the given equipment will be used for a greater number of hours, generating pollution over an extended time frame inasmuch as hours would presumably be extended for the purpose of generating more progress on the project in a given day.
2. (p. IV.B-39) A localized carbon monoxide dispersion analysis should be provided for the depressed area at the southerly side of the parking garage.
3. (p. IV.B-59, 62) In order to achieve the reductions in particulate matter indicated in Table IV.B-14, Mitigation Measures must be revised to reflect the standards utilized by the South Air Quality Management District in calculating efficiencies under Rule 403. Specifically, demolition areas must be watered every four hours during active demolition and every three hours for disturbed areas, not the twice a day suggested under Measure B-1.
4. (p. IV.B-59) In order to prevent trackout, a gravel apron must be utilized at construction access points.
5. (p. IV.B-59) In order to reduce dust, on-site vehicle speeds must be limited to no more than 15 miles per hour.

### **Cultural Resources**

The DEIR indicates that work would stop if any unique archaeological resource is discovered during site development (p. IV.D-19), so that proper investigations may be pursued. Work must stop if *any* archaeological resource is discovered, so that qualified individuals may evaluate whether or not the resource is indeed unique.

## **Geology and Soils**

The proposed project will involve excavation for a single level parking structure and excavation up to thirty eight feet below ground for the Multipurpose/gym facility. The DEIR is silent as to how these areas will be shored during construction and how stability of adjacent properties and infrastructure will be ensured. The EIR must identify how excavations will be stabilized and address any impacts caused by stabilization measures.

Prior to any soil removal, a video record must be made of conditions on Chaparal Street and on adjacent properties, to the extent permitted by adjacent property owners. The applicant must indemnify adjacent property owners and the City against any damage caused by construction and grading.

The DEIR identifies the presence of expansive soils on-site (p. IV.E-16). The EIR must address measures to mitigate expansive soils along with their potential impacts, including any additional grading or use of water necessitated.

## **Hydrology**

The proposed project will include several below-grade areas open to the sky including a portion of the parking structure and the depressed courtyard. It is not clear how such areas would drain. Any need for pumping must be identified along with associated impacts including energy use and noise.

## **Land Use and Planning**

In accordance with Guidelines Section 15125(d), an EIR is to discuss any inconsistencies between a proposed project and applicable general plans and regional plans. The DEIR has instead listed policies with which the DEIR argues that the project is compatible, generally failing to identify potential conflicts. The EIR must address the following Brentwood–Pacific Palisades Community Plan policies which relate to the proposed project, including a reduction in land devoted to single family residential use:

1-1.46 The City should promote neighborhood conservation, particularly in existing single family neighborhoods, as well as in areas with existing multiple-family residences.

1-1.2 Maintain the existing acreage of residential lands designated for single family use.

1. No structures should exceed 30 feet in height within 15 feet and 30 feet of front and rear property lines, respectively, or as specified in the Specific Plan areas.

The DEIR must identify existing condition on the project and list any changes. Currently it is left to the reviewer to flip back and forth throughout the document and reference old letters of decision posted on-line. This renders it difficult to identify specific changes in approved operational characteristics.

In addition, the following specific concerns and questions must be addressed:

1. (p. IV.H-5) How much of the site, in square feet, is zoned R-1 and how much is zoned R-3?
2. (p. IV. H-50) What would be the floor area ratio for the portion of the project in the R-1 Zone and what would be the floor area ratio for the portion of the project in the R-3 Zone?
3. (p. IV.H-50) What measures will be taken to ensure that the entire site continues to be held as one? The city must ensure that no individual lots are sold separately resulting in excessive floor area ratios or parking shortages for either the lot sold off or the remaining parcels.
4. (p. IV.H-52) What is the prevailing setback along Chaparal Street and Barrington Avenue?
5. (p. IV.H-53) How does a school function differ from an extracurricular activity? This must be defined inasmuch as school functions may occur on Sundays and start as early as 7:00 am and last as late as 10:00 pm on Saturdays.
6. (p. IV.H-54) Are the 24 days of community use intended to be the same as the non-school uses, including weddings?
7. (p. IV.H-85) The DEIR states that the project will be consistent with the scale of the surrounding neighborhood. What is the maximum height of any nearby structure in the R-1 Zone?

### **Noise**

Proposals to extend hours of operation will lead to increased disturbance and annoyance of nearby residents due to nuisance noise. In order to allow nearby residents some quiet enjoyment of their homes, existing limitations regarding weekend activities should continue, including no activities before 10:00 am on Saturday, no more than four hours of activity on Saturday, and no more than three Sunday activities. All outdoor activities, including in outdoor plazas and courts should end by 8 pm. To mitigate noise from the pool area, the aquatic center should be enclosed.

The DEIR includes analyses for various individual activities such as a soccer game or gathering in an outdoor courtyard. The EIR must also include a worst case analysis for simultaneous activities.

In addition, the following specific concerns and questions must be addressed:

1. (p. IV.I-31) Noise emanating into the neighborhood will depend not only on the sound level at the noise source, but the location of the source. Public address systems must be calibrated not to exceed 55 dBA at the property line or prohibited except for existing use during graduation.
2. (p. IV.I-32) The analysis of construction noise must take into account any extended hours and must identify the earliest and latest in the day that construction could potentially occur.

3. (p. IV.I-32) The analysis of construction noise must include hauling and placement of the portable classrooms.
4. (p. IV.I-51) Will trucks queue during placement of the portable classrooms? Where would queuing occur? Could the temporary structures be moved to the rear of the site via Sunset or would trucks need to take access at Chaparal?
5. (p. IV.I-58) Is Sunday construction proposed?
6. (p. IV.I-81) The analysis of parking noise must include echo effects from hard surfaces.
7. (p. IV.I-81) The open portion of the underground parking is approximately 25 feet wide, and the Traffic Analysis in Appendix P (Fig 8) shows parking in the open area within a few feet of the property line. The adjacent residential structure appears to be no more than twenty to twenty-five feet from the rear property line. How, then, is it asserted that the distance between the noise source and the receptor is 100 feet?
8. (p. IV.I-81) Inasmuch as the parking layout in Appendix P, which is the only parking layout shown in the DEIR, shows parking spaces only a few feet from the property line, how is it asserted that noise will be reduced by the increased distance between parking and residences.
9. (p. IV.I-84) The noise analysis must include the increased sensitivity to evening and night-time noise as well as early morning noise.
10. (p. IV.I-81) The project description indicates that school functions could begin as early as 7:00 am on Saturdays.
11. (p. IV.I-84) Normal human conversation is typically in the range of 50 to 60 DB, so how can several hundred individuals conversing, including hundreds of teen agers, be anticipated to generate such low noise levels in the area. What maximum noise level was projected to occur at the source location, e.g. Court of Leaders?
12. (p. IV.I-85) Would public address systems be utilized at more than one location on the Archer site at a time?
13. (p. IV.I-85) At what on-site locations were public address systems assumed to operate? The athletic fields and aquatic complex are located in close proximity to residences, so use of a public address system at the perimeter of one of these facilities could potentially result in significant noise impacts.
14. (p. IV.I-85) Each of the tables in the noise analysis referenced in the body of the EIR must indicate the anticipated distance from the noise source. With regard to residences adjacent to athletic facilities, it is difficult to see how sound levels in excess of 90 dBA would be attenuated over the small distance involved.
15. (p. IV.I-85) How many minutes of use per hour were utilized in calculating Leqs for the PA systems?
16. (p. IV.I-85) While the DEIR indicates that no more than one PA system would be utilized at any one location, the EIR must address the full impact of PA systems operating at more than one location on the campus simultaneously.
17. (p. IV.I-87) What noise level in dBA was assumed to be generated by each individual spectator?
18. (p. IV.I-87 to 110) Do the project noise levels for the various sporting activities include the proposed PA systems? The EIR must present analyses for these activities with and without PA systems.
19. (p. IV.I-104 to 110) Do the noise analyses include noise reflection from the hard surfaces typical of aquatic centers?



20. (p. IV.I-104 to 110) Do the noise analyses include the effects of water surfaces on noise transmission?
21. (p. IV.I-114) Is there anywhere it would not be feasible to install sound barriers, except for installation of the barriers in the first place?
22. (p. IV.I-114) As an additional mitigation measure, it is suggested that existing hours of operation and the event cap remain unchanged.

## **Traffic**

The DEIR identifies numerous intersections that will sustain a significant adverse impact. Project operations and traffic must be managed in a manner that will ensure no net increase in significant impacts on peak hour traffic (Monday through Friday from 3:00 pm to 7:00 pm) as compared to existing school operations.

In order to reduce impacts, additional mitigation measures must specify that events will be staggered such that no two events will start or end at the same time. Start and end times for events must be staggered so that vehicles will not be approaching the site at the same time as other vehicles are leaving the site. To the extent feasible, events should be scheduled such that attendees will not be arriving or leaving during peak hours. In order to avoid conflicts with other schools Archer must coordinate special events with other schools in the area in addition to instructional times.

Archer must encourage carpooling for visitors as well as students. Use of remote lots and shuttles should be provided for major events. Pedestrian entry to the campus should be prohibited except through prior arrangement for a walk-on pass which will specify that parking on neighborhood streets is not permitted.

On-campus events must be limited to those in which Archer students have an active, participatory role, not simply members of the audience or ushers. Athletic facilities must not be used for interscholastic tournaments in which many schools compete, as distinguished from competitions, i.e. Archer competing against one school. Lectures or performances by non-Archer students which would generate interest and attendance from outside Archer must not be held on the campus.

The school has used off-site parking at Sunset and Barrington in the past and may continue to do so in the future for special events and during construction. Traffic analyses must take into consideration the larger than average pedestrian activity that would occur as students, visitors, and potentially workers cross Sunset walking between the parking lot and the school.

The DEIR includes a discussion of construction traffic and haul routes but does not specifically address placement of the temporary classroom buildings on the site. The EIR must identify the route via which the classrooms will be transported to the school site, any necessary road closures, and any other impacts caused by placing or removing the buildings.

It is not clear whether any kitchen will be provided on the site upon demolition of the north wing. If not, the traffic analysis must include catering truck for lunch and special events.

The EIR must include the effect of both project construction and operations on emergency access. While site access is mentioned, there is no analysis as to how project traffic might impair emergency access to other properties in the area.

In addition, the following specific concerns and questions must be addressed:

1. (p. IV.K-14) Does the arrival and departure distribution reflect existing conditions?
2. (p. IV.K-15) Except for eight school functions, the project description indicates that school functions would end at 10:00 pm, not the 11 pm specified here.
3. (p. IV.K-15) The study appears to assume that athletic events will last approximately two hours. Is that realistic for all sports?
4. (p. IV.K-15) What is currently the greatest attendance at any school event?
5. (p. IV.K-16) How can the real life observation of intersections observed to experience acute traffic congestion with reduced vehicle throughput at intersections not accurately reflect the service levels experienced by motorists? Is this intended to mean that calculated V/C ratios differ from the real life experience?
6. (p. IV.K-17) To reduce impacts on functioning of area roadways, the project should be conditioned to refrain from starting until completion of the I-405 Sepulveda Pass Improvement Project.
7. (p. IV.K-53 to 57) The EIR must analyze the combined effect of an event with departures between 5:00 and 6:00 pm with another event arriving in the same period, essentially adding the impacts shown on Table IV.K-15 and IV.K-16.
8. (p. IV.K-77) Will access via Sunset be lost during the period when the driveways are being widened?
9. (p. IV.K-77) To reduce potential impacts on Chaparal St., widening of one driveway must not commence until work on the other driveway is completed.
10. (p. IV.K-77) While the intersections identified would operate at LOS E or F with or without the project, this should not be used as a basis for discounting the impact of project traffic. The proposed project would exacerbate currently unsatisfactory conditions, as shown in Table K-15 through 23. Typically, the significance of any additional traffic would be proportional to the volume of existing traffic such that few cars added to an already congested intersection would have a greater effect than a few cars added to an intersection at free flow.
11. (p. IV.K-79) What off-site location would be used for worker parking? Impacts at that location, including traffic impacts must be analyzed.
12. (p. IV.K-79) How does the proposed amount of seating (650) compare with seating allowed under the existing use permit.
13. (p. IV.K-84) The daily haul trips do not appear consistent with the number of haul trips shown on air quality worksheets in Appendix F. Any differences must be reconciled.
14. (p. IV.K-106) Neither project design features nor mitigation measures include the requirement for the annual bus subscription of \$750. Will this be discontinued?
15. (p. IV.K-107) Could a limitation on guests entering the campus result in increased parking in the neighborhood? While students and others regularly on Campus would likely comply with parking plans, wouldn't infrequent visitors such as grandparents or

non-school friends just park in the neighborhood? As noted above, walk-ons must be limited to those obtaining a walk-on pass in advance.

16. (p. IV.K-107) Pedestrian access from Chaparal to any on-campus facility must be limited to emergency access.
17. (p. IV.K-107) How will a limit on on-site parking reduce vehicle trips? Won't the same individuals just park elsewhere in the neighborhood, such as the lot at Barrington and Sunset?
18. (p. IV.K-110) A shuttle must be provided for any remote construction parking site.
19. (p. IV.K-110) A prohibition on construction parking within 500 feet would merely push construction parking a few homes, and a short walk, down the block. In order to truly discourage construction parking in the neighborhood, no non-designated construction worker parking should be permitted within at least 1,500 feet of the site.

### **Project Alternatives**

In accordance with Section 15126.6(a) of the Guidelines:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

An EIR must consider a “reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation” (Section 15126.6(a)). “Feasible” is defined by Section 15364 of the Guidelines as:

capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

The DEIR examines a number of alternate physical improvements but is limited in its examination of alternate operational characteristics. Unfortunately, because the Notice of Preparation did not address these changes, such as extended hours, community events, and filming during times when school is not in session, members of the public or others were deprived of the opportunity to suggest operations other than what is currently proposed in the DEIR.


An additional alternative providing for most of the proposed physical improvements, except for field lighting, but retaining existing limitations on events and hours of operations should be considered.

### **Conclusion**

As currently presented, the DEIR is inadequate to fulfill the purposes of CEQA. The document must be revised and re-circulated in accordance with Guidelines Section 15088.5(a) (4) in order that the public and decision makers may be fully informed of the impacts of the proposed project.

Thank you for this opportunity to provide these comments. Please keep the Brentwood Community Council informed regarding the progress of this project, including but not limited to any hearings or release of additional documentation.

Yours truly,

A handwritten signature in black ink, appearing to read 'Sandra L. Genis', with a stylized flourish at the end.

Sandra L. Genis  
Planning Consultant



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Opposed to Archer Forward Plan as Proposed (ENV-2011-2689-EIR)**

2 messages

**Cori Solomon** <Terikor@gte.net>

Fri, Apr 25, 2014 at 12:41 PM

To: adam.villani@lacity.org, mike.bonin@lacity.org

Adam,

Please find attached the Brentwood Glen Association's letter opposing the Archer Forward Plan as proposed (ENV-2011-2689-EIR).

Cori Solomon

President

Brentwood Glen Association

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 **Opposed to Archer Forward Plan as Proposed (ENV-2011-2689-EIR).pdf**  
848K**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:03 PM

To: Cori Solomon &lt;Terikor@gte.net&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—

Adam Villani

Planning Assistant

City of Los Angeles

Department of City Planning

Major Projects Section

Adam.Villani@lacity.org

(818) 374-5067

alternate: (213) 978-1454



BRENTWOOD GLEN  
A S S O C I A T I O N

Cori Solomon,  
President

April 25, 2014

Sue Casamassima

Mitch Feinman

David Heldman

Charles Lagreco

Bill McKnight

Judy Meadow

Mary Pringle

Jacqui Rosen

Teri Solomon

Mr. Adam Villani  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012

Re: Opposition to Archer Forward Plan (ENV-2011-2689-EIR)


Dear Mr. Villani:

I am writing on behalf of the Brentwood Glen Association, which represents approximately 560 single family homes and multifamily dwelling in the Brentwood area with the following boundaries: I-405 on the east, Sunset Boulevard on the north, the Veterans Administration on the south and east. The Brentwood Glen community is situated just a short mile east of Archer School for Girls located on Sunset Boulevard. The proposed expansion of Archer School will inevitably create a significant impact to the traffic on the already congested Sunset Boulevard, which is unacceptable to our community.

Archer School has proposed the construction of various additional buildings, sports and parking facilities, and extending the size and hours for events on the campus. Such expansion will inevitably increase the number of vehicles on Sunset Boulevard and surrounding neighboring streets, including those that cut through Brentwood Glen, a community already faced with limited ingress and egress. We are concerned that Archer and the Draft Environmental Impact Report (DEIR) for this expansion project has not adequately considered the impact of the increased traffic to the Brentwood Glen neighborhood.

The proposed construction will only magnify the growing traffic gridlock which we have endured before the 405 construction project, further increased by the 405 project, and which is already threatened to further increase with the planned widening of Wilshire Boulevard near the VA for the Wilshire Bus Rapid Transit Project and California Incline Replacement. Because of the significant adverse impact on Brentwood Glen that the proposed Archer School construction poses, we oppose the project.

Sincerely,

  
Cori Solomon

President of the Brentwood Glen  
Association

cc: Mike Bonin, Councilmember, CD-11



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Brentwood Hills Homeowners Assoc Comments on Archer School DEIR**

2 messages

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**John Given** <john@johngiven.com>

Tue, Apr 29, 2014 at 3:38 PM

To: adam.villani@lacity.org

Cc: Mike Bonin &lt;mike.bonin@lacity.org&gt;, Tricia.Keane@lacity.org

Dear Mr. Villani -

Attached are comments submitted on behalf of Brentwood Hills Homeowners Association in response to the Archer School Draft EIR, ENV-2011-2689-EIR.

If you have any questions or concerns, please do not hesitate to contact me. I would appreciate an e-mail confirming your receipt. If you would like a hard copy of the letter by mail, please let me know.

Best regards,

John Given  
BHHA Boardmember

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 **14 4-29 BHHA Archer DEIR Itr.pdf**  
316K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 5:24 PM

To: John Given &lt;john@johngiven.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

# BRENTWOOD HILLS HOMEOWNERS ASSOCIATION

Post Office Box 49495 - Los Angeles, CA 90049



April 29, 2014

Adam Villani  
City of Los Angeles  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

*VIA E-mail to adam.villani@lacity.org*

**RE: Archer School (“Archer Forward” Campus Expansion Proposal)**  
11725 Sunset Boulevard / 11728 W. Chaparal Street / 141 N. Barrington Avenue  
ENV-2011-2689-EIR

Dear Mr. Villani:

The following comments regarding the above-captioned Draft Environmental Impact Report (“DEIR”) for the Archer School’s “Archer Forward” campus expansion proposal are made on behalf of Brentwood Hills Homeowners Association (“BHHA”).<sup>1</sup>

## **General Comments**

The existing baseline conditions in the vicinity of the Archer project site along Sunset Boulevard, west of the I-405 freeway, feature some of the most congested surface-street traffic on the west side of Los Angeles. Morning and afternoon rush hours extend well beyond typical peak traffic hours of other neighborhoods. Eastbound travel along the Sunset corridor between Kenter Canyon and the I-405 routinely takes 30-45 minutes to an hour or more on weekday afternoons. Backups occasionally stretch as far west as Burlingame Avenue. Not coincidentally, the afternoon rush hour generally begins each afternoon at about the time that the numerous schools along the corridor, including Archer School, finish their academic programs.

The proposed project approximately doubles the built environment of the school by adding 9,000 square feet to the North Wing, adding a 41,400-square-foot Multipurpose Facility housing two gymnasiums and ancillary uses, a 22,600 square-foot Performing Arts Center, 7,400 square-foot Visual Arts Center, and a 2,300 square-foot Aquatic Center (the Aquatic Center may optionally be 9,675 sq. ft. depending on which alternative is ultimately approved). I-8-11, 21.<sup>2</sup> In addition, an underground parking lot would double parking capacity at the school from the current 106 spaces to 212 (increasing to 282 when stack-parking with a parking attendant

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<sup>1</sup> Brentwood Hills is a neighborhood of approximately 450 homes located in the Mandeville Canyon area of Brentwood several miles to the west of the Archer School project site, and uses Sunset Boulevard corridor as a primary access to the I-405 freeway and virtually all points located to the east of Brentwood and beyond.

<sup>2</sup> All citations are to the Draft EIR unless otherwise noted.



occurs). I-15. Expanded outdoor athletic facilities would include a new soccer field and a re-oriented softball field. I-9.

### **Project Alternatives**

The DEIR identified five feasible alternatives to the proposed project: (1) the “no project” alternative; (2) development in accordance with existing approvals; (3) an alternative site layout calling for maximum expansion of facilities to more than 170,000 square feet of built space including development of all project site parcels; (4) a reduced program alternative with two options, both of which reduce the total built space by approximately 10% (between 18,000-19,000 square feet), and reduce grading by 13-14% (approximately 13,000-14,000 cubic yards graded); and (5) a reduced grading, export, and program alternative that reduces development by approximately 14% and grading by almost 30%. I-19-25.

BHHA would like to see the range of feasible project alternatives expanded to consider additional alternatives. These alternatives should explore the possibility of a more modest proposal that is perhaps in the range of a 30-40% reduction in square footage relative to Alternative 3. By “mixing and matching” Archer’s desired project components, it is clear that additional feasible alternatives must exist that would satisfy the majority of program objectives. For example, an alternative could be a project with one gymnasium to be shared by all students (which is more typical of single campus educational institutions) and either a smaller performing arts center or elimination of the visual art center, which could easily reduce total built space by 30-40,000 square feet while still achieving most project objectives. The impacts of such an option would undoubtedly be less than alternatives 3-5, and more likely not to negatively impact the neighborhood character nor tax the local infrastructure as much as the greater intensity alternatives, while still achieving substantially all project objectives.

In addition, though it may be challenging for Archer School to find a suitable alternative location to move its campus, the analysis that leads the DEIR to find that this alternative is infeasible appears based on substantially incomplete information. V-3-4 (discussion of a rejected alternate site alternative). It appears that there has been no actual search for alternate sites, as no potential sites were identified in the DEIR. Rather, the analysis rejecting this alternative as infeasible hinges on the perceived impossibility of the alternate site alternative to achieve the stated project objectives. *Id.* The EIR should further explore the alternate site alternative and provide at least some analysis of potential sites in the region to determine whether this alternative is only philosophically, as opposed to actually, infeasible.

Another feasible alternative worth consideration is developing certain project features at the existing site and finding a smaller property to house other desired project features. For example, perhaps the large performing arts center could find a home on its own parcel somewhere in the Brentwood or Westwood communities if the right location were available. Such an alternative would not require acquisition of a site at least as large as the existing campus, because not all Archer facilities would require removal, as with an alternate site alternative. Such an alternative would likely open up many more realistic possibilities for program expansion at a more conveniently located site. Development pursuant to such alternatives are not unknown among private schools, especially with respect to athletic facilities. Many private schools

throughout Los Angeles utilize off-site athletic facilities, including Harvard-Westlake, Crossroads School, and others.

### **Project Objectives**

Archer School's DEIR identifies a great many project objectives. *See* II-13-17. BHHA believes that many of the so-called project objectives are more accurately viewed as desired project features that are mischaracterized as objectives. The mischaracterization may tend to suggest that certain project alternatives are infeasible, when in fact, that may not be the case.

For example, the fourth academic objective is to “[p]rovide new facilities on the Archer campus that can accommodate the entire Middle School and Upper School separately and simultaneously, at two locations: the Multipurpose Facility and the Performing Arts Center.” II-14. This is a remarkably detailed objective, in that it specifies the precise facilities where the two defined student bodies should assemble. Thus, any project that does not include those specific facilities must be infeasible with respect to this objective. The true objective appears to be having two separate meeting places on campus, one large enough to gather all middle school students, and one large enough to gather all upper school students. There is no explanation as to why other campus meeting facilities would not also be appropriate. This objective should be revised to specify a project objective, rather than one particular project feature that would achieve the objective.

Similarly, the fourth athletic objective is to “[p]rovide lights for the outdoor athletic fields so soccer practice and games held during the winter soccer season at Archer can continue when natural light is no longer sufficient.” II-14. Again, the true objective appears to be the ability to use athletic facilities when there is limited daylight, and installation of athletic field lights is the desired feature that would help accomplish the objective. But it is not the only possibility. For example, many schools start athletic events and competitions earlier during winter months in order to complete games while there is still sufficient light. Athletic events could also possibly be scheduled on weekend days (although that might conflict with the quiet enjoyment by residential neighbors of the project – additional analysis would be necessary.) By mislabeling a desired architectural feature as an objective, Archer stacks the deck against any project that does not include athletic field lights as an infeasible alternative.

Private schools in the vicinity of the project site do not use lights on their athletic fields (for example, Archer's nearest neighbor, the Brentwood School, does not have athletic field lights, yet manages to play outdoor winter season sports on its fields). Clearly, these schools have found a way to achieve their athletic objectives without athletic field lighting. Archer School should investigate the ways that its peers achieve this objective without using lighting, and emulate their success.

Another athletic project objective is to “[p]rovide a new Multipurpose Facility with separate gymnasiums for the Middle School and Upper School” in order to accommodate simultaneous events and practices. II-14. While it is understandable that the school would desire these expanded facilities, the true objective is to have sufficient facilities to achieve the educational and athletic goals, not to achieve them in a particular way with particular project features. Many schools share middle and upper school athletic facilities such as gymnasiums, for

example, Crossroads School's Grisanti Gymnasium is used not only by middle and upper school students, but also by elementary students.

Numerous other project objectives could be simplified and made less specific with respect to specific architectural structures (or eliminated altogether), as they seem primarily expressions of desired project features, not actually necessary project objectives. The manner in which the numerous project objectives are expressed in the DEIR seems calculated to arrive at a particular project. The use of project objectives should assist in evaluation of the feasibility of project alternatives, not distract from otherwise feasible alternatives that do not include a particular desired project feature. The confusion of project objectives with design features that represent merely one way to achieve the particular objective is not helpful, and should be corrected.

### **Comments Regarding Particular Project Impacts**

#### **Traffic**

As discussed above, one of the chief concerns regarding the proposed Archer expansion project among community members all over Brentwood, including BHHA members, relates to its traffic impacts to an already overburdened transportation infrastructure. Because the studied alternatives do not include a more moderate size option, BHHA is very concerned that one or another of the most impactful alternatives will be approved, resulting in traffic-related impacts that vastly exceed reasonable limits and result in significant adverse and unmitigatable impacts to the entire community. The DEIR admits that Traffic associated with the most impactful alternatives will result in significant and unavoidable impacts during the construction and operational phases of the project. *See* discussion, VI-2-4.

BHHA requests that additional alternatives of more modest size be studied in the final EIR in order to determine whether a project alternative or alternatives exists that will satisfy a reasonable number of project objectives while minimizing adverse traffic impacts. We also question whether the traffic study methodology suggesting that where intersection levels of service are already failing that additional trips generated by the project cannot still be considered significant and require additional mitigation so as to not make a bad situation even worse. *See, e.g.,* discussion at IV.K-77. We urge the EIR to identify additional traffic reducing mitigations wherever possible to limit project-related impacts to local traffic even where the City's LOS methodology does not show improved levels of service will result from the imposition of those mitigations. To use an obvious analogy, there is a difference between getting an F on ones math test with a score of 50 versus a score of 0. Both are failing marks, but the 50 is clearly preferable, and is less likely to have a significant cumulative impact on ones final grade. The City's methodology and the Archer traffic studies do not appear to account for this distinction and thus may fail to accurately assess traffic impacts.

BHHA is aware that community members who live closer to the project site have engaged professional traffic engineers and other consultants to study the validity of traffic report data and findings in greater detail. While BHHA is not providing more than general comment on traffic impacts and concerns via this letter because we do not possess the technical expertise to do so and have not currently engaged a professional engineer, we recommend that the EIR

include very serious consideration of all technical comments and criticisms received from these community members' consultants, and reserve the right to join in their comments.

### **Lighting**

Although BHHA members may not be directly impacted by potentially significant aesthetic impacts associated with the project in quite the same way as residential neighbors in the vicinity of the project, we nonetheless share concerns about quality of life issues associated with aesthetic and visual impacts, both because most of us drive by or spend time in the vicinity of the project on a daily basis, and because we strongly believe in preserving the character of Brentwood's residential neighborhoods, a stated goal of the community plan.<sup>3</sup> Moreover, the community plan designates the northern portion of the project site and neighboring properties to the north for "Very Low II Residential land uses." IV.H-5. Policy 1-6.5 of the local community plan "[r]equire[s] that any proposed development be designed *to enhance and be compatible with adjacent development.*" Table IV.H-2, DEIR at IV.H-36 (emphasis added). These policies are among the reasons that private schools in the vicinity of the project do not have athletic field lighting, because such athletic field lighting does not enhance, and is not consistent with, adjacent residential uses.

Nonetheless, the project proposes six 70-foot-tall pole-mounted luminaires to light the athletic field at the Archer School as part of the expansion project. I-13. BHHA requests that the project and all project alternatives studied in the Final EIR, whatever the size and impact of other features, include options to eliminate this lighting. The DEIR suggests that best practice with respect to light installations is to shield, direct, and provide for full cut-off devices. *See* Project Design Feature A-8, I-33-35. These best practices may be applicable to certain projects in commercial and industrial zones. In residential zones, however, the best practice is obviously to avoid the use of such lights in the first instance. It is obvious that such a best practice is feasible, given that the nearest private school to Archer, the Brentwood School, implements such a no athletic field lights practice at its campus. Archer School must do the same.

BHHA is concerned that the construction and operational lighting impacts do not properly analyze glare and sky-glow. Reviewing the entire DEIR, there appears to be no analysis of the impact of fog related to night-time construction lighting or operational athletic field lighting. This is a significant shortcoming in the lighting analysis, especially since the survey of existing conditions repeatedly notes the existence of fog in the area of the project site. App. D at 46, 50, 54, 62, 74. The lighting analysis must be revised to consider the impact of fog on both construction and operational lighting.

The cumulative impact analysis related to light and glare, *see* DEIR at I-31, should consider whether the approval of athletic field lighting at Archer School is likely to result in cumulative impacts in the event that other nearby educational institutions use the approval to justify a change and introduce such lights at their athletic fields.

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<sup>3</sup> Objective 1-3 of the Brentwood-Pacific Palisades Community Plan is "[t]o preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods." *See* Table IV.H-2, at DEIR IV.H-34.

In addition, the aesthetic impacts of the project should have considered whether the construction of six 70-foot-tall light towers with a total of twenty-six luminaires mounted on them, App. D at 11, will degrade the visual environment or be inconsistent with the community plan. The final EIR should correct this oversight. The EIR should also consider whether views from multi-family residential structures on the south side of Sunset Boulevard or other locations facing the project site will have negative impacts on their hillside, canyon, or other views due to the construction of the 70-foot-high light towers.

Finally, the cumulative impact analysis should consider whether future projects at other educational institutions might use the precedent established by Archer School to utilize LAMC Section 12.24.F to override generally applicable height standards, which could cause far-reaching impacts to residential and other neighborhoods within Brentwood.

### **Air Quality**

The analysis of air quality is a highly specialized and technical area beyond the expertise of BHHA's boardmembers. Nonetheless, BHHA would like to see greater analysis in the final EIR regarding the air quality impacts on nearby sensitive receptor sites, especially schools, preschools, houses of worship, and any nearby residences with household members who may be particularly susceptible to air quality-related health risks. Depending on the analysis of the impact to sensitive receptors, the EIR may need to impose additional mitigation measures to protect at-risk populations.

In addition, the air quality cumulative impact analysis begs the question: since the project all by itself exceeds cumulative impact thresholds, is there a smaller project that does not exceed these thresholds? *See* discussion, I-41, I-45 ("Project-level and cumulative regional air quality impacts during construction would be significant and unavoidable."). It is imperative, as discussed above, that the EIR include downsized project alternatives, which may result in less than significant or avoidable impacts.

### **Greenhouse Gas Emissions**

As with the air quality, greenhouse gas analysis is highly technical and generally beyond the expertise of lay persons. BHHA notes with appreciation that the "[p]roject would incorporate several sustainability design features to reduce vehicle miles traveled and to reduce the Project's potential impact with respect to GHG emissions." I-47. Benefits associated with sustainability design features implemented to reduce vehicle miles are likely to be substantially offset, however, by the additional trips associated with doubling the parking lot size (almost tripling the lot size when considering that some events will utilize a parking attendant to achieve as many as 282 on-site parking spaces) and doubling the number of special events at the project site to 98. I-15; App. B. The EIR should analyze the amount that the sustainability design features are offset by these capacity increases in order to determine whether even higher vehicle mile reduction can be achieved with additional sustainability-related project features or mitigations.

As discussed above, project alternatives should include downsized project alternatives, including reduction in parking lot expansion and fewer campus events, which will further support the State goals for GHG emissions reduction and be even more consistent with AB 32.

## **Hazards & Hazardous Materials**

The analysis of emergency response and fire hazards is incomplete. *See* discussion, I-59-62. The DEIR notes that the project site is located in a “very high fire hazard severity zone.” I-60. It may be true that the project site itself “is not adjacent to any dense wildland areas.” *Id.* But the project site is adjacent to important ingress/egress for its many neighbors to the north who are so situated, and who count on the ability of emergency vehicles to access their neighborhood via neighborhood streets in the project vicinity, whether as the result of a neighborhood-wide emergency such as a brush fire, or a personal medical emergency.

The analysis of emergency response and fire hazards is incomplete if the only consideration is the safety of the project site itself and its most immediate neighbors. The EIR should also analyze the potentially negative impact of the project, both during construction and operational phases, especially project-related traffic congestion, that will slow traffic from residential areas north of the project site escaping a wildfire, flooding, mudslide, or other disaster.

Operational analysis for emergency response, in particular, is sadly lacking. I-61-62. The analysis assumes that adequate emergency response and evacuation plans are capable of being implemented, which is far from certain on the basis of the current record. Necessary emergency plan upgrades should be studied during the environmental review process while the project can still be appropriately downsized so as to avoid significant impacts on emergency response. As discussed above, additional downsized project alternatives must be studied.

## **Land Use Impacts**

BHHA takes issue with the DEIR’s assertion that “the total allowable development on the Project Site is 308,435 square feet.” I-73. That number *might* be correct if the project were being developed wholly with residential uses. Because this is a school use, however, it is incorrect to suggest that a formulaic “by right” square footage associated with underlying zoning is available for a use that *always* requires a discretionary conditional use approval, such as private school in a residential zone. *See* LAMC § 12.24.U(24). There is no such “by right” square footage associated with a private school use, and the inclusion of such a large square footage number associated with residential use appears calculated to confuse the reader into believing that the requested square footage is well within the rights of the applicant. This assertion should be corrected to avoid any confusion by community members.

Whether the statement is intended to confuse, there is little question that the use of LAMC 12.24.F to evade generally applicable height and area zoning regulations results in a project that is not consistent with the general residential character of the neighborhood. This is particularly true given that the northern side of the project site and northerly residential neighbors are defined as “Very Low II Residential” by the community plan. IV.H-5. As discussed above, over-in-height athletic field lighting provided by six 70-foot light towers is not consistent with adjacent residential development, and thus any project including such lights does not conform with the community plan. Additional project alternatives must be explored, and existing alternatives should include the optional removal of the athletic field lighting.

BHHA also questions the assertion that the Archer project will “relieve public schools.” I-73. First, there is no evidence to support the assertion that increasing the size of Archer schools assists to relieve public schools in any way, nor is there evidence that nearby public schools require such relief. The EIR should remove these unsupported assertions.

There is also no evidence that off-site athletic facilities are in such demand that the full extent of Archer’s proposed on-site athletic facilities are needed. *Id.* Moreover, to the extent that off-site athletic spaces become available to other uses than for Archer school, Archer’s new development represents an increased intensity of use at the project site that is *not* off-set by a corresponding reduction in uses at off-site facilities. Any suggestion in the DEIR that such an offset exists and thus justifies maximum development of athletic or other facilities should be corrected.

The EIR should also analyze the potentially negative land use consequences of utilizing LAMC Sec. 12.24.F to exceed generally applicable zoning ordinances. The use of 12.24.F in this manner is likely to set extremely negative precedents that will be used by future projects, both within and beyond the project area, to similarly exceed standard land use regulations. The cumulative impact analysis of land use impacts unfairly assumes that all other future projects in the vicinity of the project will continue to use the generally applicable regulations, even though Archer School uses 12.24.F to exceed typical zoning standards. I-75. The EIR’s cumulative impact analysis of land use impacts should consider the possibility that future projects will also exceed generally applicable zoning regulations, as Archer proposes to do.

Further, the DEIR’s land use analysis does not consider whether it is possible for the project to make the legally required findings found in LAMC Sec. 12.24.E. The farther afield the project gets from the generally applicable land use regulations by its use of LAMC Sec. 12.24.F to exceed typically applicable land use regulations, the less likely it will be able to make the mandatory findings.<sup>4</sup> In particular, the proposal to install six 70-foot athletic light towers is grossly out of character with normal height regulations, is detrimental and not compatible with adjacent residential uses, and does not conform to the community plan. The EIR must study new alternatives or options to existing alternatives that will remove the athletic field lights in order to allow mandated findings for the project to be met.

### **Use of a Public Address System**

BHHA notes for the record that the use of outdoor amplification systems is generally frowned on in land use approvals for private schools located in residential areas. *See* Project design feature I-5 at I-86. There are countless examples of private schools restricted from using such amplification systems, and the EIR should include an analysis whether such a restriction is also appropriate for Archer School’s campus given its proximity to adjacent residential properties.

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<sup>4</sup> Finding 12.24.E(2) requires “that the project’s location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.” Finding 12.24.E(3) requires “that the project substantially conforms with the purpose, intent and provisions of the ... applicable community plan...”

### **Orientation of the Softball Field**

The Archer expansion project states that orientation of its softball field must be east-northeast in order to comply with California Interscholastic Federation regulations. I-94-95. The DEIR appears to provide no evidence or citation in support of this assertion. Given that such an orientation will have significant noise impacts, for which there are no feasible mitigation measures, I-94, Archer School must provide evidence supporting the assertion that CIF regulations require such an orientation. Further, the fact that no feasible mitigations can reduce the sound to a level less than significant, strongly suggests that the proposed orientation is not consistent with existing neighborhood character, and that additional analysis regarding whether the required conditional use findings, as discussed above, can be met.

### **Parking**

The DEIR asserts that the LAMC Sec. 12.21.A(4)(e) requires either 130 or 263 spaces, depending on the particular methodology used. I-110. It is not clear whether this is the correct number of spaces for the entire project, because detailed parking calculations have not been provided in the DEIR. It appears that the total number of spaces required, whichever calculation was used was calculated solely on the basis of the Multipurpose Facility use as a 650 seat assembly area. *See* IV.K-80. But this is not the only use of the school that requires parking. Classrooms are also required to have parking, as are other school facilities, including the proposed Performing Arts Center. Generally these requirements are cumulative.

As the DEIR notes, “[t]he threshold of significance with respect to parking set forth in the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on parking if the project provides less parking than that required by City code...” IV.K-43. The EIR must include a more detailed analysis of parking calculations used for the project site, and if it becomes apparent that a departure from the requirements of the zoning code is needed, the legal basis permitting such a departure must be disclosed and fully analyzed.

The DEIR’s cumulative impact analysis with respect to parking demand appears to be speculative. The analysis essentially finds that, even though parking will sometimes require many more spaces than the school has, most of the time parking will be sufficient, and therefore cumulative parking impacts will not be significant. I-116. But the Archer plan suggests that as many as 98 special events will take place on campus, so it is far from clear on the basis of available evidence that large events will be “infrequent.” *Id.* The EIR should include much more detailed analysis of cumulative parking impacts, and more detail with respect to the specific locations that will be used when parking demand management is required.

Mitigation measure K-2 appears to conflict with the parking demand methodology used earlier in the DEIR. *Compare* Mitigation Measure K-2, p. I-119 (limiting various weekday uses to no more than 72 arriving and departing vehicles), *with* Parking Demand analysis at I-110, assuming a much higher number of vehicles). This apparent conflict should be reviewed, and if found in error, a revised analysis must be included in the final EIR.

Finally, BHHA notes that Mitigation Measure K-9 incorporates an existing legal duty



Adam Villani  
April 29, 2014  
Page 10

applicable to all drivers, and is thus not an appropriate mitigation measure. Construction vehicle drivers already have a legal duty to stop when encountering school buses using red flashing lights. Thus, the mitigation measure does not provide any additional mitigation.

\* \* \* \* \*

Thank you for the opportunity to provide the above comments on the Draft EIR.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Given', with a long horizontal stroke extending to the right.

John Given  
BHHA Boardmember

CC (by e-mail only):  
Councilmember Mike Bonin, CD11  
Tricia Keane, CD11



Adam Villani <adam.villani@lacity.org>

---

**DEIR; ENV-2011-2689-EIR, (Archer Forward)**

1 message

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**Donald G. Keller** <don@hiimdon.com>

Wed, Mar 19, 2014 at 1:29 PM

To: rbenfield@archer.org

Cc: "Tricia Keane; Planning Director, CD-11" <tricia.keane@lacity.org>, Norman Kulla <norman.kulla@lacity.org>, adam.villani@lacity.org, michael.logrande@lacity.org, info@brentwoodhomeowners.org

March 19, 2014;

To: Rick Benfield

Copies to;

Tricia Keane, CD-11

Norman Kulla, CD-11

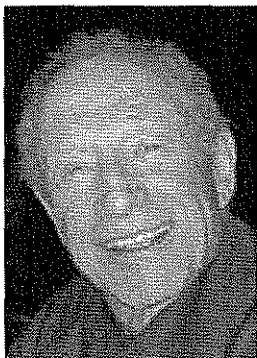
Adam Villani, EIR Coordinator, L.A. City Planning

Michael Logrande, Director, L.A. City Planning

Info@Brentwoodhomeowners.org

Please see the attached letter requesting additional "Time to submit Comments" to the subject DEIR.

Sincerely,



Donald G. Keller,

Vice President, BHA

4/24/2014

City of Los Angeles Mail - DEIR; ENV-2011-2689-EIR, (Archer Forward)

 225K



PO Box 49427 ♦ Los Angeles, California 90049 ♦ (310) 471-8712 ♦ [info@brentwoodhomeowners.org](mailto:info@brentwoodhomeowners.org)

March 18, 2014

Mr. Rick Benfield  
The Archer School For Girls  
11725 Sunset Blvd  
Los Angeles CA 90049

*via email to: [rbenfield@archer.org](mailto:rbenfield@archer.org)*

Rick:

Pursuant to City policy, I am writing to request a 45-day extension of the Archer Forward Draft EIR comment period which would make the new due date May 29, 2014.

As you know, the DEIR contains thousands of pages of important information and we have our volunteer board reviewing the materials that took experts in this arena well over a year to prepare.

Thank you for your consideration.

Yours sincerely,

*Donald G. Keller*  
Vice President

copies to:

Mike Bonin, Councilman - 11<sup>th</sup> District  
Adam Villani, Environmental Review Coordinator, Dept. of City Planning  
Michael LoGrande, Director of City Planning



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Archer DEIR - TIME SENSITIVE**

3 messages

**Rodney Liber** <rliber@brentwoodhomeowners.org>

Fri, Mar 21, 2014 at 4:34 PM

To: norman kulla &lt;norman.kulla@lacity.org&gt;, adam.villani@lacity.org

Cc: michael.logrande@lacity.org, Fred Sutton &lt;fred.sutton@lacity.org&gt;

Dear Mr. Kulla and Mr. Villani:

As respective representatives of the Councilman and the Department of City Planning, we are writing you as to avoid confusion about our DEIR request.

While we are uncertain of the exact policy, we do want to be clear we are officially requesting an extension of the DEIR comment period as described in the attached letter.

Please respond to this email to acknowledge this request and let us know if there is anything else needed to be done.

Thank you.

Rodney Liber

Vice President

rliber@brentwoodhomeowners.org

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**2 attachments****BHA\_Logo\_Small\_Blue\_On\_White.jpg**

10K

**BHA\_Archer\_Benfield\_03182014\_DEIR\_Ext.pdf**

444K

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**norman kulla** <norman.kulla@lacity.org>

Mon, Mar 24, 2014 at 11:03 AM

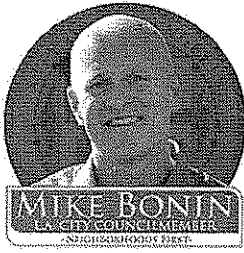
To: Rodney Liber &lt;rliber@brentwoodhomeowners.org&gt;, Tricia Keane &lt;tricia.keane@lacity.org&gt;, Chris Robertson &lt;chris.robertson@lacity.org&gt;, Debbie DynerHarris &lt;debbie.dynerharris@lacity.org&gt;

Cc: adam.villani@lacity.org, Michael J LoGrande &lt;michael.logrande@lacity.org&gt;, Fred Sutton &lt;fred.sutton@lacity.org&gt;

Tricia, Chris, Debbie,

Since this is planning territory can you please respond to Rod?

Norman



**Norman Kulla**  
*Senior Counsel*  
 Councilmember Mike Bonin  
 City of Los Angeles  
 310-575-8461 | [www.11thdistrict.com](http://www.11thdistrict.com)

1645 Corinth Ave., Room 201  
 Los Angeles, CA 90025  
[norman.kulla@lacity.org](mailto:norman.kulla@lacity.org)



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**Tricia Keane** <[tricia.keane@lacity.org](mailto:tricia.keane@lacity.org)>

Mon, Mar 24, 2014 at 11:06 AM

To: norman kulla <[norman.kulla@lacity.org](mailto:norman.kulla@lacity.org)>

Cc: Rodney Liber <[rriber@brentwoodhomeowners.org](mailto:rriber@brentwoodhomeowners.org)>, Chris Robertson <[chris.robertson@lacity.org](mailto:chris.robertson@lacity.org)>, Debbie DyerHarris <[debbie.dyerharris@lacity.org](mailto:debbie.dyerharris@lacity.org)>, "adam.villani" <[adam.villani@lacity.org](mailto:adam.villani@lacity.org)>, Michael J LoGrande <[michael.logrande@lacity.org](mailto:michael.logrande@lacity.org)>, Fred Sutton <[fred.sutton@lacity.org](mailto:fred.sutton@lacity.org)>

Hi Norman,

Already responded...



**Tricia Keane**  
*Director of Planning*  
 Councilmember Mike Bonin  
 City of Los Angeles  
 213-473-7011 | [www.11thdistrict.com](http://www.11thdistrict.com)



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Adam Villani &lt;adam.villani@lacity.org&gt;

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## Archer DEIR Comments

2 messages

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**Lisa Robinson** <lrobinson@brentwoodhomeowners.org>

Mon, Apr 28, 2014 at 1:52 PM

To: adam.villani@lacity.org, Rod Liber &lt;rliber@brentwoodhomeowners.org&gt;

Dear Mr. Villani:

Representatives from the Brentwood Homeowners Association will be emailing you their comments in response to the Archer DEIR this afternoon.

Please let us know if, for any reason, they are not received.

Thank you,

—  
Lisa Robinson  
Administrative Director  
Brentwood Homeowners Association  
Phone: (310) 471-8712  
[www.BrentwoodHomeowners.org](http://www.BrentwoodHomeowners.org)

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:46 PM

To: Lisa Robinson &lt;lrobinson@brentwoodhomeowners.org&gt;

I received the BHA comment letter. Thank you.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454





Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Archer School DEIR Case Number ENV-2011-2689-EIR**

2 messages

**Rodney Liber** <rliber@brentwoodhomeowners.org>

Mon, Apr 28, 2014 at 4:28 PM

To: adam.villani@lacity.org

Cc: Mike Bonin &lt;mike.bonin@lacity.org&gt;, Norman Kulla &lt;norman.kulla@lacity.org&gt;, Tricia Keane &lt;tricia.keane@lacity.org&gt;, michael.logrande@lacity.org, Raymond Klein &lt;rklein908@gmail.com&gt;, Robert Rene &lt;r.rene@verizon.net&gt;

Mr. Villani:

We respectfully submit the attached comments to the Archer School DEIR Case Number ENV-2011-2689-EIR

PLEASE acknowledge receipt of this email and the attachment by reply email.

Thank you.

Rodney Liber

Rodney Liber  
Vice President  
rliber@brentwoodhomeowners.org

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**2 attachments****BHA\_Logo\_Small\_Blue\_On\_White.jpg**

10K

**BHA\_Archer\_DEIR\_Comments\_04282014.pdf**

1516K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:53 PM

To: Rodney Liber &lt;rliber@brentwoodhomeowners.org&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

[Quoted text hidden]

Rodney Liber  
Vice President  
rliber@brentwoodhomeowners.org

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



PO Box 49427 ♦ Los Angeles, California 90049 ♦ (310) 471-8712 ♦ [info@brentwoodhomeowners.org](mailto:info@brentwoodhomeowners.org)

April 28, 2014

Adam Villani

City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

[adam.villani@lacity.org](mailto:adam.villani@lacity.org)

Re: The Archer School for Girls  
Case Number: ENV-2011-2689-EIR

Dear Mr. Villani:

The Brentwood Homeowners Association ("BHA") encompasses a territory of approximately 3,500 single-family homes west of the 405 and north of San Vicente Boulevard. Archer School for Girls is situated in the middle of the BHA territory and at the primary gateway for most of our constituents. The proposed Archer Expansion Plan, sometimes called the Archer Forward Project ("Project"), would impose significant adverse environmental impacts on our community.

The BHA, together with other groups and organizations in Brentwood, was very involved in the process in 1998 when Archer was first allowed to occupy its current site and operate a school on residentially zoned property. The Permit was subject to fifty Conditions that were exhaustively discussed and negotiated. BHA was also an appellant in 2004 when Archer School applied to increase its enrollment maximum after five years, even though its 1998 Permit said that the enrollment cap shall not be subject to increase for ten years.

The Archer Forward Project proposes a significant expansion of physical facilities, a significant expansion of the number and size of activities on its site, and a significant expansion of the number of cars and visitors coming to the site. Since the only entry and exit driveways are on Sunset Blvd., the Project would add thousands of car trips to a highly congested roadway. The School states that the Project is an "improvement plan to secure its mission for future generations of girls in this city." We believe Archer School is confusing its own expansion ambitions with what is fair and right as a good neighbor in our residential community.

The guiding principle was summed up by the ZA in Case No. 98-0158(CUZ)(PA3):

"In the 2004 determination involving an increase in enrollment, I reduced the pros and cons of the request to the following principle: 'the crux of the issue is a land use consideration - what substantive impacts will the increase have?' In 2004 I was guided in my deliberations by the over-arching issue of traffic generation..."

The 100% intensification of land use proposed by the Project would have significant traffic and other impacts that dwarf what the ZA wrestled with in prior years. However, the current DEIR does not provide a new decision maker with a fair, accurate and complete description of the impacts of the Project, and should be revised and re-circulated.

It may be important to recognize the comments contained herein were collected by volunteers and professionals with decades of experience reviewing developments in the subject neighborhood, and thus may possess a unique and important perspective on the pertinent issues.

It is also important to recognize the deficiencies noted in the comments serve to understate the magnitude of the impacts of the Project and thus the DEIR may fail to paint a true and accurate composite of the Project.

We respectfully submit the following comments on the Project's Draft Environmental Impact Report in the attached Addendum.

Yours sincerely,

*Raymond Klein*

Raymond Klein  
Secretary  
Board of Directors  
Brentwood Homeowners Association

copies to: Mike Bonin, Councilman, 11<sup>th</sup> District, City of Los Angeles  
Tricia Keane, Planning Director, Council District 11  
Norman Kulla, Senior Counsel, Council District 11  
Michael LoGrande, Director of Planning, City of Los Angeles

## ADDENDUM

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Document Reference: DEIR Notice of Completion dated 2/27/2014

Document Citation: "Project Description: The Project consists of improvements to the existing Archer campus totaling 75,930 square feet of net new floor area..."

**Deficiency:** The Notice is deficient and the Project description is inaccurate because the proposed square feet of the Project exceeds 186,000 sq ft (9,000 sq ft addition to North Wing, 41,400 sq ft Multipurpose Facility, 22,600 sq ft Performing Arts Center, 7,400 sq ft Visual Arts Center, 9,675 sq ft enclosed Aquatics Center, and 96,000 sq ft underground parking structure). The DEIR itself on page I-23 describes the Project as including 171,930 sq ft of development.

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Document Reference: DEIR Page I-8 b.

Document Citation: "Phase 1 of the Project would include the construction of the underground parking structure, improved outdoor athletic fields above the new parking structure, the construction of a new Multipurpose Facility, and the construction of new landscaped open space areas including the North Garden, and new plazas and pedestrian pathways, including the Court of Leaders. The vacant residence on the Barrington Parcel would be removed at the beginning of Phase 1 so that the Barrington Parcel can be used for construction staging during Phase 1. The improvements in Phase 1 would increase the floor area on-site by approximately 38,854 square feet."

**Deficiency:** The square footage reference of 38,854 is deceptive and inaccurate, as it does not include the 96,000 square feet of the referenced parking structure, which is part of Phase 1.

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Document Reference: DEIR Page I-15 j.

Document Citation: "As described above, for the 2011–2012 school year 430 students were enrolled at Archer and approximately 95 faculty and staff members were employed. To accommodate a student population of 518 students, up to 37 additional full-time-equivalent faculty and staff members may be required."

**Deficiency:** This is misleading and deceptive because the student population should **infrequently** be at 518. Since no increase in enrollment is part of the Project, current CUP Condition No. 6 would continue to control and states, "the targeted baseline enrollment is 450, and 518 is not intended to be reached."

Further, the statement is deficient because there is no explanation of why 132 faculty and staff would be needed to accommodate 518 students when the 11/7/2007 traffic count shows 79 faculty and staff for 500 students at that time.

---

Document Reference: DEIR Page I-17 6.

**Deficiency:** The list of Required Approvals is deficient because the Office of Historic Resources approval is necessary.

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Document Reference: DEIR Page I-19

**Deficiency:** This description is deficient because the ZA decision maker for the first 10 years of Archer's use of this site described the areas and issues as follows in Case No. 98-0158(CUZ)(PA3): "In the 2004 determination involving an increase in enrollment, I reduced the pros and cons of the request to the following principle which again is applicable in the 2007 request involving Special Events: 'the crux of the issue is a land use consideration - what substantive impacts will the increase have?' In 2004 I was guided in my deliberations by the over-arching issue of traffic generation, and the same issue (as well as noise) was repeated by multiple speakers at the October 11, 2007, public hearing.

---

Document Reference: DEIR Page I-20

Document Citation: "In accordance with the existing CUP, the existing student enrollment of 430 students would be increased to 518 students."

**Deficiency:** This is a blatant mis-representation of the existing CUP, which reads, "The use of the subject property shall be limited to a private school for girls, Grades 6 through 12, with a maximum enrollment of 518 students. Maximum total is not intended to be reached. The number recognizes the inability of school admissions staff to know with precision the number of students who are sent acceptance letters and provides a cushion to protect the school from being out of compliance with its targeted baseline enrollment of 450 students."

The NOP and DEIR are misleading and deficient throughout, whenever they state 518 is the permitted enrollment. The DEIR is deficient in not clarifying if the current enrollment condition cited above will be retained.

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Document Reference: DEIR Pages I-19 – I-21

**Deficiency:** The descriptions of Alternatives 1 and 2 are incomplete and deficient because they refer to the non-realization of benefits from aesthetics and traffic design features of the Project without mentioning the non-realization of increased noise from the Project and the large number of net new car trips from the Project.

---

Document Reference: DEIR Page I-74

Document Citation: "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 Project would develop additional school-related facilities within the existing..."

**Deficiency:** This statement is not accurate since the Project proposes large increases in athletic competitions and Special Events that would have adverse noise and traffic impacts on surrounding residential neighborhoods.

In addition, the businesses in the Brentwood Village would suffer a loss of clientele who will choose to avoid traveling east on Sunset in the afternoon because of additional traffic from the Project. The percentage of additional traffic resulting from the Project is not the relevant number - - the causative impact will be the additional time it takes to go from Bundy or Saltair to Barrington. The DEIR acknowledges that many cars already go north on Saltair and then east on Chaparal in order to avoid the congested stretch of eastbound Sunset between Saltair and Barrington in the PM peak traffic hours.

Further, the statement is misleading and inaccurate because new uses are proposed on two R-1 lots used currently as residential.

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Document Reference: DEIR Pages I-103

**Deficiency:** The traffic analysis of Project impacts is flawed and deficient because it lumps together athletic competitions and school events or functions. This does not enable a decision maker, or the public, to distinguish the relative impacts and construct conditions that would be aimed at the most consequential use(s).

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Document Reference: DEIR Page I-108

Document Citation: "While both of the intersections nearest the primary site access would operate at LOS E and/or F under Future with Project Conditions, the intersections of Saltair Avenue and Sunset Boulevard and Barrington Avenue and Sunset Boulevard are currently operating at LOS F during the afternoon, P.M., and evening peak hours. Therefore, the LOS E and/or F conditions at the two intersections nearest the primary site access exist prior to Project implementation and thus would not be attributable to the Project."

**Deficiency:** This is a good example of the deficiency in the methodology used to analyze traffic impacts. Once an intersection is LOS E or F, no amount of additional traffic can be said to impact the LOS rating. Under these circumstances, it is essential that a segment analysis is done; for example, how much longer will the Project related traffic extend an eastbound Sunset trip between Bundy and Barrington or between Saltair and Barrington, or between any of Bundy and the 405?

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Document Reference: DEIR Appendix B-1, pages 1-5

**Deficiency:** The table of competitions in the prior comment is misleading, inaccurate and deficient because it uses an arbitrary number of spectators per player based on "observations" (admittedly not actual counts passing the Sunset guard gate, which counts could have, and should have, been done), and then leaps to an unproven conclusion that this was the "maximum attendance."

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Document Reference: DEIR Appendix B-1, pages 1-5

**Deficiency:** At approximately the same time as the date on the letter that is this Appendix, Archer furnished information to the effect that each of these games has an average of 60 spectators. (The original DEIR for Archer in 1998 estimated 50 - 75 spectators for home games and 75 - 150 spectators for tournaments or play-offs.) The numbers of spectators set forth in this letter for 2011-2012 is grossly understated.

Document Reference: DEIR Appendix B-1, page 2

Document Citation: Table

2011-2012 Academic Year Interscholastic Athletic Competitions					
Team	Archer Players and Coaches	Visiting School Players and Coaches	Spectators	Competition Time	Days with Competitions
<b>On-Campus Competitions</b>					
Middle School Volleyball (Team 1)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	9
	1 Coach	1 Coach			
Middle School Volleyball (Team 2)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Basketball (Team 1)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Basketball (Team 2)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Soccer	18 Players	18 Players	36	3:30 p.m. to 5:30 p.m.	
	2 Coaches	1 Coach			
Middle School Softball	15 Players	15 Players	30	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Varsity Softball	12 Players	12 Players	48	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
<b>Off-Campus Competitions</b>					
Junior Varsity Volleyball	12 Players	12 Players	48	5:30 p.m. to 7:30 p.m.	12
	2 Coaches	1 Coach			
Varsity Volleyball	12 Players	12 Players	48	7:30 p.m. to 9:30 p.m.	
	2 Coaches	1 Coach			
Middle School Swimming	25 Players	25 Players	50	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Varsity Basketball	12 Players	12 Players	48	7:30 p.m. to 9:30 p.m.	
	2 Coaches	1 Coach			
Varsity Soccer	18 Players	18 Players	72	6 p.m. to 8 p.m.	
	2 Coaches	1 Coach			
Upper School Swimming	20 Players	20 Players	80	3:30 p.m. to 5:30 p.m.	7

**Deficiency:** This table is misleading and deficient because it does not disclose how many of the competitions overlap and occur on the same day, thereby multiplying the traffic impact.

Document Reference: DEIR Appendix B-1, page 2

Document Citation: See Table

**Deficiency:** This table is misleading and deficient because it does not disclose the number of spectators coming in their own vehicle because the parents are not coming from the same place (one from work and one from home), because they are divorced, or for some other reason. What assumption should be made as to the number of students with 4 parents?

2011-2012 Academic Year Interscholastic Athletic Competitions					
Team	Archer Players and Coaches	Visiting School Players and Coaches	Spectators	Competition Time	Days with Competitions
<b>On-Campus Competitions</b>					
Middle School Volleyball (Team 1)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	9
	1 Coach	1 Coach			
Middle School Volleyball (Team 2)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Basketball (Team 1)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Basketball (Team 2)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Soccer	18 Players	18 Players	36	3:30 p.m. to 5:30 p.m.	6
	2 Coaches	1 Coach			
Middle School Softball	15 Players	15 Players	30	3:30 p.m. to 5:30 p.m.	6
	1 Coach	1 Coach			
Varsity Softball	12 Players	12 Players	48	3:30 p.m. to 5:30 p.m.	12
	1 Coach	1 Coach			
<b>Off-Campus Competitions</b>					
Junior Varsity Volleyball	12 Players	12 Players	48	5:30 p.m. to 7:30 p.m.	12
	2 Coaches	1 Coach			
Varsity Volleyball	12 Players	12 Players	48	7:30 p.m. to 9:30 p.m.	
	2 Coaches	1 Coach			
Middle School Swimming	25 Players	25 Players	50	3:30 p.m. to 5:30 p.m.	6
	1 Coach	1 Coach			
Varsity Basketball	12 Players	12 Players	48	7:30 p.m. to 9:30 p.m.	12
	2 Coaches	1 Coach			
Varsity Soccer	18 Players	18 Players	72	6 p.m. to 8 p.m.	10
	2 Coaches	1 Coach			
Upper School Swimming	20 Players	20 Players	80	3:30 p.m. to 5:30 p.m.	7

Document Reference: DEIR Appendix B-1, page 2

Document Citation: See Previous Table

**Deficiency:** This is misleading and deficient because it implies that the competitions between 3:30pm - 5:30pm on campus are permitted under the current CUP. However, they clearly *violate* the terms of the CUP, which clearly and deliberately distinguishes between (1) instruction and practice for students, and (2) competitions with other schools.

CUP Condition 11b: For gymnasium use:

- 7:30 a.m. to 6:00 p.m., Monday through Friday for class instruction,
- 6:00 p.m. to 7:30 p.m., Monday through Thursday for athletic practice,
- 6:00 p.m. to 7:30 p.m., Monday through Thursday for competitions/other schools (notice to neighbors required),
- 6:00 p.m. to 9:00 p.m., Fridays for athletic practice,
- 6:00 p.m. to 9:00 p.m., Fridays as needed for competitions/other schools (notice to neighbors is required),
- 10:00 a.m. to 9:00 p.m., Saturdays for athletic practice and,
- 10:00 a.m. to 6:00 p.m., Saturdays as needed for play offs (notice to neighbors required).
- No gymnasium use is permitted on Sundays with exception of 3 admissions open houses between the hours of 12:00 p.m. to 5:00 p.m. (notice to the neighbors is required) or national holidays.

CUP Condition 11(c) 1(ii): For Athletic Use

- 7:40 a.m. to 6:00 p.m., Monday thru Friday, with a limitation of 100 students at one time,
- 6:00 p.m. to 7:00 p.m., Monday through Friday for athletic practice.
- Saturday use is limited to 4 days a year with a 4 hour period between 10 a.m. and 6 p.m. for a school use within the established school program. No activities of any kind [e.g., setting up, deliveries, warm ups] shall take place on the field prior to 9 a.m. Within the 4 hour period limit, the 4 Saturday uses shall permit practices between the hours of 9 a.m. and 6 p.m., as
- needed, and competitions/other schools with a goal of being played between the hours of 3:30 p.m. and 6 p.m. Notice to the neighbors is required for competitions/other schools.
- Athletic use is not permitted on Sundays or national holidays, with the exception of Columbus Day and Veterans Day when those days are used as regular school days.

Hence, NO outdoor use is currently permitted midweek for competitions/other schools. Gym use is currently permitted midweek for competitions/other schools only 6:00 p.m. to 7:30 p.m.

In Archer's letter, dated 11/29/2012, to the ZA in connection with Plan Approval Requirements, it states in an attachment, and acknowledges the limits on competitions:

*"In addition to the classroom instruction hours on the athletic fields, the Archer hours for use for athletics are 6:00 P.M. to 7:00 P.M., Monday through Friday, and Saturday use is limited to four days a year within a four hour period between 10:00 A.M. and 6:00 P.M.. Archer hours for passive use of the outdoors are 7:40 A.M. to 6:00 P.M., Monday through Friday and 10:00 A.M. to 6:00 P.M. on Saturdays. Outdoor use is not permitted on Sundays or national holidays, with the exception of Columbus Day and Veterans Day when those days are used as regular school days."*

The DEIR is flawed because it ignores this current CUP violation. If the Planning Department failed to catch this violation during the 2013 Plan Approval, it is nevertheless a violation, and relevant to the current Project requests. All DEIR analysis that starts with an assumption that the current CUP permits unlimited athletic competitions Monday through Friday, 3:00 p.m. to 6:00 p.m., is inaccurate and all impacts of the Project that start with that assumption are grossly understated, and need to be re-analyzed and disclosed.

---

Document Reference: DEIR Appendix B-1, page 4

Document Citation: "Accordingly, these historical data accurately reflect expected future attendance levels at on-campus Interscholastic Athletic Competitions. The table below identifies the teams proposed to host..."

**Deficiency:** This statement is misleading, inaccurate, and deficient because the letter already states that all data is based on so-called "observations" and not accurate counts, and is based on an arbitrary estimate of the number of spectators per player.

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Document Reference: DEIR Appendix B-1, page 4

Document Citation: Table on Page 4

**Deficiency:** The table on page 4 is misleading and deficient because it does not disclose how many of the competitions overlap and occur on the same day, thereby multiplying the traffic impact.

---

Document Reference: DEIR Appendix B-1, page 4

Document Citation: Table on Page 4

**Deficiency:** This table on page 4 is misleading and deficient because it does not disclose the number of spectators coming in their own vehicle, because the parents may not be coming from the same place.

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Document Reference: DEIR Appendix B-1, page 4

Document Citation: "As noted above, final schedules will be determined in conjunction with the athletic leagues in which Archer's teams compete, so the exact number of days with competitions may vary slightly from year to year based on each year's game and playoff schedule."

**Deficiency:** This statement fails to explain the omission and inadequate disclosure in the table on page 4, of the column "Competition Time" which was included in the table on page 2. The disclosure on page 4 is deficient without this information which would show a decision maker the number of potential vehicle arrivals and departures during PM peak traffic hours from adding to the campus the enormous number of athletic competitions proposed by the Project.

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Document Reference: DEIR Appendix B-2, pages 1-3

Document Citation: Table of Special Events

**Deficiency:** This disclosure is misleading, inadequate and deficient because it does not clearly compare apples with apples. For 15 years, Archer, the City, and the surrounding community have been living with a table of "Special Events" that was attached to the CUP as an Exhibit. That Exhibit has the following column headings:

- Event Name
- Time/Day
- Parked Cars On Site
- Approximate Attendance
- Permitted Maximum Attendance (on 15 Events)

The information in the table on pages 1-3 may be an interesting additional disclosure of Archer's experience with Special Events during a recent year, but full disclosure of impact requires a direct comparison of the current CUP "Special Events" table with the same information in a table for the Project's proposed 98 "School Functions." The new name may be an attempt to enhance palatability, but also causes confusion, as they remain non-curriculum Special Events.

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Document Reference: DEIR Appendix B-2, page 3

Document Citation: "As part of the Archer Forward: Campus Preservation and Improvement Plan, School Functions are defined as planned functions that involve students and/or guests on campus. Archer is proposing a maximum of 98 School Functions to be permitted per Academic Year. Categories of School Functions will include Academic and Leadership Functions; Admission Functions; Alumnae Functions; Dances and Socials; Graduation; Interscholastic Athletic Tournaments; Music Functions; Parents and Family Functions; Performances; Student Enrichment Functions; and Visual Arts Functions. The specific School Functions within each category may vary each Academic Year.

**Deficiency:** The inclusion of "Interscholastic Athletic Tournaments", without any definition or explanation, in this list of "School Functions" is misleading and deficient. These "Tournaments" must be distinguished from the Athletic Competitions in Appendix B-1.

Document Reference: DEIR Appendix B-2, page 3

Document Citation: Table on Page 2 and 3

**Deficiency:** The mere listing of the categories of 98 "School Functions" is inadequate and deficient without the same information that appears in Exhibit C of the current CUP. That is the only way that a decision maker might be able to determine the increased intensification of use proposed by the Project's land use requests.

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Document Reference: DEIR Appendix B-2, page 3

Document Citation: "School Functions in all School Buildings and Courtyards, on the Athletic Fields, and in the Aquatics Center shall be permitted Monday through Saturday from 7:00 a.m. to 10:00 p.m., and Sunday from 12:00 p.m. to 7:00 p.m., except for eight School Functions that shall be permitted to conclude by 11:00 p.m. on Fridays and Saturdays."

**Deficiency:** Memo, also dated 2/7/2014, which is Appendix P-2. According to this Appendix B-2, ALL "School Functions" could take place (start and end) during the weekday PM peak traffic hours of 3:00 - 7:00pm. But a different schedule of Events must have been given to LADOT and used to generate the net new trip numbers in the last paragraph on page 2 of Appendix P-2. This inconsistency, and failure to include adequate information about the Project's proposed "School Functions," results in a legally deficient DEIR.

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Document Reference: DEIR Appendix B-1 and B-2

Document Citation: Interscholastic Athletic Program and School Functions Overview

**Deficiency:** The disclosure is misleading, inadequate and deficient because it does not combine the overall number of the Project's proposed participants, staff, guests, and spectators from the Project's proposed intensification of use from athletic competitions and "School Functions" compared to (1) what is currently permitted by the CUP and, (2) what is actually occurring on campus now. This information is essential for proper evaluation of the environmental impacts from the proposed Project.

In addition, the disclosure must show how many additional persons would be permitted to arrive on campus and depart campus during weekday PM peak traffic hours of 3:00

p.m. – 7:00 p.m. This information is necessary for a decision maker to estimate whether the potential net new trips from the proposed Project from the aggregate of all additional activities during the weekday PM peak traffic hours is 20,000 or 30,000, or some other number. This omission must be rectified and the DEIR re-circulated.

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Document Reference: DEIR Appendix P-1, page 3

Document Citation: "An enrollment cap of 518 total middle school and high school students has been established by an existing Conditional Use Permit (CUP). This enrollment cap will remain the same with the implementation of the Project. Archer's enrollment for the 2011-2012 school year was 430 total middle school and high school students, which is below their maximum allowable enrollment of 518 students. This study analyzes the difference between full enrollment of 518 total students and the 2011-2012 enrollment of 430 students."

**Deficiency:** This statement of the enrollment cap is misleading, incomplete, inaccurate and deficient. The actual targeted baseline enrollment is 450 and is set forth in Permit Condition #6 as follows:

*The use of the subject property shall be limited to a private school for girls, Grades 6 through 12, with a maximum enrollment of 518 students. Maximum total is not intended to be reached. The number recognizes the inability of school admissions staff to know with precision the number of students who are sent acceptance letters and provides a cushion to protect the school from being out of compliance with its targeted baseline enrollment of 450 students."*

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Document Reference: DEIR Appendix P-1, page 7

Document Citation: For purposes of this analysis, on an event day, the following scenarios and associated study time periods were analyzed:

- 300-attendee interscholastic athletic competition or school function with arrival time between 3:00 and 4:00 PM Monday through Friday and departure times between 5:00 and 6:00 PM Monday through Friday
  - 3:00 to 4:00 PM (weekday)
  - 5:00 to 6:00 PM (weekday)
- 300-attendee interscholastic athletic competition or school function with arrival time between 5:00 and 6:00 PM Monday through Friday
  - 5:00 to 6:00 PM (weekday)
- 300-attendee school function with arrival time between 6:00 and 7:00 PM



Monday through Friday and 1:00 to 2:00 PM Saturday

- o 6:00 to 7:00 PM (weekday)
- o 1:00 to 2:00 PM (Saturday)

- 650-attendee school function with arrival time between 6:00 and 7:00 PM

Monday through Friday and 1:00 to 2:00 PM Saturday

- o 6:00 to 7:00 PM (weekday)
- o 1:00 to 2:00 PM (Saturday)

**Deficiency:** The entire analysis is grossly deficient because the scenarios and time periods analyzed are incorrect, inadequate, deficient, and defy common sense.

Instead of 37 Special Events during weekday hours 3:00 p.m. to 7:00 p.m., Archer proposes an increase to 69 Special Functions (and that doesn't include 10 proposed Interscholastic Athletic Tournaments hosting 200 guests each). Of those 69 Events, 24, instead of the current 20, would have a proposed attendance of 100, and 26, instead of the current 14, would have a proposed attendance of 200.

This intensified use and resulting environmental impact must be included in the "event day" analysis. It takes very few trips to significantly impact Sunset/Barrington and the omission of these proposed, additional 16 Events makes the analysis deficient.

The omission is magnified when proposed athletic competitions are added to omitted Events.

The analysis fails to study departures between 6:00 p.m. - 7:00 p.m. from athletic competitions or school functions.

The analysis fails to study athletic competitions with arrival times between 6:00 p.m. - 7:00 p.m.

The analysis fails to study all the Events during weekday hours 3:00 p.m. - 7:00 p.m. with attendance of more than 300 (7 proposed instead of 1 as currently).

The deficiency of the analysis is not remedied by the possibility that LADOT has consented to a deficient analysis.

---

Document Reference: DEIR Appendix P-1, page 8

Document Citation: In addition to the analyzed intersections, 10 street segments were analyzed for potential neighborhood impacts as part of this Project:

1. Chaparal Street between Barrington Avenue and Westgate Avenue
2. Westgate Avenue between Sunset Boulevard and Chaparal Street
3. Barrington Avenue between Sunset Boulevard and Chaparal Street
4. Kearsarge Street between Westgate Avenue and Granville Avenue
5. Saltair Avenue between Sunset Boulevard and Chaparal Street
6. Granville Avenue between Sunset Boulevard and Kearsarge Street
7. Bundy Drive between Sunset Boulevard and Saltair Avenue
8. Westgate Avenue between Sunset Boulevard and Kearsarge Street
9. Kenter Avenue between Sunset Boulevard and Homewood Road
10. Bundy Drive between Sunset Boulevard and Bonny Lane

**Deficiency:** The traffic study is grossly deficient because the analyzed street segments do not include any segments of Sunset Blvd. between Kenter Ave and the 405 Freeway. On page 6 of Appendix P-2, it states that traffic cuts through Chaparal Street between Saltair Ave and Barrington Ave **"in order to bypass the congested eastbound traffic on Sunset Blvd during the PM peak period."** After making that statement, this traffic study is grossly deficient without an analysis of the Project's impact on that **congested eastbound traffic on Sunset Boulevard during the PM peak period.** The only analysis that is meaningful is one that measures the extra time it would take to travel the Sunset segment(s) if the Project is approved and built. The purpose of the EIR is to aid the understanding of a project's impacts by the public and the decision makers. A decision maker cannot judge the true impact if the information discloses that an intersection now rated "F" will be an "F" after the Project. But if the information discloses, for instance, that a one-mile segment of Sunset Blvd that now takes one hour to pass (during PM peak hours) will take one and a half hours after the Project is completed, then the decision maker has the necessary information that should be in an EIR. Without this information, the traffic study and the EIR are legally deficient.

Obviously, the capacity to study Sunset street segments is readily available. It is also obvious that Sunset is the location of the worst congestion and delay in the area. We suspect that the Sunset segment information already exists and has been omitted only due to a combination of faulty traffic study methodology and a desire to hide the most important and significant adverse impacts of the proposed Project. The information needs to be included in an amended EIR, which is then re-circulated.

Document Reference: DEIR Appendix P-1, page 15

Document Citation: In fact, during field observations, seven intersections along Sunset Boulevard and Wilshire Boulevard were observed to experience acute traffic congestion during the afternoon peak traffic period on certain approaches of the intersection, resulting in a reduced number of vehicles traversing the intersection. This reduction in vehicle throughput was determined to inaccurately reflect the existing LOS experienced by motorists. The congestion was determined to be worsened by the temporary impacts of construction of the I-405 Sepulveda Pass Improvements Project, resulting in uncharacteristically oversaturated conditions unreflective of generally existing conditions and longer than normal queuing and delays along the following seven study intersections:

3. Bundy Drive & Sunset Boulevard
4. Saltair Avenue & Sunset Boulevard
5. Barrington Avenue & Sunset Boulevard
6. Barrington Place & Sunset Boulevard
13. Barrington Avenue & Montana Avenue
15. Barrington Avenue & Wilshire Boulevard
16. San Vicente Boulevard/Federal Avenue & Wilshire Boulevard

**Deficiency:** The conclusion regarding the impact of the 405 Project is not accurate and therefore misleading. Observations in 2014 after all ramp construction at Sunset and Wilshire has been completed, on more than one day, at 4pm and at 5pm, at Sunset/Saltair, showed that the number of cars able to go east through a green light in the eastbound curb lane of Sunset, averaged 3 cars over 6 light cycles.

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Document Reference: DEIR Appendix P-1, page 17

Document Citation: Existing Levels of Service.

Existing year traffic volumes presented in Appendix Table G1 were analyzed using the intersection capacity analysis methodology described above to realistically determine the existing operating conditions at the 17 study intersections.

**Deficiency:** All Sunset intersection analyses in the EIR are deficient to the extent they measure or examine, and make conclusions as to LOS or anything else, based on the traffic going both east and west. It is obvious that the traffic weekdays, during 3:00 p.m. – 7:00 p.m. going east, is at least twice the amount going west. Hence, if the analysis

were based on eastbound numbers and eastbound capacity, it is likely that each Sunset intersection LOS would be much worse. And the number of cars going eastbound that would create a significant impact would be much fewer.

Document Reference: DEIR Appendix P-1, page 24

Document Citation: Table 3: Project Trip Generation (50% Busing)

**TABLE 3  
PROJECT TRIP GENERATION (50% BUSING)**

Landuse	No. of Employees	No. of Students	Group Activity Date	Legend	BEFORE PROPOSED PROJECT (50% BUSING)			AFTER PROPOSED PROJECT (50% BUSING)			NET CHANGE			BEFORE PROPOSED PROJECT (50% BUSING)			AFTER PROPOSED PROJECT (50% BUSING)			NET CHANGE				
					AM	PM	TOTAL	AM	PM	TOTAL	AM	PM	TOTAL	AM	PM	TOTAL	AM	PM	TOTAL	AM	PM	TOTAL		
Existing Homebased School Day	35	430	100% of Occupancy	7:00-8:00 AM	14	14	28	14	14	28	0	0	0	0	0	0	0	0	0	0	0	0	0	
			8:00-9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			9:00-10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			10:00-11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Existing Homebased Athletic Competitions or School Functions Day	35	430	100% of Occupancy	7:00-8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			8:00-9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			9:00-10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			10:00-11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Proposed Homebased School Day	137	113	100% of Occupancy	7:00-8:00 AM	17	17	34	17	17	34	0	0	0	0	0	0	0	0	0	0	0	0	0	
			8:00-9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			9:00-10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			10:00-11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Proposed Homebased Athletic Competitions or School Functions Day	137	113	100% of Occupancy	7:00-8:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			8:00-9:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			9:00-10:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			10:00-11:00 AM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Net New Projected Homebased School Day Trips</b>					<b>17</b>	<b>17</b>	<b>34</b>	<b>17</b>	<b>17</b>	<b>34</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
<b>Net New Projected Homebased Athletic Competitions or School Functions Day Trips</b>					<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			

**Deficiency:** The entire analysis of Table 3 and the EIR is deficient because it is executed by combining proposed athletic competitions and proposed school functions. In order for a decision maker to be able to determine whether to approve the construction and use of athletic facilities, the impacts of the proposed athletic competitions must be analyzed separately from the impacts of proposed school functions, which would use different proposed facilities. Archer Forward is not an all or nothing proposal. For example, a decision maker might consider approving the proposed increase in Special Events, but no increase in athletic competitions, and must be able to discern the impacts of that choice.

Document Reference: DEIR Appendix P-1, page 24

Document Citation: See Previous Table

**Deficiency:** Since Table 3 shows zero trips out by event attendees weekdays between 5:00 p.m. – 7:00 p.m., all 320 trips during those hours, plus students, faculty and staff, will be departing after 7:00 p.m., and the environmental impacts must be studied and disclosed, or else the EIR is deficient.

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Document Reference: DEIR Appendix P-1, page 24

Document Citation: See Previous Table

**Deficiency:** The deficiencies described above regarding page 7 of Appendix P-1 are repeated in this Table 3. The entire analysis is grossly deficient because the scenarios and time periods analyzed are incorrect, inadequate, deficient.

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Document Reference: DEIR Appendix P-1, page 24, Table 3; and page 27 (net new trips data)

Document Citation: See Previous Table and Net New Trips Data

**Deficiency:** In January 2014, Archer advised community organizations that the proposed 177 athletic competitions would generate at least 9,100 guests per school year during weekday peak PM traffic hours, and 4,400 guests at school functions during the same hours. These numbers must be converted into vehicle trips in and out. And a higher ratio than 1.5 guests per car must be used for afternoon athletic competitions when parents will be arriving separately from different locations. Only then can it be determined whether there is a consistency between the information being provided.

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Document Reference: DEIR Appendix P-1, page 34

Document Citation: Table 4: Related Projects List

TABLE 4  
 RELATED PROJECTS LIST

Project Location	Land Use	Size	Daily	Trip Generation								
				AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
				In	Out	Total	In	Out	Total	In	Out	Total
1 11975 San Vicente Blvd	Mixed Use (Retail)	58.5 ksf	1,456	46	30	76	125	130	255	237	213	452
	Mixed Use (Restaurant)	10.5 ksf										
	Mixed Use (Office)	8 ksf										
2 11906 - 11920 San Vicente Blvd	Restaurant	3.9 ksf	358	20	19	39	19	17	32	24	19	43
3 11711 Gorham Ave	Retail Center	30 ksf	734	2	1	3	48	50	98	113	104	217
4 11669 - 11677 Wilshire Blvd	Mixed Use (Condominium)	49 du	516	97	13	110	13	66	79	14	10	24
	Mixed Use (Office)	41 ksf										
	Mixed Use (Retail)	8 ksf										
5 11600-11620 Wilshire Blvd	Mixed Use (Office)	120.2 ksf	1,280	38	5	43	29	112	135	92	69	161
	Mixed Use (Medical Office)	120.9 ksf										
6 11900 Santa Monica Blvd	Mixed Use (Condominium)	93 du	375	18	11	29	18	18	36	10	8	18
	Mixed Use (Retail)	26 ksf										
7 11857 - 11859 Santa Monica Blvd	Mixed Use (Condominium)	28 du	1,143	7	36	43	19	9	28	32	29	61
	Mixed Use (Retail)	4.7 ksf										
8 1466 Westgate Ave	YMCA Recreation Center	65 ksf	1,204	38	47	85	42	31	73	338	338	676
9 11701 Santa Monica Blvd	Fast Food Restaurant	1.2 ksf	859	46	30	76	14	14	28	14	15	29
10 11660 Santa Monica Blvd	Supermarket	53.2 ksf	1,948	51	32	83	37	36	73	6	17	23
11 100 South Barrington Place	Brentwood School	275 stu	470	79	37	116	17	19	36	19	11	30
<b>TOTAL RELATED PROJECT TRAFFIC</b>			<b>10,344</b>	<b>442</b>	<b>262</b>	<b>703</b>	<b>375</b>	<b>502</b>	<b>873</b>	<b>899</b>	<b>835</b>	<b>1,734</b>

Notes:  
 du = dwelling units  
 ksf = one thousand square feet  
 stu = number of enrolled students  
 Related project data and trip generation estimates obtained from LADOT and Overland Traffic Consultants, February 2012.

**Deficiency:** Table 4 fails to describe what is meant by "PM Peak Hour." Table 4 fails to include regional projects that will have a significant impact that are outside the City of Los Angeles boundaries. Los Angeles is not an island. The fact that LADOT does not have jurisdiction over projects in Santa Monica must not allow those projects to be excluded from the impact analysis. The reality is that proposed new projects in Santa Monica will greatly impact Sunset Blvd because it is well documented that many workers at these projects live in points north and east of Brentwood and commuters will use Sunset to access the 405 to return home during the weekday PM peak traffic hours. *The traffic analysis for the Project is grossly deficient because it does not include several projects in Santa Monica that are substantial in size.*

Document Reference: DEIR Appendix P-1, page 37

Document Citation: Wilshire Bus Rapid Transit Bus-Only Lanes

**Deficiency:** The traffic analysis is deficient because it does not include the increased traffic that will be diverted to Sunset Blvd when Wilshire Blvd is reduced during weekday PM peak traffic hours from 3 lanes to 2 lanes east of Centinela by the Wilshire BRT project.

Document Reference: DEIR Appendix P-1, page 39

Document Citation: City of Los Angeles Significance Criteria

The City of Los Angeles has established threshold criteria to determine significant traffic impacts of a proposed project in its jurisdiction. Under the LADOT guidelines, an intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C, equal to or greater than 0.02 for intersections operating at LOS D, and equal to or greater than 0.01 for intersections operating at LOS E or F after the addition of project traffic. Intersections operating at LOS A or B after the addition of the project traffic are not considered significantly impacted regardless of the increase in V/C ratio. The following summarizes the impact criteria:

<b>LOS</b>	<b>Final V/C Ratio</b>	<b>Project-Related Increase in V/C</b>
C	>0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E or F	> 0.900	equal to or greater than 0.010

**Deficiency:** The traffic analysis and EIR are deficient because it is obviously a gross error to blindly use these intersection criteria without recognizing that eastbound traffic on Sunset Blvd during weekday PM peak traffic hours is more than double the traffic going westbound. Hence, the number of vehicles having a significant impact is far less if the lack of capacity going eastbound is studied rather than studying an average of both directions.

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Document Reference: DEIR Appendix P-1, page 54

Document Citation: Wilshire Bus Rapid Transit Bus-Only Lanes

**Deficiency:** The suggestion that increasing a busing requirement on paper will mitigate future real trip impacts lacks all semblance of integrity, and is misleading, inaccurate, and deficient. The DEIR states that busing during the baseline period was actually 85%. Trip impacts are compared to the baseline period. Changing a CUP busing requirement on paper from 50% to 70% can't mitigate future trips since the actual busing during the baseline period was already at 85%.

---

Document Reference: DEIR Appendix P-1, page 59

Document Citation: Feasible Mitigation Measures

**Deficiency:** The only suggested physical mitigation is not properly described, and has been deficiently studied. The Project had ample opportunity to inquire whether there is a possibility of acquiring this strip of private property, and the failure to inquire indicates the Project doesn't really want to hear the answer. Further, the negative aspects to this suggestion have not been described and therefore the traffic study and EIR are deficient. A wider Saltair will encourage northbound traffic on Saltair, particularly if there is no right turn at Barrington north. It will encourage more traffic to go east on congested Sunset. And it will encourage more traffic to cross Sunset to access Chaparral to avoid Sunset congestion, which is acknowledged on page 61 in the DEIR to already be a problem.

---

**BHA DEIR Comments X – XX on Appendix P-2 are intended to also be comments on the DEIR source of the statements incorporated by LADOT in its letter.**

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Document Reference: DEIR Appendix P-2, page 1

Document Citation: The current school enrollment cap has been established by the existing Conditional Use Permit (CUP) at 518 total middle school and high school students, and this cap will remain with the implementation of the proposed Project.

**Deficiency:** This statement of the enrollment cap is misleading, incomplete, inaccurate and deficient. The actual targeted baseline enrollment is 450 as set forth in CUP Condition 6:

“The use of the subject property shall be limited to a private school for girls, Grades 6 through 12, with a maximum enrollment of 518 students. Maximum total is not intended to be reached. The number recognizes the inability of school admissions staff to know with precision the number of students who are sent acceptance letters and provides a cushion to protect the school from being out of compliance with its targeted baseline enrollment of 450 students.”

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Document Reference: DEIR Appendix P-2, page 4

Document Citation: "In order to mitigate the impact at the significantly impacted study intersections, the Project shall revise the TMP and utilize vans and buses to transport at least 70% of student enrollment on a daily basis."

**Deficiency:** This suggested mitigation of significantly traffic impacted intersections here and throughout the DEIR is misleading, deceptive, and deficient because the DEIR states on page IV.K-5, that "During the 2011-2012 school year, approximately 85 percent of the students used the school bus." The fact that the CUP busing requirement might be changed on paper from 50% to 70% cannot reduce new traffic impacts over and above current traffic numbers since the existing baseline conditions (before the additional traffic) already include 85% busing.

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Document Reference: DEIR Appendix P-2, page 2

Document Citation: Discussion and Findings: "300-attendee interscholastic athletic competition or school function with arrival time between 5:00 and 6:00 PM, Monday through Friday."

**Deficiency:** This scenario and analysis of net new trips are incomplete, inadequate, and deficient, and hence the traffic study is deficient. Any 300-attendee interscholastic athletic competition that has an arrival time of 5:00 - 5:30pm will have a departure time before 7:00 pm, and therefore at least 216 net new departing trips have been incorrectly omitted from the traffic study.

---

Document Reference: DEIR Appendix P-2, page 4

Document Citation: "It should be noted that DOT considers construction-related traffic impacts to be temporary and adverse in nature but less than significant."

**Deficiency:** The statement that all construction, by definition, is temporary, and therefore is not significant, defies reason. On page 2 of Appendix P-2, it states that North Wing Renovation is expected to take 16 months, Phase 1 will take 27 months, and Phase 2 will take 38 months. That is close to 7 years, and it is unclear whether these estimates take into account the statement on page 5 of Appendix P-2 that DOT recommends that construction related traffic be restricted to off-peak hours. Hence, the proposed construction could easily be 10 years. Is that temporary? What if it took 15 - 20 years?

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Document Reference: DEIR Appendix P-2, page 2

Document Citation: Documents and Findings: "300-attendee school function with arrival time between 6:00 PM and 7:00 PM, Monday through Friday and 1:00 to 2:00 PM Saturday peak hour."

**Deficiency:** This scenario and analysis of net new trips are deficient, and the traffic study is incomplete, inadequate, and deficient. Currently, of the 47 Special Events permitted by the Permit, only 3 have the potential to have 300 or more attendees arriving between 6:00 p.m. - 7:00 p.m., and the cars parked on site are limited to the 109 capacity. Hence the statement on page 2 that only 85 net new trips would be generated during 6:00 - 7:00pm for 300-attendee arrival events when proposed parking would accommodate 282 cars cannot be correct. Further, the statement that a 300-attendee school function with arrivals 5:00 p.m. - 6:00 p.m. would generate 216 net new trips, but a 300-attendee school function with arrivals 6:00 p.m. - 7:00 p.m. would generate only 85 net new trips, cannot be correct. Also, by Archer's own admission to stakeholders (as of July 22, 2013), 300 attendees would result in 200 cars.

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Document Reference: DEIR Appendix P-2, page 3

Document Citation: "DOT has determined that the proposed Project will not create a significant impact at any of ten (10) analyzed neighborhood street segments analyzed during a non-event day or various event day scenarios, as shown below and in Attachment C, average daily traffic (ADT) impact analysis of the neighborhood street segments."

**Deficiency:** The traffic study is grossly deficient because the analyzed street segments do not include any segments of Sunset Blvd. between Kenter Ave and the 405 Freeway. On page 6 of Appendix P-2, it states that traffic cuts through Chaparral Street between Saltair Ave and Barrington Ave "in order to bypass the congested eastbound traffic on Sunset boulevard during the PM peak period." After making that statement, a traffic study by DOT and in the DEIR is grossly deficient without an analysis of the Project's impact on that congested eastbound traffic on Sunset Boulevard during the PM peak period.

The only analysis that is meaningful is one that measures the extra time it would take to travel the Sunset segment(s) if the Project is approved and built. The purpose of the EIR is to aid the understanding of a project's impacts by the public and the decision makers. A decision maker cannot judge the true impact if the information discloses that

an intersection now rated "F" will be an "F" after the Project. But if the information discloses that a one-mile segment of Sunset Blvd that now takes one hour during PM peak hours will take an hour and a half after the Project, then the decision maker has the necessary information that should be in an EIR. Without this information, the traffic study and the EIR are legally deficient.

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Document Reference: DEIR Appendix P-2, page 5

Document Citation: Proposed Physical Mitigation Measure

"Saltair Avenue and Sunset Boulevard – To mitigate the significant impact at this intersection under all the event day scenarios, the Project proposes to widen the east side of Saltair Avenue south of Sunset Boulevard and install a right-turn-only lane for the northbound traffic on Saltair Avenue. However, this mitigation consists of acquiring a strip of private property right-of-way along the east side of Saltair Avenue. If the right-of-way cannot be acquired, the impact at this intersection would remain significant and unavoidable under some event day scenarios."

**Deficiency:** It is indicative of the extent of the significant traffic impacts that the only proposed physical mitigation measure (1) requires an unlikely acquisition of private property and (2) would aggravate the traffic. Installing a right-turn-only lane at the NE corner of Sunset/Saltair would encourage cars to come north on Saltair to access the 405 via Sunset. Enabling cars to more easily turn east on Sunset would contribute to the **congested eastbound traffic on Sunset Boulevard during the PM peak period**. Also, having two northbound lanes on Saltair would contribute to the cut through traffic on Chaparal described on page 6 of Appendix P-2. The suggested mitigation is unlikely, impractical, ineffective and inappropriate.

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Document Reference: DEIR Appendix P-2, page 4

Document Citation: "In addition, the following trip reduction limits shall be implemented to reduce or eliminate event-related significant impacts:

- 3:00 PM to 4:00 PM, Monday through Friday Arrival – Limit the number of vehicles generated by guests arriving at the Archer Campus to attend school functions and interscholastic athletic competitions to no more than 72 vehicles.
- 5:00 PM to 6:00 PM, Monday through Friday Departure – Limit the number of

vehicles generated by guests departing from the Archer Campus after attending school functions and interscholastic athletic competitions to no more than 72 vehicles.”

**Deficiency:** This proposed limit on only the number of vehicles arriving 3:00 p.m. – 4:00 p.m. and departing 5:00 p.m. – 6:00 p.m. is a meaningless number without describing the arrivals for school functions and interscholastic athletic competitions between 5:00 p.m. – 6:00 p.m and between 6:00 p.m. – 7:00 p.m. It is misleading, deceptive and inaccurate to describe such limits as being capable of reducing or eliminating event-related significant impacts. Throughout its history, the School’s Permit has included an Exhibit listing the number of Special Events, the days and hours of those Events, the number of cars that may be parked on-site for each Event, and permitted attendance at each Event (including faculty and staff). This Special Event Exhibit has been amended several times. The EIR is legally deficient without a new Exhibit of proposed Special Events (school functions) in the same format as the current Permit Exhibit that would give the public and a decision maker the ability to compare the use of the proposed physical additions to the campus with the use currently permitted on the existing campus. A similar comparison must be included in the EIR of (A) current interscholastic athletic competitions occurring on campus, days and hours, and spectator and other non-Archer attendance, with (B) proposed competitions on campus, days and hours, and spectator and other attendance. Otherwise, a decision maker has no way of determining the impacts of the proposed physical additions to the campus, and no way of determining the conditions and limitations that should be imposed (on the physical additions, or on the use of those physical additions, or both).

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Document Reference: DEIR Page IV.H-54

Document Citation: “. Filming on campus for commercial purposes would continue to be prohibited except when the School is not in session and provided the filming revenue is placed in the School’s scholarship fund.”

**Deficiency:** The DEIR is deficient in that it fails to describe or analyze in greater detail the noise and traffic effects of unlimited filming days and hours as described in the above passage.

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Document Reference: DEIR Page IV.H-54

Document Citation: “Rental, lease, or use of the facilities for non-School Use (e.g., club athletics, weddings, private parties) would be permitted a maximum of 24 days per year

between the hours of 8:00 A.M. and 10:00 P.M., Monday through Saturday.”

**Deficiency:** The DEIR is deficient in that it fails to describe or analyze in greater detail the noise and traffic effects of the 24 days of leasing of facilities as described in the above passage. There is no reference to vehicle restriction and therefore we must assume a maximum of 282 vehicles will enter and exit the campus, resulting in an additional 13,536 car trips.

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Document Reference: DEIR Page II-2

Document Citation: “Development of the Project would commence with the North Wing Renovation, which is anticipated to be completed as early as the summer of 2015. The remainder of the Project would be developed in two phases, as described further below, and may be completed as early as 2020.”

**Deficiency:** The DEIR is deficient in that it improperly describes the project as a two-phase project. The description clearly shows THREE phases, the first of which is the reconstruction of the North Wing, which includes added square footage.

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Document Reference: DEIR Page II-2

Document Citation: Footnote 2: “The existing Conditional Use Permit for Archer permits an enrollment of up to 518 students. The project does not propose to increase enrollment.”

**Deficiency:** The DEIR is deficient and inaccurate in two ways on this point.

1. Archer has never achieved enrollment of 518, so while they may not intend to increase their enrollment “cap,” there is a clear intention to increase their enrollment beyond the 450 baseline specified in their current CUP.
  2. The existing CUP does NOT permit enrollment up to 518. It is merely a maximum, which the CUP clearly states is not meant to be reached. The continued assumption that 518 is the allowed enrollment is a perpetuated falsehood.
-

Document Reference: DEIR Page I-10

Document Citation: "To provide for these improvements, the existing residence on the Chaparal Parcel would be removed, resulting in a net increase of 28,076 square feet of floor area upon completion of Phase 2.."

**Deficiency:** The DEIR is deficient in allowing the demolition of homes owned by Archer to factor into net square footage for the Project.

1. The homes owned by Archer are currently not permitted as anything more than residences.
2. The fact Archer is the owner of the homes does not make them part of the school.
3. Demolition of the homes as part of the Project does not reduce building square footage of the school and thus should not be deducted from the overall square footage of the construction square footage.
4. There is no analysis of the impact on the neighborhood of changing the use of residential homes to school uses and eliminating a buffer between school and residential use (e.g., noise and sight lines).

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Document Reference: DEIR Page II-17

Document Citation: "Development of the Project would commence with the North Wing Renovation, which is anticipated to be completed in the summer of 2015."

**Deficiency:** The DEIR is inaccurate and deficient in that it is now highly unlikely any portion of this project will be completed by the summer of 2015, and thus the entire completion projection of 2020 may be as unlikely. This also puts into question the traffic projections for construction periods and post-completion.

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Document Reference: DEIR Page II-41

Document Citation: "Options for off-site parking facilities could also include the surface parking lot south of Sunset Boulevard at Barrington Village..."

**Deficiency:** The DEIR is deficient in that it suggests by the above statement that the Project wishes to create a new impact not studied in the DEIR. It is common knowledge this aforementioned parking lot operates at near capacity and to further burden the capacity with construction vehicles would further impact the businesses, park users and shoppers that operate just south of Sunset.

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Document Reference: DEIR Page IV.K-84

Document Citation: "The total daily truck round trips were then converted into total daily inbound and outbound trips by applying a factor of two and a passenger car equivalency (PCE) factor ranging from 1 to 2.5 depending on the vehicle size and type."

**Deficiency:** The DEIR is deficient in that the factor of 2.5 for a PCE of a 5-axle haul truck is the lowest possible reference point and not consistent with standards outlined in the HCM (Highway Capacity Manual). Given the grades in the area, and factoring in the effects at a signalized intersection, of which there are no less than five between the Project site and the shortest haul route, the more appropriate PCE conversion might conservatively be 3.5, which would about 40% to parts of the construction trip count. In other words, 100 haul truck round trips referenced in Table IV-K-28 might be converted to 700 daily trips for that one vehicle class.

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Document Reference: DEIR Table IV.K-29

Document Citation: Haul Truck Trips Daily Estimate = 500

**Deficiency:** The DEIR is deficient in that 500 daily trips represents an inaccurate number of PCE trips when factoring in grades and signalized intersections.

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Document Reference: DEIR Page IV.K-89

Document Citation: "As summarized in Table IV.K-30, the greatest number of significantly impacted intersections is projected to occur during the peak week of activity under "Remainder of Phase 1(d)."

**Deficiency:** The DEIR is deficient in that it refers to "the peak week" as if the impacts during high capacity construction will only happen during one week. In fact, these high capacity weeks will last for *months*.

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Document Reference: DEIR Page IV.K-102

Document Citation: "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.

**Deficiency:** The DEIR is deficient in that it assumes DTV will be reduced by 50% when the 405 project is complete. Why would traffic volume decrease because of the end of 405 construction? Traffic CONGESTION might decrease, but why volume?

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Document Reference: DEIR Appendix C-2, page 1

Document Citation: Table – Round Trips Per Vehicle Classification

**Deficiency:** The DEIR is deficient and incomplete in that this chart fails to provide in this chart accurate trip counts, totals, or PCEs. By omitting this vital information, one can assume the construction related trip counts are insignificant. In fact, when all factors are calculated, the Project construction will likely add over 250,000 car trips to congested streets of Brentwood.

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Additional General Comments Applicable to the DEIR

The DEIR is faulty and deficient because it makes an assumption that all, or most, trips during afternoon peak hours coming to athletic events will be westbound on Sunset, and all trips leaving the events will be eastbound on Sunset.

The DEIR is faulty and deficient because merely measuring total traffic at intersections on Sunset Blvd does not accurately measure Sunset traffic in weekday PM peak hours of 3:00 p.m. – 7:00 p.m. It is likely that the traffic going eastbound is more than twice the amount of traffic going westbound. For example, westbound traffic on Sunset at the Saltair light can clear on one light cycle at a time when only 2-3 cars can go eastbound on one light cycle because of congestion backup. The impact on eastbound traffic must be separately studied.

The DEIR is faulty and deficient because it measures significant impact based on a 2011 – 2012 baseline (which includes the busing/car pooling mitigation at that time). And it is based on the zip codes of Archer students/parents. In other words, the traffic study does not take into account the zip codes of the students/parents from other schools with which Archer would like to start playing athletic competitions on the Archer campus, which are now being played at other venues.

The DEIR is faulty and deficient because the impact analysis using a 2011-2012 baseline ignores the creeping growth in the number of Special Events over the life of the CUP, and the growth of impact over those years of traffic on Sunset. The baseline should be tied to conditions at the time of the CUP grant in 1998 when Archer was first allowed to use residential property for school use.

The DEIR is faulty and deficient because it assumes/concludes that all arrivals between 6:00 p.m. – 7:00 p.m. for Special Events of 100 or 200 guests will have no significant impact on any intersection. Adding those trips to eastbound traffic on Sunset Blvd at that hour for a proposed additional 16 Events would have a very significant impact. The cumulative impact of the Hines project in Santa Monica (recently approved) and similar projects in Santa Monica that also should have been reasonably anticipated, must be analyzed because it is well established that Santa Monica office workers use Sunset Blvd to access the 405 during weekday peak PM traffic hours.

The DEIR is faulty and deficient because it does not analyze adverse and significant land use compatibility and consistency impacts due to the proposed change to school use of properties that have always been zoned and used for residential use. Changing the permitted use of residential properties by way of a CUP from residential use to school institution use would have a unique set of impacts that must be studied, including visual, noise, and traffic impacts. It is a matter of common sense that a homeowner will have a different viewpoint if a residence is constructed on an adjacent lot compared with the construction of a school institution on the adjacent lot. Given the density of the regional area, assumptions of annual traffic growth eastbound on Sunset Blvd are significantly understated for the weekday peak PM traffic hours 3:00 p.m. - 7:00 p.m. All construction of Sunset and Wilshire ramps are complete and the congestion eastbound on Sunset Blvd during weekday peak PM traffic hours 3:00 p.m - 7:00 p.m is as bad as ever. Any assumption that the final few months of the 405 project will lessen that congestion is faulty and deficient.

The DEIR is faulty and deficient because the impacts of the Metro BRT project on Wilshire Blvd are not studied. A few years ago, a trial of dedicated bus lanes that removed 1/3 of the eastbound capacity had to be shut down because the LADOT found and stated in writing, among other reasons, it caused traffic to be diverted off Wilshire and north onto residential streets in Brentwood. The Wilshire BRT project is underway, and was approved by Metro and City Council because the diversion off Wilshire (they were told by LADOT) would not occur this time because an extra lane would be added by narrowing the sidewalks and widening Wilshire. However, current plans do not include narrowing the sidewalks and widening Wilshire between Barrington and Federal. In addition, eastbound traffic on Wilshire coming from Santa Monica (which will not have bus lanes) will run up against a loss of 1/3 of the roadway at the L.A. border at Centinela. It makes only common sense that some Santa Monica traffic will get off Wilshire and come north to Sunset. All these impacts must be studied. The DEIR is deficient because it does not analyze for a decision maker and the public what would be REASONABLE objectives as opposed to MAXIMIZED objectives. The description of Project Objectives starting on page II-13 describes Archer's desire to maximize every aspect, and the DEIR needs to study the impacts of a reasonable Project.

The DEIR is deficient because it does not study and disclose the greater traffic impacts from athletic competitions and special events that overlap at the same time, or follow one another, such that guests will be coming and going during the same hour.

The DEIR is deficient because it does not analyze for a decision maker and the public the impacts related to each separate requested addition to the physical plant and use of each requested addition to the physical plant. It is unlikely that a decision maker will make an all or nothing decision. Therefore, the impacts must be separately studied for each major element of the Project. For example, the impacts of an addition to the North Wing may be minor, but the impacts of adding a Performing Arts Center may be major, and decisions can't be made if the only impacts studied are from the entire Project as a whole.

The DEIR is deficient as it does not recognize the Brentwood-Pacific Palisades Community Plan, as it relates to the demolition of Archer-owned homes, which specifically states on Page III-1, "...to provide for the preservation of existing housing..."

- end -



Adam Villani &lt;adam.villani@lacity.org&gt;

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**BHA Archer DEIR Comments**

4 messages

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**Rodney Liber** <rodliber@aol.com>  
To: adam.villani@lacity.org

Mon, Apr 28, 2014 at 4:55 PM

Hi Adam:

I sent you via email the BHA comments to the Archer DEIR.

Please let me know if they have been received and if the PDF format is satisfactory, of if you need a paper copy.

Thanks.

Rod Liber  
Board VP  
BHA

---

**Adam Villani** <adam.villani@lacity.org>  
To: Rodney Liber <rodliber@aol.com>

Tue, Apr 29, 2014 at 2:55 PM

I have received the comments, and the PDF format is satisfactory. Thank you. Which P.O.Box address shall I use for future distributions of notices to the BHA?

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Rodney Liber** <rodliber@aol.com>  
To: Adam Villani <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:13 PM

Thanks Adam. I think Elva got it, but here they are again...

Rodney Liber  
PO Box 49625  
Los Angeles CA 90049Lisa Robinson  
BHA Administrative Asst  
PO Box 49427  
Los Angeles CA 90049

[Quoted text hidden]

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 5:21 PM

To: Rodney Liber <rodliber@aol.com>

OK, I will have both addresses in the distribution, then. Thank you.

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer DEIR Comments**

6 messages

**Rodney Liber** <rodliber@aol.com>

Tue, Apr 29, 2014 at 10:34 AM

To: adam.villani@lacity.org

Cc: Tricia Keane &lt;tricia.keane@lacity.org&gt;, Norman Kulla &lt;norman.kulla@lacity.org&gt;, Mike Bonin &lt;mike.bonin@lacity.org&gt;

Mr. Villani:

To make sure this is getting through, I am again sending the attached comments to the Archer DEIR. I am also sending a hard copy via USPS overnight.

Thank you.

Rod Liber  
BHA

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 **BHA\_Archer\_DEIR\_Comments\_04282014\_FINAL.pdf**  
1516K**Elva Nuno-O'Donnell** <elva.nuno-odonnell@lacity.org>

Tue, Apr 29, 2014 at 11:28 AM

To: Brentwood Homeowners Association &lt;info@brentwoodhomeowners.org&gt;

Cc: Adam Villani &lt;adam.villani@lacity.org&gt;

Hi Lisa and Rod,

Thank you for the Brentwood Homeowners Association comments on the Archer DEIR. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will then receive mailed notice as this project moves through the City process. At this time, we are only able to provide notification of interested parties by US mail.

Sincerely,

Elva

On Tue, Apr 29, 2014 at 11:20 AM, Brentwood Homeowners Association <info@brentwoodhomeowners.org> wrote:

[Quoted text hidden]

--  
**Brentwood Homeowners Association**

PO Box 49427 LA, CA 90049

Phone: (310) 471-8712

[www.BrentwoodHomeowners.org](http://www.BrentwoodHomeowners.org)

--  
Elva Nuno-O'Donnell, City Planner  
Major Projects  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 91401  
**(818) 374-5066**  
**Work Schedule: 7:30 a.m. to 4:00 p.m.**  
**RDO (Every other Friday)**

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**Elva Nuno-O'Donnell** <[elva.nuno-odonnell@lacity.org](mailto:elva.nuno-odonnell@lacity.org)>  
To: Stephanie Eyestone-Jones <[s.eyestone@matrixeir.com](mailto:s.eyestone@matrixeir.com)>  
Cc: Adam Villani <[adam.villani@lacity.org](mailto:adam.villani@lacity.org)>

Tue, Apr 29, 2014 at 11:32 AM

Hi Stephanie,

I am forwarding the BHA comments (all 33 pages) to you as they were emailed to me for confirmation of receipt.  
Adam will continue to forward other comments as received.

Feel free to contact me if you have any questions.

Elva

----- Forwarded message -----

From: **Brentwood Homeowners Association** <[info@brentwoodhomeowners.org](mailto:info@brentwoodhomeowners.org)>  
Date: Tue, Apr 29, 2014 at 11:20 AM  
Subject: Fwd: Archer DEIR Comments  
To: [elva.nuno-odonnell@lacity.org](mailto:elva.nuno-odonnell@lacity.org)

----- Forwarded message -----

From: **Rodney Liber** <[rodliber@aol.com](mailto:rodliber@aol.com)>  
Date: Tue, Apr 29, 2014 at 10:34 AM  
Subject: Archer DEIR Comments  
To: [adam.villani@lacity.org](mailto:adam.villani@lacity.org)  
Cc: Tricia Keane <[tricia.keane@lacity.org](mailto:tricia.keane@lacity.org)>, Norman Kulla <[norman.kulla@lacity.org](mailto:norman.kulla@lacity.org)>, Mike Bonin <[mike.bonin@lacity.org](mailto:mike.bonin@lacity.org)>

[Quoted text hidden]

--  
**Brentwood Homeowners Association**

PO Box 49427 LA, CA 90049

Phone: (310) 471-8712

www.BrentwoodHomeowners.org

—  
Elva Nuno-O'Donnell, City Planner  
Major Projects  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 91401  
(818) 374-5066  
**Work Schedule: 7:30 a.m. to 4:00 p.m.**  
**RDO (Every other Friday)**

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 **BHA\_Archer\_DEIR\_Comments\_04282014\_FINAL.pdf**  
1516K

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**Stephanie Eyestone-Jones** <s.eyestone@matrixeir.com>  
To: Elva Nuno-O'Donnell <elva.nuno-odonnell@lacity.org>  
Cc: Adam Villani <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 11:33 AM

Thanks!

---

**From:** Elva Nuno-O'Donnell [mailto:elva.nuno-odonnell@lacity.org]  
**Sent:** Tuesday, April 29, 2014 11:32 AM  
**To:** Stephanie Eyestone-Jones  
**Cc:** Adam Villani

[Quoted text hidden]

[Quoted text hidden]

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**Elva Nuno-O'Donnell** <elva.nuno-odonnell@lacity.org>  
To: Stephanie Eyestone-Jones <s.eyestone@matrixeir.com>  
Cc: Adam Villani <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 11:38 AM

Hi Stephanie,

Would you kindly add the following individuals and their respective addresses to your Archer Forward mailing list

Thank you,

Elva

----- Forwarded message -----  
From: **Rodney Liber** <rodliber@aol.com>  
Date: Tue, Apr 29, 2014 at 11:32 AM  
Subject: Re: Archer DEIR Comments  
To: elva.nuno-odonnell@lacity.org



Cc: Lisa Robinson <lrobinson@brentwoodhomeowners.org>

Thank you for the confirmation Elva.

Here is the interested party information:

Rodney Liber  
PO Box 49625  
Los Angeles CA 90049

Lisa Robinson  
Brentwood Homeowners Assoc  
PO Box 49427  
Los Angeles CA 90049

On Apr 29, 2014, at 11:29 AM, Brentwood Homeowners Association <info@brentwoodhomeowners.org> wrote:

[Quoted text hidden]

[Quoted text hidden]

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**Stephanie Eystone-Jones** <s.eyestone@matrixeir.com>  
To: Elva Nuno-O'Donnell <elva.nuno-odonnell@lacity.org>  
Cc: Adam Villani <adam.villani@lacity.org>

Wed, Apr 30, 2014 at 11:39 AM

Hi- yes – we will make sure they are on the list with the addresses below. Thanks.

---

**From:** Elva Nuno-O'Donnell [mailto:elva.nuno-odonnell@lacity.org]  
**Sent:** Tuesday, April 29, 2014 11:39 AM  
**To:** Stephanie Eystone-Jones  
**Cc:** Adam Villani  
**Subject:** Fwd: Archer DEIR Comments

Hi Stephanie,

[Quoted text hidden]



PO Box 49427 ♦ Los Angeles, California 90049 ♦ (310) 471-8712 ♦ [info@brentwoodhomeowners.org](mailto:info@brentwoodhomeowners.org)

April 28, 2014

Adam Villani

City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

[adam.villani@lacity.org](mailto:adam.villani@lacity.org)

Re: The Archer School for Girls  
Case Number: ENV-2011-2689-EIR

Dear Mr. Villani:

The Brentwood Homeowners Association ("BHA") encompasses a territory of approximately 3,500 single-family homes west of the 405 and north of San Vicente Boulevard. Archer School for Girls is situated in the middle of the BHA territory and at the primary gateway for most of our constituents. The proposed Archer Expansion Plan, sometimes called the Archer Forward Project ("Project"), would impose significant adverse environmental impacts on our community.

The BHA, together with other groups and organizations in Brentwood, was very involved in the process in 1998 when Archer was first allowed to occupy its current site and operate a school on residentially zoned property. The Permit was subject to fifty Conditions that were exhaustively discussed and negotiated. BHA was also an appellant in 2004 when Archer School applied to increase its enrollment maximum after five years, even though its 1998 Permit said that the enrollment cap shall not be subject to increase for ten years.

The Archer Forward Project proposes a significant expansion of physical facilities, a significant expansion of the number and size of activities on its site, and a significant expansion of the number of cars and visitors coming to the site. Since the only entry and exit driveways are on Sunset Blvd., the Project would add thousands of car trips to a highly congested roadway. The School states that the Project is an "improvement plan to secure its mission for future generations of girls in this city." We believe Archer School is confusing its own expansion ambitions with what is fair and right as a good neighbor in our residential community.

The guiding principle was summed up by the ZA in Case No. 98-0158(CUZ)(PA3):

"In the 2004 determination involving an increase in enrollment, I reduced the pros and cons of the request to the following principle: 'the crux of the issue is a land use consideration - what substantive impacts will the increase have?' In 2004 I was guided in my deliberations by the over-arching issue of traffic generation..."

The 100% intensification of land use proposed by the Project would have significant traffic and other impacts that dwarf what the ZA wrestled with in prior years. However, the current DEIR does not provide a new decision maker with a fair, accurate and complete description of the impacts of the Project, and should be revised and re-circulated.

It may be important to recognize the comments contained herein were collected by volunteers and professionals with decades of experience reviewing developments in the subject neighborhood, and thus may possess a unique and important perspective on the pertinent issues.

It is also important to recognize the deficiencies noted in the comments serve to understate the magnitude of the impacts of the Project and thus the DEIR may fail to paint a true and accurate composite of the Project.

We respectfully submit the following comments on the Project's Draft Environmental Impact Report in the attached Addendum.

Yours sincerely,

*Raymond Klein*

Raymond Klein  
Secretary  
Board of Directors  
Brentwood Homeowners Association

copies to: Mike Bonin, Councilman, 11<sup>th</sup> District, City of Los Angeles  
Tricia Keane, Planning Director, Council District 11  
Norman Kulla, Senior Counsel, Council District 11  
Michael LoGrande, Director of Planning, City of Los Angeles

## ADDENDUM

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Document Reference: DEIR Notice of Completion dated 2/27/2014

Document Citation: "Project Description: The Project consists of improvements to the existing Archer campus totaling 75,930 square feet of net new floor area..."

**Deficiency:** The Notice is deficient and the Project description is inaccurate because the proposed square feet of the Project exceeds 186,000 sq ft (9,000 sq ft addition to North Wing, 41,400 sq ft Multipurpose Facility, 22,600 sq ft Performing Arts Center, 7,400 sq ft Visual Arts Center, 9,675 sq ft enclosed Aquatics Center, and 96,000 sq ft underground parking structure). The DEIR itself on page I-23 describes the Project as including 171,930 sq ft of development.

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Document Reference: DEIR Page I-8 b.

Document Citation: "Phase 1 of the Project would include the construction of the underground parking structure, improved outdoor athletic fields above the new parking structure, the construction of a new Multipurpose Facility, and the construction of new landscaped open space areas including the North Garden, and new plazas and pedestrian pathways, including the Court of Leaders. The vacant residence on the Barrington Parcel would be removed at the beginning of Phase 1 so that the Barrington Parcel can be used for construction staging during Phase 1. The improvements in Phase 1 would increase the floor area on-site by approximately 38,854 square feet."

**Deficiency:** The square footage reference of 38,854 is deceptive and inaccurate, as it does not include the 96,000 square feet of the referenced parking structure, which is part of Phase 1.

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Document Reference: DEIR Page I-15 j.

Document Citation: "As described above, for the 2011–2012 school year 430 students were enrolled at Archer and approximately 95 faculty and staff members were employed. To accommodate a student population of 518 students, up to 37 additional full-time-equivalent faculty and staff members may be required."

**Deficiency:** This is misleading and deceptive because the student population should **infrequently** be at 518. Since no increase in enrollment is part of the Project, current CUP Condition No. 6 would continue to control and states, "the targeted baseline enrollment is 450, and 518 is not intended to be reached."

Further, the statement is deficient because there is no explanation of why 132 faculty and staff would be needed to accommodate 518 students when the 11/7/2007 traffic count shows 79 faculty and staff for 500 students at that time.

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Document Reference: DEIR Page I-17 6.

**Deficiency:** The list of Required Approvals is deficient because the Office of Historic Resources approval is necessary.

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Document Reference: DEIR Page I-19

**Deficiency:** This description is deficient because the ZA decision maker for the first 10 years of Archer's use of this site described the areas and issues as follows in Case No. 98-0158(CUZ)(PA3): "In the 2004 determination involving an increase in enrollment, I reduced the pros and cons of the request to the following principle which again is applicable in the 2007 request involving Special Events: 'the crux of the issue is a land use consideration - what substantive impacts will the increase have?' In 2004 I was guided in my deliberations by the over-arching issue of traffic generation, and the same issue (as well as noise) was repeated by multiple speakers at the October 11, 2007, public hearing.

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Document Reference: DEIR Page I-20

Document Citation: "In accordance with the existing CUP, the existing student enrollment of 430 students would be increased to 518 students."

**Deficiency:** This is a blatant mis-representation of the existing CUP, which reads, "*The use of the subject property shall be limited to a private school for girls, Grades 6 through 12, with a maximum enrollment of 518 students. Maximum total is not intended to be reached. The number recognizes the inability of school admissions staff to know with precision the number of students who are sent acceptance letters and provides a cushion to protect the school from being out of compliance with its targeted baseline enrollment of 450 students.*"

The NOP and DEIR are misleading and deficient throughout, whenever they state 518 is the permitted enrollment. The DEIR is deficient in not clarifying if the current enrollment condition cited above will be retained.

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Document Reference: DEIR Pages I-19 – I-21

**Deficiency:** The descriptions of Alternatives 1 and 2 are incomplete and deficient because they refer to the non-realization of benefits from aesthetics and traffic design features of the Project without mentioning the non-realization of increased noise from the Project and the large number of net new car trips from the Project.

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Document Reference: DEIR Page I-74

Document Citation: "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 Project would develop additional school-related facilities within the existing..."

**Deficiency:** This statement is not accurate since the Project proposes large increases in athletic competitions and Special Events that would have adverse noise and traffic impacts on surrounding residential neighborhoods.

In addition, the businesses in the Brentwood Village would suffer a loss of clientele who will choose to avoid traveling east on Sunset in the afternoon because of additional traffic from the Project. The percentage of additional traffic resulting from the Project is not the relevant number - - the causative impact will be the additional time it takes to go from Bundy or Saltair to Barrington. The DEIR acknowledges that many cars already go north on Saltair and then east on Chaparral in order to avoid the congested stretch of eastbound Sunset between Saltair and Barrington in the PM peak traffic hours.

Further, the statement is misleading and inaccurate because new uses are proposed on two R-1 lots used currently as residential.

---

Document Reference: DEIR Pages I-103

**Deficiency:** The traffic analysis of Project impacts is flawed and deficient because it lumps together athletic competitions and school events or functions. This does not enable a decision maker, or the public, to distinguish the relative impacts and construct conditions that would be aimed at the most consequential use(s).

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Document Reference: DEIR Page I-108

Document Citation: "While both of the intersections nearest the primary site access would operate at LOS E and/or F under Future with Project Conditions, the intersections of Saltair Avenue and Sunset Boulevard and Barrington Avenue and Sunset Boulevard are currently operating at LOS F during the afternoon, P.M., and evening peak hours. Therefore, the LOS E and/or F conditions at the two intersections nearest the primary site access exist prior to Project implementation and thus would not be attributable to the Project."

**Deficiency:** This is a good example of the deficiency in the methodology used to analyze traffic impacts. Once an intersection is LOS E or F, no amount of additional traffic can be said to impact the LOS rating. Under these circumstances, it is essential that a segment analysis is done; for example, how much longer will the Project related traffic extend an eastbound Sunset trip between Bundy and Barrington or between Saltair and Barrington, or between any of Bundy and the 405?

---

Document Reference: DEIR Appendix B-1, pages 1-5

**Deficiency:** The table of competitions in the prior comment is misleading, inaccurate and deficient because it uses an arbitrary number of spectators per player based on "observations" (admittedly not actual counts passing the Sunset guard gate, which counts could have, and should have, been done), and then leaps to an unproven conclusion that this was the "maximum attendance."

---

Document Reference: DEIR Appendix B-1, pages 1-5

**Deficiency:** At approximately the same time as the date on the letter that is this Appendix, Archer furnished information to the effect that each of these games has an average of 60 spectators. (The original DEIR for Archer in 1998 estimated 50 - 75 spectators for home games and 75 - 150 spectators for tournaments or play-offs.) *The numbers of spectators set forth in this letter for 2011-2012 is grossly understated.*

Document Reference: DEIR Appendix B-1, page 2

Document Citation: Table

2011-2012 Academic Year Interscholastic Athletic Competitions					
Team	Archer Players and Coaches	Visiting School Players and Coaches	Spectators	Competition Time	Days with Competitions
<b>On-Campus Competitions</b>					
Middle School Volleyball (Team 1)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	9
	1 Coach	1 Coach			
Middle School Volleyball (Team 2)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Basketball (Team 1)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Basketball (Team 2)	12 Players	12 Players	24	3:30 p.m. to 5:30 p.m.	
	1 Coach	1 Coach			
Middle School Soccer	18 Players	18 Players	36	3:30 p.m. to 5:30 p.m.	6
	2 Coaches	1 Coach			
Middle School Softball	15 Players	15 Players	30	3:30 p.m. to 5:30 p.m.	6
	1 Coach	1 Coach			
Varsity Softball	12 Players	12 Players	48	3:30 p.m. to 5:30 p.m.	12
	1 Coach	1 Coach			
<b>Off-Campus Competitions</b>					
Junior Varsity Volleyball	12 Players	12 Players	48	5:30 p.m. to 7:30 p.m.	12
	2 Coaches	1 Coach			
Varsity Volleyball	12 Players	12 Players	48	7:30 p.m. to 9:30 p.m.	
	2 Coaches	1 Coach			
Middle School Swimming	25 Players	25 Players	50	3:30 p.m. to 5:30 p.m.	6
	1 Coach	1 Coach			
Varsity Basketball	12 Players	12 Players	48	7:30 p.m. to 9:30 p.m.	12
	2 Coaches	1 Coach			
Varsity Soccer	18 Players	18 Players	72	6 p.m. to 8 p.m.	10
	2 Coaches	1 Coach			
Upper School Swimming	20 Players	20 Players	80	3:30 p.m. to 5:30 p.m.	7

**Deficiency:** This table is misleading and deficient because it does not disclose how many of the competitions overlap and occur on the same day, thereby multiplying the traffic impact.



Document Reference: DEIR Appendix B-1, page 2

Document Citation: See Table

**Deficiency:** This table is misleading and deficient because it does not disclose the number of spectators coming in their own vehicle because the parents are not coming from the same place (one from work and one from home), because they are divorced, or for some other reason. What assumption should be made as to the number of students with 4 parents?

2011-2012 Academic Year Interscholastic Athletic Competitions					
Team	Archer Players and Coaches	Visiting School Players and Coaches	Spectators	Competition Time	Days with Competitions
<b>On-Campus Competitions</b>					
Middle School Volleyball (Team 1)	12 Players 1 Coach	12 Players 1 Coach	24	3:30 p.m. to 5:30 p.m.	9
Middle School Volleyball (Team 2)	12 Players 1 Coach	12 Players 1 Coach	24	3:30 p.m. to 5:30 p.m.	
Middle School Basketball (Team 1)	12 Players 1 Coach	12 Players 1 Coach	24	3:30 p.m. to 5:30 p.m.	6
Middle School Basketball (Team 2)	12 Players 1 Coach	12 Players 1 Coach	24	3:30 p.m. to 5:30 p.m.	
Middle School Soccer	18 Players 2 Coaches	18 Players 1 Coach	36	3:30 p.m. to 5:30 p.m.	6
Middle School Softball	15 Players 1 Coach	15 Players 1 Coach	30	3:30 p.m. to 5:30 p.m.	6
Varsity Softball	12 Players 1 Coach	12 Players 1 Coach	48	3:30 p.m. to 5:30 p.m.	12
<b>Off-Campus Competitions</b>					
Junior Varsity Volleyball	12 Players 2 Coaches	12 Players 1 Coach	48	5:30 p.m. to 7:30 p.m.	12
Varsity Volleyball	12 Players 2 Coaches	12 Players 1 Coach	48	7:30 p.m. to 9:30 p.m.	
Middle School Swimming	25 Players 1 Coach	25 Players 1 Coach	50	3:30 p.m. to 5:30 p.m.	6
Varsity Basketball	12 Players 2 Coaches	12 Players 1 Coach	48	7:30 p.m. to 9:30 p.m.	12
Varsity Soccer	18 Players 2 Coaches	18 Players 1 Coach	72	6 p.m. to 8 p.m.	10
Upper School Swimming	20 Players	20 Players	80	3:30 p.m. to 5:30 p.m.	7

Document Reference: DEIR Appendix B-1, page 2

Document Citation: See Previous Table

**Deficiency:** This is misleading and deficient because it implies that the competitions between 3:30pm - 5:30pm on campus are permitted under the current CUP. However, they clearly violate the terms of the CUP, which clearly and deliberately distinguishes between (1) instruction and practice for students, and (2) competitions with other schools.

CUP Condition 11b: For gymnasium use:

- 7:30 a.m. to 6:00 p.m., Monday through Friday for class instruction,
- 6:00 p.m. to 7:30 p.m., Monday through Thursday for athletic practice,
- 6:00 p.m. to 7:30 p.m., Monday through Thursday for competitions/other schools (notice to neighbors required),
- 6:00 p.m. to 9:00 p.m., Fridays for athletic practice,
- 6:00 p.m. to 9:00 p.m., Fridays as needed for competitions/other schools (notice to neighbors is required),
- 10:00 a.m. to 9:00 p.m., Saturdays for athletic practice and,
- 10:00 a.m. to 6:00 p.m., Saturdays as needed for play offs (notice to neighbors required).
- No gymnasium use is permitted on Sundays with exception of 3 admissions open houses between the hours of 12:00 p.m. to 5:00 p.m. (notice to the neighbors is required) or national holidays.

CUP Condition 11(c) 1(ii): For Athletic Use

- 7:40 a.m. to 6:00 p.m., Monday thru Friday, with a limitation of 100 students at one time,
- 6:00 p.m. to 7:00 p.m., Monday through Friday for athletic practice.
- Saturday use is limited to 4 days a year with a 4 hour period between 10 a.m. and 6 p.m. for a school use within the established school program. No activities of any kind [e.g., setting up, deliveries, warm ups] shall take place on the field prior to 9 a.m. Within the 4 hour period limit, the 4 Saturday uses shall permit practices between the hours of 9 a.m. and 6 p.m., as
- needed, and competitions/other schools with a goal of being played between the hours of 3:30 p.m. and 6 p.m. Notice to the neighbors is required for competitions/other schools.
- Athletic use is not permitted on Sundays or national holidays, with the exception of Columbus Day and Veterans Day when those days are used as regular school days.

Hence, NO outdoor use is currently permitted midweek for competitions/other schools. Gym use is currently permitted midweek for competitions/other schools only 6:00 p.m. to 7:30 p.m.

In Archer's letter, dated 11/29/2012, to the ZA in connection with Plan Approval Requirements, it states in an attachment, and acknowledges the limits on competitions:

*"In addition to the classroom instruction hours on the athletic fields, the Archer hours for use for athletics are 6:00 P.M. to 7:00 P.M., Monday through Friday, and Saturday use is limited to four days a year within a four hour period between 10:00 A.M. and 6:00 P.M.. Archer hours for passive use of the outdoors are 7:40 A.M. to 6:00 P.M., Monday through Friday and 10:00 A.M. to 6:00 P.M. on Saturdays. Outdoor use is not permitted on Sundays or national holidays, with the exception of Columbus Day and Veterans Day when those days are used as regular school days."*

The DEIR is flawed because it ignores this current CUP violation. If the Planning Department failed to catch this violation during the 2013 Plan Approval, it is nevertheless a violation, and relevant to the current Project requests. All DEIR analysis that starts with an assumption that the current CUP permits unlimited athletic competitions Monday through Friday, 3:00 p.m. to 6:00 p.m., is inaccurate and all impacts of the Project that start with that assumption are grossly understated, and need to be re-analyzed and disclosed.

---

Document Reference: DEIR Appendix B-1, page 4

Document Citation: "Accordingly, these historical data accurately reflect expected future attendance levels at on-campus Interscholastic Athletic Competitions. The table below identifies the teams proposed to host..."

**Deficiency:** This statement is misleading, inaccurate, and deficient because the letter already states that all data is based on so-called "observations" and not accurate counts, and is based on an arbitrary estimate of the number of spectators per player.

---

---

Document Reference: DEIR Appendix B-1, page 4

Document Citation: Table on Page 4

**Deficiency:** The table on page 4 is misleading and deficient because it does not disclose how many of the competitions overlap and occur on the same day, thereby multiplying the traffic impact.

---

Document Reference: DEIR Appendix B-1, page 4

Document Citation: Table on Page 4

**Deficiency:** This table on page 4 is misleading and deficient because it does not disclose the number of spectators coming in their own vehicle, because the parents may not be coming from the same place.

---

Document Reference: DEIR Appendix B-1, page 4

Document Citation: "As noted above, final schedules will be determined in conjunction with the athletic leagues in which Archer's teams compete, so the exact number of days with competitions may vary slightly from year to year based on each year's game and playoff schedule."

**Deficiency:** This statement fails to explain the omission and inadequate disclosure in the table on page 4, of the column "Competition Time" which was included in the table on page 2. The disclosure on page 4 is deficient without this information which would show a decision maker the number of potential vehicle arrivals and departures during PM peak traffic hours from adding to the campus the enormous number of athletic competitions proposed by the Project.

---

Document Reference: DEIR Appendix B-2, pages 1-3

Document Citation: Table of Special Events

**Deficiency:** This disclosure is misleading, inadequate and deficient because it does not clearly compare apples with apples. For 15 years, Archer, the City, and the surrounding community have been living with a table of "Special Events" that was attached to the CUP as an Exhibit. That Exhibit has the following column headings:

- Event Name
- Time/Day
- Parked Cars On Site
- Approximate Attendance
- Permitted Maximum Attendance (on 15 Events)

The information in the table on pages 1-3 may be an interesting additional disclosure of Archer's experience with Special Events during a recent year, but full disclosure of impact requires a direct comparison of the current CUP "Special Events" table with the same information in a table for the Project's proposed 98 "School Functions." The new name may be an attempt to enhance palatability, but also causes confusion, as they remain non-curriculum Special Events.

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Document Reference: DEIR Appendix B-2, page 3

Document Citation: "As part of the Archer Forward: Campus Preservation and Improvement Plan, School Functions are defined as planned functions that involve students and/or guests on campus. Archer is proposing a maximum of 98 School Functions to be permitted per Academic Year. Categories of School Functions will include Academic and Leadership Functions; Admission Functions; Alumnae Functions; Dances and Socials; Graduation; Interscholastic Athletic Tournaments; Music Functions; Parents and Family Functions; Performances; Student Enrichment Functions; and Visual Arts Functions. The specific School Functions within each category may vary each Academic Year.

**Deficiency:** The inclusion of "Interscholastic Athletic Tournaments", without any definition or explanation, in this list of "School Functions" is misleading and deficient. These "Tournaments" must be distinguished from the Athletic Competitions in Appendix B-1.

Document Reference: DEIR Appendix B-2, page 3

Document Citation: Table on Page 2 and 3

**Deficiency:** The mere listing of the categories of 98 "School Functions" is inadequate and deficient without the same information that appears in Exhibit C of the current CUP. That is the only way that a decision maker might be able to determine the increased intensification of use proposed by the Project's land use requests.

---

Document Reference: DEIR Appendix B-2, page 3

Document Citation: "School Functions in all School Buildings and Courtyards, on the Athletic Fields, and in the Aquatics Center shall be permitted Monday through Saturday from 7:00 a.m. to 10:00 p.m., and Sunday from 12:00 p.m. to 7:00 p.m., except for eight School Functions that shall be permitted to conclude by 11:00 p.m. on Fridays and Saturdays."

**Deficiency:** Memo, also dated 2/7/2014, which is Appendix P-2. According to this Appendix B-2, ALL "School Functions" could take place (start and end) during the weekday PM peak traffic hours of 3:00 - 7:00pm. But a different schedule of Events must have been given to LADOT and used to generate the net new trip numbers in the last paragraph on page 2 of Appendix P-2. This inconsistency, and failure to include adequate information about the Project's proposed "School Functions," results in a legally deficient DEIR.

---

Document Reference: DEIR Appendix B-1 and B-2

Document Citation: Interscholastic Athletic Program and School Functions Overview

**Deficiency:** The disclosure is misleading, inadequate and deficient because it does not combine the overall number of the Project's proposed participants, staff, guests, and spectators from the Project's proposed intensification of use from athletic competitions and "School Functions" compared to (1) what is currently permitted by the CUP and, (2) what is actually occurring on campus now. This information is essential for proper evaluation of the environmental impacts from the proposed Project.

In addition, the disclosure must show how many additional persons would be permitted to arrive on campus and depart campus during weekday PM peak traffic hours of 3:00

p.m. – 7:00 p.m. This information is necessary for a decision maker to estimate whether the potential net new trips from the proposed Project from the aggregate of all additional activities during the weekday PM peak traffic hours is 20,000 or 30,000, or some other number. This omission must be rectified and the DEIR re-circulated.

---

Document Reference: DEIR Appendix P-1, page 3

Document Citation: "An enrollment cap of 518 total middle school and high school students has been established by an existing Conditional Use Permit (CUP). This enrollment cap will remain the same with the implementation of the Project. Archer's enrollment for the 2011-2012 school year was 430 total middle school and high school students, which is below their maximum allowable enrollment of 518 students. This study analyzes the difference between full enrollment of 518 total students and the 2011-2012 enrollment of 430 students."

**Deficiency:** This statement of the enrollment cap is misleading, incomplete, inaccurate and deficient. The actual targeted baseline enrollment is 450 and is set forth in Permit Condition #6 as follows:

*The use of the subject property shall be limited to a private school for girls, Grades 6 through 12, with a maximum enrollment of 518 students. Maximum total is not intended to be reached. The number recognizes the inability of school admissions staff to know with precision the number of students who are sent acceptance letters and provides a cushion to protect the school from being out of compliance with its targeted baseline enrollment of 450 students."*

---

Document Reference: DEIR Appendix P-1, page 7

Document Citation: For purposes of this analysis, on an event day, the following scenarios and associated study time periods were analyzed:

- 300-attendee interscholastic athletic competition or school function with arrival time between 3:00 and 4:00 PM Monday through Friday and departure times between 5:00 and 6:00 PM Monday through Friday
  - 3:00 to 4:00 PM (weekday)
  - 5:00 to 6:00 PM (weekday)
- 300-attendee interscholastic athletic competition or school function with arrival time between 5:00 and 6:00 PM Monday through Friday
  - 5:00 to 6:00 PM (weekday)
- 300-attendee school function with arrival time between 6:00 and 7:00 PM

Monday through Friday and 1:00 to 2:00 PM Saturday

- 6:00 to 7:00 PM (weekday)
- 1:00 to 2:00 PM (Saturday)
- 650-attendee school function with arrival time between 6:00 and 7:00 PM  
Monday through Friday and 1:00 to 2:00 PM Saturday
  - 6:00 to 7:00 PM (weekday)
  - 1:00 to 2:00 PM (Saturday)

**Deficiency:** The entire analysis is grossly deficient because the scenarios and time periods analyzed are incorrect, inadequate, deficient, and defy common sense.

Instead of 37 Special Events during weekday hours 3:00 p.m. to 7:00 p.m., Archer proposes an increase to 69 Special Functions (and that doesn't include 10 proposed Interscholastic Athletic Tournaments hosting 200 guests each). Of those 69 Events, 24, instead of the current 20, would have a proposed attendance of 100, and 26, instead of the current 14, would have a proposed attendance of 200.

This intensified use and resulting environmental impact must be included in the "event day" analysis. It takes very few trips to significantly impact Sunset/Barrington and the omission of these proposed, additional 16 Events makes the analysis deficient.

The omission is magnified when proposed athletic competitions are added to omitted Events.

The analysis fails to study departures between 6:00 p.m. - 7:00 p.m. from athletic competitions or school functions.

The analysis fails to study athletic competitions with arrival times between 6:00 p.m. - 7:00 p.m.

The analysis fails to study all the Events during weekday hours 3:00 p.m. - 7:00 p.m. with attendance of more than 300 (7 proposed instead of 1 as currently).

The deficiency of the analysis is not remedied by the possibility that LADOT has consented to a deficient analysis.

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Document Reference: DEIR Appendix P-1, page 8

Document Citation: In addition to the analyzed intersections, 10 street segments were analyzed for potential neighborhood impacts as part of this Project:

1. Chaparal Street between Barrington Avenue and Westgate Avenue
2. Westgate Avenue between Sunset Boulevard and Chaparal Street
3. Barrington Avenue between Sunset Boulevard and Chaparal Street
4. Kearsarge Street between Westgate Avenue and Granville Avenue
5. Saltair Avenue between Sunset Boulevard and Chaparal Street
6. Granville Avenue between Sunset Boulevard and Kearsarge Street
7. Bundy Drive between Sunset Boulevard and Saltair Avenue
8. Westgate Avenue between Sunset Boulevard and Kearsarge Street
9. Kenter Avenue between Sunset Boulevard and Homewood Road
10. Bundy Drive between Sunset Boulevard and Bonny Lane

**Deficiency:** The traffic study is grossly deficient because the analyzed street segments do not include any segments of Sunset Blvd. between Kenter Ave and the 405 Freeway. On page 6 of Appendix P-2, it states that traffic cuts through Chaparal Street between Saltair Ave and Barrington Ave **"in order to bypass the congested eastbound traffic on Sunset Blvd during the PM peak period."** After making that statement, this traffic study is grossly deficient without an analysis of the Project's impact on that **congested eastbound traffic on Sunset Boulevard during the PM peak period.** The only analysis that is meaningful is one that measures the extra time it would take to travel the Sunset segment(s) if the Project is approved and built. The purpose of the EIR is to aid the understanding of a project's impacts by the public and the decision makers. A decision maker cannot judge the true impact if the information discloses that an intersection now rated "F" will be an "F" after the Project. But if the information discloses, for instance, that a one-mile segment of Sunset Blvd that now takes one hour to pass (during PM peak hours) will take one and a half hours after the Project is completed, then the decision maker has the necessary information that should be in an EIR. Without this information, the traffic study and the EIR are legally deficient.

Obviously, the capacity to study Sunset street segments is readily available. It is also obvious that Sunset is the location of the worst congestion and delay in the area. We suspect that the Sunset segment information already exists and has been omitted only due to a combination of faulty traffic study methodology and a desire to hide the most important and significant adverse impacts of the proposed Project. The information needs to be included in an amended EIR, which is then re-circulated.

Document Reference: DEIR Appendix P-1, page 15

Document Citation: In fact, during field observations, seven intersections along Sunset Boulevard and Wilshire Boulevard were observed to experience acute traffic congestion during the afternoon peak traffic period on certain approaches of the intersection, resulting in a reduced number of vehicles traversing the intersection. This reduction in vehicle throughput was determined to inaccurately reflect the existing LOS experienced by motorists. The congestion was determined to be worsened by the temporary impacts of construction of the I-405 Sepulveda Pass Improvements Project, resulting in uncharacteristically oversaturated conditions unreflective of generally existing conditions and longer than normal queuing and delays along the following seven study intersections:

3. Bundy Drive & Sunset Boulevard
4. Saltair Avenue & Sunset Boulevard
5. Barrington Avenue & Sunset Boulevard
6. Barrington Place & Sunset Boulevard
13. Barrington Avenue & Montana Avenue
15. Barrington Avenue & Wilshire Boulevard
16. San Vicente Boulevard/Federal Avenue & Wilshire Boulevard

**Deficiency:** The conclusion regarding the impact of the 405 Project is not accurate and therefore misleading. Observations in 2014 after all ramp construction at Sunset and Wilshire has been completed, on more than one day, at 4pm and at 5pm, at Sunset/Saltair, showed that the number of cars able to go east through a green light in the eastbound curb lane of Sunset, averaged 3 cars over 6 light cycles.

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Document Reference: DEIR Appendix P-1, page 17

Document Citation: Existing Levels of Service.

Existing year traffic volumes presented in Appendix Table G1 were analyzed using the intersection capacity analysis methodology described above to realistically determine the existing operating conditions at the 17 study intersections.

**Deficiency:** All Sunset intersection analyses in the EIR are deficient to the extent they measure or examine, and make conclusions as to LOS or anything else, based on the traffic going both east and west. It is obvious that the traffic weekdays, during 3:00 p.m. – 7:00 p.m. going east, is at least twice the amount going west. Hence, if the analysis

were based on eastbound numbers and eastbound capacity, it is likely that each Sunset intersection LOS would be much worse. And the number of cars going eastbound that would create a significant impact would be much fewer.

Document Reference: DEIR Appendix P-1, page 24

Document Citation: Table 3: Project Trip Generation (50% Busing)

TABLE 3  
PROJECT TRIP GENERATION (50% BUSING)

Scenario	No. of Employees	No. of Students	Event/Activity Dates	Legend	AM PEAK HR VEHICLE TRIPS (PEAK HOUR WITH BUS ATTENDANCE)			MIDNIGHT SCHOOL VEHICLE TRIPS (MIDNIGHT WITH BUS ATTENDANCE)			PM PEAK HR VEHICLE TRIPS (PEAK HOUR WITH BUS ATTENDANCE)			EVENING HR VEHICLE TRIPS (EVENING HOUR WITH BUS ATTENDANCE)			SATURDAY PEAK HR VEHICLE TRIPS (SATURDAY PEAK HOUR WITH BUS ATTENDANCE)			
					AM	PM	TOTAL	AM	PM	TOTAL	AM	PM	TOTAL	AM	PM	TOTAL	AM	PM	TOTAL	
Existing Home-based School Day	95	440	N/A	Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0				
Proposed Home-based School Day	152	511	N/A	Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
Proposed Home-based School Day	152	511	N/A	Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0
				Standard General Purpose Street	15	15	30	0	0	0	15	15	30	0	0	0	0	0	0	0

**Deficiency:** The entire analysis of Table 3 and the EIR is deficient because it is executed by combining proposed athletic competitions and proposed school functions. In order for a decision maker to be able to determine whether to approve the construction and use of athletic facilities, the impacts of the proposed athletic competitions must be analyzed separately from the impacts of proposed school functions, which would use different proposed facilities. Archer Forward is not an all or nothing proposal. For example, a decision maker might consider approving the proposed increase in Special Events, but no increase in athletic competitions, and must be able to discern the impacts of that choice.

Document Reference: DEIR Appendix P-1, page 24

Document Citation: See Previous Table

**Deficiency:** Since Table 3 shows zero trips out by event attendees weekdays between 5:00 p.m. – 7:00 p.m., all 320 trips during those hours, plus students, faculty and staff, will be departing after 7:00 p.m., and the environmental impacts must be studied and disclosed, or else the EIR is deficient.

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Document Reference: DEIR Appendix P-1, page 24

Document Citation: See Previous Table

**Deficiency:** The deficiencies described above regarding page 7 of Appendix P-1 are repeated in this Table 3. The entire analysis is grossly deficient because the scenarios and time periods analyzed are incorrect, inadequate, deficient.

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Document Reference: DEIR Appendix P-1, page 24, Table 3; and page 27 (net new trips data)

Document Citation: See Previous Table and Net New Trips Data

**Deficiency:** In January 2014, Archer advised community organizations that the proposed 177 athletic competitions would generate at least 9,100 guests per school year during weekday peak PM traffic hours, and 4,400 guests at school functions during the same hours. These numbers must be converted into vehicle trips in and out. And a higher ratio than 1.5 guests per car must be used for afternoon athletic competitions when parents will be arriving separately from different locations. Only then can it be determined whether there is a consistency between the information being provided.

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Document Reference: DEIR Appendix P-1, page 34

Document Citation: Table 4: Related Projects List

TABLE 4  
 RELATED PROJECTS LIST

Project Location	Land Use	Size	Daily	Trip Generation								
				AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
				In	Out	Total	In	Out	Total	In	Out	Total
1 11975 San Vicente Blvd	Mixed Use (Retail)	58.5 ksf	1,456	46	30	76	125	130	255	237	215	452
	Mixed Use (Restaurant)	10.5 ksf										
	Mixed Use (Office)	8 ksf										
2 11906 - 11920 San Vicente Blvd	Restaurant	3.9 ksf	358	20	19	39	19	17	32	24	19	43
3 11711 Gorham Ave	Retail Center	30 ksf	734	2	1	3	48	50	98	113	104	217
4 11669 - 11677 Wilshire Blvd	Mixed Use (Condominium)	49 du	516	97	13	110	13	66	79	14	10	24
	Mixed Use (Office)	41 ksf										
	Mixed Use (Retail)	8 ksf										
5 11600-11620 Wilshire Blvd	Mixed Use (Office)	120.2 ksf	1,280	38	5	43	23	112	135	92	69	161
	Mixed Use (Medical Office)	120.9 ksf										
6 11900 Santa Monica Blvd	Mixed Use (Condominium)	93 du	375	18	11	29	18	18	36	10	8	18
	Mixed Use (Retail)	26 ksf										
7 11857 - 11859 Santa Monica Blvd	Mixed Use (Condominium)	28 du	1,143	7	36	43	19	9	28	32	29	61
	Mixed Use (Retail)	4.7 ksf										
8 1466 Westgate Ave	YMCA Recreation Center	65 ksf	1,204	38	47	85	42	31	73	338	338	676
9 11701 Santa Monica Blvd	Fast Food Restaurant	1.2 ksf	859	46	30	76	14	14	28	14	15	29
10 11660 Santa Monica Blvd	Supermarket	53.2 ksf	1,948	51	32	83	37	36	73	6	17	23
11 100 South Barrington Place	Brentwood School	275 stu	470	79	37	116	17	19	36	19	11	30
<b>TOTAL RELATED PROJECT TRAFFIC</b>			<b>10,344</b>	<b>442</b>	<b>262</b>	<b>703</b>	<b>375</b>	<b>502</b>	<b>873</b>	<b>899</b>	<b>835</b>	<b>1,734</b>

Notes:  
 du = dwelling units  
 ksf = one thousand square feet  
 stu = number of enrolled students  
 Related project data and trip generation estimates obtained from LADOT and Overland Traffic Consultants, February 2012.

**Deficiency:** Table 4 fails to describe what is meant by "PM Peak Hour."

Table 4 fails to include regional projects that will have a significant impact that are outside the City of Los Angeles boundaries. Los Angeles is not an island. The fact that LADOT does not have jurisdiction over projects in Santa Monica must not allow those projects to be excluded from the impact analysis. The reality is that proposed new projects in Santa Monica will greatly impact Sunset Blvd because it is well documented that many workers at these projects live in points north and east of Brentwood and commuters will use Sunset to access the 405 to return home during the weekday PM peak traffic hours. *The traffic analysis for the Project is grossly deficient because it does not include several projects in Santa Monica that are substantial in size.*

Document Reference: DEIR Appendix P-1, page 37

Document Citation: Wilshire Bus Rapid Transit Bus-Only Lanes

**Deficiency:** The traffic analysis is deficient because it does not include the increased traffic that will be diverted to Sunset Blvd when Wilshire Blvd is reduced during weekday PM peak traffic hours from 3 lanes to 2 lanes east of Centinela by the Wilshire BRT project.

Document Reference: DEIR Appendix P-1, page 39

Document Citation: City of Los Angeles Significance Criteria

The City of Los Angeles has established threshold criteria to determine significant traffic impacts of a proposed project in its jurisdiction. Under the LADOT guidelines, an intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C, equal to or greater than 0.02 for intersections operating at LOS D, and equal to or greater than 0.01 for intersections operating at LOS E or F after the addition of project traffic. Intersections operating at LOS A or B after the addition of the project traffic are not considered significantly impacted regardless of the increase in V/C ratio. The following summarizes the impact criteria:

<b>LOS</b>	<b>Final V/C Ratio</b>	<b>Project-Related Increase in V/C</b>
C	>0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E or F	> 0.900	equal to or greater than 0.010

**Deficiency:** The traffic analysis and EIR are deficient because it is obviously a gross error to blindly use these intersection criteria without recognizing that eastbound traffic on Sunset Blvd during weekday PM peak traffic hours is more than double the traffic going westbound. Hence, the number of vehicles having a significant impact is far less if the lack of capacity going eastbound is studied rather than studying an average of both directions.

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Document Reference: DEIR Appendix P-1, page 54

Document Citation: Wilshire Bus Rapid Transit Bus-Only Lanes

**Deficiency:** The suggestion that increasing a busing requirement on paper will mitigate future real trip impacts lacks all semblance of integrity, and is misleading, inaccurate, and deficient. The DEIR states that busing during the baseline period was actually 85%. Trip impacts are compared to the baseline period. Changing a CUP busing requirement on paper from 50% to 70% can't mitigate future trips since the actual busing during the baseline period was already at 85%.

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Document Reference: DEIR Appendix P-1, page 59

Document Citation: Feasible Mitigation Measures

**Deficiency:** The only suggested physical mitigation is not properly described, and has been deficiently studied. The Project had ample opportunity to inquire whether there is a possibility of acquiring this strip of private property, and the failure to inquire indicates the Project doesn't really want to hear the answer. Further, the negative aspects to this suggestion have not been described and therefore the traffic study and EIR are deficient. A wider Saltair will encourage northbound traffic on Saltair, particularly if there is no right turn at Barrington north. It will encourage more traffic to go east on congested Sunset. And it will encourage more traffic to cross Sunset to access Chaparral to avoid Sunset congestion, which is acknowledged on page 61 in the DEIR to already be a problem.

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**BHA DEIR Comments X – XX on Appendix P-2 are intended to also be comments on the DEIR source of the statements incorporated by LADOT in its letter.**

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Document Reference: DEIR Appendix P-2, page 1

Document Citation: The current school enrollment cap has been established by the existing Conditional Use Permit (CUP) at 518 total middle school and high school students, and this cap will remain with the implementation of the proposed Project.

**Deficiency:** This statement of the enrollment cap is misleading, incomplete, inaccurate and deficient. The actual targeted baseline enrollment is 450 as set forth in CUP Condition 6:

“The use of the subject property shall be limited to a private school for girls, Grades 6 through 12, with a maximum enrollment of 518 students. Maximum total is not intended to be reached. The number recognizes the inability of school admissions staff to know with precision the number of students who are sent acceptance letters and provides a cushion to protect the school from being out of compliance with its targeted baseline enrollment of 450 students.”

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Document Reference: DEIR Appendix P-2, page 4

Document Citation: "In order to mitigate the impact at the significantly impacted study intersections, the Project shall revise the TMP and utilize vans and buses to transport at least 70% of student enrollment on a daily basis."

**Deficiency:** This suggested mitigation of significantly traffic impacted intersections here and throughout the DEIR is misleading, deceptive, and deficient because the DEIR states on page IV.K-5, that "During the 2011-2012 school year, approximately 85 percent of the students used the school bus." The fact that the CUP busing requirement might be changed on paper from 50% to 70% cannot reduce new traffic impacts over and above current traffic numbers since the existing baseline conditions (before the additional traffic) already include 85% busing.

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Document Reference: DEIR Appendix P-2, page 2

Document Citation: Discussion and Findings: "300-attendeo interscholastic athletic competition or school function with arrival time between 5:00 and 6:00 PM, Monday through Friday."

**Deficiency:** This scenario and analysis of net new trips are incomplete, inadequate, and deficient, and hence the traffic study is deficient. Any 300-attendeo interscholastic athletic competition that has an arrival time of 5:00 - 5:30pm will have a departure time before 7:00 pm, and therefore at least 216 net new departing trips have been incorrectly omitted from the traffic study.

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Document Reference: DEIR Appendix P-2, page 4

Document Citation: "It should be noted that DOT considers construction-related traffic impacts to be temporary and adverse in nature but less than significant."

**Deficiency:** The statement that all construction, by definition, is temporary, and therefore is not significant, defies reason. On page 2 of Appendix P-2, it states that North Wing Renovation is expected to take 16 months, Phase 1 will take 27 months, and Phase 2 will take 38 months. That is close to 7 years, and it is unclear whether these estimates take into account the statement on page 5 of Appendix P-2 that DOT recommends that construction related traffic be restricted to off-peak hours. Hence, the proposed construction could easily be 10 years. Is that temporary? What if it took 15 - 20 years?

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Document Reference: DEIR Appendix P-2, page 2

Document Citation: Documents and Findings: "300-attendee school function with arrival time between 6:00 PM and 7:00 PM, Monday through Friday and 1:00 to 2:00 PM Saturday peak hour."

**Deficiency:** This scenario and analysis of net new trips are deficient, and the traffic study is incomplete, inadequate, and deficient. Currently, of the 47 Special Events permitted by the Permit, only 3 have the potential to have 300 or more attendees arriving between 6:00 p.m. - 7:00 p.m., and the cars parked on site are limited to the 109 capacity. Hence the statement on page 2 that only 85 net new trips would be generated during 6:00 - 7:00pm for 300-attendee arrival events when proposed parking would accommodate 282 cars cannot be correct. Further, the statement that a 300-attendee school function with arrivals 5:00 p.m. – 6:00 p.m. would generate 216 net new trips, but a 300-attendee school function with arrivals 6:00 p.m. – 7:00 p.m. would generate only 85 net new trips, cannot be correct. Also, by Archer's own admission to stakeholders (as of July 22, 2013), 300 attendees would result in 200 cars.

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Document Reference: DEIR Appendix P-2, page 3

Document Citation: "DOT has determined that the proposed Project will not create a significant impact at any of ten (10) analyzed neighborhood street segments analyzed during a non-event day or various event day scenarios, as shown below and in Attachment C, average daily traffic (ADT) impact analysis of the neighborhood street segments."

**Deficiency:** The traffic study is grossly deficient because the analyzed street segments do not include any segments of Sunset Blvd. between Kenter Ave and the 405 Freeway. On page 6 of Appendix P-2, it states that traffic cuts through Chaparral Street between Saltair Ave and Barrington Ave "in order to bypass the congested eastbound traffic on Sunset boulevard during the PM peak period." After making that statement, a traffic study by DOT and in the DEIR is grossly deficient without an analysis of the Project's impact on that congested eastbound traffic on Sunset Boulevard during the PM peak period.

The only analysis that is meaningful is one that measures the extra time it would take to travel the Sunset segment(s) if the Project is approved and built. The purpose of the EIR is to aid the understanding of a project's impacts by the public and the decision makers. A decision maker cannot judge the true impact if the information discloses that

an intersection now rated "F" will be an "F" after the Project. But if the information discloses that a one-mile segment of Sunset Blvd that now takes one hour during PM peak hours will take an hour and a half after the Project, then the decision maker has the necessary information that should be in an EIR. Without this information, the traffic study and the EIR are legally deficient.

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Document Reference: DEIR Appendix P-2, page 5

Document Citation: Proposed Physical Mitigation Measure

"Saltair Avenue and Sunset Boulevard – To mitigate the significant impact at this intersection under all the event day scenarios, the Project proposes to widen the east side of Saltair Avenue south of Sunset Boulevard and install a right-turn-only lane for the northbound traffic on Saltair Avenue. However, this mitigation consists of acquiring a strip of private property right-of-way along the east side of Saltair Avenue. If the right-of-way cannot be acquired, the impact at this intersection would remain significant and unavoidable under some event day scenarios."

**Deficiency:** It is indicative of the extent of the significant traffic impacts that the only proposed physical mitigation measure (1) requires an unlikely acquisition of private property and (2) would aggravate the traffic. Installing a right-turn-only lane at the NE corner of Sunset/Saltair would encourage cars to come north on Saltair to access the 405 via Sunset. Enabling cars to more easily turn east on Sunset would contribute to the **congested eastbound traffic on Sunset Boulevard during the PM peak period**. Also, having two northbound lanes on Saltair would contribute to the cut through traffic on Chaparal described on page 6 of Appendix P-2. The suggested mitigation is unlikely, impractical, ineffective and inappropriate.

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Document Reference: DEIR Appendix P-2, page 4

Document Citation: "In addition, the following trip reduction limits shall be implemented to reduce or eliminate event-related significant impacts:

- 3:00 PM to 4:00 PM, Monday through Friday Arrival – Limit the number of vehicles generated by guests arriving at the Archer Campus to attend school functions and interscholastic athletic competitions to no more than 72 vehicles.
- 5:00 PM to 6:00 PM, Monday through Friday Departure – Limit the number of

vehicles generated by guests departing from the Archer Campus after attending school functions and interscholastic athletic competitions to no more than 72 vehicles.”

**Deficiency:** This proposed limit on only the number of vehicles arriving 3:00 p.m. – 4:00 p.m. and departing 5:00 p.m. – 6:00 p.m. is a meaningless number without describing the arrivals for school functions and interscholastic athletic competitions between 5:00 p.m. – 6:00 p.m and between 6:00 p.m. – 7:00 p.m. It is misleading, deceptive and inaccurate to describe such limits as being capable of reducing or eliminating event-related significant impacts. Throughout its history, the School’s Permit has included an Exhibit listing the number of Special Events, the days and hours of those Events, the number of cars that may be parked on-site for each Event, and permitted attendance at each Event (including faculty and staff). This Special Event Exhibit has been amended several times. The EIR is legally deficient without a new Exhibit of proposed Special Events (school functions) in the same format as the current Permit Exhibit that would give the public and a decision maker the ability to compare the use of the proposed physical additions to the campus with the use currently permitted on the existing campus. A similar comparison must be included in the EIR of (A) current interscholastic athletic competitions occurring on campus, days and hours, and spectator and other non-Archer attendance, with (B) proposed competitions on campus, days and hours, and spectator and other attendance. Otherwise, a decision maker has no way of determining the impacts of the proposed physical additions to the campus, and no way of determining the conditions and limitations that should be imposed (on the physical additions, or on the use of those physical additions, or both).

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Document Reference: DEIR Page IV.H-54

Document Citation: “. Filming on campus for commercial purposes would continue to be prohibited except when the School is not in session and provided the filming revenue is placed in the School’s scholarship fund.”

**Deficiency:** The DEIR is deficient in that it fails to describe or analyze in greater detail the noise and traffic effects of unlimited filming days and hours as described in the above passage.

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Document Reference: DEIR Page IV.H-54

Document Citation: “Rental, lease, or use of the facilities for non-School Use (e.g., club athletics, weddings, private parties) would be permitted a maximum of 24 days per year

between the hours of 8:00 A.M. and 10:00 P.M., Monday through Saturday.”

**Deficiency:** The DEIR is deficient in that it fails to describe or analyze in greater detail the noise and traffic effects of the 24 days of leasing of facilities as described in the above passage. There is no reference to vehicle restriction and therefore we must assume a maximum of 282 vehicles will enter and exit the campus, resulting in an additional 13,536 car trips.

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Document Reference: DEIR Page II-2

Document Citation: “Development of the Project would commence with the North Wing Renovation, which is anticipated to be completed as early as the summer of 2015. The remainder of the Project would be developed in two phases, as described further below, and may be completed as early as 2020.”

**Deficiency:** The DEIR is deficient in that it improperly describes the project as a two-phase project. The description clearly shows THREE phases, the first of which is the reconstruction of the North Wing, which includes added square footage.

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Document Reference: DEIR Page II-2

Document Citation: Footnote 2: “The existing Conditional Use Permit for Archer permits an enrollment of up to 518 students. The project does not propose to increase enrollment.”

**Deficiency:** The DEIR is deficient and inaccurate in two ways on this point.

1. Archer has never achieved enrollment of 518, so while they may not intend to increase their enrollment “cap,” there is a clear intention to increase their enrollment beyond the 450 baseline specified in their current CUP.
  2. The existing CUP does NOT permit enrollment up to 518. It is merely a maximum, which the CUP clearly states is not meant to be reached. The continued assumption that 518 is the allowed enrollment is a perpetuated falsehood.
-

Document Reference: DEIR Page I-10

Document Citation: "To provide for these improvements, the existing residence on the Chaparal Parcel would be removed, resulting in a net increase of 28,076 square feet of floor area upon completion of Phase 2.."

**Deficiency:** The DEIR is deficient in allowing the demolition of homes owned by Archer to factor into net square footage for the Project.

1. The homes owned by Archer are currently not permitted as anything more than residences.
2. The fact Archer is the owner of the homes does not make them part of the school.
3. Demolition of the homes as part of the Project does not reduce building square footage of the school and thus should not be deducted from the overall square footage of the construction square footage.
4. There is no analysis of the impact on the neighborhood of changing the use of residential homes to school uses and eliminating a buffer between school and residential use (e.g., noise and sight lines).

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Document Reference: DEIR Page II-17

Document Citation: "Development of the Project would commence with the North Wing Renovation, which is anticipated to be completed in the summer of 2015."

**Deficiency:** The DEIR is inaccurate and deficient in that it is now highly unlikely any portion of this project will be completed by the summer of 2015, and thus the entire completion projection of 2020 may be as unlikely. This also puts into question the traffic projections for construction periods and post-completion.

---

Document Reference: DEIR Page II-41

Document Citation: "Options for off-site parking facilities could also include the surface parking lot south of Sunset Boulevard at Barrington Village..."

**Deficiency:** The DEIR is deficient in that it suggests by the above statement that the Project wishes to create a new impact not studied in the DEIR. It is common knowledge this aforementioned parking lot operates at near capacity and to further burden the capacity with construction vehicles would further impact the businesses, park users and shoppers that operate just south of Sunset.

---

Document Reference: DEIR Page IV.K-84

Document Citation: "The total daily truck round trips were then converted into total daily inbound and outbound trips by applying a factor of two and a passenger car equivalency (PCE) factor ranging from 1 to 2.5 depending on the vehicle size and type."

**Deficiency:** The DEIR is deficient in that the factor of 2.5 for a PCE of a 5-axle haul truck is the lowest possible reference point and not consistent with standards outlined in the HCM (Highway Capacity Manual). Given the grades in the area, and factoring in the effects at a signalized intersection, of which there are no less than five between the Project site and the shortest haul route, the more appropriate PCE conversion might conservatively be 3.5, which would about 40% to parts of the construction trip count. In other words, 100 haul truck round trips referenced in Table IV-K-28 might be converted to 700 daily trips for that one vehicle class.

---

Document Reference: DEIR Table IV.K-29

Document Citation: Haul Truck Trips Daily Estimate = 500

**Deficiency:** The DEIR is deficient in that 500 daily trips represents an inaccurate number of PCE trips when factoring in grades and signalized intersections.

---

Document Reference: DEIR Page IV.K-89

Document Citation: "As summarized in Table IV.K-30, the greatest number of significantly impacted intersections is projected to occur during the peak week of activity under "Remainder of Phase 1(d)."

**Deficiency:** The DEIR is deficient in that it refers to "the peak week" as if the impacts during high capacity construction will only happen during one week. In fact, these high capacity weeks will last for *months*.

---

Document Reference: DEIR Page IV.K-102

Document Citation: "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.

**Deficiency:** The DEIR is deficient in that it assumes DTV will be reduced by 50% when the 405 project is complete. Why would traffic volume decrease because of the end of 405 construction? Traffic CONGESTION might decrease, but why volume?

---

Document Reference: DEIR Appendix C-2, page 1

Document Citation: Table – Round Trips Per Vehicle Classification

**Deficiency:** The DEIR is deficient and incomplete in that this chart fails to provide in this chart accurate trip counts, totals, or PCEs. By omitting this vital information, one can assume the construction related trip counts are insignificant. In fact, when all factors are calculated, the Project construction will likely add over 250,000 car trips to congested streets of Brentwood.

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Additional General Comments Applicable to the DEIR

The DEIR is faulty and deficient because it makes an assumption that all, or most, trips during afternoon peak hours coming to athletic events will be westbound on Sunset, and all trips leaving the events will be eastbound on Sunset.

The DEIR is faulty and deficient because merely measuring total traffic at intersections on Sunset Blvd does not accurately measure Sunset traffic in weekday PM peak hours of 3:00 p.m. – 7:00 p.m. It is likely that the traffic going eastbound is more than twice the amount of traffic going westbound. For example, westbound traffic on Sunset at the Saltair light can clear on one light cycle at a time when only 2-3 cars can go eastbound on one light cycle because of congestion backup. The impact on eastbound traffic must be separately studied.

The DEIR is faulty and deficient because it measures significant impact based on a 2011 – 2012 baseline (which includes the busing/car pooling mitigation at that time). And it is based on the zip codes of Archer students/parents. In other words, the traffic study does not take into account the zip codes of the students/parents from other schools with which Archer would like to start playing athletic competitions on the Archer campus, which are now being played at other venues.

The DEIR is faulty and deficient because the impact analysis using a 2011-2012 baseline ignores the creeping growth in the number of Special Events over the life of the CUP, and the growth of impact over those years of traffic on Sunset. The baseline should be tied to conditions at the time of the CUP grant in 1998 when Archer was first allowed to use residential property for school use.

The DEIR is faulty and deficient because it assumes/concludes that all arrivals between 6:00 p.m. – 7:00 p.m. for Special Events of 100 or 200 guests will have no significant impact on any intersection. Adding those trips to eastbound traffic on Sunset Blvd at that hour for a proposed additional 16 Events would have a very significant impact. The cumulative impact of the Hines project in Santa Monica (recently approved) and similar projects in Santa Monica that also should have been reasonably anticipated, must be analyzed because it is well established that Santa Monica office workers use Sunset Blvd to access the 405 during weekday peak PM traffic hours.



The DEIR is faulty and deficient because it does not analyze adverse and significant land use compatibility and consistency impacts due to the proposed change to school use of properties that have always been zoned and used for residential use. Changing the permitted use of residential properties by way of a CUP from residential use to school institution use would have a unique set of impacts that must be studied, including visual, noise, and traffic impacts. It is a matter of common sense that a homeowner will have a different viewpoint if a residence is constructed on an adjacent lot compared with the construction of a school institution on the adjacent lot. Given the density of the regional area, assumptions of annual traffic growth eastbound on Sunset Blvd are significantly understated for the weekday peak PM traffic hours 3:00 p.m. - 7:00 p.m. All construction of Sunset and Wilshire ramps are complete and the congestion eastbound on Sunset Blvd during weekday peak PM traffic hours 3:00 p.m - 7:00 p.m is as bad as ever. Any assumption that the final few months of the 405 project will lessen that congestion is faulty and deficient.

The DEIR is faulty and deficient because the impacts of the Metro BRT project on Wilshire Blvd are not studied. A few years ago, a trial of dedicated bus lanes that removed 1/3 of the eastbound capacity had to be shut down because the LADOT found and stated in writing, among other reasons, it caused traffic to be diverted off Wilshire and north onto residential streets in Brentwood. The Wilshire BRT project is underway, and was approved by Metro and City Council because the diversion off Wilshire (they were told by LADOT) would not occur this time because an extra lane would be added by narrowing the sidewalks and widening Wilshire. However, current plans do not include narrowing the sidewalks and widening Wilshire between Barrington and Federal. In addition, eastbound traffic on Wilshire coming from Santa Monica (which will not have bus lanes) will run up against a loss of 1/3 of the roadway at the L.A. border at Centinela. It makes only common sense that some Santa Monica traffic will get off Wilshire and come north to Sunset. All these impacts must be studied. The DEIR is deficient because it does not analyze for a decision maker and the public what would be REASONABLE objectives as opposed to MAXIMIZED objectives. The description of Project Objectives starting on page II-13 describes Archer's desire to maximize every aspect, and the DEIR needs to study the impacts of a reasonable Project.

The DEIR is deficient because it does not study and disclose the greater traffic impacts from athletic competitions and special events that overlap at the same time, or follow one another, such that guests will be coming and going during the same hour.

The DEIR is deficient because it does not analyze for a decision maker and the public the impacts related to each separate requested addition to the physical plant and use of each requested addition to the physical plant. It is unlikely that a decision maker will make an all or nothing decision. Therefore, the impacts must be separately studied for each major element of the Project. For example, the impacts of an addition to the North Wing may be minor, but the impacts of adding a Performing Arts Center may be major, and decisions can't be made if the only impacts studied are from the entire Project as a whole.

The DEIR is deficient as it does not recognize the Brentwood-Pacific Palisades Community Plan, as it relates to the demolition of Archer-owned homes, which specifically states on Page III-1, "...to provide for the preservation of existing housing..."

- end -



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Support for Archer Forward - RE: ENV-2011-2689-EIR**

2 messages

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**Peter Smailes** <psmailes@curtisschool.org>

Sat, Mar 22, 2014 at 7:14 PM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

**RE: ENV-2011-2689-EIR**

March 22, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for *Archer Forward*

Dear Mr. Villani,

I am the Headmaster of Curtis School and write this letter in support of The Archer School for Girls and its campus improvement plan, *Archer Forward*. Independent schools play a critical role in strengthening education in our city and I believe this plan will help Archer advance its mission to provide an outstanding education for girls from all over Los Angeles. Archer's commitment to diversity and inclusivity is widely recognized. It is a school that truly embraces the multi-cultural richness of our city. Simply put, the young women enrolled at Archer deserve facilities that contribute to their development and empowerment – not hamper or restrict them.

We, at Curtis, hold Archer School and its Head of School, Elizabeth English, in the highest regard. Her leadership is imbued with integrity, wisdom, and vision. Archer has been dedicated to its community since it moved into its current location in Brentwood over 15 years ago. They have designed and implemented one of the most impressive traffic management programs of any school in Los Angeles. Their staff is in constant contact with the neighbors and their girls are actively involved with community service programs that directly benefit their neighborhood. The school has a demonstrated track record of cultivating leadership and a love for learning in its students.

All schools need adequate facilities in order to offer the quality of education that students deserve, and most independent schools in Los Angeles already have the facilities that Archer has requested in its plan (including sufficient parking, visual arts and performing arts buildings, and athletic facilities). It's a straightforward, no-nonsense plan that encompasses a necessary step forward for the school.

I hope you'll join us in support of Archer and their campus improvement plan *Archer Forward*.

Sincerely,

Peter Smailes  
Headmaster  
Curtis School

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Mar 27, 2014 at 1:54 PM

To: Peter Smailes <psmailes@curtisschool.org>

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Archer School - ENV-2011-2689-EIR**

2 messages

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**Khalatian, Edgar** <EKhalatian@mayerbrown.com>  
To: Adam Villani <Adam.Villani@lacity.org>  
Cc: "Amato, John" <jamato@hw.com>

Mon, Apr 28, 2014 at 2:25 PM

Adam,

On behalf of Harvard-Westlake School, attached is a letter of support for the above referenced matter.

Thanks, and please do not hesitate to contact me if you have any questions or want to discuss.

**Edgar Khalatian**  
**Partner**  
Mayer Brown LLP  
213-229-9548  
ekhalatian@mayerbrown.com  
350 South Grand Avenue  
25th Floor  
Los Angeles, CA 90071



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**Adam Villani - LA Department of City Planning.pdf**  
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**Adam Villani** <adam.villani@lacity.org>  
To: "Khalatian, Edgar" <EKhalatian@mayerbrown.com>

Tue, Apr 29, 2014 at 2:47 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to

the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



## HARVARD-WESTLAKE SCHOOL

April 28, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR

Dear Mr. Villani,

Like other independent and public schools in Los Angeles, Archer needs modern classrooms, visual and performing arts spaces, and athletic facilities to meet its current and long-term educational mission. At Harvard-Westlake, we embarked on a middle school modernization project in Holmby Hills that enabled us to add new facilities while continuing to live in concert with our neighbors. From the sciences to the performing arts, this plan has helped our school immensely.

Archer, too, should be given the opportunity to create a modern campus. Improving facilities not only benefits students by creating better and new environments for learning, but it helps with teacher retention and recruitment.

Fundamentally, a strong Archer is important for Los Angeles, now and into the future. Archer is an extremely diverse school community, enrolling girls from throughout the city and region. In addition, Archer provides scholarships to a significant segment of its student body, offering an educational opportunity that would otherwise be unattainable.

As the Vice President of Harvard-Westlake School, I support the Archer Forward Campus Preservation and Improvement plan, and encourage its approval by the City of Los Angeles.

Sincerely,

John Amato

John Amato  
Vice President  
Harvard-Westlake School  
700 N. Faring Road  
Los Angeles, CA 90077  
310-288-3255 D  
jamato@hw.com



April 25, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR

Dear Mr. Villani:

I am writing on behalf of Joffe Emergency Services, a leading provider of emergency response training, event safety, and disaster preparedness for independent schools throughout the nation. Joffe has had the good fortune to work as a safety consultant with over fifty CAIS schools in order to strengthen emergency response preparedness this year alone.

For the past 5 years, Joffe has worked with Archer as a dedicated consultant on all matters related to safety and have helped to develop a growth plan that is sympathetic to the residential character of Archer's neighborhood. In addition, Archer is poised as a model for school traffic management while engaging in early and extensive outreach to stakeholders, organizations, neighbors, and community leaders in order to solicit feedback on structured and responsible growth. Our history with Archer demonstrates an unflappable institutional dedication to the safety of students, parents, teachers, and community members alike, and is a model for school safety partnerships throughout the CAIS system.

Archer's growth is a necessary and important step in the provision of a 21<sup>st</sup> century education for girls throughout the city of Los Angeles. As Archer expands, so too does the next generation of talented and dedicated business, community, and educational leaders. As a result, these updates are necessary and vital for the long-term health of our community.

Specific improvements will help to ensure that Archer is able to serve both the needs of its students and the needs of the surrounding community. Archer's safety infrastructure is in place and capable of growth and expansion without any compromise. Their Emergency Response Teams (ERT's) drill and train multiple times throughout the year, they have demonstrated excellence in immediate communication with parents and students in emergency settings and their ability to make the necessary adjustments for their building has been impeccable.

If you have any questions about Archer's planned improvements, or need any further clarifications, please don't hesitate to contact me. I have the upmost trust in Archer's ability to execute a safe and responsible growth plan that will better the lives of numerous girls for generations to come. I hope you will allow them to take this important step forward.

In health  
  
Chris Joffe

Cc: Councilmember Mike Bonin

Joffe Emergency Services • [www.JoffeEmergencyServices.com](http://www.JoffeEmergencyServices.com) 310.525.6333

1454 Cloverfield Blvd Santa Monica CA 90404 Fax: (313) 450-1812

•CPR • First Aid • AED • AED sales • Standbys • Training Supplies • Disaster Supplies • Safety Management•





Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Fwd: Attached Image**

2 messages

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**Cheryl Alcaraz** <CAlcaraz@jtdschool.com>

Mon, Apr 21, 2014 at 10:53 AM

To: "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

Cheryl Alcaraz  
Executive Assistant to the Headmaster  
The John Thomas Dye School  
11414 Chalon Road  
Los Angeles, CA 90049  
310/476-2811 x225  
calcaraz@jtdschool.com

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59K

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**Adam Villani** <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 11:41 AM

To: Cheryl Alcaraz &lt;CAlcaraz@jtdschool.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org

4/28/2014

City of Los Angeles Mail - Fwd: Attached Image

(818) 374-5067

alternate: (213) 978-1454

# The John Thomas Dye School

Raymond R. Michaud, Jr.  
Headmaster

April 21, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

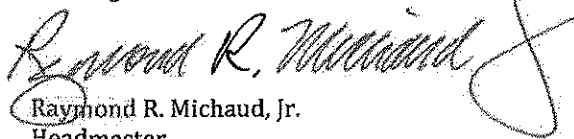
I have served as the Headmaster of The John Thomas Dye School in Brentwood for the past 34 years and I am writing to you today to request your support for the Archer Forward Campus Preservation and Improvement Plan proposed by The Archer School for Girls.

As an Archer board member, I can personally attest to the value of an Archer education. Students are taught to be responsible citizens and leaders in an educational environment that is at once joyful and ambitious. The school administration goes to great lengths to ensure that the student body, parents, and teachers abide by the restrictions set forth in its CUP in order to make good on its promises to its neighbors.

The school needs basic facilities so that it can continue to be an institution that the Brentwood community is proud of. This includes much needed arts and athletics facilities, larger classrooms, and a parking facility with sufficient space for faculty, student carpools, and visitors. These are all facilities that almost every other independent school in the city already has.

The school has dedicated countless hours to educating its neighbors and local community groups about the plan and will continue to do so in the weeks and months ahead. I hope you'll join us in supporting this plan for one of Los Angeles' leading independent girls' schools.

Best regards,



Raymond R. Michaud, Jr.  
Headmaster

RRM/cla

11414 Chalon Road  
Los Angeles  
California  
90048  
(310) 476-2811  
Fax (310) 476-9176  
www.jtdschool.com



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Re: ENV-2011-2689-EIR Support for Archer Forward**

2 messages

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**Lauren Wolke** <lwolke@laurenceschool.com>

Fri, Mar 21, 2014 at 3:37 PM

To: "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

March 21, 2014

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room #750

Los Angeles, CA 90012

RE: ENV-2011-2689-EIR

Support for Archer Forward

Dear Mr. Villani,

As you are aware, The Archer School for Girls is currently in the public phase of the review process for its Campus Preservation and Improvement Plan, Archer Forward. As the Head of a fellow independent school in Los Angeles, I am writing to request your help and support for Archer Forward.

Archer has worked hard to earn its reputation as a good Brentwood neighbor. Since moving into its current facility on Sunset Boulevard in 1999, the school has kept a Community Liaison on staff who is specifically tasked with meeting regularly with local residents and addressing their concerns. Everything that takes place on campus, from special events to sports games to the students' daily commute, is designed to minimize the burden on its neighbors. Archer's strict adherence to its CUP is an achievement that any independent school would be proud of and the school has gone above and beyond in meeting its obligations to the community.

In my opinion, the Archer Forward plan is a necessary next step for the school. It will provide spaces where all of its students can gather together for assemblies and performances, participate in athletics, and grow in the visual and performing arts. Its current facilities do not allow any of the aforementioned. This plan is an investment not only in the City of Los Angeles but in the next generation of female leaders.

We hope for your support as the school moves through the public review process.

Best regards,

Laurie

Laurie Wolke

Head of School

Laurence School

818-782-4001

[lwolke@laurenceschool.com](mailto:lwolke@laurenceschool.com)<mailto:lwolke@laurenceschool.com>

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**Adam Villani** <adam.villani@lacity.org>  
To: Lauren Wolke <lwolke@laurenceschool.com>

Thu, Mar 27, 2014 at 1:49 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



BARBARA E. WAGNER  
HEAD OF SCHOOL

March 20, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 North Spring Street, Room #750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 24 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
Support for *Archer Forward*

Dear Mr. Villani,

As Head of School of an independent school for girls in Los Angeles, I understand the need for educational institutions to continually refine their pedagogy and practices, and to update their facilities in order to deliver on their mission. I am writing in support of *Archer Forward*, the campus enhancement plan for The Archer School for Girls. The improvements included in the plan will allow Archer to center more of its athletic and arts activities on its campus—an important aspect of the growth of any high quality school.

As I am sure you appreciate, schools are important components of healthy and vibrant communities and it is in every school's best interest to maintain good relationships with their neighbors. I understand Archer has done exceptionally well in this regard as they have met and even exceeded the requirements of their Conditional Use Permit, and they have listened and responded to the concerns of their neighbors. Their traffic control program is unique in the area—over 80% of students use the school bus to get to campus. From all I have observed, they are doing their best to mitigate their traffic burden in their busy neighborhood.

Most schools of similar size and scope already have the facilities that Archer is proposing in this project. Having a regulation-sized soccer field, aquatics center, and resources for arts and music are vital components of a well-rounded education. I am hopeful the school will receive the support needed to ensure this project becomes a reality.

Thank you in advance for your support.

Sincerely yours,

Barbara E. Wagner  
Head of School

COMMUNITY • EXCELLENCE • CONFIDENCE • HONOR

# Marymount

LOS ANGELES

March 20, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 24 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

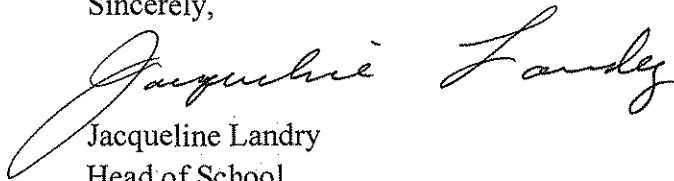
I am the Head of School at Marymount High School, an all-girls Catholic school near UCLA. I am writing to you today to ask for your support for the campus improvement plan of The Archer School for Girls in Brentwood. I firmly believe that Archer is an asset to the independent school network in our city and that this project is necessary to sustain the school's future.

Like our school, Archer seeks to offer the best education possible to girls from a wide range of socioeconomic backgrounds. The school provides millions of dollars in financial assistance to ensure that no qualified student is turned away by an inability to pay. Their students participate in service activities with a number of organizations in the local community, ensuring that the girls learn the importance of giving back.

The school's proposed project, Archer Forward, simply requests the same level and quality of facilities that other top independent schools in our area already offer. Their students and faculty have to travel off-campus frequently for performances, athletic practices, events, and lectures, and I believe it is critical to the student experience to have such facilities on campus. This is a necessary and practical investment in the long-term health of the school.

I applaud Archer's track record in educating and shaping future leaders and I fully support their proposal for this campus enhancement project that will allow them to continue to fulfill their mission. I ask that you join us in support.

Sincerely,



Jacqueline Landry  
Head of School  
Marymount High School

90 Years

Confident Girls.  
Ethical Leaders.  
Global Advocates.



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Letter of support for Archer School's campus improvement project

2 messages

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sessaid <sessaid@newhorizonwestside.com>

Tue, Apr 8, 2014 at 8:00 PM

Reply-To: sessaid &lt;sessaid@newhorizonwestside.com&gt;

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, dantabli@newhorizonwestside.com

Dear Mr. Villani,

Below please find a letter I am forwarding to you on behalf of Mrs. Dalal H. Antabli, Head of School at New Horizon School Westside regarding Archer School's campus improvement

Salwa Essaid

Director of Student Affairs

New Horizon School Westside

1819 Sawtelle Blvd

Los Angeles, CA 90025

(310) 231-6092

April 8, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

As the School Head of New Horizon School Westside, I am writing to ask for your support for Archer's campus improvement plan, Archer Forward, which will provide 21<sup>st</sup> century facilities for its students.

Archer abides very strictly to its Conditional Use Permit, which was informed by the concerns and needs of its neighbors, and the school has a proven track record of compliance. Students are highly involved in the Brentwood community and participate in a variety of volunteer community service projects such as Adopt-a-Family events, cooking and serving food at Daybreak Women's Shelter, and helping with the Save the Coral Tree Campaign on San Vicente. All of these activities directly benefit the neighborhood and teach students the importance of giving back to their community.



Archer Forward includes new onsite facilities for academics, the arts, sports and school-wide gatherings, as well as an underground parking garage—all resources and features that already exist in most other independent schools. Simply put, Archer is asking for facilities that other schools already have so that they can continue to deliver on their mission.

I hope that the school's track record proves its willingness to fulfill its commitments. We hope that you will join us in support of Archer Forward.

Sincerely,

Dalal Hassouna-Antabli  
Head of School  
New Horizon School Westside

---

**Adam Villani** <adam.villani@lacity.org>  
To: sessaid <sessaid@newhorizonwestside.com>

Thu, Apr 17, 2014 at 5:30 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



James Alan Astman, Ph.D.  
Headmaster

March 24, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

As the Headmaster of a fellow independent school in Los Angeles, I am writing to request your help and support for Archer Forward, Archer's campus improvement plan.

Archer has worked hard to earn its reputation as a responsible neighbor in Brentwood. The school has a Community Liaison on staff who is specifically tasked with meeting regularly with local residents and addressing their concerns. The school has gone above and beyond in meeting its obligations to the community as specified in its CUP, an achievement that any school in Los Angeles would be proud of.

In my opinion, Archer Forward is a necessary next step for the school. It envisions spaces where all of its students can gather together for assemblies and performances, participate in athletics, and grow in the visual and performing arts. This plan is an investment in the school's future and will impact the lives of thousands of young women to come.

I hope that you will support the school as it moves through the public review process.

Best regards,

A handwritten signature in cursive script that reads "James Alan Astman".

James Alan Astman  
Headmaster  
Oakwood School



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

**Sondi Scheck** <sscheck@oakwoodschool.org>

Mon, Mar 24, 2014 at 1:15 PM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

Please see the attached letter from Dr. James Astman.

### Sondi

Sondi Scheck

Executive Assistant to Dr. James Astman

Oakwood School

11600 Magnolia Blvd.

North Hollywood, CA 91601-3015

818-732-3011

sscheck@oakwoodschool.org

**Support for Archer Forward.pdf**

342K

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**Adam Villani** <adam.villani@lacity.org>

Thu, Mar 27, 2014 at 1:56 PM

To: Sondi Scheck &lt;sscheck@oakwoodschool.org&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will be included in future mailings related to this project.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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**re Archer - DEIR ENV-2011-2689-EIR**

2 messages

**PPCC** <info@pacpalicc.org>

Fri, Apr 25, 2014 at 12:33 PM

To: adam.villani@lacity.org

Cc: mike bonin &lt;mike.bonin@lacity.org&gt;, Tricia Keane &lt;tricia.keane@lacity.org&gt;, PPCC Council &lt;info@pacpalicc.org&gt;

Pacific Palisades Community Council comments re subject DEIR

Please add to the file.

Please add Pacific Palisades Community Council to mailing list for future reference.

Thank You

barbara kohn

barbara kohn  
president  
pacific palisades community council  
www.pp90272.org  
info@pacpalicc.org  
PPCC Facebook

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 **Microsoft Word - PPCC Archer FINA.doc.pdf**  
120K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:03 PM

To: PPCC &lt;info@pacpalicc.org&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

[Quoted text hidden]

barbara kohn  
president  
pacific palisades community council  
www.pp90272.org  
info@pacpalicc.org  
PPCC Facebook

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



## PACIFIC PALISADES COMMUNITY COUNCIL

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April 22, 2014

Department of City Planning  
City of Los Angeles  
Attn: Adam Villani – via email to [adam.villani@lacity.org](mailto:adam.villani@lacity.org)

**Re: DEIR (ENV-2011-2689-EIR) – ARCHER SCHOOL FOR GIRLS**

Pacific Palisades Community Council (PPCC) has long been concerned with traffic congestion on Sunset Blvd. and surrounding Brentwood streets, including San Vicente Blvd., which negatively affects thousands of Palisadians on a daily basis. Sunset is one of two primary routes of ingress and egress in the Palisades, the other is Pacific Coast Highway; it is the most direct route to Brentwood, the 405 Freeway and areas north/east for many community members who travel that route regularly to and from work. Traffic at peak travel times on Sunset, San Vicente and neighboring streets is extremely congested creating potentially stressful driving conditions for commuters.

In reference to traffic conditions, PPCC notes the conclusion of the Department of Transportation (DOT) that six locations will be significantly impacted under certain scenarios by the project and that these impacts cannot be mitigated (DEIR Appendix P2, 2/7/14 DOT traffic assessment letter, pp. 3, 5-6).

We are concerned in light of the conclusion that the project as proposed may lead to further increased levels of traffic congestion and negative impacts not only on Brentwood but also on Pacific Palisades including potentially increasing the already delayed emergency response during peak hours.

We request that the final EIR specifically address:

1. potential traffic impacts on Pacific Palisades and whether or not any such impacts can be mitigated;
2. the accuracy and/or validity of the DOT's conclusions that six locations will be significantly impacted, which impacts cannot be mitigated; and
3. the cumulative impact of the proposed project along with impacts generated by the operations of nearby schools, including Paul Revere Middle School, St. Martin of Tours Elementary School, the Sunshine Preschool, the Brentwood School (lower and upper schools) and other nearby religious schools and facilities.

Sincerely,

Barbara Kohn  
President  
Pacific Palisades Community Council

cc: Councilmember Mike Bonin, CD11  
Tricia Keane, Planning Director, CD11

**PACIFIC PALISADES RESIDENTS ASSOCIATION, INC.**

POST OFFICE BOX 617  
PACIFIC PALISADES  
CALIFORNIA 90272



April 18, 2014

Department of City Planning  
City of Los Angeles  
Attn: Adam Villani – via email to [adam.villani@lacity.org](mailto:adam.villani@lacity.org)

Re: DEIR (ENV-2011-2689-EE) – Archer School for Girls, Archer Forward Plan – Opposed

Pacific Palisades Residents Association opposes any Archer School expansion of structures or activities that will add traffic on Sunset Blvd and its impacted intersecting streets. PPRA agrees with the Residential Neighbors of Archer School in opposing expansion that will increase traffic in this congested area. Archer's proposal will place heavy burdens on nearby residents, on Pacific Palisades residents, commuters and others traveling to and from the coast.

Archer School agreed to Permit Conditions 15 years ago, conditions imposed by the City to maintain livability for affected residential areas. The reasons for imposing those conditions have only increased, especially the worsening traffic over 15 years. This proposed expansion would intensify it still more.

Expansion of Archer School would burden those with few or no alternatives to Sunset Boulevard. For Pacific Palisades, Sunset is one of only two routes of ingress and egress. Travel now on Sunset Boulevard is often difficult. Palisadians must carefully plan their activities to avoid long delays on every eastbound or southbound street in the afternoon and early evening. Most feasible travel times are during school hours, 10:00 a.m. to 2:00 p.m. The eastbound crush begins by the Sunset/Saltair intersection and continues to the 405 freeway, creeping right past Archer School - even without accidents.

It is unjust for an institution to obtain permits by agreeing to limits on size, hours, and uses and then to be permitted to expand all that later. Numerous institutions, many near Archer, will note the precedent set by decision on this application. Those who do not live with the impacts often view the expanding institutions as only beneficial, and support expansion. Palisadians have lived this pattern, fighting the same battles repeatedly, often losing ground each time. The City should require that agreements are honored to ensure quiet enjoyment of our homes, without endless struggle to keep communities livable.

One proposed traffic mitigation is to increase busing from 50% to 70% of students. Can the City monitor compliance? Many added traffic impacts cannot be reduced according to DCT. Archer proposes to rent space to others if allowed expanded uses and hours. Is it fair that Archer benefits by profit making uses that add negative impacts for residents and others?

Pacific Palisades Residents Association urges denial of any proposed expansion for Archer School that will increase the number of car trips on Sunset Blvd and its impacted intersections and side streets.

Respectfully submitted,

*Frances Tibbitts*

Frances Tibbitts, Corresponding Secretary

Cc: Councilman Mike Bonta, Residential Neighbors of Archer School



Adam Villani <adam.villani@lacity.org>

# Archer Forward DEIR - comment from PPRA

3 messages

**FTibbits1@aol.com** <FTibbits1@aol.com> Sat, Apr 19, 2014 at 12:16 AM  
To: adam.villani@lacity.org, councilmember.bonin@lacity.org, archerneighbor@gmail.com  
Cc: ftibbits1@aol.com

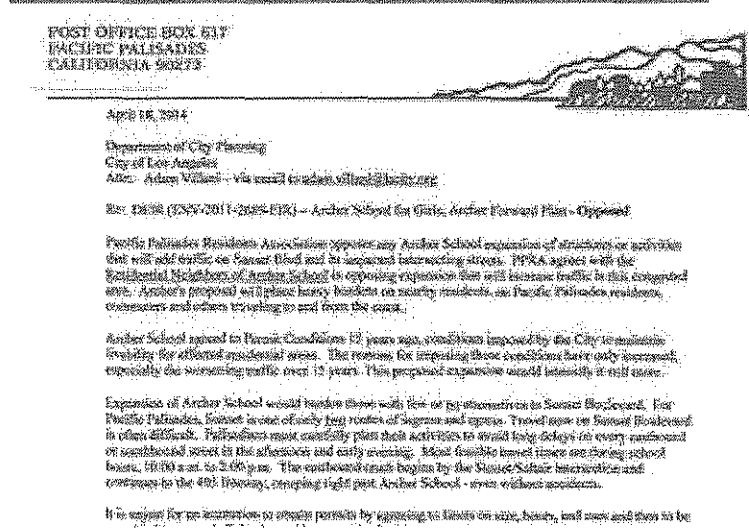
Subj: Archer Forward DEIR - comment from PPRA

April 19, 2014

Pacific Palisades Residents Association has prepared the attached comment in opposition to the Archer Forward Application for expansion.

I regret that I wasn't able to figure out how to put a better name on the scanned document.

Frances Tibbits  
Corresponding Secretary  
Pacific Palisades Residents Association, PPRA  
FTibbits1@aol.com  
310-459-5403



Scan0001.jpg  
88K

**Adam Villani** <adam.villani@lacity.org> Wed, Apr 23, 2014 at 11:31 AM  
To: FTibbits1@aol.com

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

Adam Villani



Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

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**FTibbits1@aol.com** <FTibbits1@aol.com>  
To: adam.villani@lacity.org

Wed, Apr 23, 2014 at 3:31 PM

Re Archer Expansion notification list:

Please send the notices re Archer to:  
Pacific Palisades Residents Assn., Inc.  
PO Box 617  
Pacific Palisades, CA 90272

Thank you,  
Frances Tibbits  
Corresponding Secretary  
[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Opposition to Archer Forward Plan (ENV-2011-2689-EIR)**

2 messages

**Residential Neighbors of Archer** <archerneighbor@gmail.com>

Tue, Apr 29, 2014 at 1:46 PM

To: adam.villani@lacity.org

Dear Mr. Villani,

Attached for submission into the record is a petition with over 1,000 signatures opposing Archer's proposed expansion plan as well as over 200 comments submitted by people in response to the petition. To view the petition and comments online, please visit our website at [www.archerneighbors.com](http://www.archerneighbors.com) for the link.

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**2 attachments** **Comments-Opposition to Archer Forward Petition 4-29-14.pdf**  
559K **Petition--Opposition to Archer Forward 4-29-14.pdf**  
1388K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 5:17 PM

To: Residential Neighbors of Archer &lt;archerneighbor@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

On Tue, Apr 29, 2014 at 1:46 PM, Residential Neighbors of Archer <archerneighbor@gmail.com> wrote:

Dear Mr. Villani,

Attached for submission into the record is a petition with over 1,000 signatures opposing Archer's proposed expansion plan as well as over 200 comments submitted by people in response to the petition. To view the petition and comments online, please visit our website at [www.archerneighbors.com](http://www.archerneighbors.com) for the link.

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Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org

5/2/2014

City of Los Angeles Mail - Opposition to Archer Forward Plan (ENV-2011-2689-EIR)

(818) 374-5067

alternate: (213) 978-1454

**change.org**  
Residential Neighbors of Archer

Recipient: Councilman Mike Bonin

Letter: Greetings,

I oppose the Archer School for Girls' Archer Forward Plan as currently proposed. The size of this expansion in a residential neighborhood, the intensification of use of the school and its new facilities and the resulting increase in traffic from this use on an already over burdened area will adversely affect our local community as well the community at large. Please do not support a plan that will have significant impacts that cannot be mitigated on six key intersections in Brentwood. Please support a downsized alternative that reduces the impacts on the neighborhood.

# Comments

Name	Location	Date	Comment
Robert Turbin	Los Angeles, CA	2014-03-19	Archer has been providing an excellent education for it's girls with the present facility which was approved under a previously negotiated CUP. This community cannot assume the burden and impacts from the proposed plan. Traffic is so bad that it has taken me nearly an hour to get from my house to Sunset (0.5 miles) and we cannot tolerate ANY additional congestion. The neighborhood is bearing more than its share of proximate schools and the proposed expansion will significantly impact what little quiet time we have remaining. JUST SAY NO.
Donald Keller	Los Angeles, CA	2014-03-19	The traffic produced by this proposed 89,000+ sq. ft. addition to the current facilities, will clog up Sunset Blvd. and other nearby streets, with much more traffic than that which has occurred due to the I-405 construction. It will be "Sunset-aggeddeon"!
Joyce Keller	Los Angeles, CA	2014-03-19	I cannot drive on Sunset Blvd., NOW, to go to Beverly Hills! When this school, doubles their number of events, has interscholastic events on Saturdays, I will never be able to go shopping in Beverly Hills, using Sunset Blvd.!
Burton Wixen	Los Angeles, CA	2014-03-19	Taffic on Sunset is a nightmare. Even the slightest increase would have a terrible effect!!
Esther Iumer	los angeles, CA	2014-03-19	we could not leave the house after 2:30 Pm to go anywhere east on Sunset to catch the 405! its been a nightmare in every direction!!! for the last 4 years !!!havent gone to the valley or down town for that long in the PM time!!! same going west in the morning on Sunset!
Eileen Greene	Los Angeles, CA	2014-03-20	Traffic is already unbearabel. How can you consider adding to it? Please, please no more expansion!!!!!!
Tracy Berglass	Santa Monica, CA	2014-03-20	Archer has not been true to their word regarding original plans. There is already ENTIRELY TOO MUCH traffic on Sunset making driving long, laborious and dangerous for all; especially regarding emergency vehicles. This is a residential area and the residents' rights to a peaceful neighborhood should be respected.
amy Chapman	Los Angeles, CA	2014-03-20	My life has been destroyed by having 9 SCHOOLS in a 1 mile radius of my house
Cynthia Truhan	Los Angeles, CA	2014-03-20	Just look at the photo on this page! Archer moved into our quiet neighborhood and now wants to runover the existing CUP's
Maryann Fenster	Los Angeles,, CA	2014-03-20	To be able to travel to my Drs.and medical appts.
Susan Lindau	Los Angeles, CA	2014-03-20	You ask? Obviously you haven't attempted to move around this neighborhood at any time of day and to allow such an adverse change simply deteriorates what was a tolerable environment even further. Even avoiding single use vehicle and taking the bus through this neighborhood is horrific - the bus is unable to move and I might as well add to the pain with my own car.
Caroline V. Saltzman	Los Angeles, CA	2014-03-20	Gridlock traffic to go to my Temple, on Sepulveda, -for meetings, services, anything!
Damoon Songhorian	Los Angeles, CA	2014-03-20	Traffic is already a nightmare!!!
Brenda Lilly	Asheville, NC	2014-03-20	I left LA because of the traffic.
Marcia Messing	Los Angeles, CA	2014-03-20	Sounds like a nightmare in the making. Too big, too much, too crowded into a congested area

Name	Location	Date	Comment
Vera J. Hirtz	Los Angeles, CA	2014-03-20	Money is again the most important thing for the Archer School without any kind of moral or community minded respect. Having lived at my address for 58 years, I have seen all the changes in the community, and these planned ones are the worst ever.
Gil Kofman	Los Angeles, CA	2014-03-20	The congestion it would cause on Sunset would be overwhelming. The infrastructure was not designed to sustain this.
Nicole Stuart	West Hollywood, CA	2014-03-20	I make several trips daily to that side of town and already the traffic is unmanageable. It takes me sometimes over two hours on sunset heading east which should only take 15/20 minutes at most. To go one mile. It's unbelievable to me that this would bring more cars into an area which is already impossible to travel through. Please stop this. Thank you
Carli Greenebaum	Los Angeles, CA	2014-03-20	As a resident of the neighborhood nearest this proposed expansion I am simply dumbfounded that something of this magnitude would be proposed at this junction of Sunset and Barrington. Traffic at rush hour is already gridlocked from as far south as Olympic/Barrington and as far West as Allenford. This additional traffic would be a blight on all of West Los Angeles and all commuters using the 405 in this area to get to and from work. DISASTEROUS proposal.
Matthew Marquez	Los Angeles, CA	2014-03-20	I travel through this area daily and the intersection tends to have some of the worst traffic in the city. Sunset had been helped by the construction around the 405 crossing but the traffic here has negated any positives for people traveling east bound on sunset. A solution must be reached and if this school wants to make itself bigger then they can pay to figure a way for not only the people who use these streets and routes but the parents of the students that go there that are caught up in this mess.
Sara Melzer	Los Angeles, CA	2014-03-20	The quality of life in Brentwood is of concern to me and this new proposal will crush the neighborhood with a disproportionate amount of traffic that our streets cannot handle.
Barbara Sternberg	Pacific Palisades, CA	2014-03-20	This plan is an outrage! Traffic is already at a standstill much of the time along Sunset! After years of suffering through the 405 construction and resultant traffic nightmares, it is now suggested that all of Brentwood be turned into a traffic jam to accommodate the overdeveloped sense of entitlement of the Archer School and parents?! We in the Palisades are bottled in...Santa Monica traffic is a nightmare, PCH traffic stalls much of the day and evening, W.L.A is barely drivable, and Sunset is often totally impassable. Who will pay damages when fires cannot be extinguished, ambulances cannot pass, to name but a few inevitable scenarios? Los Angeles has indeed shown the world what it's leaders value, money! Let the girls at Archer learn real lessons..how to do with enough and how to co-exist with others!
Joan George	Los Angeles, CA	2014-03-20	I'm opposed to any expansion of anything that will increase traffic in this area. I have just about given up on going anywhere after about 2 PM. I fear I'll soon be a prisoner in my own home.
SUE ELLEN DOUGLAS	Los Angeles, CA	2014-03-20	TRAFFIC
Barbara Dohrmann	Los Angeles, CA	2014-03-20	This project is potentially a disaster for the Brentwood community. Archer School made many promises in order to obtain its original CUP and is now proceeding to break almost all of them. In my opinion, its CUP should be revoked, not expanded.
Stanley Stogel	Los Angeles, CA	2014-03-20	Traffic is terrible on Sunset

Name	Location	Date	Comment
Elizabeth Motika	Los Angeles, CA	2014-03-20	We have more than reached the tipping point on Sunset. One project here, another there, and the burden on Sunset and those residents who live not only in the immediate neighborhood of Archer School, but everybody else who use this main thoroughfare are impacted. I have already changed my driving habit to calculate for the habitual choking traffic on Sunset. I live on Medio Drive (for the past 38 years) and have over the years ruled out traveling on Sunset at certain hours of the day. If I must, I build in time allowances that to the outside observer would seem preposterous! The reasonable changes proffered in the counteroffer should be endorsed!
Dan Radlauer	Los Angeles, CA	2014-03-20	Mitigating traffic.
Catherine Pate	Pacific Palisades, CA	2014-03-20	The traffic on Sunset is already beyond a nightmare. This will only make it worse.
Steven Meiers	Los Angeles, CA	2014-03-20	Traffic is the #1 problem on the West Side, with Sunset Boulevard absolutely horrible for hours most days. The impact on quality of life is great. Anything that increases traffic on local streets should be extraordinarily suspect and, I personally believe, denied.
Ron Di Costanzo	Santa Monica,, CA	2014-03-20	The entire westside has been nearly gridlocked for over decade. When will the pols stop it? Certainly the developers - including schools - will not.
zed la saulle	santa monica, CA	2014-03-20	Because Santa Monica is already crowded & the housing on ocean north of Pico, hasn't even opened yet. We,don't need more traffic.
Donna Dubrow	Los Angeles, CA	2014-03-20	I would like to be able to travel from house to another destination in a reasonable amount of time.
Carol Vernon	Los Angeles, CA	2014-03-20	I already can't get in and out of our neighborhood and more traffic, longer event hours and more events will only make things worse.
brett brett elkins	los angeles, CA	2014-03-20	Sunset is a zoo. I live on in. Bus kids in instead and allow no cars
Marcia Herman	Los Angeles, CA	2014-03-20	I am unable to leave kenter canyon now. Imagine if this project is approved!
Bruce Mellon	Los Angeles, CA	2014-03-20	Traffic is a nightmare right now and Archer's plans will only make it worse. Please have them dramatically downsize there requests.
Robert Greenfield	Los Angeles, CA	2014-03-20	I strongly oppose the Archer Expansion Plan. I support an alternative plan proposed by the RNA that substantially reduces the size and scope of the proposed project as well as traffic and puts less of a burden on the neighborhood. We cannot approve a Plan for Archer that increases traffic on Sunset and No. Barrington, and adjacent streets. Enough is enough. We need to hold Archer to its promises in the initial CUP, especially as to hours of operation and the number of people that it is allowed to bring onto its campus. They must be required to justify why they NEED changes, as opposed to why the WANT changes.
Sheri A. Saperstein	Los Angeles, CA	2014-03-20	Because I can only leave my home by car on South Barrington (between Wilshire and San Vicente) between 10 am and 2 pm, or after 7-7:30 pm.
Allison Mellon	Los Angeles, CA	2014-03-20	We live two blocks from Sunset and it takes us 20 min and as much as 45 min. to get out of our neighborhood.
Beverley Auerbach	Pacific Palisades, AR	2014-03-20	Traffic right now is horrendous - don't make it worse!

Name	Location	Date	Comment
Lynn Altman	Los Angeles, CA	2014-03-20	You have to be kidding! What a way to NOT preserve a neighborhood and vastly change, forever, the quality, peacefulness of this community. Has any one, mainly Archer and the powers-at-be in City Hall also taken into the equation of what these variances, if at all granted to Archer, will do to the property values of this neighborhood? I would like any of you in our Council office, drive with me on nights when it takes me more the one hour to, and less than a mile's distance, to get to the entry of the northbound 405. If all of Archer's, or, basically any, are granted, traffic will be totally at a stand still.
Bobbie Asgar	Los Angeles, CA	2014-03-20	Our lives are already spent in the can not have more traffic added
Paul Herman	Los Angeles, CA	2014-03-21	There is NO way of mitigating the incremental but very significant traffic burden this tremendous expansion would create, both in its construction and in its usage.
Bobbie Greenfield	Los Angeles, CO	2014-03-21	An emergency evacuation where everyone had to leave at the same time would be impossible. I live at 455 N. Barrington Ave., it took me at 4pm, 1 hour and seven minutes to go from my house down Barrington (I am not including the time to turn onto Sunset). Extended hours with programs at the school means there will not be relief on weekend and after school hours. Therefore, the traffic is currently unbearable and Archer's plans would make this even worse. I feel very discouraged about how we are being treated by Archer and hope our local government will hear our needs. It is upsetting to think that trucks and construction people will continue for 6 more years.
Leslie Vermut	Los Angeles, CA	2014-03-21	Traffic
Myron Pufier	LOS ANGELES, CA	2014-03-21	Using a "Conditional Use Permit" to get the camel's nose under the tent wall is a betrayal of the neighbors. Barrington Ave is regularly a nightmare and Archer's ambitions will make it worse, permanently. If they have so much money and potential for growth, let them move somewhere where it won't create misery for local residents.
Nooshin Emrani	Los Angeles, CA	2014-03-21	Please do not add more cars on sunset. It is already a nightmare. Please!!
Cheri Linder	Los Angeles, CA	2014-03-21	Because I just moved here and it is a traffic nightmare compared to the cities to the east.
Michelle Schoenfeld	Los Angeles, CA	2014-03-21	No more traffic, just when the construction is almost done
phyllis bernard bernard	santa monica,, CA	2014-03-21	Traffice congestion will be a nightmare on Sunset Blvd. if the Archer Expansion Plan goes forward.
judi hochman	los angeles, CA	2014-03-21	It is impossible to go up to barrington and then to turn right on sunset. I do this 3 or 4 times a week to go to work at the getty.
aimee knowlton	santa monica, CA	2014-03-21	traffic!
Navid Salouk	Los Angeles, CA	2014-03-21	Traffic is already horrible in the area and near 405 Fwy. We can not afford for it to get any worse.
Nader Karimi	Los Angeles, CA	2014-03-21	I have regular doctor's appointments in Santa Monica every week. I get stuck in Sunset traffic for an hour just trying to go 5 miles. There is no other route to our house except through Sunset. Traffic already is a nightmare and the expansion of the Sunset bridge over 405 has not helped the traffic at all. There is no way Sunset can take any more traffic.
Ira Stein	L.A. (Brentwood), CA	2014-03-21	DUH!
Nicole Westheimer	Los Angeles, CA	2014-03-21	I drive on sunset for school and work and it is already a big nightmare
Bitá & Jamal Kazemini	Bel air, CA	2014-03-21	If you live around this area you know why:( Normally 10 min to my daughters school takes me 45 min.



Name	Location	Date	Comment
sanford gaynor	Los Angeles, CA	2014-03-21	Archer has been a good neighbor-up to now. Six more years of construction and markedly increased traffic is intolerable. The school is in a RESIDENTIAL area. Do the residents not have a right to object to such mega-projects?
Karen Murphy	Brentwood, CA	2014-03-21	traffic after 2:00 p.m.
Frances Vincent	Pacific Palisades, CA	2014-03-21	Traffic congestion must be stopped.
David F. Yadegar	838 N. Doheny Dr. Los Angeles, CA	2014-03-22	i pass by that location everyday.
Lori SOROKO	Los Angeles, CA	2014-03-22	I live in Brentwood off Sunset and can't even imagine what a terrible impact this could have on our neighborhood. An Archer expansion would bring more cars and render Sunset unusable in the mornings and afternoons and early evenings.
Laurie Benenson	Santa Monica, CA	2014-03-22	Traffic on Sunset through Brentwood is already a nightmare at peak hours, and now "peak hours" will be significantly increased.
Allan and Joan Burns	Los Angeles, CA	2014-03-22	The traffic that will result from this huge project would contribute to an already nightmarish situation for residents and visitors traveling on Sunset Blvd. Congestion has already brought traffic to a near-standstill. Archer School has already violated its promise to keep further construction under control. Enough is enough!
rosalyn benitez-bloch	Los Angeles, CA	2014-03-23	When on call need to get out quickly. Bundy & Barrington only way out. Sunset impossible even to cross and getting to 405 is impossible at certain hours and getting worse earlier
Gail Ellis	Los Angeles, CA	2014-03-23	Obvious reasons. The traffic on Sunset is impossible and Archer should be held to the terms of their original agreement.
Paul First	L.A., CA	2014-03-23	It all affects my quality of life
Arlene Fink	Pacific Palisades, CA	2014-03-24	I use this interchange almost daily. As it is, I experience major delays. An increase in traffic will severely affect productivity and quality of life.
Carl Orfuss	Los Angeles, CA	2014-03-26	traffic
Diane Rosenthal	Los Angeles,, CA	2014-03-26	Dear Councilman Bonin, We live on North Barrington. Sometimes we can't get home because of the traffic. Sometimes we can't go out because of the traffic. Is this what you want for the community that you represent? Can Archer school have integrity if it goes back on it's word to its neighbors? What kind of example does that set for its students? The Barrington/Saltair /Sunset traffic is already a nightmare for everybody. Are you going to help make it worse? Diane Rosenthalg
Patty Fiden	Santa Monica, CA	2014-03-27	I cannot get to work or home in a timely manner!
Lauren Wilstein	Los Angeles, CA	2014-03-27	I live on Barrington!! It's already a nightmare to get to work or home in a decent amount of time! Additionally, I've been in two accidents on this stretch of Barrington in the last year - neither of which were my fault but definitely traffic related. I was also rear-ended on this street a 3rd time, but there was no damage to my car. Traffic is a safety hazard already!!
Marilyn Ridley	Los Angeles, CA	2014-03-27	My property has lost considerable value due to traffic on Sunset. Friends and family would rather call then drop by. It takes several minues to get out of my driveway and then I have to go in the wrong direction. etc. etc.
Greg Myer	Los Angeles, CA	2014-03-27	Quality of life
Marianne Talbot	Los Angeles, CA	2014-03-28	Traffic congestion

Name	Location	Date	Comment
David Offer	Los Angeles, CA	2014-03-28	Not fair that they should be able to expand as this was not part of the original plan that was approved when they moved to this location and traffic is already unbearable with no solution to it.
Leslie Offer	Los Angeles, CA	2014-03-28	i live in the area and think it would make an already horrible traffic situation worse
Barbara McCoy	Los Angeles, CA	2014-03-29	The increased density Archer School's plan will bring to our residential neighborhood and to the important Sunset artery.
unni warrior	Los Angeles, CA	2014-03-29	Archer is breaking every covenant it agreed to when it moved in.
sharon Yarden	Los angeles, CA	2014-03-30	I live in this neighborhood & it is gridlock now, so this will make much worse ; we are prisoners on westside after 3:00p.m.
Helen Nickols	West Hills, CA	2014-03-30	I have friends and family that live in Brentwood and there are times when I cannot visit because the traffic makes it impossible. The school's expansion plans will contribute to this traffic. The school should not be able to totally disregard the agreement it made when it moved into the neighborhood.
Richard Sternberg	Pacific Palisades, CA	2014-03-31	Traffic on Sunset is already a nightmare. Why make it worse?
Stephen Kuchenbecker Md	Los Angeles, CA	2014-03-31	traffic problems are terrible and these changes will make them worse!!
Jay Ornellas	Los Angeles, CA	2014-03-31	The extreme, adverse impact of this monstrosity on the surrounding community is self-evident. No elaboration is required.
Bob Waldorf	Los Angeles, CA	2014-03-31	The idea that Archer has the right to inconvenience so many people in Brentwood for so many years, just so that they can grow their school is unacceptable. We/most of us were here first before Archer ever landed here. They owe us the respect to understand that the traffic is already unbearable and if they need to expand, they should move somewhere else!
CYNTHIA MCROSKEY	LOS ANGELES, CA	2014-03-31	It seems that Archer School forgot what they promised the Brentwood neighbors when they moved in to one of the most beautiful properties on the Westside. They know the traffic issues, and they know their plan will contribute to a worsening of the general state of our very educationally-minded community.
Phillip Blum	Los Angeles, CA	2014-04-01	It presently takes almost an hour to reach the 405 during the 2:00PM to 6:30PM time period. What Archer is requesting would make living in Brentwood intolerable!
richard ziman	Los Angeles, CA	2014-04-01	Undoubtedly the worst traffic intersection in all of LA which has the worst traffic in all of the USA. Why would anyone of the right mind or character allow this Archer expansion to happen. It is a horrific additional burden on all surrounding residents and all others who need to use Sunset, Barrington or surrounding streets whether they live in the area or are just travelling through. Archer and all of the other schools in the immediate area are already excessively contributing to an incredibly unworkable traffic environment. We who live in the area have become virtual prisoners in our own homes. We have a constitutional right to free access which is being unreasonably trampled now and would be horrendous and unacceptable if this school expansion is allowed, which of course, if allowed in any way, would set an example for the other private schools in the immediate vicinity. This will further destroy our community and compound many times an already egregious situation which has not been helped by local government!!!!
Margot Calabrese	Los angeles, CA	2014-04-01	TOO MUCH TRAFFIC ON WESTSIDE!!!! ARE YOU KIDDING????

Name	Location	Date	Comment
Charlene Baskin	Pacific Palisades, CA	2014-04-01	This is important to me because I voted to allow Archer School when it first came into the neighborhood and I lived close by. I supported it with the conditional uses. I currently live in Pacific Palisades and am negatively impacted by Palisades High School's expansions. Traffic is Horrible at the Barrington intersection and can only get worse. It is total gridlock. In addition, there will be additional noise and lights. This kind of school does not belong in this neighborhood. I also use Barrington and Barrington place for shopping and personal business. This already over-crowded area will become inaccessible to those of us who live in the area.
Michael Woronoff	Los Angeles, CA	2014-04-01	If this plan passes, those of us who live in Brentwood will be stuck in our homes from 3:30pm to 7:00pm.
Linda Vitale	Los Angeles, CA	2014-04-01	It is already impossible to head east in the afternoon on Sunset, this will make it impossible.
Carol Halperin	Los Angeles, CA	2014-04-01	Driving East on Sunset is already a nightmare. This project would bring even more congestion.
Christine Cooper	Los Angeles, CA	2014-04-02	Ask yourself this question. If your main Artery (Sunset Blvd) was blocked and you added more plaque (traffic) making death inevitable. What would you do ?
Judith Bedrosian	Los Angeles, CA	2014-04-02	I live off of Stone Canyon, but need to travel east on Sunset Blvd. several times a week. It is a nightmare to be coming east on Sunset from Brentwood at any time of the day, but this will only compound the problem. It will also affect commerce in Brentwood and the Palisades, as we will look to shop more East of the 405.
Elizabeth Kemper	Los Angeles, CA	2014-04-02	I travel on Sunset every day, and the traffic keeps getting worse. We should be taking steps to ameliorate traffic, not add thousands of additional car trips.
Alexander Podobas	Los Angeles, CA	2014-04-02	Apart from the obvious constraints inherent in permitting a greater quantity of vehicular traffic into a locale without the corresponding physical capacity to accommodate the increase, I would remind Councilman Bonin of a simple maxim: politics must work for the greatest good for the greatest number. It is factually undeniable that far more of his constituents will be negatively impacted by accepting Archer's proposal than will benefit. There seems no compelling governmental, environmental, or economic interest in materially increasing Sunset Boulevard traffic congestion simply to benefit a private institution's internal functions.
John McRoskey	Los Angeles, CA	2014-04-03	The construction at the Archer School with the corresponding trucks, noise, lights and expanded hours will impact the traffic in Brentwood to an intolerable degree. Currently, it can take over 25 minutes for our family to exit our neighborhood through Barrington or Saltair. The roads cannot bear this addition, and the CUP understanding between the school and neighbors is being abandoned if this plan moves forward. This is a betrayal of the compromise established with the original CUP. Had this plan been discussed in 1996, the Archer School would not have been occupying the Eastern Star property. Where is their conscience? They promised to be good neighbors, and we hold them to it.
IVAN TETHER	LOS ANGELES, CA	2014-04-03	Vehicular and construction traffic increase from Archer's Proposal will create materially increased public safety issues, pollution and gridlock in our neighborhood. In addition, this will substantially threaten our home values and quality of life.
Alan Field	Los Angeles, CA	2014-04-04	While I personally like the idea of a local school, I think that they should abide to the conditional use permit in effect when they purchased the property. Sunset and the surrounding streets are over congested as things stand now. Every effort to date has failed to mitigate current traffic volume.

Name	Location	Date	Comment
Carla Kettner	Los Angeles, CA	2014-04-04	Traffic is already impossible on Sunset. This would just make it worse.
Ann Kates	Redondo Beach, CA	2014-04-04	I visit the area frequently.
Tom Freeman	Los Angeles, CA	2014-04-04	Archer's arrogance is disappointing. This private institution moved directly into a quiet residential neighborhood in the 1990s, promised to strictly limit its uses in a manner consistent with the residential character of that neighborhood and, now that it is safety entrenched, it insists on aggressively intensifying its use of the property, acting as if the residents, not Archer, brought the conflicting land uses to the neighborhood. The project must be downsized to fit the neighborhood.
Lisa Cohen	Los Angeles, CA	2014-04-05	I live in Brentwood!
Zofia Wright	Los Angeles, CA	2014-04-05	Archer overblown and too aggressive expansion plan will have a huge negative impact on the quality of life for all the nearby residents and it will make the horrible Sunset Blvd traffic situation even worse!
Alex Baskin	Los Angeles, CA	2014-04-06	Traffic in this area is at a snarl after the support for Archer in the first place. This proposal is unfair to the residents who supported Archer's existence -- and now will face major quality of life issues should this pass.
Stephanie Snyder	Santa Monica, CA	2014-04-06	Traffic congestion already a nightmare and this is a flagrant disregard of the permit.
Louise Phanstiel	Los Angeles, CA	2014-04-06	Traffic at the intersection of Barrington and Sunset is unbearable now. This would be a disaster!
Howard Phanstiel	Los Angeles, CA	2014-04-06	Traffic congestion and pollution is out of control on the Westside and this will make it worse.
robert dowling	santa monica, CA	2014-04-06	Give us a break. We don't need more congestion. We already have too much
Ann Lockie	Los Angeles, CA	2014-04-07	The negative impact on our neighborhood is already at a peak. This will put us over the edge. This is too small an area to have such a high concentration of schools and traffic at peak hours.
Ilana Roofian	Los Angeles, CA	2014-04-07	this is my neighborhood!
Michael Roofian	Los Angeles, CA	2014-04-07	I live here
Farshad Bostani	Los Angeles, CA	2014-04-07	Need to take my kids to and from school every day and delays due to traffic can cause significant issues for the whole family
Benjamin Squire	Topanga, CA	2014-04-07	My brother and his family live blocks from Archer, and there's already no visiting them due to excessive traffic.
Howard Walter	Los Angeles, CA	2014-04-08	We have enough traffic congestion at Barington & Sunset, we don't need more.
Daniel Lee	Los Angeles, CA	2014-04-08	Even as is, I am constantly awoken by school buses and piano music at and before 8am. There are nights when the alarm goes off and no one is willing to come turn it off. Also, having to spend upwards of 15 minutes to get to the 405 is ridiculous. I do not want nor need any more annoyances in my daily life, and while getting new buildings and facilities may be exciting for the students, it is, in the long run, unnecessary.
Jaroslava Wilcox	Los Angeles, CA	2014-04-08	5 years ago, the average driving time from the Bundy-Sunset intersection to Fwy 405 was 5 min. Since then it has increased to 30 min. We stopped attending UCLA and other events hoping it will be temporary situation. There should be no more construction allowed on Westside that would affect Sunset traffic unless we want to be imprisoned in our houses.
Thomas Pilla	Los Angeles, CA	2014-04-09	To maintain the integrity of our neighborhood and hold Archer School to its promises.
Cindy Wang	Los Angeles, CA	2014-04-09	Traffic on Sunset is already bad enough. Pls do not make it worse.

Name	Location	Date	Comment
Nancy Stephens	LA, United Kingdom	2014-04-09	It is important because I am trapped in my very own neighborhood every week day by the traffic and the school parents who refuse to abide by rules set to protect the neighborhood ! And I worked with Archer initially to make peace with the neighborhood but the situation is untenable now!
Lissa Chesnoff	Los Angeles, CA	2014-04-09	the traffic in this neighborhood is already at unbearably congested. There are times of the day that I can't leave my house. Their expansion is unnecessary and a burden to the neighborhood.
Kathleen Flanagan	Los Angeles, CA	2014-04-09	I travel on Sunset everyday and the traffic is already unbearable.
Nicole Hillebrandt	Los Angeles, CA	2014-04-10	I live in the building that faces the track that is used for games, running, etc.. Every day I drive home from Santa Monica and deal with enough bad traffic. The idea of MORE traffic is just mind numbing. Plus, the peace and quiet at night is part of why people like me live in this neighborhood. In all fairness, I want the girls who go to Archer get a well-rounded education, but not so that inconveniences all of the neighbors.
Elaine Morita	Los Angeles, CA	2014-04-10	Traffic on Sunset Blvd west of the 405 is a disaster, any changes that would increase car trips would be IRRATIONAL. Please do not undo the protections for the surrounding neighborhood agreed upon in the original Conditional Use Permit.
Leda Takacs	Los Angeles, CA	2014-04-10	I live right beside Archer School. Our balcony is a few meter from the Archer School's parking lot. The noise, the pollution, the lights and traffic would make our lives hell.
Judy Mardis	Los Angeles, CA	2014-04-11	Traffic is already a nightmare on Sunset. We certainly don't need to go thru another few years of congestion.
Traci Thornburg	Los Angeles, CA	2014-04-11	Traffic is my concern.
Juli Woronoff	Los Angeles, CA	2014-04-12	Traffic is absolutely terrible on Sunset and nothing has changed, nor will it, even when the freeway project is complete. Archer assured its neighbors that it would not expand when they agreed to welcome them to the neighborhood and now they are going back on their word. We live in gridlock here and Archer's expansion will only add to the mess. I cannot even imagine the traffic on Chaparral, down Barrington and onto Sunset if Archer gets its way.
Tina Gale	Pacific Palisades, CA	2014-04-12	I don't want more traffic in the neighborhood! Sunset is my main route of travel every day!
Fred Taber	Los Angeles, CA	2014-04-12	90049
dahlia bilger	los angeles, CA	2014-04-13	I travel on Sunset Blvd at least 4 times a week always crossing Saltair Avenue. It is already a nightmare to cross in the afternoons. I just don't think any of us can take any more hassles getting around that part of town. It will be a true disaster of a bottleneck if this passes.
Linda & Ken Howard	Los Angeles, CA	2014-04-14	The last 2 years have been an absolute nightmare to get anything done in Brentwood. What should normally take 10 to 15 minutes takes an hour or LONGER to get done. Traffic is at a standstill. ENOUGH!!
Mary Montclair	Montecito, CA	2014-04-14	I am "trying" to do business in that area and the traffic making is making it nearly impossible to do!
Bart Young	Pacific Palisades, CA	2014-04-14	Sunset already has the worst congestion of any major thoroughfare in LA. Don't allow it to get worse!
Fred Stuart	Hermosa Beach, CA	2014-04-14	Traffic is impassable already
Matthew Biren	West Los Angeles, CA	2014-04-14	Traffic is so bad that we have become virtually landlocked at certain times of the day.

Name	Location	Date	Comment
Dustin Biren	Pacific Palisades, CA	2014-04-14	I work and live in Santa Monica, specifically I work off of Montana and San Vicente and I live right by Barrington and Santa Monica Blvd. Traffic is already a nightmare on a daily basis, construction will make it unlivable.
marc Katzman	Brentwood, CA	2014-04-14	It is impossible to travel east or west on sunset at intersection with Church nearly at all times of the day. It takes hours to find a route north from the Brentwood area if destination is Valley and it takes an hour to go south. The Supulveda project b/w the valley and west side is ongoing and there is no foreseeable date of completion so this Archer project will make travel impossible adding total dysfunction to misery.
Alanna Geremia	Westlake Village, CA	2014-04-14	I work in Brentwood three days a week, and even though I make my own hours it is almost impossible for me to handle...I'm losing clients left and right, and the fact that at 800 at night still takes me 40 minutes or more to get on the freeway which is less than two miles and then another 30 minutes to get home....It's unacceptable and Archer made a deal four years ago that they wouldn't expand and affect the neighborhood and they are lying and not living up to their signed contract....does anybody care? How about looking up the contract they signed??? Or is there money pushing that under the rug??please someone have integrity and have them honor their agreement and stop this madness.....
Danielle Collins	Los Angeles, CA	2014-04-15	I live in an apartment right next door (to the west) of the school. I have lived in this building for over 16 years, so I moved in BEFORE Archer took over the property. Things are bad enough right now in terms of traffic, noise and other matters of nuisance and annoyance and inconvenience, so I cannot fathom how much worse things will be if this ridiculous expansion plan is allowed to go forward. My guess is that if the PARENTS of the Archer students lived near the school as we do, the expansion plan would never have gotten this far.
Maya Schorer	Los Angeles, CA	2014-04-15	Current roads cannot accommodate the current load of traffic. Adding to this without a solution is irresponsible. I am also concerned with increased noise levels at my home which overlooks the Archer campus.
Frances Galvon	Santa Monica, CA	2014-04-16	I run a home business and most of my clients either originate or drive through Brentwood. I cannot afford to lose my client base due to unreasonable drive times!!!
Kristina Effenberger	Los Angeles, CA	2014-04-16	Traffic is already bad enough!
Mary Fenstermacher	Sherman Oaks, CA	2014-04-16	Because I live right next door to Archer and will be directly affected by the noise, the bad air quality (I have asthma) and the increased traffic this development will bring. This does not just impact those in the immediate vicinity; the east bound traffic in the morning and the westbound traffic in the evening M-F is already a nightmare. Anyone from as far as Pacific Palisades and up into Malibu will tell you that they are trapped by existing traffic at key times of day. All of this and more to benefit a private school? This is ridiculous and needs to be re-considered and/or stopped entirely.
Larissa Percy	Los Angeles, CA	2014-04-16	Don't need to create even worse traffic in the area! Need to be able to get to work on time as well as get to my home without an extra aggravation.
Bethany Fields	Los Angeles, CA	2014-04-16	Living north of Sunset we are virtual prisoners from 3-7PM..traffic backs up west of Kenter...

Name	Location	Date	Comment
Eden Romick	Los Angeles, CA	2014-04-17	<p>We cannot freely get in and out of our neighborhood as it is. Too many cars with careless drivers sharing the road with families who lack a sidewalk is a recipe for disaster.</p> <p>We have a right to the quiet, peaceful enjoyment of our home and our environs. While we do not support any part of Archer Forward, we will respect the right to peacefully coexist.</p> <p>Please do not undo the protections for the surrounding neighborhood agreed upon in the original Conditional Use Permit.</p>
Julie Clark De Blasio	Los Angeles, CA	2014-04-17	The expansion is unsustainable for the neighborhood in terms of the environment, ambient neighborhood, traffic & population pressures.
Sandra yadegar	los angeles, CA	2014-04-18	The current traffic gridlock on Sunset is unbearable. Something needs to be done to eliminate it not to make it worse. I feel imprisoned in my home between the hours of 4 to 7 already because of Archer traffic.
Helen Shoenfeld	Los Angeles, CA	2014-04-18	We are already plagued by an incredible amount of traffic. I cannot go to any of my local stores between 3pm-8pm. Our local drugstore won't even deliver during that time. We are already trapped, and more cars and a 6 year year building project is unthinkable. Also, my family has been forced to vote by mail. Two elections in a row, it took us over an hour and to get to our polling place, just a little over a mile away. The impact on our already over burdened neighborhood would be beyond belief. Unless Archer is hoping we all move away so they can but up all the property around them, and can continue to expand.
Phillip Colburn	Los Angeles, CA	2014-04-20	Traffic would be impossible. It's bad enough now.
Max Falamaki	Los Angeles, CA	2014-04-20	Archer promised no expansion when moved here
Andrew Biren	Los Angeles, CA	2014-04-21	Traffic is already bad enough.
Martine Vo	Pacific palisades, CA	2014-04-21	Too much traffic to get to my business
Madeline Levine	Los Angeles, CA	2014-04-21	Traffic is a nightmare now and has been since the 405 project behan.
Ba Nguyen	Pacific palisades, CA	2014-04-21	Customer can not get to my business
Stephanie Richardson	Los Angeles, CA	2014-04-21	I live on Barrington & the traffic is already impossible.
Helen Tran	Pacific palisades, CA	2014-04-21	Bad traffic for business
Lauren Hejazi	los angeles, CA	2014-04-21	Because I live at the intersection of Barrington and Sunset and traffic is already a nightmare....I can't even imagine what will happen if it does get worst because of Archer's school expansion.
Hai Mai	Pacific palisades, CA	2014-04-21	Bad traffic, client cannot get to my business
Elinor Green	Los Angeles, CA	2014-04-22	Don't need more congestion on Sunset....Bad enough already
Alan Treves	LA, CA	2014-04-22	GRIDLOCK IS STRESSFUL. DRIVERS BLOCK INTERSECTIONS. CARS TURNING LEFT INTO ARCHER COMPOUND THE TRAFFIC.
Deborah Berman	Los Angeles, CA	2014-04-22	<p>The traffic on Sunset is unbearable now. The Archer expansion will only add to it.</p> <p>I feel like a prisoner in my home because I cannot go east of the 405 or travel to the valley during the week after 2:00 in the afternoon without planning on a 1-2 hour drive.</p>
Naomi Thorpe	Los Angeles, CA	2014-04-23	Everyday we are adversely impacted by Archer School. Expansion would only worsen our neighborhood conditions!





Name	Location	Date	Comment
Melissa Mack	Alameda, CA	2014-04-28	As a licensed CA attorney who often practices in this SoCal area, I am familiar with the neighborhood and I have close friends who live in the apartment complex that would be directly affected by this traffic nightmare. It is unfair to subject people to a traffic fiasco, while allowing the original terms of the negotiation between Archer and the residents to fall by the wayside. Why should Archer be allowed to renege on its promises and create a traffic fiasco for residents simply to further its own self serving motives and purposes? Unfair and contrary to the bargain previously negotiated.
Jason Manning	alameda, CA	2014-04-28	My wife and I work in this area and would not appreciate waiting hours to navigate through this neighborhood. As it is, it takes upwards of 30 minutes during rush hour so this Archer plan would increase that up to 3 times. Ridiculous.
Michael moskowitz	Los Angeles, CA	2014-04-28	The traffic is already so difficult heading west that it takes over 45m most afternoons to reach the 405 freeway. More congestion is a safety and living issue. Please vote against this development
Sheri Fried	Los Angeles, CA	2014-04-28	There are multiple schools all converging onto the streets and into the same intersections. I can't leave my home during those times. We are trapped on the Westside - and supporting the growth of Archer School (which is contrary to our original agreement with them) will make living and doing business in the area utterly impossible. We can't afford any more congestion - we need solutions not the additional burden of Archer.
Gary Tenzer	Los Angeles, CA	2014-04-28	Traffic on Sunset west of Barrington has become impossible trapping us in our homes for much of the day and will clearly affect property values for home owners west of Barrington. Expanding Archer per the school's plan would only make the matter considerably worse and untenable. I'm not a "nimby" but enough is enough.
Eve Axelrad	Los Angeles, CA	2014-04-28	too much traffic already, will be impossible situation
Julie McDonald	Los Angeles, CA	2014-04-28	Because I often have to commute to the west valley to help my family, Saturday April 26th noon, I was stuck in the jammed up traffic. It's was no better on Sepulveda I found out! This has progressively become a major commuting nightmare for me.
Prof. Anne Mellor	UCLA, Los Angeles, CA	2014-04-28	Would make travel on Sunset Blvd almost impossible.
sanford mendelson	los angeles, CA	2014-04-28	It is gridlock on Sunset between Mandeville Cyn Rd and the 405 weekdays during A.M. and P.M. rush hours. The same is true on Wilshire between San Vicente and the 405, making it very difficult to get East of the 405 from home or return home from East to West during several hours a day.
Madeline Graham	Los Angeles, CA	2014-04-28	Traffic is already a nightmare on Sunset.
Stacy Schulman	Los Angeles, CA	2014-04-28	The school should be held to their original agreement regarding size. Traffic on Sunset is already intolerable
Ronald Mellor		2014-04-28	Traffic on sunset blvd.
Sohrab Elyasi	Los Angeles, CA	2014-04-28	Too much traffic
aliza nikayin	la, CA	2014-04-28	We are already spending too much time in the traffic to and from, enough is enough
David Brown	L. A., CA	2014-04-28	Traffic conditions on Sunset, congestion, and bad precedent for other institutions in residential neighborhood
Shawn Matian	Los Angeles, CA	2014-04-28	I live in the area & this was & remains a residential area, not commercial which Archer is clearly making it. Archer has already crossed its boundaries & has created a nightmare for all of us & now it wants more at our expense.

Name	Location	Date	Comment
Wendy Ruby	Los Angeles,, CA	2014-04-28	The intersection at Barrington and Sunset is already a nightmare. Sunset Blvd. is backed up regularly from Kentor to the freeway. I don't object to the school, but the traffic problem cannot be ignored and would only get worse with expansion plans.
Brigitta Troy	Los Angeles, CA	2014-04-29	Traffic on Sunset is already a nightmare. There are NO ALTERNATE ROUTES for traffic in the neighborhood. Archer promised when it received its first CUP to keep trips to a minimum. This plan would exponentially increase traffic and is unacceptable.
Lenora Kelton	L.A., CA	2014-04-29	Traffic on Sunset between Mandeville and the freeway is impossible now. We do not need any more cars in our area.
Joyce Kidd	Beverly Hills, CA	2014-04-29	I drive the areas impacted by the proposed project regularly, so certainly do not want to encounter more gridlock. They are already parking lots at certain times of the day and evening.
John Weissenbach	Los Angeles, CA	2014-04-29	Traffic is already unacceptably bad. Archer is a new school and should have seen this problem. If they want to expand, they should move.
sonia scheideman	Los Angeles, CA	2014-04-29	The Archer expansion will ruin the quality of life for residents of Brentwood and gridlock traffic flow through the community. What on earth are they thinking?????
Leonard Kolod	Los Angeles, CA	2014-04-29	I live a block south of Sunset, which is usually not available to me because of gridlock.
Sharon Hersch	Los Angeles, CA	2014-04-29	The Sunset traffic is horrendous! It's like a parking lot on Sunset after 3 & good luck getting through Sunset and Barrington. I usually don't even leave my house after 3 anymore, and if I want to go to Beverly Hills it takes 45 minutes to an hour with the Sunset traffic in Brentwood. Ruining our quality of life and adding so much stress. How could anyone possibly consider expanding Archer now? It would be illogical to worsen an already intolerable situation.
Ann Colfax	Los Angeles, CA	2014-04-29	It can already take 45 minutes or longer to get to Sepulveda Blvd via Sunset or Wilshire from my home near 26th St in the afternoon or evening. I could walk it faster, but that isn't safe with no sidewalks. I feel utterly trapped, with no viable transit alternatives to get downtown in the evening.
Dottie Lewis	Los Angeles, CA	2014-04-29	My daughter lives n of sunset and Barrington. It is a nightmare going to her house. It is dangerous, I have seen fire trucks not being able to get through.
Frosene Maniatis	Danville, CA	2014-04-29	Because I can't visit my cousin without encountering severe traffic problems already! You can't even pull out of their driveway!
Gerald Adomian	LA, CA	2014-04-29	Sunset is already a nightmare during certain hours. Let's not make it even worse.
Gabrielle Davis	la, CA	2014-04-29	traffic

Name	Location	Date	Comment
Franklin Gerechter	Los Angeles, CA	2014-04-29	<p>Greetings:</p> <p>Facing the daily grind of massive traffic jams every day as I weave my way slowly to the 405, I am amazed how selfish and short sighted the folks at Archer school are. The facts are obvious. The road structure, poor design and overuse on Sunset create an unsafe, and poor quality of life issues for the residents of Brentwood.</p> <p>Throw in the mix of countless other commuters who are trapped in the hell that is Sunset Blvd. add the traffic and thus the local inhabitants who live near the Archer will face even more difficulty in their lives. Why would the school even consider expanding? The answer is, they do not care and think they can get away with it.</p> <p>Sunset Blvd has been the only road which leads to the 405 and has been taxed since the other massive project of fixing the 405 has caused this street to get destroyed as construction trucks rolled through it.</p> <p>I can go through the list of how bad this project is for those who live , and commute in the Brentwood community. I don't want to bore you with this as you hopefully know what goes on here.</p> <p>My bottom line is my strong disapproval of the Archer School plans. If the compromise is not to the liking of the Archer School, let them pack up their books and head somewhere else.</p> <p>Regards,</p> <p>Franklin Gerechter, Mandeville Canyon Road</p>
Bruce Levine	Los Angeles, CA	2014-04-29	Too much congestion already and inability to exit my driveway throughout the day due to congestion and traffic.
Amy Sweeney	Los Angeles, CA	2014-04-29	We can't handle any more traffic on Sunset. We already feel like we can't travel east on school day passed 2 pm
Harvey Flax	Los Angeles, CA	2014-04-29	I live in the area, 30 years, fighting the traffic. Enough is enough
Bobby Ko	Los angeles, CA	2014-04-29	Traffic has been terrible last few years. Nightmare to continue?
Robyn Fuchs	Pacific Plisades, CA	2014-04-29	It currently takes an hour & a half just to get through the intersection of Barrington & Sunset. This expansion will make it ten times worse.
Ruth Lynn Sobel	Los Angeles, CA	2014-04-29	We who live west of the school are prisoners if we need to use Sunset Blvd in the afternoons. We should be looking for ways to alleviate the monstrous traffic going east instead of adding to it. Even considering this is an insult to the voters in 90049.
Barry Pressman	San Fernando, CA	2014-04-29	It will affect my commute
Nancy Newberg	LA, CA	2014-04-29	I am impacted by the daily traffic gridlock on Sunset Blvd. It is overwhelming and frustrating to deal with.
Merle Strauss	Los Angeles, CA	2014-04-29	<p>My life has already been negatively impacted by the traffic on Sunset Blvd. It would be unconscionable to allow the allow the Archer Forward expa</p> <p>My life has already been negatively impacted enough by the traffic on Sunset Boulevard. The quality of my life has been lessened over the past 15 years</p> <p>The proposed Archer expansion plan would create a nightmare on Sunset Boulevard. Due to traffic, the quality of my life has lessened over the past 15 years due to traffic on Sunset Boulevard.</p>

**change.org**

## Residential Neighbors of Archer

Recipient: Councilman Mike Bonin

Letter: Greetings,

I oppose the Archer School for Girls' Archer Forward Plan as currently proposed. The size of this expansion in a residential neighborhood, the intensification of use of the school and its new facilities and the resulting increase in traffic from this use on an already over burdened area will adversely affect our local community as well the community at large. Please do not support a plan that will have significant impacts that cannot be mitigated on six key intersections in Brentwood. Please support a downsized alternative that reduces the impacts on the neighborhood.

# Signatures

Name	Location	Date
Thelma Waxman	Los Angeles, CA, United States	2014-03-19
Robert Turbin	Los Angeles, CA, United States	2014-03-19
John Whitesell	Los Angeles, CA, United States	2014-03-19
Donald Keller	Los Angeles, CA, United States	2014-03-19
David Shenassa	Los Angeles, CA, United States	2014-03-19
Burton Wixen	Los Angeles, CA, United States	2014-03-19
Lauryn Harris	Los Angeles, CA, United States	2014-03-19
Haya Handel	Los Angeles, CA, United States	2014-03-19
Esther lumer	los angeles, CA, United States	2014-03-19
Wendy Hibbert	Los Angeles, CA, United States	2014-03-19
Hilary Meserole	Los Angeles, CA, United States	2014-03-19
Alain Rogier	Los Angeles, CA, United States	2014-03-19
Eileen Greene	Los Angeles, CA, United States	2014-03-19
Tracy Berglass	Santa Monica, CA, United States	2014-03-19
amy Chapman	Los Angeles, CA, United States	2014-03-20
Cynthia Truhan	Los Angeles, CA, United States	2014-03-20
Elin Schwartz	Los Angeles, CA, United States	2014-03-20
Maryann Fenster	Los angeles,, CA, United States	2014-03-20
Martin and Linda Klopert	Los Angeles, CA, United States	2014-03-20
Susan Lindau	Los Angeles, CA, United States	2014-03-20
Caroline V Saltzman, Caroline	Santa Monica, CA, United States	2014-03-20
Damoon Songhorian	Los Angeles, CA, United States	2014-03-20
Macie Scherick	Los Angeles, CA, United States	2014-03-20
Brenda Lilly	Asheville, NC, United States	2014-03-20
Marcia Messing	Los Angeles, CA, United States	2014-03-20
Mitch Paradise	Los Angeles, CA, United States	2014-03-20
Emile Levisetti	Santa Monica, CA, United States	2014-03-20
Vera J. Hirtz	Los Angeles, CA, United States	2014-03-20
Janet Manning	Santa Monica, CA, United States	2014-03-20
Rosa Needleman	los angeles, CA, United States	2014-03-20

<b>Name</b>	<b>Location</b>	<b>Date</b>
Colin Summers	Santa Monica, CA, United States	2014-03-20
Fred Freeman	Los Angeles, CA, United States	2014-03-20
Gil Kofman	Los Angeles, CA, United States	2014-03-20
Nicole Stuart	West Hollywood, CA, United States	2014-03-20
Carli Greenebaum	Los Angeles, CA, United States	2014-03-20
Amy Ziering	Los Angeles, CA, United States	2014-03-20
Patricia Gomez	Los Angeles, CA, United States	2014-03-20
Deborah F	Los Angeles, CA, United States	2014-03-20
Jane Marlis	Los Angeles, CA, United States	2014-03-20
GLORIA SETAREH	Los Angeles, CA, United States	2014-03-20
Nasim Pirian	Los angeles, CA, United States	2014-03-20
Matthew Marquez	Los Angeles, CA, United States	2014-03-20
Sara Melzer	Los Angeles, CA, United States	2014-03-20
Barbara Sternberg	Pacific Palisades, CA, United States	2014-03-20
Joan George	Los Angeles, CA, United States	2014-03-20
Barbara Dischler	Los Angeles, CA, United States	2014-03-20
Cynthia Velky	Los Angeles, CA, United States	2014-03-20
sue douglas	los angeles, CA, United States	2014-03-20
Barbara Dohrmann	Los Angeles, CA, United States	2014-03-20
Tara Alpin	Los Angeles, CA, United States	2014-03-20
Allison Baratelli	Los Angeles, CA, United States	2014-03-20
Jody Trager	Los Angeles, CA, United States	2014-03-20
Anthony Foux	Los angeles, CA, United States	2014-03-20
Cindy Zoller	Los Angeles, CA, United States	2014-03-20
David Marinoff	Los Angeles, CA, United States	2014-03-20
Stanley Stogel	Los Angeles, CA, United States	2014-03-20
Karen Williams	Los Angeles, CA, United States	2014-03-20
Jaime Offenberger	Los Angeles, CA, United States	2014-03-20
Concerned Citizen	New City, NY, United States	2014-03-20
Elizabeth Motika	Los Angeles, CA, United States	2014-03-20
Dan Radlauer	Los Angeles, CA, United States	2014-03-20
Joy Dabby	Los Angeles, CA, United States	2014-03-20

Name	Location	Date
Catherine Pate	Pacific Palisades, CA, United States	2014-03-20
Louisa Saini	Santa Monica, CA, United States	2014-03-20
Steven Meiers	Los Angeles, CA, United States	2014-03-20
Ron Di Costanzo	Santa Monica,, CA, United States	2014-03-20
Zed La Saulle	Santa Monica, CA, United States	2014-03-20
Donna Dubrow	Los Angeles, CA, United States	2014-03-20
Sam Soule	Los Angeles, CA, United States	2014-03-20
Carol Vernon	Los Angeles, CA, United States	2014-03-20
brett elkins	brentwood ca, CA, United States	2014-03-20
Kelly Martino	la, CA, United States	2014-03-20
Raphael Darvish	Los Angeles, CA, United States	2014-03-20
David Rosenbaum MD	Los Angeles, CA, United States	2014-03-20
Marcia Herman	Los Angeles, CA, United States	2014-03-20
Bruce Mellon	Los Angeles, CA, United States	2014-03-20
Mark Stratton	Los Angeles, CA, United States	2014-03-20
Robert Greenfield	Los Angeles, CA, United States	2014-03-20
sheba shammaie	los angeles, CA, United States	2014-03-20
Sheri A. Saperstein	Los Angeles, CA, United States	2014-03-20
Allison Mellon	Los Angeles, CA, United States	2014-03-20
Sarah Nelson	Pacific Palisades, CA, United States	2014-03-20
Beverley Auerbach	Pacific Palisades, AR, United States	2014-03-20
Lynn Altman	Los Angeles, CA, United States	2014-03-20
Jay sures	Los Angeles, CA, United States	2014-03-20
Louise Greenberg	Beverly Hills, CA, United States	2014-03-20
Bobbie Asgar	La, CA, United States	2014-03-20
Paul Herman	Los Angeles, CA, United States	2014-03-21
Terry Nikkhoo	Los Angeles, CA, United States	2014-03-21
Paul Greenberg	Beverly Hills, CA, United States	2014-03-21
Jennifer Mirner	Los Angeles, CA, United States	2014-03-21
Deborah Ryan	los angeles, CA, United States	2014-03-21
Mary Ann Hagopian	Los Angeles, CA, United States	2014-03-21
Bobbie Greenfield	Los Angeles, CO, United States	2014-03-21

Name	Location	Date
Leslie Vermut	LA, CA, United States	2014-03-21
Aviva Covitz	Los Angeles, CA, United States	2014-03-21
Ray Emrani	Los Angeles, CA, United States	2014-03-21
Saghar Zarabian	Los Angeles, CA, United States	2014-03-21
Myron Pulier	LOS ANGELES, CA, United States	2014-03-21
Cristina Cameron	Los angeles, CA, United States	2014-03-21
Kathleen Reiss	Los Angeles, CA, United States	2014-03-21
Nooshin Emrani	Los Angeles, CA, United States	2014-03-21
Cheri Linder	Los Angeles, CA, United States	2014-03-21
David McGrath	Los Angeles, CA, United States	2014-03-21
sarah petrie	Los Angeles, CA, United States	2014-03-21
Mojgan Pakravan	Los Angeles, Ca United States, CA, United States	2014-03-21
Shawn Pakravan	Los Angeles, CA, United States	2014-03-21
Michelle Schoenfeld	Los Angeles, CA, United States	2014-03-21
phyllis bernard	santa Monica, CA, CA, United States	2014-03-21
Lisa Lukas	Pacific Palisades,, CA, United States	2014-03-21
judi hochman	los angeles, CA, United States	2014-03-21
aimee knowlton	santa monica, CA, United States	2014-03-21
Navid Salouk	Los Angeles, CA, United States	2014-03-21
Thomas Weinberger	Los Angeles, CA, United States	2014-03-21
Nader Karimi	Los Angeles, CA, United States	2014-03-21
Heidi Wasserman	Los Angeles, CA, United States	2014-03-21
Stella Pakravan	Los Angeles, CA, United States	2014-03-21
Emily Greenspan	Los Angeles, CA, United States	2014-03-21
Dan Garner	Los Angeles, CA, United States	2014-03-21
Antonia Chan-Goldsobel	Los Angeles, CA, United States	2014-03-21
Gina Brouman-Sacks	Los Angeles, CA, United States	2014-03-21
James Silber	Santa Monica, CA, United States	2014-03-21
Ira Stein	L.A. (Brentwood), CA, United States	2014-03-21
Richard Handel	Los Angeles, CA, United States	2014-03-21
Allan and Joan Burns	Los Angeles, CA, United States	2014-03-21



Name	Location	Date
Nicole Westheimer	Los Angeles, CA, United States	2014-03-21
Bitu & Jamal Kazemini	Bel air, CA, United States	2014-03-21
flor troconis	Los Angeles, CA, CA, United States	2014-03-21
Ashley Tanski	Random Lake, WI, United States	2014-03-21
Andrew Schmoller	Los Angeles, CA, United States	2014-03-21
Marilyn Staubitz	Los Angeles, CA, United States	2014-03-21
sanford gaynor	Los Angeles, CA, United States	2014-03-21
Anissa Knowlton	Santa Monica, CA, United States	2014-03-21
Hod Rubenstein	Los Angeles, CA, United States	2014-03-21
pamela alexander	los angeles, CA, United States	2014-03-21
anna rodd	Los Angeles, CA, United States	2014-03-21
Karen Murphy	Brentwood, CA, United States	2014-03-21
Frances Vincent	Pacific Palisades, CA, United States	2014-03-21
Peter Ettinger	los angeles, CA, United States	2014-03-21
sheila garb	Pacific Palisades, CA, United States	2014-03-21
Kira Chow	Los Angeles, CA, United States	2014-03-22
Lois Orfuss	Los Angeles, CA, United States	2014-03-22
Dr. Farshad David Yadegar	la, CA, United States	2014-03-22
Beth Wilson	Los Angeles, CA, United States	2014-03-22
bronya galef	los angeles, CA, United States	2014-03-22
Lori Soroko	LA, CA, United States	2014-03-22
Farnaz Yashar	los angeles, CA, United States	2014-03-22
Laurie Benenson	Santa monica, CA, United States	2014-03-22
Allan and Joan Burns	Los Angeles, CA, United States	2014-03-22
Connie Horak	LA, CA, United States	2014-03-22
bea ammidown	Santa Monica, CA, United States	2014-03-22
Dr. Rosalyn Bloch	Los Angeles, CA, United States	2014-03-23
Richard Bergman	Los Angeles, CA, United States	2014-03-23
Angella Bina	Los Angeles, CA, United States	2014-03-23
Gail Ellis	Los Angeles, CA, United States	2014-03-23
Paul First	Los Angeles, CA, United States	2014-03-23
Timothy Pennington	Los Angeles, CA, United States	2014-03-24

<b>Name</b>	<b>Location</b>	<b>Date</b>
charles rahban	Beverly Hills, CA, United States	2014-03-24
natasha rahban	beverly hills, CA, United States	2014-03-24
Gail Buchalter	Los Angeles, CA, United States	2014-03-24
Melissa Pennington	Los Angeles, CA, United States	2014-03-24
Stacia Thompson	Pacific Palisades, CA, United States	2014-03-24
Arlene Fink	Pacific Palisades, CA, United States	2014-03-24
jeanette clavin	LA, CA, United States	2014-03-24
Kathy Moghimi	Beverly Hills, CA, United States	2014-03-25
Rady Rahban	Beverly Hills, CA, United States	2014-03-25
Carl Orfuss	Los Angeles, CA, United States	2014-03-26
Diane Rosenthal	Los Angeles,, CA, United States	2014-03-26
Mitchell Hersch	Los Angeles, CA, United States	2014-03-26
Jacqueline Benyamini	Los Angeles, CA, United States	2014-03-27
Emily Waxman	Los Angeles, CA, United States	2014-03-27
Patty Fiden	Santa Monica, CA, United States	2014-03-27
Andrew Martino	Los Angeles, CA, United States	2014-03-27
Janet Pratt	Santa Monica, CA, United States	2014-03-27
Lauren Wilstein	Los Angeles, CA, United States	2014-03-27
Kaitlin Nickols	Los Angeles, CA, United States	2014-03-27
Alex Nickols	Norman, OK, United States	2014-03-27
Lloyd Ettinger	Los Angeles, CA, United States	2014-03-27
Nate Cordray	Los Angeles, CA, United States	2014-03-27
Nick Nickols	Los Angeles, CA, United States	2014-03-27
Steve Berg	Pasadena, CA, United States	2014-03-27
Cassandra Nickols	Los Angeles, CA, United States	2014-03-27
Barbara Seinfeld	Los Angeles, CA, United States	2014-03-27
Katherine Manolopoulos	Los Angeles, CA, United States	2014-03-27
Jessica Elbaum	los angeles, CA, United States	2014-03-27
Marilyn Ridley	Los Angeles, CA, United States	2014-03-27
Jane Marpet	Los Angeles, CA, United States	2014-03-27
Rebecca Foster	Santa Monica, CA, United States	2014-03-27
Greg Myer	Los Angeles, CA, United States	2014-03-27

<b>Name</b>	<b>Location</b>	<b>Date</b>
Lesley Barbour	Los Angele, CA, United States	2014-03-28
Marianne Talbot	Los Angeles, CA, United States	2014-03-28
David Offer	Los Angeles, CA, United States	2014-03-28
Howard Soroko	LA, CA, United States	2014-03-28
Ann Myer	Los Angeles, CA, United States	2014-03-28
Leslie Offer	Los Angeles, CA, United States	2014-03-28
Cristine Gillespie	Los Angeles, CA, United States	2014-03-28
Joel Schrier	Los Angeles, CA, United States	2014-03-29
Barbara McCoy	Los Angeles, CA, United States	2014-03-29
Gary Palmer	los angeles, CA, United States	2014-03-29
Unni Warrier	Los Angeles, CA, United States	2014-03-29
Jana Tether	Los Angeles, CA, United States	2014-03-29
Nikkole Nethery	St Amant, LA, United States	2014-03-30
sharon Yarden	Los angeles, CA, United States	2014-03-30
Jon Reiss	Los Angeles, CA, United States	2014-03-30
Helen Nickols	West Hills, CA, United States	2014-03-30
Doug Mirner	Los Angeles, CA, United States	2014-03-31
Richard Sternberg	Pacific Palisades, CA, United States	2014-03-31
Barbara Deming	Los Angeles, CA, United States	2014-03-31
Stephen Kuchenbecker Md	Los Angeles, CA, United States	2014-03-31
Martha Wells	Los angeles, CA, United States	2014-03-31
Jessica Wagner	Los Angeles, CA, United States	2014-03-31
Krista Levitan	Los Angeles, CA, United States	2014-03-31
Lori Ekstrom	Los Angeles, CA, United States	2014-03-31
Jay Ornellas	Los Angeles, CA, United States	2014-03-31
Patixia Kouba	Los Angeles, CA, United States	2014-03-31
Robert Waldorf	Los Angeles, CA, United States	2014-03-31
CYNTHIA MCROSKEY	LOS ANGELES, CA, United States	2014-03-31
william Tooley	Pacific Palisades, CA, United States	2014-04-01
Toby Waldorf	Los Angeles, CA, United States	2014-04-01
Freya Ivener	Los Angeles, CA, United States	2014-04-01
Sarah Piehl	LOS ANGELES, CA, United States	2014-04-01

<b>Name</b>	<b>Location</b>	<b>Date</b>
Lucy Strawburrow	De Moine, IA, United States	2014-04-01
Brenda Bacha	Santa Monica, CA, United States	2014-04-01
Kathleen McRoskey	Pacific Palisades, CA, United States	2014-04-01
Alex Bakhtiar	Los Angeles, CA, United States	2014-04-01
Joel Piehl	Los Angeles, CA, United States	2014-04-01
Sharon Piehl	Pacific Palisades, CA, United States	2014-04-01
Debra Hockemeyer	Los Angeles, CA, United States	2014-04-01
Janis Susskind	United States	2014-04-01
Phillip Blum	Los Angeles, CA, United States	2014-04-01
richard ziman	Los Angeles, CA, United States	2014-04-01
Maxine Robinson	Los Angeles, CA, United States	2014-04-01
Mary Snyder	LOS ANGELES, CA, United States	2014-04-01
Robyn Mandelberg	Los Angeles, CA, United States	2014-04-01
Margot Calabrese	Los angeles, CA, United States	2014-04-01
Charlene Baskin	Pacific Palisades, CA, United States	2014-04-01
Michael Woronoff	Los Angeles, CA, United States	2014-04-01
Linda Vitale	Los Angeles, CA, United States	2014-04-01
stacy Dalglish	Santa Monica, CA, United States	2014-04-01
Debra Oates	Brentwood, CA, United States	2014-04-01
Vicky Goodman	Santa Monica, CA, United States	2014-04-01
Carol Halperin	Los Angeles, CA, United States	2014-04-01
Joan Steier	Los Angeles, CA, United States	2014-04-02
Diedra Stark	Reseda, CA, United States	2014-04-02
Kerry Cullins	Kahului, HI, United States	2014-04-02
Christine Cooper	Los Angeles, CA, United States	2014-04-02
dan cappello	lawrence, PA, United States	2014-04-02
Cheryl Reis	Surprise, AZ, United States	2014-04-02
Judith Bedrosian	Los Angeles, CA, United States	2014-04-02
Nicholas Prychodko	Bridgehampton, NY, United States	2014-04-02
Michele Glaze	Garland, TX, United States	2014-04-02
Steven Cameron	Bohemia, NY, United States	2014-04-02
Linda Owen	Loveland, CO, United States	2014-04-02

<b>Name</b>	<b>Location</b>	<b>Date</b>
Janell Rose	Phoenix, AZ, United States	2014-04-02
krycia kurzyca	great barrington ma, MA, United States	2014-04-02
Michael Summers	Landers, CA, United States	2014-04-02
Eleanora Tevis	New York City, NY, United States	2014-04-02
Dolores Raffellini	Bronx, NY, United States	2014-04-02
Jennifer Schmick	Kill Buck, NY, United States	2014-04-02
Dylan McAlpin	pensacola, FL, United States	2014-04-02
Alex Harris	Los Angeles, CA, United States	2014-04-02
jason noel	new york, NY, United States	2014-04-02
Alice Corson	Locustville, VA, United States	2014-04-02
A. McGreevy	NY, NY, United States	2014-04-02
beth darlington	Poughkeepsie, NY, United States	2014-04-02
Carol Lawson	Jackson Height, NY, United States	2014-04-02
bruce cohen	worcester, MA, United States	2014-04-02
george donabed	milton, MA, United States	2014-04-02
Stephanie Rogers	maspeth, NY, United States	2014-04-02
William Briggs	Ferndale, CA, United States	2014-04-02
Margaret Eells	Auburn, MA, United States	2014-04-02
stephen blank	linwood, NJ, United States	2014-04-02
Chris Washington	New York, NY, United States	2014-04-02
Frank Stonis	Holiday, FL, United States	2014-04-02
Katherine Cooke	Brooklyn, NY, United States	2014-04-02
Maria Rial	Elmhurst, NY, United States	2014-04-02
Sharon McCardle	Las Cruces, NM, United States	2014-04-02
Elizabeth Kemper	Los Angeles, CA, United States	2014-04-02
malina butts	ny, NY, United States	2014-04-02
Kirk Stambler	Los Angeles, CA, United States	2014-04-02
Esther Garvett	Miami, FL, United States	2014-04-02
LeeAnn Hughes-Mastin	Nunda, NY, United States	2014-04-02
Sandy Tabin	saugerties, NY, United States	2014-04-02
Michelle John	New york, NY, United States	2014-04-02
Shirley Wallack	Santa Rosa, CA, United States	2014-04-02

<b>Name</b>	<b>Location</b>	<b>Date</b>
Tom Hilgartner	Institute, WV, United States	2014-04-02
Charles Campbell	Grayland, WA, United States	2014-04-02
aron shevis	brooklyn, NY, United States	2014-04-02
Danielle Colburn	Brooklyn, NY, United States	2014-04-02
Suzanne Young	Roslindale, MA, United States	2014-04-02
Andrew Arrabaca	Beacon, NY, United States	2014-04-02
Carole Iosee	Bridgehampton, NY, United States	2014-04-02
Debora Modra	Athens, NY, United States	2014-04-02
Shannon Lawrence	Milwaukee, WI, United States	2014-04-02
Virginia Walsh	Worcester, MA, United States	2014-04-02
Janet Berger	Los Angeles, CA, United States	2014-04-02
Deborah Baumann	Florida, NY, United States	2014-04-02
Janet Robinson	Boca Raton, FL, United States	2014-04-02
Alexander Podobas	Los Angeles, CA, United States	2014-04-02
leola spilbor	hyde park, NY, United States	2014-04-02
Patricia Calebrese	Stormville, NY, United States	2014-04-03
Alice Lewis	Pacific Palisades, CA, United States	2014-04-03
Jessie Cortez	willmar, MN, United States	2014-04-03
Astrid O'Brien	Bronx, NY, United States	2014-04-03
Barbara Reukauf	Lancaster, NY, United States	2014-04-03
Vicki Shulof	New Lebanon, NY, United States	2014-04-03
Lorena Bellolio	Quito, DE, United States	2014-04-03
Thea Sames	South Portland, ME, United States	2014-04-03
Amanda Goodpaster	Los Angeles, CA, United States	2014-04-03
Janis Totham-Davies	Takoma Park, MD, United States	2014-04-03
Tamar Shapiro-Tamir	Ithaca, NY, United States	2014-04-03
Patricia Orlinski	Sun City, AZ, United States	2014-04-03
Irvin Lopez	Long Beach, CA, United States	2014-04-03
Eric Bollens	Pacific Palisades, CA, United States	2014-04-03
Henry Bennett	Portland, OR, United States	2014-04-03
rosie pajmans	Australia	2014-04-03
karen schectman	Mt. Kisco, NY, United States	2014-04-03

Name	Location	Date
Shai-Dre Dillard	Lynn, MA, United States	2014-04-03
DivyaDarshan G.	VIJAYAWADA, IA, United States	2014-04-03
Edith Borie	Karlsruhe, Germany, NY, United States	2014-04-03
Sophie Kyriacou	Beacon, NY, United States	2014-04-03
Shane Stevens	Rochester, NY, United States	2014-04-03
Roger Raehl	Traverse City, MI, United States	2014-04-03
Maskin Vance	Lauderdale Lakes, FL, United States	2014-04-03
holly lindsay	albuquerque, NM, United States	2014-04-03
Carolyn Shults	Redmond, OR, United States	2014-04-03
Pat Bowen	bastrop, TX, United States	2014-04-03
robert knauber	cheektowaga, NY, United States	2014-04-03
John McRoskey	Los Angeles, CA, United States	2014-04-03
Elizabeth Schwartz	Ann Arbor, MI, United States	2014-04-03
Ryan Persad	Jamaica, NY, United States	2014-04-03
James Proie	Pittsburgh, PA, United States	2014-04-03
Mary Thomas	Richmond, CA, United States	2014-04-03
Evelyn Legare	Sumter, SC, United States	2014-04-03
JELLJACK CAMACHO	Manila, AL, United States	2014-04-03
Vince Mendieta	Austin, TX, United States	2014-04-03
M Freddie Reiss	Santa Monica, CA, United States	2014-04-03
David Rasmussen	Los Angeles, CA, United States	2014-04-03
MARIE MANHARDT	park ridge, IL, United States	2014-04-03
Charlene Zatloukal	Lincoln, NE, United States	2014-04-03
Kathleen Carr	Cedaredge, CO, United States	2014-04-03
Maica Belknap	Laguna Niguel, CA, United States	2014-04-04
Shirley Strang	Australia	2014-04-04
S Bryan	Burnsville, NC, United States	2014-04-04
Antonia Gutierrez	Fort Myers, FL, United States	2014-04-04
Adela Pickles	Los Angeles, CA, United States	2014-04-04
Marcia Caro	Madison Heights, VA, United States	2014-04-04
Sarah Baker	East Peoria, IL, United States	2014-04-04
Roberta Limoli-barufaldi	Burlington, MA, United States	2014-04-04

Name	Location	Date
Patrick M. Donovan	Brooklyn, NY, United States	2014-04-04
Susan Warner	Santa Ynez, CA, United States	2014-04-04
Laurie Sudol	Clarkdale, AZ, United States	2014-04-04
Herman Milligan	Minneapolis, MN, United States	2014-04-04
sogol rezvanpour	Los Angeles, CA, United States	2014-04-04
Mia Silverman	Santa Monica, CA, United States	2014-04-04
Colette Bronstein	Jupiter, FL, United States	2014-04-04
Elizabeth Campbell	Omaha, NE, United States	2014-04-04
HILKO D Wiersema	Berkel en Rodenrijs, AL, United States	2014-04-04
Sandra Stott	Waukesha, WI, United States	2014-04-04
George Hopkins	Charleston, SC, United States	2014-04-04
Alex Santiago	new york, NY, United States	2014-04-04
valerie field	los angeles, CA, United States	2014-04-04
pamela patterson	los angeles, CA, United States	2014-04-04
Aghdas Marashi	El Cerrito, CA, United States	2014-04-04
Janie Contreras	kyle, TX, United States	2014-04-04
Sandra K. Walker	Greensboro, NC, United States	2014-04-04
Sharyn Shubert	Naples, FL, United States	2014-04-04
Alan Field	Los Angeles, CA, United States	2014-04-04
Carla Kettner	Los Angeles, CA, United States	2014-04-04
Jane Davidson	Englewood, NJ, United States	2014-04-04
Ginger Hill	Lyman, SC, United States	2014-04-04
Ann Kates	Redondo Beach, CA, United States	2014-04-04
Ralph Famularo	Japan	2014-04-04
Frann Beg	Parker, CO, United States	2014-04-04
C Bradley	Hood River, OR, United States	2014-04-04
michael bane	hollywood, CA, United States	2014-04-04
Tom Freeman	Los Angeles, CA, United States	2014-04-04
michele king	port orchard, WA, United States	2014-04-04
Rena Kaplowitz	La Veta, CO, United States	2014-04-04
Sandy Elder	Whitby, CA, United States	2014-04-05
Graham MacGillivray	Los Angeles, CA, United States	2014-04-05



<b>Name</b>	<b>Location</b>	<b>Date</b>
Max Coll	Los Angeles, CA, United States	2014-04-05
Tyler Trfas	los angeles, CA, United States	2014-04-05
Ellyn Sutton	Simi Valley, CA, United States	2014-04-05
Ryan Ligon	Los Angeles, CA, United States	2014-04-05
Helen Porter	Phoenix, AZ, United States	2014-04-05
Lisa Cohen	Los Angeles, CA, United States	2014-04-05
elizabeth goldstone	haifa, ID, United States	2014-04-05
Jennifer Zielinski	New Providence, PA, United States	2014-04-05
Jeanne Peters	Lansdale, PA, United States	2014-04-05
Lee Michelsen	Stamford, CT, United States	2014-04-05
Shawn Milby	Kettering, OH, United States	2014-04-05
Aviva Rahmani	NYC, NY, United States	2014-04-05
clare hedin	glastonbury, AL, United States	2014-04-05
James Eaton	Westport, CT, United States	2014-04-05
Cecelia Assaf	Los Angeles, CA, United States	2014-04-05
Crystal Gehr	Van Nuys, CA, United States	2014-04-05
H. Guh	Addison, TX, United States	2014-04-05
Samantha Schoenberg	Beverly Hills, CA, United States	2014-04-05
Ellyn Sutton	S;pokane, WA, United States	2014-04-05
Karen Dippolito	Boca Raton, FL, United States	2014-04-05
Anne Pinkerton	Phoenixville, PA, United States	2014-04-05
Zofia Wright	Los Angeles, CA, United States	2014-04-05
Lucy Ralphs	Malibu, CA, United States	2014-04-05
Annie Cawley	Saint Joseph, MO, United States	2014-04-05
Kimberly Wiley	Rochester, NY, United States	2014-04-05
Marcia Balta	Massapequa, NY, United States	2014-04-06
Linda Wheeler	Potlatch, ID, United States	2014-04-06
Marsha Mikell	Mount Pleasant, SC, United States	2014-04-06
Derrick Chin	Torrington, CT, United States	2014-04-06
Karen Hatzia gelis	Astoria, NY, United States	2014-04-06
Venetta Politis	Whittier, CA, United States	2014-04-06
Freda Delaney	windsor, CA, United States	2014-04-06

<b>Name</b>	<b>Location</b>	<b>Date</b>
Sherquetta Ingram	Opelika, AL, United States	2014-04-06
No Nope	Nopesville, AL, United States	2014-04-06
Denise Jones	Windsor Mills, MD, United States	2014-04-06
Janette Gunn	Belleville, WI, United States	2014-04-06
Mark Hayduke 12810 N. Cave Creek Rd. #105	Phoenix, AZ, United States	2014-04-06
Donald Shaw	SYRACUSE, NY, United States	2014-04-06
Michael Shapiro	GOLETA, CA, United States	2014-04-06
Patricia Venegas paniagua	Glencross, SD, United States	2014-04-06
marybeth wilk	madison, WI, United States	2014-04-06
judy petrilla	san angelo, TX, United States	2014-04-06
Curtis and Jane Hoffman	Dallas, TX, United States	2014-04-06
KATHLEEN BOYD	WATERFORD, OH, United States	2014-04-06
Sandra Ellis	Bonita, CA, United States	2014-04-06
Patty Sherman	Tarzana, CA, United States	2014-04-06
sandi baker	emmett, ID, United States	2014-04-06
Patricia Moguel	Los Angeles, CA, United States	2014-04-06
Kelsey Raabe	Kent, OH, United States	2014-04-06
HERMAN FOUNTAIN	JACKSONVILLE, FL, United States	2014-04-06
ann lilje	tucson, AZ, United States	2014-04-06
Alejandra Morales	New Bern, NC, United States	2014-04-06
Kristy Sampler	Chattanooga, TN, United States	2014-04-06
Joseph Belcastro	Homer, AK, United States	2014-04-06
Michael Serota	Las Vegas, NV, United States	2014-04-06
Fred Fuchs	Pembroke Pines, FL, United States	2014-04-06
Krystian OSullivan	Buffalo, NY, United States	2014-04-06
Norma Cortes	san jose, CA, United States	2014-04-06
Stuart Thomas	Tucson, AZ, United States	2014-04-06
Elijah Ammazi	douglasville, GA, United States	2014-04-06
Laura Wilder	Garland, TX, United States	2014-04-06
sherry jones	wilmington, DE, United States	2014-04-06
Regenia Johnson	Wentzville, MO, United States	2014-04-06

Name	Location	Date
Blake Bentley	Pulaski, VA, United States	2014-04-06
Elysia Blackhart	Stansbury Park, UT, United States	2014-04-06
Kaitlin Dillon	Mesa, AZ, United States	2014-04-06
Greta Fitzpatrick	Belleville, IL, United States	2014-04-06
Kevin Davis	Cleveland, OH, United States	2014-04-06
Jess Duelfer	Allentown, PA, United States	2014-04-06
Debora Kay Taylor	Mt. Pleasant, UT, United States	2014-04-06
Bill Dell	Phoenix, AZ, United States	2014-04-06
Donna Heimlich	Sewell, NJ, United States	2014-04-06
marie rose	cc, CA, United States	2014-04-06
Valerie Cokley	Covington, KY, United States	2014-04-06
steve williams	I.a., CA, United States	2014-04-06
Kendsley Rodriguez	New York, NY, United States	2014-04-06
Simone Meeker	Helendale, CA, United States	2014-04-06
Francisco Diaz	Richmond, CA, United States	2014-04-06
Molly Muro	Placentia, CA, United States	2014-04-06
Maureen Fitzpatrick	Morris, CT, United States	2014-04-06
Julia Underwood	Ofallon, IL, United States	2014-04-06
Alex Aparicio	Fullerton, CA, United States	2014-04-06
Booh Edouardo	San Francisco, CA, United States	2014-04-06
chongjun Xu	San Jose, CA, United States	2014-04-06
Camille Roberts	Chicago, IL, United States	2014-04-06
Malka Essig	oakley, CA, United States	2014-04-06
jim mcnulty	cedar hill, MO, United States	2014-04-06
Cheng Lor	Elk mound, WI, United States	2014-04-06
Shelia Gamel	Mason, OH, United States	2014-04-06
stacy reid	nacogdoches, TX, United States	2014-04-06
STEVE MILLER	JASPER, AR, United States	2014-04-06
DEBRA MATHIS	MORGANTON, NC, United States	2014-04-06
NICOLE LITTLEJOHN	las vegas, NV, United States	2014-04-06
Teresa Littlepage	Burien, WA, United States	2014-04-06
Nancy Black	St. Charles, MO, United States	2014-04-06

<b>Name</b>	<b>Location</b>	<b>Date</b>
Amber Castle	Blacklick, OH, United States	2014-04-06
Allen Zhang	Lake Oswego, OR, United States	2014-04-06
Lyn Williams	Winter Haven, FL, United States	2014-04-06
Maggie Miller	Appleton, WI, United States	2014-04-06
Karen Murphy	Newport News, VA, United States	2014-04-06
G north	chattanooga, TN, United States	2014-04-06
Staci Nelson	Decatur, GA, United States	2014-04-06
Alex Baskin	Los Angeles, CA, United States	2014-04-06
Max Myers	LA, CA, United States	2014-04-06
Bobbie D. Flowers	New York, NY, United States	2014-04-06
Gilman Martin	Andover, CT, United States	2014-04-06
Juliet Ganpat	Richmond Hill, NY, United States	2014-04-06
Carmel de Bertaut	Morgan Hill, CA, United States	2014-04-06
Barbara Vieira	Staten Island, NY, United States	2014-04-06
Stephanie Snyder	Santa Monica, CA, United States	2014-04-06
Mary Bagnaschi	Torrington, CT, United States	2014-04-06
Louise Phanstiel	Los Angeles, CA, United States	2014-04-06
Phillip Shamas	Roswell, NM, United States	2014-04-06
Howard Phanstiel	Los Angeles, CA, United States	2014-04-06
Alan Lambert	Gibsonburg, OH, United States	2014-04-06
Cedric Stewart	Greenbelt, MD, United States	2014-04-06
Andrew&Rosemary Georganna	Titusville, FL, United States	2014-04-06
Yvonne Townsley	Louisburg, NC, United States	2014-04-06
Juliann Pinto	Philadelphia, PA, United States	2014-04-06
Sharon McCluskey	Sarasota, FL, United States	2014-04-06
Govindasamy Thirunavukkarasu	India	2014-04-06
Samantha Giesecke	Rockford, IL, United States	2014-04-06
robert dowling	santa monica, CA, United States	2014-04-06
Eve Rametta	Jersey City, NJ, United States	2014-04-06
sarah perez	Lake Odessa, MI, United States	2014-04-06
carol coons	redmond, OR, United States	2014-04-06
D C Harris	Tulsa, OK, United States	2014-04-06

Name	Location	Date
Sandie May Klag	Mead, CO, United States	2014-04-06
daniel Coughlin	chicago, IL, United States	2014-04-06
tracie greene	elizabethton, TN, United States	2014-04-06
JUDITH TALBOAT	WILMINGON, NC, United States	2014-04-06
Elisa Faulkner-Uriarte	Santa Maria, CA, United States	2014-04-06
Mark De Julio	Las Vegas, NV, United States	2014-04-06
Jan zollars	asheville, NY, United States	2014-04-06
Skyler Magers	Levelland, TX, United States	2014-04-06
L Henry	Stoneham, MA, United States	2014-04-06
Arnold Chasen	Santa Monica, CA, United States	2014-04-06
Yoshi-chan SuperHyuga	Douglasville, GA, United States	2014-04-06
charlene Boydston	Pahrump, NV, United States	2014-04-06
marianne flanagan	des plaines, IL, United States	2014-04-06
Noah Corlew	rome, AR, United States	2014-04-06
Linda Barnes	Daly City, CA, United States	2014-04-06
Steven Kaspar	Linden, NJ, United States	2014-04-06
Susan Hanlon	Manchester, NJ, United States	2014-04-06
monika mc comb	norco, CA, United States	2014-04-06
K.I. Rasmussen	Junction City, OR, United States	2014-04-06
joe and mary volpe	ventura, CA, United States	2014-04-06
Renee Harvey	Elgin, IL, United States	2014-04-06
alex petrosillo	Peabody, MA, United States	2014-04-06
debby morge	oak forest, IL, United States	2014-04-06
Frank Fredenburg	Milford, PA, United States	2014-04-06
agnieszka beletsky	East New Market, MD, United States	2014-04-06
Diane Bianchi	Put in Bay, OH, United States	2014-04-06
nick peterson	peabody, MA, United States	2014-04-06
SHAKEERAH ABDUL AL SABUUR	PENNDEL, PA, United States	2014-04-06
Travis Leverich	Haymarket, VA, United States	2014-04-06
mitchell albertz	mount calvary, WI, United States	2014-04-06
john smith	North Hollywood, CA, United States	2014-04-06

Name	Location	Date
Amine Moukrem	folcroft, PA, United States	2014-04-06
Angel Peri	New York, AL, United States	2014-04-06
Ilya Turov	Moreno Valley, CA, United States	2014-04-06
Laci Butler	Lakeland, FL, United States	2014-04-06
nicolette gascon	chicago, IL, United States	2014-04-06
becki anderson	Chugiak, AK, United States	2014-04-06
jay patel	Carol stream, IL, United States	2014-04-06
Oliver Goodridge	Charlottesville, VA, United States	2014-04-06
Lucas Yamashiro	Westwood, NJ, United States	2014-04-06
sade willer	townsville, TN, United States	2014-04-06
Kimberly Pettitt	Beaverton, OR, United States	2014-04-06
James Moreno	Mira Loma, CA, United States	2014-04-06
Despo Pullaro	Salem, OR, United States	2014-04-06
Rena Lee	Lansdale, PA, United States	2014-04-06
Mark McClary	bartonville, IL, United States	2014-04-06
James Ranstrom	Vashon, WA, United States	2014-04-06
Brad Jorgensen	Clinton, NJ, United States	2014-04-06
Suzanne Marcella Camarillo	Los Angeles, CA, United States	2014-04-06
Anne Taubman	Los Angeles, CA, United States	2014-04-06
L.J. Sand	Santa Monica, CA, United States	2014-04-06
Susan Wegleitner	Los Angeles, CA, United States	2014-04-06
Ann Lockie	Los Angeles, CA, United States	2014-04-07
Ilana Roofian	Los Angeles, CA, United States	2014-04-07
Michael Roofian	Los Angeles, CA, United States	2014-04-07
Katherine Sedgh	Los Angeles, CA, United States	2014-04-07
Kamran Hayem	Los Angeles, CA, United States	2014-04-07
Niloo Farhadian	Los Angeles, CA, United States	2014-04-07
Farshad Bostani	Los Angeles, CA, United States	2014-04-07
Bijan Afar	Los Angeles, CA, United States	2014-04-07
Benjamin Squire	Topanga, CA, United States	2014-04-07
firouzeh matian	los angeles, CA, United States	2014-04-07
farang javidzad	los angeles, CA, United States	2014-04-07

Name	Location	Date
Tiffany M	Los Angeles, CA, United States	2014-04-07
Fariba M	Los Angeles, CA, United States	2014-04-07
Simon Brookim	Los Angeles, CA, United States	2014-04-07
Camaran Komani	Los Angeles, CA, United States	2014-04-07
Doris Blum	Los Angeles, CA, United States	2014-04-07
Howard Walter	Los Angeles, CA, United States	2014-04-07
Justin Matian	la, CA, United States	2014-04-08
Daniel Lee	Los Angeles, CA, United States	2014-04-08
Leonard Schrage	Los Angeles, CA, United States	2014-04-08
Susan Landau	Los Angeles, CA, United States	2014-04-08
christian minaya	Lake Worth, FL, United States	2014-04-08
Isabel Merino	Miami, FL, United States	2014-04-08
elaine avdalas	new york, NY, United States	2014-04-08
Dean Thompson	Irving, TX, United States	2014-04-08
Ariel Hazi	Pacific Palisades, CA, United States	2014-04-08
Eileen Ward	lindenwold, NJ, United States	2014-04-08
Janet Hamilton	New York, NY, United States	2014-04-08
Skip Bleecker	Mt. Pleasant, MI, United States	2014-04-08
Shai Rodriquez	Absecon, NJ, United States	2014-04-08
Christian Oligo	Prontera, CA, United States	2014-04-08
Judy Buchsbaum	Philadelphia, PA, United States	2014-04-08
Brandon Barrett	Waldron, IN, United States	2014-04-08
judith mello	amsterdam, NY, United States	2014-04-08
teri attean-witham	Strafford, NH, United States	2014-04-08
Earnest G.H.W.B. Verdant	I.R.S.Verofy Beach, FL, United States	2014-04-08
sergio sanchez	Walnut, CA, United States	2014-04-08
samantha boensch	Mt. Pleasant, SC, United States	2014-04-08
Jaroslava Wilcox	Los Angeles, CA, United States	2014-04-08
Thomas Pilla	Los Angeles, CA, United States	2014-04-08
Cindy Wang	Los Angeles, CA, United States	2014-04-08
Nancy Stephens	LA, United Kingdom	2014-04-08
patris ilkani	los angeles, CA, United States	2014-04-08

<b>Name</b>	<b>Location</b>	<b>Date</b>
Lissa Chesnoff	Los Angeles, CA, United States	2014-04-08
Kevin Nikkhoo	Los Angeles, CA, United States	2014-04-08
Theodore Glaessner	Pacific Palisades, CA, United States	2014-04-09
Kathleen Flanagan	los angeles, CA, United States	2014-04-09
Aaron Lichtman	LA, CA, United States	2014-04-09
Eva Satori	Los Angeles, CA, United States	2014-04-09
Terme Hayempour	Los Angeles, CA, United States	2014-04-09
Nel Roofian	Los Angeles, CA, United States	2014-04-09
Dorothy Crawley	Los Angeles, CA, United States	2014-04-09
Bruce Rosenblum	Pacific Palisades, CA, United States	2014-04-09
james athas	goffstown, NH, United States	2014-04-10
ARMIDA LOPEZ	Yuma, AZ, United States	2014-04-10
Nicole Hillebrandt	Los Angeles, CA, United States	2014-04-10
Shelly Schrader	Los Angeles, CA, United States	2014-04-10
Frances FrainAguirre	Denver, CO, United States	2014-04-10
Ina Hillebrandt	Los Angeles, CA, United States	2014-04-10
Jay Jones	Upland, CA, United States	2014-04-10
Peter Singer	Sherman Oaks, CA, United States	2014-04-10
DMN 8TR	MIAMI, FL, United States	2014-04-10
Roberta Perell	Tomkins Cove, NY, United States	2014-04-10
Perry Johnson	Morton Grove, IL, United States	2014-04-10
Lisa Starr	Weston, FL, United States	2014-04-10
paipai aung	fort wayne, IN, United States	2014-04-10
Danielle DiThomas	Quincy, MA, United States	2014-04-10
Skylar Zhao	Chicago, IL, United States	2014-04-10
John Scofield	Coto de Caza, CA, United States	2014-04-10
Janell Hipwell	Los angeles, CA, United States	2014-04-10
john whitlock	palatka, FL, United States	2014-04-10
Lori Gasser	Hermitage, TN, United States	2014-04-10
michael sarabia	stockton, CA, United States	2014-04-10
Elaine Morita	Los Angeles, CA, United States	2014-04-10
Michael Scarchilli	Los Angeles, CA, United States	2014-04-10



<b>Name</b>	<b>Location</b>	<b>Date</b>
Adel Takacs	Los Angeles, CA, United States	2014-04-10
Linda Wolfe	Los Angeles, CA, United States	2014-04-10
Joyce Gale	Reseda, CA, United States	2014-04-11
Judy Mardis	Los Angeles,, CA, United States	2014-04-11
Traci Thornburg	Los Angeles, CA, United States	2014-04-11
Rita Rodef	la, CA, United States	2014-04-11
Amy Ziering	Los Angeles, CA, United States	2014-04-11
Marilyn Ziering	Beverly Hills, CA, United States	2014-04-11
angela foster	pineville, NC, United States	2014-04-11
Beth Walters	Mt. Pleasant, SC, United States	2014-04-11
Maria Divirgilio	Staten Island, NY, United States	2014-04-11
Sindi Linette	Potsdam, NY, United States	2014-04-11
nancy michaud	colchester, CT, United States	2014-04-11
Fred Wolfe	Los Angeles, CA, United States	2014-04-11
Andrea Edwards	Pomona, CA, United States	2014-04-11
Cynthia Stahl	Wilsonville, OR, United States	2014-04-11
Hal Kittredge	LA, CA, United States	2014-04-12
Gary Avrech	Los Angeles, CA, United States	2014-04-12
paulina bartczak	los angeles, CA, United States	2014-04-12
Michael Gale	Pacific Palisades, CA, United States	2014-04-12
William Coon	Los Angeles, CA, United States	2014-04-12
Juli Woronoff	Los Angeles, CA, United States	2014-04-12
Tina Gale	Pacific Palisades, CA, United States	2014-04-12
Fred Taber	Los Angeles, CA, United States	2014-04-12
dahlia bilger	los angeles, CA, United States	2014-04-13
Sharon Weiner	Los Angeles, CA, United States	2014-04-13
Barbara Rognlien	Los Angeles, CA, United States	2014-04-13
Janet Barnet	Los Angeles, CA, United States	2014-04-13
David Rognlien	Los Angeles, CA, United States	2014-04-13
David Lee	Santa Monica, CA, United States	2014-04-14
Linda & Ken Howard	Los Angeles, CA, United States	2014-04-14
Jeri Gaile	Pacific Palisades, CA, United States	2014-04-14

<b>Name</b>	<b>Location</b>	<b>Date</b>
Judd Apatow	Beverly Hills, CA, United States	2014-04-14
Wendy Klein	Los Angeles, CA, United States	2014-04-14
Mary Montclair	Los Angeles, CA, United States	2014-04-14
Bart Young	Pacific Palisades, CA, United States	2014-04-14
Sandra Rygel	LA, CA, United States	2014-04-14
Fred Stuart	Hermosa Beach, CA, United States	2014-04-14
Matthew Biren	West Los Angeles, CA, United States	2014-04-14
Dustin Biren	Los Angeles, CA, United States	2014-04-14
Dee. Dee Biren@aol.com	Los Angeles, CA, United States	2014-04-14
Joann L Smith	Los Angeles, CA, United States	2014-04-14
marc Katzman	bRentwood, CA, United States	2014-04-14
Alanna Geremia	Westlake Village, CA, United States	2014-04-14
Jan Davidson	Lompoc, CA, United States	2014-04-14
Danielle Collins	Los Angeles, CA, United States	2014-04-15
Andrea Mohr	Los Angeles, CA, United States	2014-04-15
Tina Sao	Beverly Hills, CA, United States	2014-04-15
Maya Schorer	Los Angeles, CA, United States	2014-04-15
Frances Galvon	Santa Monica, CA, United States	2014-04-15
Kristina Effenberger	Los Angeles, CA, United States	2014-04-16
Mary Fenstermacher	Los Angeles, CA, United States	2014-04-16
Laurel Ziegler	Los Angeles, CA, United States	2014-04-16
Renee Gingold	Los Angeles, CA, United States	2014-04-16
Larissa Percy	Los Angeles, CA, United States	2014-04-16
Steven Fields	Los Angeles, CA, United States	2014-04-16
Bethany Fields	Los Angeles, CA, United States	2014-04-16
Eden Romick	Los Angeles, CA, United States	2014-04-17
Julie Clark De Blasio	Los Angeles, CA, United States	2014-04-17
dogan ozkan	Fairbanks, AK, United States	2014-04-17
Sumana Raychaudhuri	New York, NY, United States	2014-04-17
Rhoda Levine	New York, NY, United States	2014-04-17
Judith Gilbert	New York, NY, United States	2014-04-17
Don Fisk	Laguna Hills, CA, United States	2014-04-17

Name	Location	Date
Emory Marler	Olivehurst, CA, United States	2014-04-17
stephen childers	omaha, NE, United States	2014-04-17
Dishanth kumar	hayward, CA, United States	2014-04-17
Karen Keating-Secular	Rego Park, NY, United States	2014-04-17
Kirk Bonin	San Francisco, CA, United States	2014-04-17
g beam	berkeley, CA, United States	2014-04-17
D R	New York, NY, United States	2014-04-17
KIM POWLES	EEEEEE, KS, United States	2014-04-17
Warren Harrington	Canton, OH, United States	2014-04-17
Haley Petersen	New York, NY, United States	2014-04-17
Lori Bryan	Durango, CO, United States	2014-04-17
Paul Thomason	New York, NY, United States	2014-04-17
timothy Beaver	CARY, NC, United States	2014-04-17
henny garfunkel	tucson, AZ, United States	2014-04-17
Frieda Patterson	Richmond Hill, NY, United States	2014-04-17
CATHY RAMOS	NEW YORK, NY, United States	2014-04-17
fuck face	fuckerville, LA, United States	2014-04-17
Daymeon Gartrell	Raleigh, NC, United States	2014-04-17
Harriet Smith	Florence, MA, United States	2014-04-17
Steven Kostis	New York, NY, United States	2014-04-17
Stephen DeMeo	New York, NY, United States	2014-04-17
Carmen Elliott	League City, TX, United States	2014-04-17
Tara Chambers	New York, NY, United States	2014-04-17
Erica Roman	Buford, GA, United States	2014-04-17
Jim and Molly Davis	Billings,, MT, United States	2014-04-17
sam smith	urbandale, IA, United States	2014-04-17
Sarah Sercombe	Royal Oak, MI, United States	2014-04-17
Kimberly Kay	Atlanta, GA, United States	2014-04-17
Nancy Carter	Beaumont, CA, United States	2014-04-17
Debbie Franzese	Bedford, NY, United States	2014-04-17
Sandra yadegar	los angeles, CA, United States	2014-04-18
Dianne Markman	Los Angeles, CA, United States	2014-04-18

<b>Name</b>	<b>Location</b>	<b>Date</b>
Helen Shoenfeld	Los Angeles, CA, United States	2014-04-18
Ellen Doeren	Los Angeles, CA, United States	2014-04-19
JOHN RICHARD YOUNG	East Norriton, MontCo., PA, United States	2014-04-19
Michael Koterba	Charlotte, NC, United States	2014-04-19
Erma Lewis	Brooklyn, NY, United States	2014-04-19
Adrian Landon	NY, NY, United States	2014-04-19
kathy alpagut	HANOVER PARK, IL, United States	2014-04-19
Hannah Yelin	Concord, MA, United States	2014-04-19
gloria von Sperling	New York, NY, United States	2014-04-19
Doria Whitlatch	Reynoldsburg, OH, United States	2014-04-19
Tracy Schafer	Willowbrook, IL, United States	2014-04-19
staci wade	columbus, OH, United States	2014-04-19
Star Night	West Columbia, SC, United States	2014-04-19
Nona Burnett	Robeline, LA, United States	2014-04-19
TRISTAN TABER	BANGOR, ME, United States	2014-04-19
neva kelley	anniston, AL, United States	2014-04-19
James's Crawford	Haiku-Pauwela, HI, United States	2014-04-19
Corinne Asher	Huntington Woods, MI, United States	2014-04-19
Timothy Paich	Flemington, NJ, United States	2014-04-19
Will Orman	Nashville, TN, United States	2014-04-19
Nicole Paul-Almand	Eureka, CA, United States	2014-04-19
Bill Tregoning	Cleveland, OH, United States	2014-04-19
Val Schmidt	Henderson, NV, United States	2014-04-19
Joanna Behrens	Star Valley Ranch, WY, United States	2014-04-19
Sarah Fajardo	Milwaukee, WI, United States	2014-04-19
hope ewing	norman, OK, United States	2014-04-19
Doug Bradford	Sun City, AZ, United States	2014-04-19
Sang Rc	Baytown, TX, United States	2014-04-19
Jerry Bolick	Lenoir, NC, United States	2014-04-19
Nancy H	Shelby Twp, MI, United States	2014-04-19
Paul Grohman	Yonkers, NY, United States	2014-04-19
Pedro Rodriguez	Miami, FL, United States	2014-04-19

Name	Location	Date
Guy Marco	Goitha, FL, United States	2014-04-19
Bonnie Kotz	Newberg, OR, United States	2014-04-19
Lois Melegari	Deerbrook, WI, United States	2014-04-19
Cecile Granstedt-Hallberg	Camp Verde, AZ, United States	2014-04-19
ernest tamura	port orchard, WA, United States	2014-04-19
GEORGE FLORES	PHOENIX, AZ, United States	2014-04-19
Michael Hale	Olive Branch, MS, United States	2014-04-19
mae friedman	los angeles, CA, United States	2014-04-19
Philip Colburn	Los Angeles, CA, United States	2014-04-20
Max Falamaki	Los Angeles, CA, United States	2014-04-20
Barbara Palmer	Los Angeles, CA, United States	2014-04-20
karyn millet	los angeles, CA, United States	2014-04-21
William Kun	Los Angeles, CA, United States	2014-04-21
Andrew Biren	Los Angeles, CA, United States	2014-04-21
Martine Vo	Pacific palisades, CA, United States	2014-04-21
Madeline Levine	Los Angeles, CA, United States	2014-04-21
Ba Nguyen	Pacific palisades, CA, United States	2014-04-21
Stephanie Richardson	Los Angeles, CA, United States	2014-04-21
Daniel Lin	Monterey Park, CA, United States	2014-04-21
Neda Safvati	Los Angeles, CA, United States	2014-04-21
Helen Tran	Pacific palisades, CA, United States	2014-04-21
Lauren Hejazi	los angeles, CA, United States	2014-04-21
Elisabeth Berkowitz	Los Angeles, CA, United States	2014-04-21
Hai Mai	Pacific palisades, CA, United States	2014-04-21
MARTIN gelber	los angeles, CA, United States	2014-04-21
Elinor Green	Los Angeles, CA, United States	2014-04-22
Robert & Jane Mandel	Los Angeles, CA, United States	2014-04-22
Alan Treves	LA, CA, United States	2014-04-22
Deborah Berman	Los Angeles, CA, United States	2014-04-22
dan jacobson	la, CA, United States	2014-04-22
Berta Zwang	Los Angeles, CA, United States	2014-04-22
Kevin Yamazaki	Los Angeles, CA, United States	2014-04-22

<b>Name</b>	<b>Location</b>	<b>Date</b>
Lani Yamazaki	Culver City, CA, United States	2014-04-22
Leslie Castanuela Barnes	Los Angeles, CA, United States	2014-04-22
Nathaniel Schier	Los Angeles, CA, United States	2014-04-22
Naomi Thorpe	Los Angeles, CA, United States	2014-04-22
jan silverman	los angeles, CA, United States	2014-04-22
Douglas Thorpe	LA, CA, United States	2014-04-22
Joelle Juillard	juillarducla@gmail.comLos Angeles, CA, United States	2014-04-22
Pat Lebel	Santa Monica, CA, United States	2014-04-22
Sharon Jacobson	Los Angeles, CA, United States	2014-04-23
Helen Schwarzkopf	Los Angeles, CA, United States	2014-04-23
Melanie Kaplan	Los Angeles, CA, United States	2014-04-23
Josh Kaplan	Los Angeles, CA, United States	2014-04-23
Jeni Grecnis	Brooklyn, NY, United States	2014-04-23
Doug and Jan Parker	Dolores, CO, United States	2014-04-23
Rosalie Salvato	Burbank, CA, United States	2014-04-23
Turner Simon	Deepwater, MO, United States	2014-04-23
Robin Peterson	Jacksonville, FL, United States	2014-04-23
Barbara Tomlinson	Seattle, WA, United States	2014-04-23
Peter Fleming	Georgetown, KY, United States	2014-04-23
Alicia Fry	Montgomery, AL, United States	2014-04-23
Don Scofield	Lago Vista, TX, United States	2014-04-23
Dorinda Rounsville	watertown, NY, United States	2014-04-23
Phil Logsdon	los angeles, CA, United States	2014-04-23
Calahan Miller	Encinitas, CA, United States	2014-04-23
Montez Powell	Monroe, LA, United States	2014-04-23
Frank Schultz	Thiells, NY, United States	2014-04-23
Linda Nicoletto	CorteMadera, CA, United States	2014-04-23
Ann Mackey	Glen Cove, L.I.C., NY, United States	2014-04-23
felix sifuentes	Siler City, NC, United States	2014-04-23
John Baskin	Pacific Palisades, CA, United States	2014-04-23
Paul Arrow	Los Angeles, CA, United States	2014-04-23

Name	Location	Date
Michael Kent	Los Angeles, CA, United States	2014-04-23
Ashley Kent	Venice, CA, United States	2014-04-23
Jonathan Hausman	Los Angeles, CA, United States	2014-04-23
Maruuja Lugash	Los Angeles, CA, United States	2014-04-23
Robert Gunn	Plano, TX, United States	2014-04-23
cameron burwell	denton, TX, United States	2014-04-23
Reggie jackson	conway, AR, United States	2014-04-23
Cristina Noland	Merrillville, IN, United States	2014-04-23
Neely Gunn	Florissant, MO, United States	2014-04-23
Bobbie Lowery	Jonesboro, LA, United States	2014-04-23
Annie Wu	forest hills, NY, United States	2014-04-23
juan rivers	kissimmee, FL, United States	2014-04-23
Michelle West	mesquite, NV, United States	2014-04-23
Cheryl Copelin	Tallahassee,, FL, United States	2014-04-23
Fanya Weinberger	Los Angeles, CA, United States	2014-04-23
Robert and Lillian Wintroub	Los Angeles, CA, United States	2014-04-24
Bridget Hedison	Beverly Hills, CA, United States	2014-04-24
Alistair Stevenson	Thousand Oaks, CA, United States	2014-04-24
Julie Waxman	Pacific Palisades, CA, United States	2014-04-24
Terri Stern	Los Angeles, CA, United States	2014-04-24
Daniel Krause	Calabasas, CA, United States	2014-04-24
Liz Hernandez	Montebello, CA, United States	2014-04-24
Ken Sleeper	Pacific Palisades, CA, United States	2014-04-24
hratch sarkis	los angeles, CA, United States	2014-04-24
Laura Salgues	Los Angeles, CA, United States	2014-04-24
Helga Sarkis	Los Angeles, CA, United States	2014-04-24
Christine Walsh	Glendora, CA, United States	2014-04-24
Robert Marshall	Simi Valley, CA, United States	2014-04-25
Mir Bahmanyar	Toronto, Canada	2014-04-25
Shriram Krishnan	Chengalpatti, TN, United States	2014-04-25
Beverly Harrington	San Francisco, CA, United States	2014-04-25
Rae Nelson	Tarboro, NC, United States	2014-04-25

<b>Name</b>	<b>Location</b>	<b>Date</b>
Shu Hu	Atlanta, GA, United States	2014-04-25
Andrea Henry	Waterford, CT, United States	2014-04-25
Susan Rosenson	Los Angeles, CA, United States	2014-04-25
Edward Rosenson	Los Angeles, CA, United States	2014-04-25
Dian Berger	Boise, ID, United States	2014-04-25
Britnae Garcia	North Syracuse, NY, United States	2014-04-25
isela trujillo	national city, CA, United States	2014-04-25
Dingus McGee	rialto, CA, United States	2014-04-25
Charles Bernstein	Topanga, CA, United States	2014-04-25
Rita Gattegno	Los Angeles, CA, United States	2014-04-25
alisa wright	Torrance, CA, United States	2014-04-26
Linda Rich	Los Angeles, CA, United States	2014-04-26
Heather Barrow	Moorpark, CA, United States	2014-04-26
Kirsten Blockhus	Los Angeles, CA, United States	2014-04-26
Bijan Vahhaji	Santa Monica, CA, United States	2014-04-26
donald shrum	san pedro, CA, United States	2014-04-26
Max Sartorio	, Italy	2014-04-26
Alex Gonzales	West Hollywood, CA, United States	2014-04-26
Manrique Barahona	Los Angeles, CA, United States	2014-04-26
Christian Medina	Los Angeles, CA, United States	2014-04-26
Kevin Horn	Long Beach, CA, United States	2014-04-26
Gyorgy Mezo	Los Angeles, CA, United States	2014-04-26
James D'Apollonia	New York, NY, United States	2014-04-26
JULIANNA BENEFIELD	CARY, NC, United States	2014-04-26
Cathie Serletic	San Francisco, CA, United States	2014-04-26
Joan McDougall	Albuquerque, NM, United States	2014-04-26
Herminio Flores, Ph. D.	Soledad, CA, United States	2014-04-26
Mark Powell	Tacoma, WA, United States	2014-04-26
annie cowling	danbury, CT, United States	2014-04-26
martha briseno	san Fernando, CA, United States	2014-04-26
Ray Feldpausch	Belleville, IL, United States	2014-04-26
Gina Rinetti	Daly City, CA, United States	2014-04-26



Name	Location	Date
donna r	parts unknwn, PA, United States	2014-04-26
Anuruddh Misra	SF, CA, United States	2014-04-26
Victoria Bruner	West Valley City, UT, United States	2014-04-26
Corvete Tajo	Corona, CA, United States	2014-04-26
Adrienne Moscato	Bayside, NY, United States	2014-04-26
Ramez Toubassy	Los Angeles, CA, United States	2014-04-27
William Fox	Sherman Oaks, CA, United States	2014-04-27
Ambereen Toubassy	Los Angeles, CA, United States	2014-04-27
Martina Gilbertson	Pomona, CA, United States	2014-04-27
alberto vera	Los Angeles, CA, United States	2014-04-27
Elena Phillips	Los Angeles, CA, United States	2014-04-27
Melissa Mack	Alameda, CA, United States	2014-04-28
Beth Moskowitz	Los Angeles, CA, United States	2014-04-28
Jason Manning	alameda, CA, United States	2014-04-28
Michael moskowitz	Los Angeles, CA, United States	2014-04-28
Sheri Fried	Los Angeles, CA, United States	2014-04-28
Paula Bernstein	Los Angeles, CA, United States	2014-04-28
Eric Kaufman	Los Angeles, CA, United States	2014-04-28
McKenna Grace Fisher	Portland, OR, United States	2014-04-28
Cynthia Crittenton	Simi Valley, CA, United States	2014-04-28
james simsek	sun city west, AZ, United States	2014-04-28
Bridgett Hollowell	San Diego, CA, United States	2014-04-28
Amanda Loose	Fairview, PA, United States	2014-04-28
candice rowland	Brentwood, TN, United States	2014-04-28
Diane Ethridge	Conroe, TX, United States	2014-04-28
Sherrie Sullivan	Bloomington, IN, United States	2014-04-28
Tracey Levy	Los Angeles, CA, United States	2014-04-28
Nadia aguirre	TN, TN, United States	2014-04-28
karen crouse	Port Townsend, WA, United States	2014-04-28
Bobby Pervez	Sugar Land, TX, United States	2014-04-28
Heidi kirby	seattle, WA, United States	2014-04-28
gail marsico	clearwater, FL, United States	2014-04-28

<b>Name</b>	<b>Location</b>	<b>Date</b>
Roxanne Becker	Longville, MN, United States	2014-04-28
Katie Serrano	Milwaukee, WI, United States	2014-04-28
lisa black	marrero, LA, United States	2014-04-28
Barbara Chase	Long Beach, CA, United States	2014-04-28
Wendy Roberts	Livermore, CA, United States	2014-04-28
Kathryn Foster	Columbus, OH, United States	2014-04-28
anneris cuevas	lehigh acres, FL, United States	2014-04-28
Cody Honeycutt	Johnson City, TN, United States	2014-04-28
Leanne Grasso	Warren, OR, United States	2014-04-28
KR Hecker	Los Angeles, CA, United States	2014-04-28
leah cooper	Chicago, IL, United States	2014-04-28
Elizabeth Nester	Las Vegas, NV, United States	2014-04-28
Gary Tenzer	Los Angeles, CA, United States	2014-04-28
Lois Wagner	EI Dorado Hills, CA, United States	2014-04-28
steve messina	daniels, MD, United States	2014-04-28
nancy morgan	Kingston, NY, United States	2014-04-28
Melissa Everett	Charlottesville, VA, United States	2014-04-28
Sally Cool	Henderson, NV, United States	2014-04-28
Marina Barnett	Los Angeles, CA, United States	2014-04-28
Tamar Spitzer	Brppklyn, NY, United States	2014-04-28
latrell weston-carroll	quincy, FL, United States	2014-04-28
Kim Gruber	Portsmouth, OH, United States	2014-04-28
Susie C.	Lincoln Park, MI, United States	2014-04-28
Kendall Witherspoon	Cedar Park, TX, United States	2014-04-28
Marcy Gamba	Vacaville, CA, United States	2014-04-28
Megan Carpenter	Waukon, IA, United States	2014-04-28
hasty saleh	tehran, IN, United States	2014-04-28
Brett Nelson	Cottonwood, AZ, United States	2014-04-28
Joanna Katsafouros	Lido Beach, NY, United States	2014-04-28
Sarah Scholar	Fresno, CA, United States	2014-04-28
Faye Hobley	coushatta, LA, United States	2014-04-28
Tammy Parker-Haas	Plant City, FL, United States	2014-04-28

Name	Location	Date
Chantal Dothey	Cleveland, OH, United States	2014-04-28
Gail Anderson	Riverside, RI, United States	2014-04-28
Eve Axelrad	Los Angeles, CA, United States	2014-04-28
Julie McDonald	Los Angeles, CA, United States	2014-04-28
Cheryl Tiano	Los Angeles, CA, United States	2014-04-28
Anne Mellor	United States	2014-04-28
sanford mendelson	los angeles, CA, United States	2014-04-28
David Clark	Los Angeles, CA, United States	2014-04-28
Robert Shamsi	Los Angeles, CA, United States	2014-04-28
Albert Shamsi	Los Angeles, CA, United States	2014-04-28
Parvaneh Shamsi	Los Angeles, CA, United States	2014-04-28
Rebecca Harper	Los Angeles, CA, United States	2014-04-28
madeline graham	los angeles, CA, United States	2014-04-28
Jackie Watson	BRADFORD, AR, United States	2014-04-28
Javier Rivera	Brooklyn, NY, United States	2014-04-28
Walter Kempton	Muskegon, MI, United States	2014-04-28
Lukas Gilmer	Friend, NE, United States	2014-04-28
Shana Halligan	Los Angeles, CA, United States	2014-04-28
Marybeth kszystyniak-Hamblen	Port Angeles, WA, United States	2014-04-28
Jane Chischilly	Bisbee, AZ, United States	2014-04-28
Marva Fiffie	Destrehan, LA, United States	2014-04-28
eddie jackson	hoffman estates, IL, United States	2014-04-28
Lynn Elliott	Durham, NC, United States	2014-04-28
lucy osinski	pittsburgh, PA, United States	2014-04-28
Maria Soriano	Ashland, OR, United States	2014-04-28
yolanda figueroa	tampa, FL, United States	2014-04-28
Michele Lewis	Los Angeles, CA, United States	2014-04-28
Alexandra Novak	Galesville, MD, United States	2014-04-28
Crystal Hayman	Providence, RI, United States	2014-04-28
Lisa Villa	Los Angeles, CA, United States	2014-04-28
Akeala Johnson	Los Angeles, CA, United States	2014-04-28
Thea Koury	Keller, TX, United States	2014-04-28

<b>Name</b>	<b>Location</b>	<b>Date</b>
Jenny Melgar	Los Angeles, CA, United States	2014-04-28
Todd Snyder	San Francisco, CA, United States	2014-04-28
Paige Ray	Anderson, CA, United States	2014-04-28
Amber Rodriguez	Pico Rivera, CA, United States	2014-04-28
Amy Lev i	Tiburon, CA, United States	2014-04-28
Rebeka Garcia	Los Angeles, CA, United States	2014-04-28
Paul Riska	Danbury, CT, United States	2014-04-28
Justin Chan	Rancho Cucamonga, CA, United States	2014-04-28
Denise Santiago	Los Angeles, CA, United States	2014-04-28
Gregory Brown	San Francisco, CA, United States	2014-04-28
Rossana Otero	Baldwin Park, CA, United States	2014-04-28
Amir Siassi	Los Angeles, CA, United States	2014-04-28
JIM BROWN	LOS ANGELES, CA, United States	2014-04-28
Dominga Robinson	Quincy, FL, United States	2014-04-28
Stacey Mcgee	Los angeles, CA, United States	2014-04-28
Stacy Schulman	Los Angeles, CA, United States	2014-04-28
Melissa Smith	Lutz, FL, United States	2014-04-28
Rachel Rogers	Muncie, IN, United States	2014-04-28
pooper mooper	poopooland, AK, United States	2014-04-28
Lilly Deerin	Washington DC, DC, United States	2014-04-28
vera leblanc	irvine, CA, United States	2014-04-28
Alan Finkel	Santa Monica, CA, United States	2014-04-28
Ronald Mellor	United States	2014-04-28
Meredith Salenger	Los Angeles, CA, United States	2014-04-28
Sohrab Elyasi	Los Angeles, CA, United States	2014-04-28
Patricia Ganz	Los Angeles, CA, United States	2014-04-28
kian zarrinam	Los Angeles, CA, United States	2014-04-28
Elizabeth Freitas	Los Angeles, CA, United States	2014-04-28
aliza nikayin	la, CA, United States	2014-04-28
Behzad Kianmahd	Los Angeles, CA, United States	2014-04-28
David Brown	L. A., CA, United States	2014-04-28
Suzanne Bunzel	L.A., CA, United States	2014-04-28

<b>Name</b>	<b>Location</b>	<b>Date</b>
Judy Holston	Los Angeles, CA, United States	2014-04-28
Susan Stockel	Los Angeles, CA, United States	2014-04-28
Minerva Bouttier	Los Angeles, CA, United States	2014-04-28
Stephen Reese	Chicago, IL, United States	2014-04-28
Shawn Matian	Los Angeles, CA, United States	2014-04-28
Wendy Ruby	Los Angeles,, CA, United States	2014-04-28
Brigitta Troy	Los Angeles, CA, United States	2014-04-28
Lenora Kelton	L.A., CA, United States	2014-04-28
Deborah Brown	Los Angeles, CA, United States	2014-04-28
Joyce Kidd	Beverly Hills, CA, United States	2014-04-28
John Weissenbach	Los Angeles, CA, United States	2014-04-28
Vivian Pine	Los Angeles, CA, United States	2014-04-28
Michael Curtis	Fruitport, MI, United States	2014-04-28
Antonieta Weld	kennesaw, GA, United States	2014-04-28
Eric Vosburgh	olean, NY, United States	2014-04-28
D W	Lakewood, WA, United States	2014-04-28
kevin schouweiler	Missoula, MT, United States	2014-04-28
sonia scheideman	Los Angeles, CA, United States	2014-04-28
SIDNE ERDOSI	los angeles, CA, United States	2014-04-28
Leonard Kolod	Los Angeles, CA, United States	2014-04-28
jane Bard	Los Angeles, CA, United States	2014-04-28
Sharon Hersch	Los Angeles, CA, United States	2014-04-28
Hilary Garland	Los Angeles, CA, United States	2014-04-28
Ann Colfax	Los Angeles, CA, United States	2014-04-28
Thomas Roley	Los angeles, CA, United States	2014-04-28
Dottie Lewis	Los Angeles, CA, United States	2014-04-28
Frosene Maniatis	Danville, CA, United States	2014-04-29
Gerald Adomian	Los Angeles, CA, United States	2014-04-29
Charles Cale	Los Angeles, CA, United States	2014-04-29
Gabrielle Davis	la, CA, United States	2014-04-29
Franklin Gerechter	Los Angeles, CA, United States	2014-04-29
Stephen Sebolsky	Los Angeles, CA, United States	2014-04-29

<b>Name</b>	<b>Location</b>	<b>Date</b>
Bob Bouttier	Los Angeles, CA, United States	2014-04-29
maria vidal	Loas Angeles, CA, United States	2014-04-29
Deborah Kerly	Istanbul, Turkey	2014-04-29
Bruce Levine	Los Angeles, CA, United States	2014-04-29
Angela Yasharel	los angeels, CA, United States	2014-04-29
Eileen Hinkes	Los Angeles, CA, United States	2014-04-29
harold clavin	los angeles, CA, United States	2014-04-29
Joan Lewis	La, CA, United States	2014-04-29
Amy Sweeney	Los Angeles, CA, United States	2014-04-29
Harvey Flax	Los Angeles, CA, United States	2014-04-29
Linda Covette	Los Angeles, CA, United States	2014-04-29
Tracy Yadegar	Los Angeles, CA, United States	2014-04-29
Jamie Rosenblood	Los Angeles, CA, United States	2014-04-29
sal agnello	Centerport, NY, United States	2014-04-29

# SEVEN ARROWS ELEMENTARY SCHOOL™

Passionate Learners, Compassionate Leaders

March 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 19 2014

RE: ENV-2011-2689-EIR  
Support for Archer Forward

ENVIRONMENTAL  
UNIT

Dear Mr. Villani,

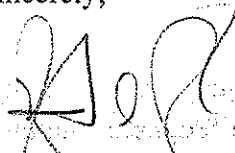
As the Head of School at Seven Arrows Elementary School in the Pacific Palisades, I am writing to request your support for the campus improvement plan of The Archer School for Girls. We share their belief that independent schools play a pivotal role in the education movement here in Los Angeles.

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.

Sincerely,



Margarita Pagliani  
Head of School

Seven Arrows Elementary School

15240 La Cruz Drive, Pacific Palisades, California 90272  
Telephone 310/230-0257 Facsimile 310/230-7725  
E-mail [schoolinfo@sevenarrows.org](mailto:schoolinfo@sevenarrows.org) [www.sevenarrows.org](http://www.sevenarrows.org)





Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

---

Joanna Lee <jlee@sjsla.org>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Mon, Mar 17, 2014 at 11:43 AM

RE: ENV-2011-2689-EIR

Dear Adam Villani,

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

Joanna Lee  
Administrative Assistant  
St. James' Episcopal School  
jlee@sjsla.org

---

 **Support for Archer Forward.pdf**  
43K

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Adam Villani <adam.villani@lacity.org>  
To: Joanna Lee <jlee@sjsla.org>

Wed, Mar 19, 2014 at 10:47 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

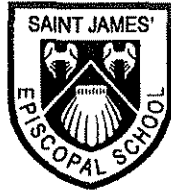
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[Quoted text hidden]

Joanna Lee  
Administrative Assistant  
St. James' Episcopal School  
jlee@sjsla.org



—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



March 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

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 21<sup>st</sup> 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.

Sincerely,

A handwritten signature in cursive script that reads "Deborah David". The signature is written in black ink and is followed by a horizontal line.

Deborah David  
Head of School  
Saint James' Episcopal Day School



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**Stuart Work** <swork@stmatthewsschool.com>

Sun, Mar 16, 2014 at 3:27 PM

To: Adam.Villani@lacity.org

Cc: Councilmember Bonin &lt;councilmember.bonin@lacity.org&gt;

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

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.

Sincerely,

Stu Work  
Head of School  
St. Matthew's Parish School

1031 Bienvenida Ave.

Pacific Palisades, CA 90272

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**Adam Villani** <adam.villani@lacity.org>

Wed, Mar 19, 2014 at 10:47 AM

To: Stuart Work &lt;swork@stmatthewsschool.com&gt;

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will

4/24/2014

City of Los Angeles Mail - Support for Archer Forward

address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer Forward DEIR (ENV-2011-2689-EIR)**

2 messages

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**Beverly Grossman Palmer** <bpalmer@strumwooch.com>

Tue, Apr 29, 2014 at 12:27 PM

To: "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;, "tricia.keane@lacity.org" &lt;tricia.keane@lacity.org&gt;

Dear Mr. Villani,

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.

Thank you,

Beverly Grossman Palmer

Strumwasser &amp; Woocher LLP

10940 Wilshire Boulevard, Suite 2000

Los Angeles, CA 90024

T: 310-576-1233

F: 310-319-0156

bpalmer@strumwooch.com

**Archer Comment Letter FINAL 140429.pdf**

10140K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:10 PM

To: Beverly Grossman Palmer &lt;bpalmer@strumwooch.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to

the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
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STRUMWASSER & WOOCHELLP

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FREDRIC D. WOOCHELLP  
MICHAEL J. STRUMWASSER  
GREGORY G. LUKE †‡  
BRYCE A. GEE  
BEVERLY GROSSMAN PALMER  
RACHEL A. DEUTSCH  
PATRICIA T. PEI  
ADRIENNA WONG

† Also admitted to practice in New York

‡ Also admitted to practice in Massachusetts

April 29, 2014

Via personal delivery and email

Adam Villani  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, California 90012  
Email: [adam.villani@lacity.org](mailto:adam.villani@lacity.org)

RE: Archer Forward DEIR Comments (ENV-2011-2689-EIR)

Dear Mr. Villani,

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.

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.

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.

#### **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 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.

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.

**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.

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.

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.

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.

**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.

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.<sup>1</sup> 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 Chaparral 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.)

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

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<sup>1</sup> 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.

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.

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.

**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 Unmitigable 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 an 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."<sup>2</sup> 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.

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.

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

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<sup>2</sup> 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.

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.

**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. 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.

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.

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. 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<sup>3</sup>. 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.

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.) 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

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<sup>3</sup> 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.

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. 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.

**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. 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. 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.

**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.

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 historic Main Building, creates a unified campus, and enhances open space by placing parking underground. (See DEIR IV H-46-49.)

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.

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.

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 on 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.

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. 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. School construction and operation on residentially-zoned 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.

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. 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.

## 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.)

**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.)

**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.4<sup>th</sup> 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 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.

**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.

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.

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.

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.
- “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 constrain[t]s 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.

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.

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. 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 project<sup>4</sup>, a true analysis of whether Alternative 4 (or other reduced alternatives) would satisfy the "basic objectives" of the project is a requirement under CEQA. 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.

### **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

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<sup>4</sup> 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.



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.

	Athletics off campus	# of Gyms	Acres	Year Founded	# of Students
<b>Crossroads</b>	yes	1	15	1971	746
<b>Marlborough School</b>	yes	1	4	1889	530
<b>Sierra Canyon</b>	yes	1	37	1978	531
<b>Archer School for Girls</b>	yes	0	6.2	1995	460
<b>Marymount High School</b>	yes	1	5.5	1923	375
<b>Windward School</b>	yes	1	9.5	1971	550

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.

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.4<sup>th</sup> 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.

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.

#### 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)(1)-(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, 131 [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

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augment and improve the analysis and discussion of many issues inadequately discussed in this DEIR.

## 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. 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. 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. 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.

Sincerely,



Beverly Grossman Palmer

cc: Councilmember Mike Bonin (email and personal delivery)  
Tricia Keane (email only)

# **EXHIBIT A**

# Tom Brohard and Associates

April 25, 2014

Ms. Beverly G. Palmer, Attorney at Law  
Strumwasser & Woocher LLP  
10940 Wilshire Boulevard, Suite 2000  
Los Angeles CA 90024

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

Dear Ms. Palmer:

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:

- Section II – Project Description
- Section IV.K – Traffic, Access, and Parking
- Section V – Alternatives
- Appendix P
  - Appendix P.1 – Transportation Analysis Report
  - Appendix P.2 – LADOT Assessment Letter
  - Appendix P.3 – Construction Traffic Analysis

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

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.

### 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.

### 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.

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.

- 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. 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).

- 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.

- 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.

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.

- 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 gridlocked 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 spill over 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

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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.

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 4 ½ 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).

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).

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).

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. 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.

- 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.

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.

- 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 Chaparral 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 Chaparral 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.

- 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.
  - 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.
  - 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.
- 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.
- 9) Chaparral Street Significant Impacts During Construction Require Mitigation – Chaparral 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 Chaparral 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 Chaparral Street driveway during construction of the Performing Arts Center, and then all construction traffic

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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.

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.

The DEIR then reanalyzes construction traffic in the neighborhood assuming that completion of the I-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”, and must be mitigated.

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

- 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.

- 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

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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.

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.

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.

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-43 on Page 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.



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.

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.

- 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

Ms. Beverly G. Palmer  
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April 25, 2014

weddings and private parties) must also be considered to limit the number of days when significant traffic impacts are forecast to occur.

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.

Respectfully submitted,

Tom Brohard and Associates



Tom Brohard, PE  
Principal



Enclosures

Resume

Set #1 Traffic Photos – Eastbound Queuing on Chaparal Street

Set #2 Traffic Photos – Eastbound Queuing on Sunset Boulevard

Set #3 Traffic Photos – Busses Exiting Archer School at Dismissal

## Tom Brohard, PE

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- 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:

- o Bellflower..... 1997 - 1998
- o Bell Gardens..... 1982 - 1995
- o Huntington Beach..... 1998 - 2004
- o Lawndale..... 1973 - 1978
- o Los Alamitos..... 1981 - 1982
- o Oceanside..... 1981 - 1982
- o Paramount..... 1982 - 1988
- o Rancho Palos Verdes..... 1973 - 1978
- o Rolling Hills..... 1973 - 1978, 1985 - 1993
- o Rolling Hills Estates..... 1973 - 1978, 1984 - 1991
- o San Marcos..... 1981
- o Santa Ana..... 1978 - 1981
- o 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.

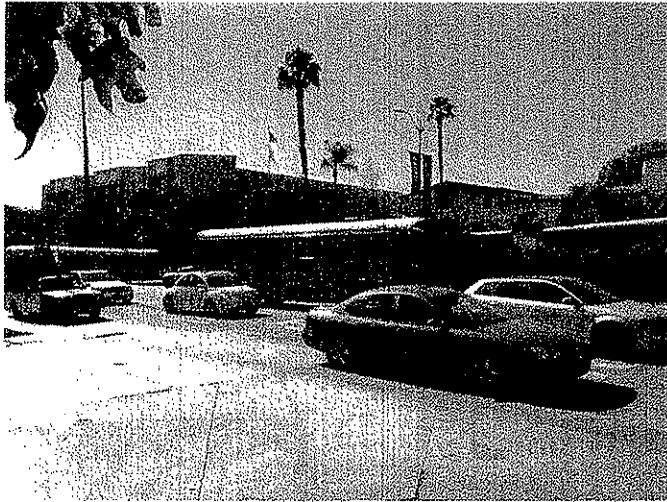


Chaparral is a narrow street and queuing traffic during PM peak hour is not uncommon. Taken 3:21 pm, Oct. 27, 2011.



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

**SET #1 TRAFFIC PHOTOS**



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.

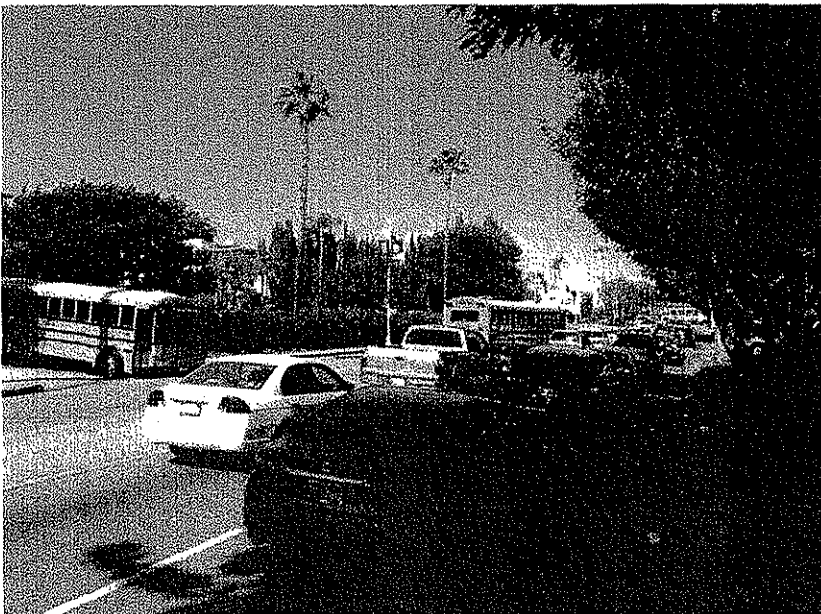


Southbound traffic on Barrington turning eastbound to Sunset.

**SET #2 TRAFFIC PHOTOS**



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

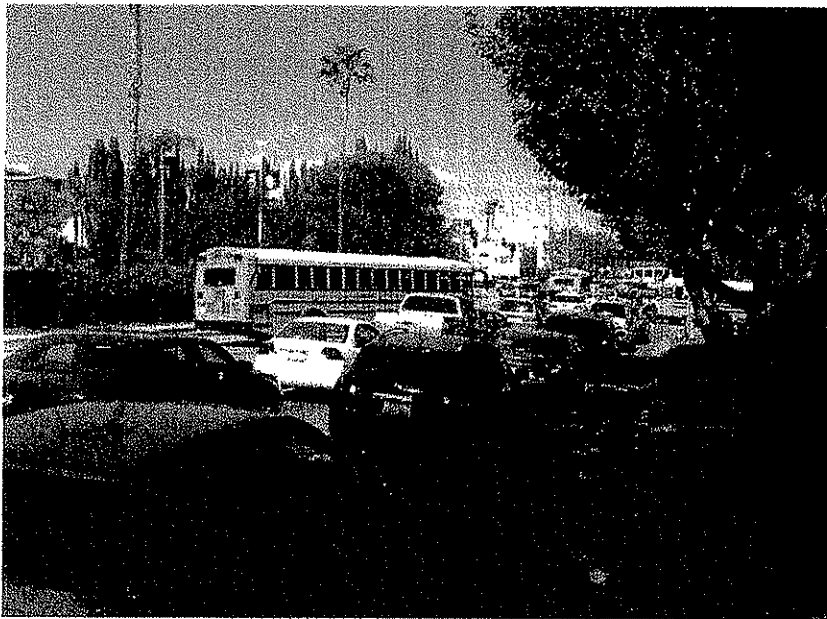


Bus departing Archer, attempting to turn onto eastbound Sunset. Taken 3:21 pm, March 12, 2014.

**SET #3 TRAFFIC PHOTOS**



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.

### SET #3 TRAFFIC PHOTOS



# **EXHIBIT B**



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28 April 2014

Beverly Grossman Palmer, Esq.  
Strumwasser & Woocher, LLP  
10940 Wilshire Boulevard, Suite 2000  
Los Angeles, California 90024

Subject: Archer Forward DEIR Review – Noise Section  
Case Number: ENV-2011-2689-EIR  
State Clearinghouse Number: 2012011001

Dear Ms. Palmer,

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.I 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.

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 21002.1(a)]. 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.

## 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)
- *Duration of the sound event*
- *Number of event occurrences, repetitiveness, and intermittency*
- Time of day the event occurs.

[DEIR, Appendix N, p. 5, *emphasis added*]<sup>1</sup>

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<sup>1</sup> 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]

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.

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 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?

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.

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.

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**

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

**Extracurricular Activities**

Buildings	Current	7A – 6P	None	Note 1
	Proposed	7A – 10P	7A – 6P	
	<b>Increase</b>	<b>4 evening hours</b>	<b>New 11 hour use</b>	
Fields	Current	6P – 7P	None	Note 1
	Proposed	6P – 8P	7A – 6P	
	<b>Increase</b>	<b>1 hour in evening</b>	<b>New 11 hour use</b>	
Aquatics	Current	Does not exist	Does not exist	
	Proposed	7A – 8P	7A – 6P	
	<b>Increase</b>	<b>New 13 hour use</b>	<b>New 8 hour use</b>	

**Customary School Activities**

Buildings	Current	7A – 9P	Not allowed	
	Proposed	7A – 10P	7A – 6P	
	<b>Increase</b>	<b>1 evening hour</b>	<b>New 11 hour use</b>	

## Notes:

1. The current usage reflects the actual conditions experienced by residents in the past.

**TABLE II INCREASE IN EVENT USAGE**

		Mon- Fri	Sat	
Special Events (School Functions)	Current	31	15	Chart does not reflect Sunday usage, currently at one event per year, but use permitted every Sunday from 12PM to 7PM under Archer Forward.
	Proposed	98		
	<b>Increase</b>	<b>52 Events</b>		
Athletics, Outdoors	Current	39 Games		Currently softball, soccer, volleyball, and basketball are outside. Proposal would move basketball inside, and add aquatics and field hockey outside.
	Proposed	100 Games		
	<b>Increase</b>	<b>61 Games</b>		
Community Use	Current	0		Community use would be allowed for Aquatics Center, Multipurpose, and other buildings, but not fields.
	Proposed	24		
	<b>Increase</b>	<b>24 Events</b>		
Rental Use	Current	0		Club athletics, weddings, and private parties.
	Proposed	24		
	<b>Increase</b>	<b>24 Events</b>		
Summer Camps (Days of use)	Current	0	0	
	Proposed	30	0	
	<b>Increase</b>	<b>30 d</b>	None	

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.

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.

### **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-I-30].

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.

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 III Summary of Soccer/Field Hockey Noise Impact Analyses

	M-F 3P – 6P	M-F 6P – 8P	Saturday
Lowest Measured $L_{eq}$	51	50	47
Existing Sport $L_{eq}$	61	N/A	N/A
Future Sport $L_{eq}$	59	59	59
Baseline for Assessment	Existing	Measured	Measured
Increase Over Baseline	-2	9	12
Impact?	No	Yes	Yes
Existing Sport $L_{max}$	70	N/A	N/A
Future Sport $L_{max}$	70	70	70
Baseline for Assessment	Existing	Measured	Measured
Increase Over Baseline	0	20	23
Impact?	No	Yes	Yes

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.



## 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". [DEIR at p. IV.I-83. 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.

## 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.

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". 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". [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.

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". Under this oft-cited perception rule of thumb, 20 dB would be considered "four-times as loud", 30 dB as "eight-times as loud", 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". 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 1 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*.<sup>2</sup> 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.

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-

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<sup>2</sup> Harris, Cyril M., *Handbook of Noise Control*, 2d ed., McGraw Hill, New York, 1979. See Chapter 14 (Effects of Noise on Speech Communications), p. 14-5.

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.

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 Eastern 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.

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.

## 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.

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.

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) . . .<sup>3</sup>

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.

\* \* \* \* \*

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.

Very truly yours,

WILSON, IHRIG & ASSOCIATES, INC.



Derek L. Watry  
Principal

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<sup>3</sup> Harris, Cyril M., *Handbook of Noise Control*, 2d ed., McGraw Hill, New York, 1979. See Chapter 3 (Sound Propagation in the Open Air), p. 3-8.

TABLE IV-A SUMMARY OF CONSTRUCTION NOISE IMPACTS

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

TABLE IV-A SUMMARY OF CONSTRUCTION NOISE IMPACTS (CONTINUED)

DEIR Table No. ‡	Analyzes	Sig Imp w/o Mit?	Sig Imp w/ Mit?	Remaining Noise Level/Exceedance		
				Highest (dBA)	dB Over Existing	Est. No. of Residences Impacted
24	Worst-Case Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Sunday	Yes	No Mit	63	8	TNM
25	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.	No	N/A			TNM
30	Construction Noise Levels Under Accelerated Construction Schedule	Yes	Yes	97	39	19
31	Temporary Classroom Village Noise Levels Under Accelerated Construction Schedule	No	N/A			N/A
32	Worst-Case Accelerated Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Weekday	Yes	No Mit	57	6	TNM
33	Worst-Case Accelerated Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Saturday	Yes	No Mit	63	6	TNM
34	Worst-Case Accelerated Off-Site Construction Noise Levels as Compared to Lowest Measured Hourly Ambient—Sunday	Yes	No Mit	63	8	TNM

‡ 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

DEIR Table No. ‡	Analyzes	Sig Imp?	Remaining Noise Level/Exceedance		
			Highest (dBA)	dB Over Existing	Est. No. of Residences Impacted
36	Leq Noise Levels during Weekday Softball Activities: 3 P.M.–6 P.M. (2-Hour Event Duration)	No (Note 1)			
37	Maximum Noise Levels during Weekday Softball Activities: 3 P.M.–6 P.M. (2-Hour Event Duration)	Yes (Note 2)	71	13	7
38	Leq Noise Levels during Weekday Softball Activities: 6 P.M.–8 P.M. (2-Hour Event Duration)	Yes	49	6	1
39	Maximum Noise Levels during Weekday Softball Activities: 6 P.M.–8 P.M. (2-Hour Event Duration)	Yes	71	28	7
40	Leq Noise Levels during Softball Activities: Saturday (2-Hour Event Duration)	No			
41	Maximum Noise Levels during Softball Activities: Saturday (2-Hour Event Duration)	Yes	71	26	10
42	Leq Noise Levels during Weekday Soccer/Field Hockey Activity: 3 P.M.–6 P.M. (2-Hour Event Duration)	No (Note 1)			
43	Maximum (Lmax) Noise Levels during Weekday Soccer/Field Hockey Activity: 3 P.M.–6 P.M. (2-Hour Event Duration)	No (Note 1)			
44	Leq Noise Levels during Weekday Soccer/Field Hockey Activity: 6 P.M.–8 P.M. (2-Hour Soccer Event Duration)	Yes	54	11	5
45	Maximum (Lmax) Noise Levels during Weekday Soccer/Field Hockey Activity: 6 P.M.–8 P.M. (2-Hour Event Duration)	Yes	65	22	10



TABLE IV-B SUMMARY OF OUTDOOR SPORTS NOISE IMPACTS (CONTINUED)

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

‡ 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.

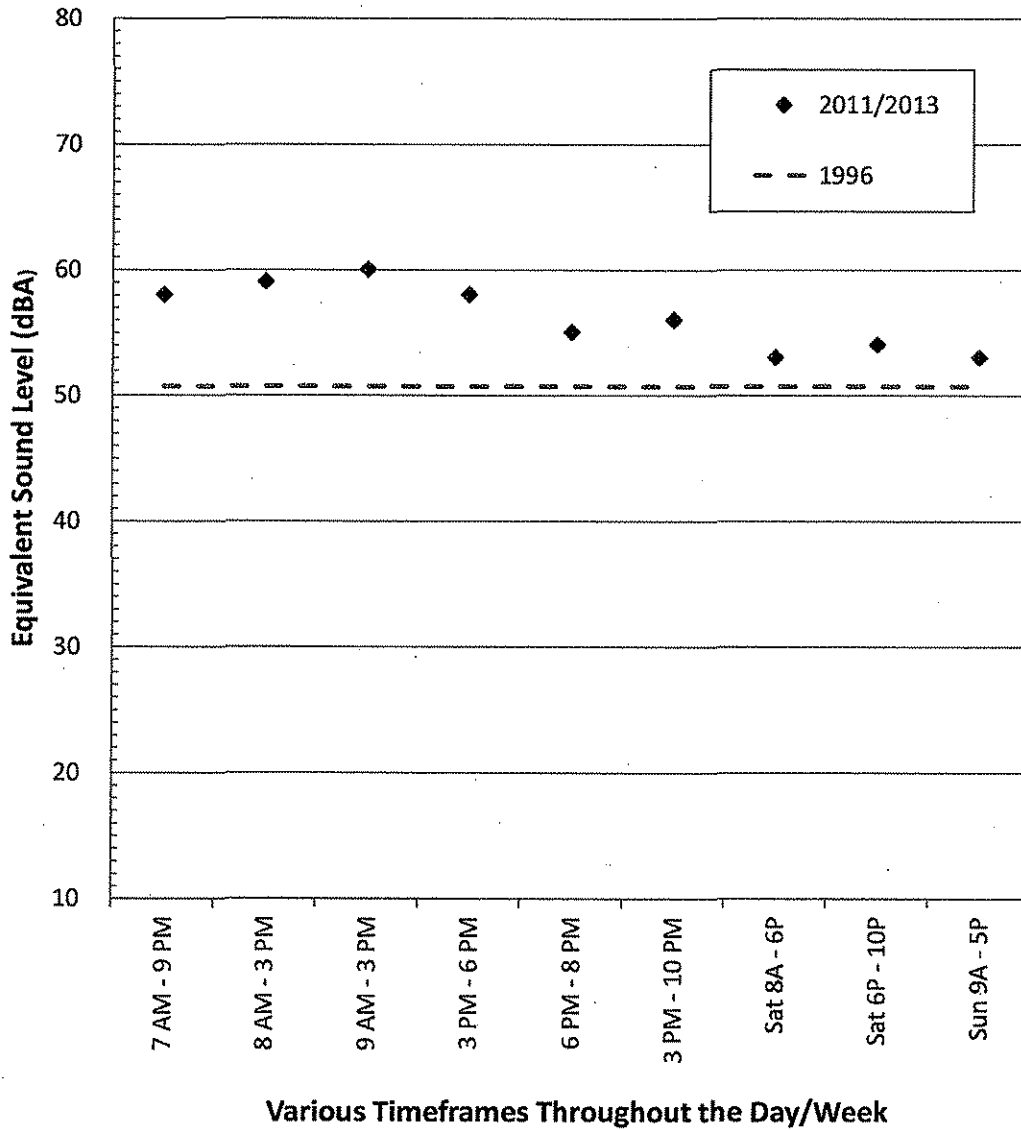


FIGURE 1 COMPARISON OF 1996 AND 2011/2013 NOISE LEVELS ON CHAPARAL



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**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.*

# **EXHIBIT C**

April 24, 2014

**Regarding the Draft Environmental Impact Report (DEIR) of the Archer School**

To Whom It May Concern:

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 Chapparral 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, Lightings Study. My observations, notes and findings are:

**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 10th Edition of the IES Lighting Handbook, published by the IES in 2011 (hereinafter "Handbook").
- 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.
- 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"<sup>1</sup>.*

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<sup>1</sup> 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.

- 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.
- 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 CALGreen, 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 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.

2. **The Lighting Study does not properly calculate the light trespass at receptors D, D-1 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 Chapparral 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,  $E_v = .008$  at 10' above grade,  $E_h = .008$  at 10' above grade, and  $E_h = .011$  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 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 Chapparral Street abutting the Archer School property. Existing condition measurements indicate  $E_h = .004$  at 10' above grade, and  $E_v = .000$  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%.<sup>2</sup> 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  $E_h = .15$  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  $(.15 / \sin 1.7^\circ) = 5.07$  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  $E_h = .96$  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  $(.96 / \sin 45^\circ) = 1.36$  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).

<sup>2</sup> [http://www.bembook.ibpsa.us/index.php?title=Ground\\_Reflectance](http://www.bembook.ibpsa.us/index.php?title=Ground_Reflectance)

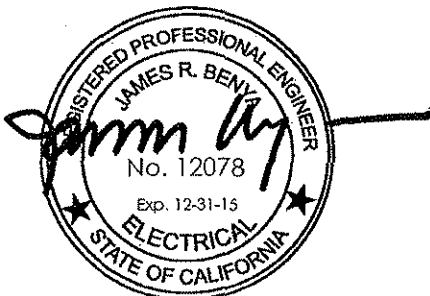


**3. Sports lighting as proposed at the Archer School will cause a significant and immitigable environmental impact that must be changed in the DEIR conclusions. I base this on:**

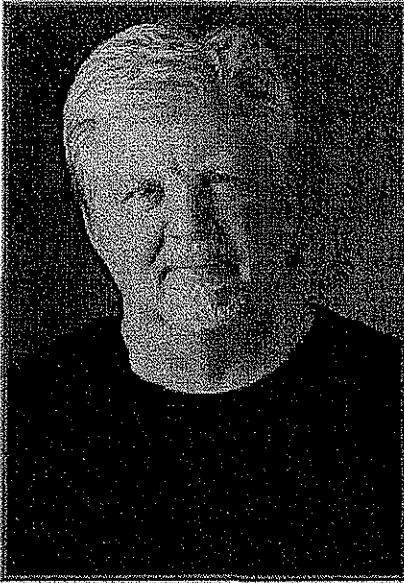
- a. The California CEQA standard asks whether a new light source would "create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?". Horizontal plane calculations at point E prior to sports lighting are .004 footcandles. With sports lighting, this 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 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.

Sincerely,



James R Benya, PE, FIES, FIALD



## Curriculum Vitae

**JAMES ROBERT BENYA, PE, FIES, FIALD**

Principal, the Benya Burnett Consultancy

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*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 Luminæ 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 ground breaking 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**

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## PROFESSIONAL DESIGN AND ENGINEERING HISTORY

Principal, the Benya Burnett Consultancy	2010-present
Principal, Benya Lighting Design, West Linn, OR	1994-2013
Principal, Pacific Lightworks, Portland, OR	1996-1998
Principal, Luminæ Souter Lighting Design, San Francisco	1983-1994
Associate and Chief Electrical Engineer, the Smith Group, Detroit	1980-1983
Electrical Engineer and Project Manager, the Smith Group, Detroit	1973-1980

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## EDUCATIONAL HISTORY

BSE, University of Michigan, Electrical Engineering	1973
BS, University of Michigan. Computer Science	1973
Graduate work in Computer Science, University of Michigan	1973
Professional Development Work in Building Energy Systems, Iowa State	1978
Professional Development Work in Daylighting, Harvard Graduate School	2009

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## ACADEMIC TEACHING HISTORY

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

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## PROFESSIONAL PRESENTATIONS and COURSE DEVELOPMENT

### National and International Venues

LightFair International (39 presentations)	1990-2013
Professional Lighting Design Conference (Berlin, Madrid, Copenhagen)	2009, 2011, 2013
Professional Lighting Design (Alingsås, Copenhagen, Wismar, Venice)	2011
Pan Pacific Lighting Conference, (San Francisco)	1984, 1986, 1989
Intl. Daylighting Conference (Bilbao, Rotterdam, Lausanne, Copenhagen)	2007, 2009, 2011 and 2013
IALD Annual Conference	2000, 2002, 2009
IES Annual Conference	1985, 1988, 1990 2000, 2005

International Dark Sky Association Annual Meeting	2002,2003,2008
AIA Annual Conference	2001,2005,2007
ASID Annual Conference	1985,1986,1989
	1990,1994,1998
Green Build	2002,2003,2007
	2008, 2009
Neocon Chicago	1998,2002,2009
Strategies in Light (LED and OLED conferences)	2009,2011,2012
LED Show	2013
LightShow West	2013
LED Specifier Summit	2013

### **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)	1985-1995
IES Regional and Sectional Meetings -75 programs	1975-2011

### **Professional Development Classes for Commercial Clients**

1983-2011

Commercial presentation and program 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 Pnomia, 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	<b>2012</b>
NECA Annual Conference, Las Vegas	<b>2012</b>
IES Conference Australia New Zealand, Auckland	<b>2011</b>
IES Conference Australia New Zealand, Queenstown	<b>2008</b>
International Daylighting Conference, Bilbao	<b>2007</b>
Trade Commission of Spain, Barcelona	<b>2005</b>
IES Annual Conference	<b>1997</b>

### **Internet Classes and Webinars**

Federal Energy Management Program (FEMP) Lighting Class	1997-2002
Bonneville Power ETC Program	<b>2013</b>
Focus on Energy Webinars (Wisconsin)	<b>2013</b>

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### **MEMBERSHIPS**

Illuminating Engineering Society (IES)	1975-2012
Board of Fellows	2003-2007
	1994-1998
ASHRAE AEDG Schools	2005-2007
Technical review committee	<b>2007</b>
Spectral effects committee	1998-2002
ASHRAE/IES90.1 representative	1992-1997
Elected Fellow	<b>1991</b>
Energy Management committee	1983-2008
Health Care Committee	1979-1983
Chair, annual meeting program committee	<b>1985</b>
Annual conference papers	1975, 1983, 2010
Elected member	<b>1975</b>
International Association of Lighting Designers (IALD)	1987-2012
Fellows Selection Committee	2010-2012
Elected Fellow	<b>2005</b>
Special presidential citation	<b>2003</b>
LightFair Management Board	2002-2004

NCQLP Board	2002-2003
Member of Board, Director of External Affairs	2002-2003
Member of Board, Director of Education	<b>2001</b>
LightFair Program Committee	1998-2001
Elected Professional Member	<b>1987</b>
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)	
Member, SPC 189.1	2009-2010
Member SPC 90.1	1992-1997
AEDG Schools	2005-2007
High Efficiency Buildings Conference Paper presenter	2010, 2012
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)	
Chairman, Examination Committee	<b>2000</b>
Chairman, Test Committee	1997-1999
Member, organizing committee	1995-1996
Lighting Certified	1998-2010
General Electric Consumer Advisory Council (GE CAC)	2001-2012
California Energy Commission (CEC)	
Advanced Lighting Professional Advisory Committee	1987-1994
Advanced Lighting Advisory Committee	1995-1998

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## PUBLICATIONS

### Books (Author and Co-Author)

Lighting Design Basics Second Edition, Wiley	<b>2012</b>
Lighting Retrofits and Relighting, Wiley	<b>2011</b>
Lighting Design Basics Wiley	<b>2004</b>
Lighting Fundamentals, EPRI	1997
Lighting Retrofit Handbook, EPRI	<b>1997</b>
Daylighting Fundamentals, EPRI	<b>1998</b>

Lighting Controls: Patterns for Design, EPRI

1996

**Contributing Editor and Author**

Advanced Lighting Guidelines, California Energy Commission

1990,1993

Advanced Lighting Guidelines, New Buildings Institute

2001,2003,2009

Lighting Controls Patterns for Design, EPRI

1997

**Author and Columnist**

Architectural Lighting Magazine

1988-1992

Architectural Record Magazine

1992-1997

Architectural Lighting Magazine

2001-2012

Blog, Architectural Lighting

2008-2009

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

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**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

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**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 KAA NAPALI, 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

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### 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

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### 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.

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### CONTACT INFORMATION

James R Benya  
The BENYA BURNETT CONSULTANCY  
Davis, CA 95616-6663  
Cell/SMS +1 (503) 519-9631  
[jbenya@benyaburnett.com](mailto:jbenya@benyaburnett.com)  
[jbenya@benyalighting.com](mailto:jbenya@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.

**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 23mm/1 to 4 seconds at  $f/2.8$  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 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)<sup>1</sup>. 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.

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<sup>2</sup>. Care was taken to eliminate streetlights from impacting the measurements<sup>3</sup>, 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

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.

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<sup>1</sup> IES Lighting Handbook, 10<sup>th</sup> Edition, Page 26-14, Table 26-5 note a.

<sup>2</sup> Sky glow seldom causes measureable light levels exceeding .01 to 0.02 footcandles, well below the light levels being measured and therefore insignificant.

<sup>3</sup> This was generally accomplished by taking measurements with the streetlights sufficiently to the side and/or behind the meter as practical.



**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**

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

*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”<sup>4</sup>, 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)<sup>5</sup> 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”. 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.

### 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”<sup>6</sup> 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.

### 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<sup>7</sup>, 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.

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<sup>4</sup> IES Lighting Handbook, Tenth Edition, 2011, pp 26-13 and 26-14, “Lighting for Exteriors”

<sup>5</sup> Op cit

<sup>6</sup> Op cit

<sup>7</sup> 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)<sup>8</sup>. 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.

**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%.

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<sup>8</sup> Op cit, Table 26-5 note a.

- 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<sup>9</sup> 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..”<sup>10</sup>. 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.

- 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.

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<sup>9</sup> County of San Diego, Guidelines for Determining Significance, Dark Skies and Glare, July 30, 2007 Modified January 15, 2009.

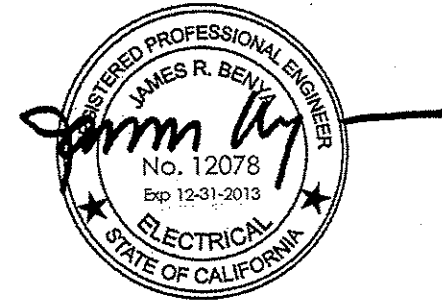
<sup>10</sup> Ibid, Page 13, Section 4.0

## 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 immitigable 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.

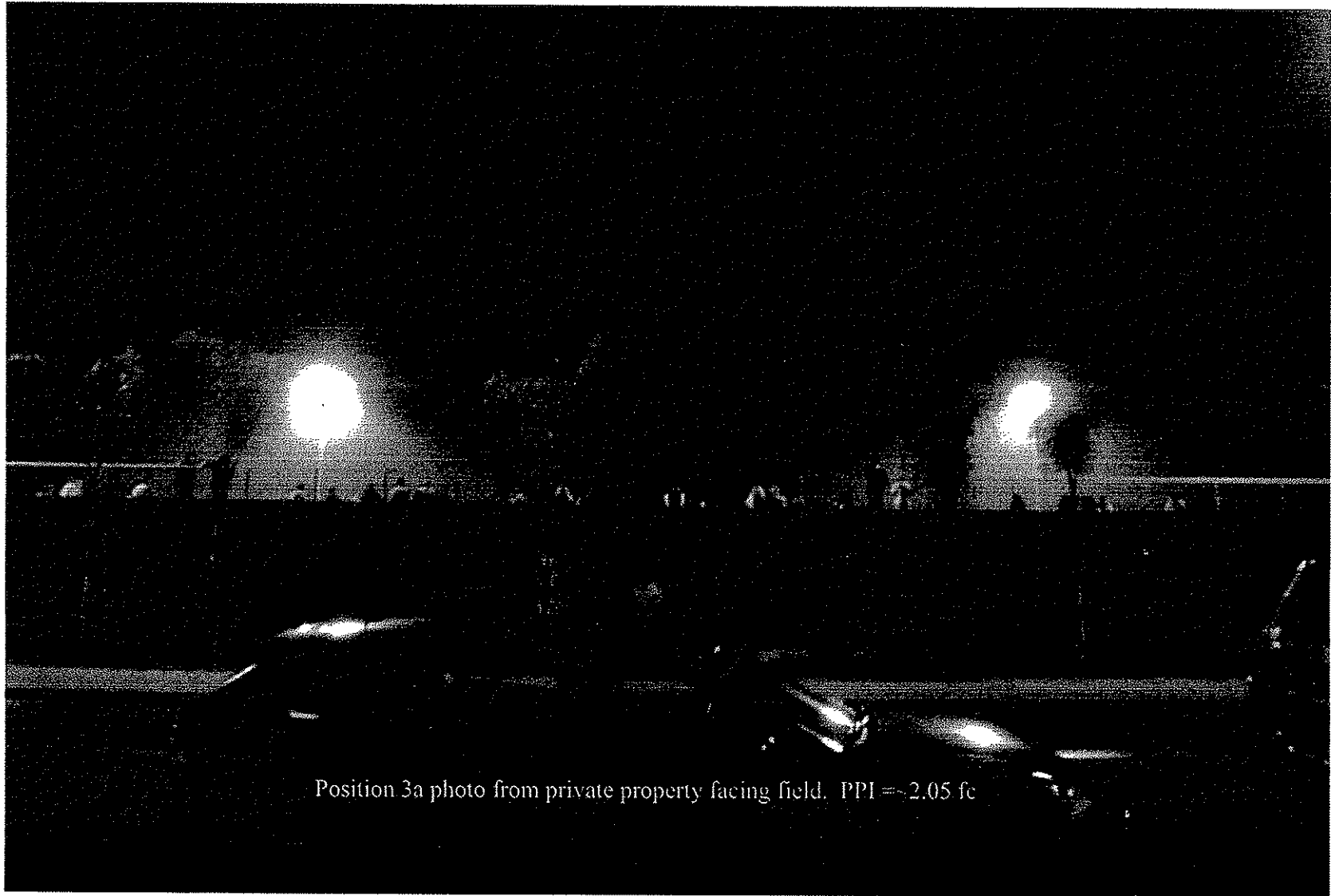


## Table of Acronyms Used in this Report

<b>MND</b>	<b>Final Mitigated Negative Declaration</b> December, 2010 Prepared by BRG Consulting
<b>LIS</b>	<b>Lighting Impact Study</b> October 9, 2009 Prepared by T & B Planning Consultants
<b>EIR</b>	<b>Draft Environmental Impact Report</b> October, 2013 Prepared by BRG Consulting
<b>LISA</b>	<b>Addendum to the Lighting Impact Study</b> October 11, 2013 Prepared by T&B Planning Consultants
<b>IES</b>	<b>Illuminating Engineering Society of North America</b> New York, NY USA
<b>CSD</b>	<b>County of San Diego</b>



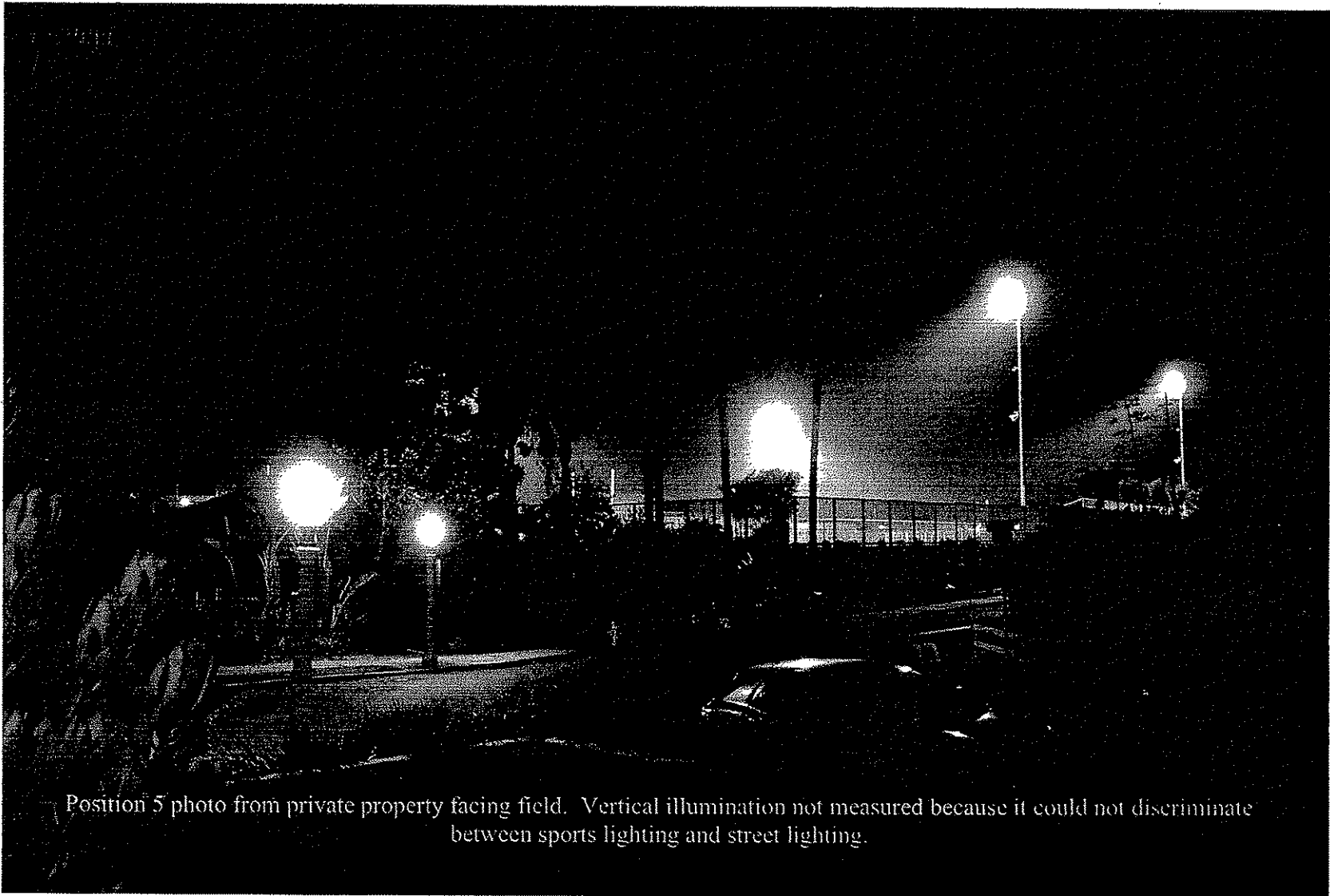
Position 1a photo from private property facing field. PPI  $\approx$  -1.15 fe



Position 3a photo from private property facing field. PPI = -2.05 fc

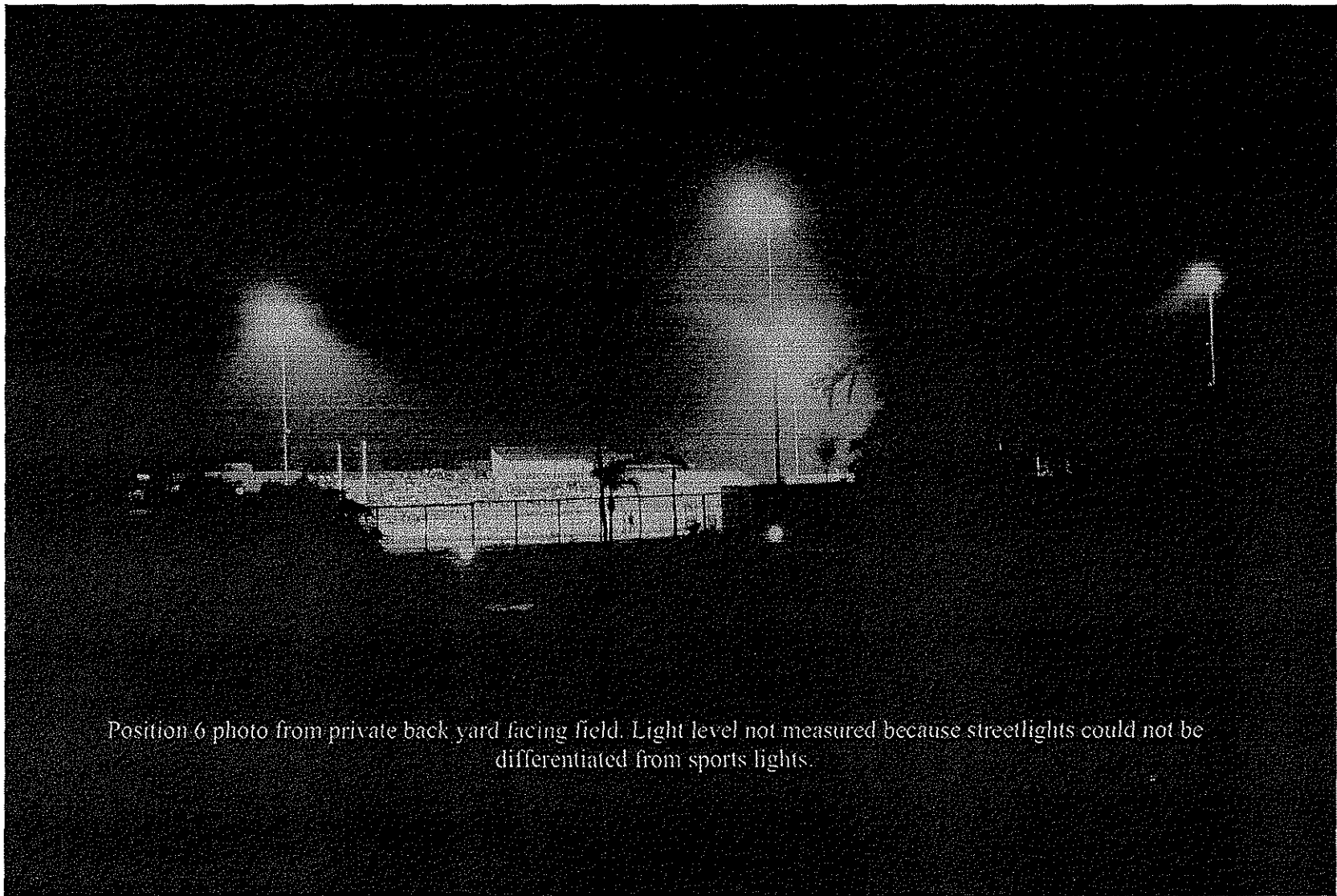


Photo taken from Position 3a facing home. Illumination on house is from football field lights. No flash was used.

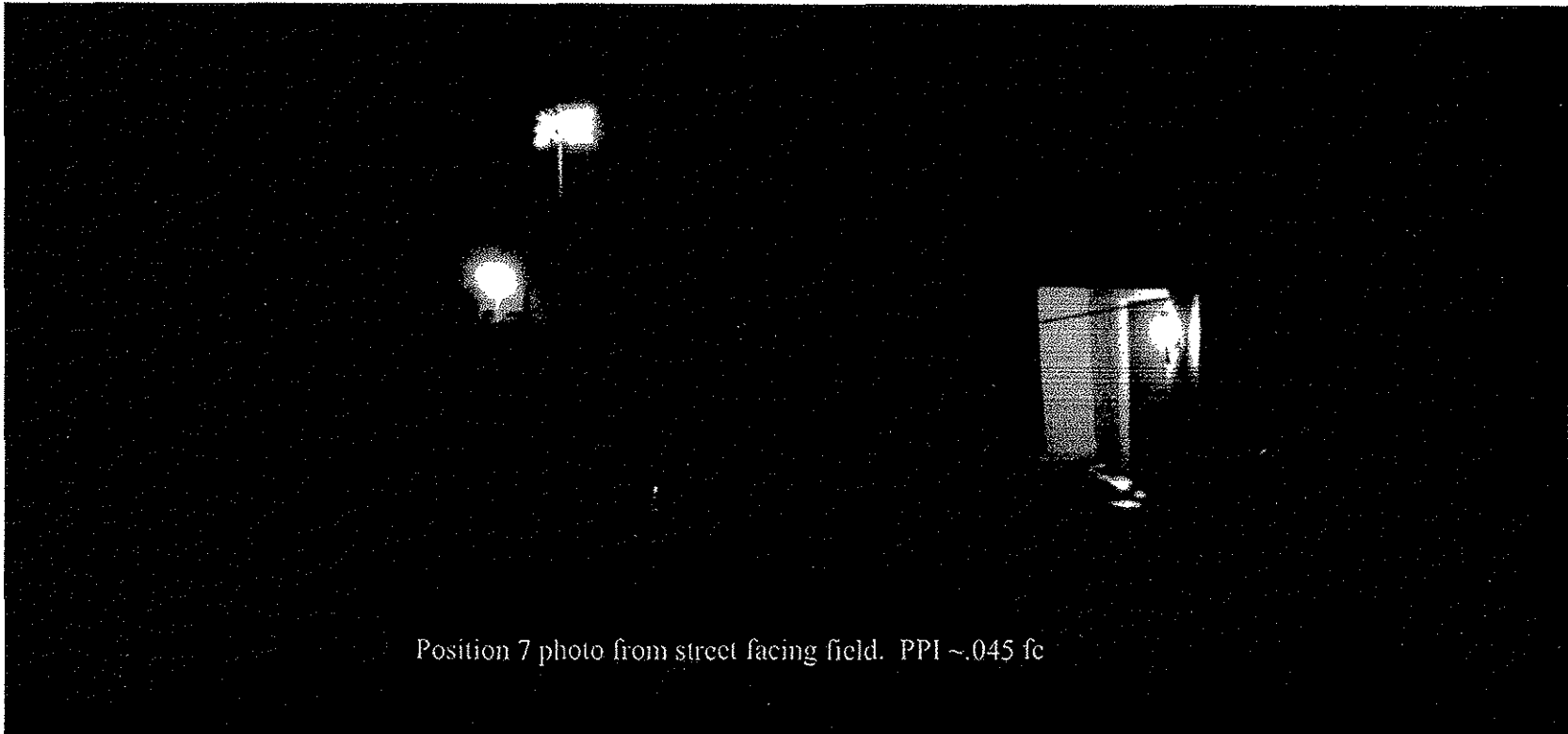


Position 5 photo from private property facing field. Vertical illumination not measured because it could not discriminate between sports lighting and street lighting.

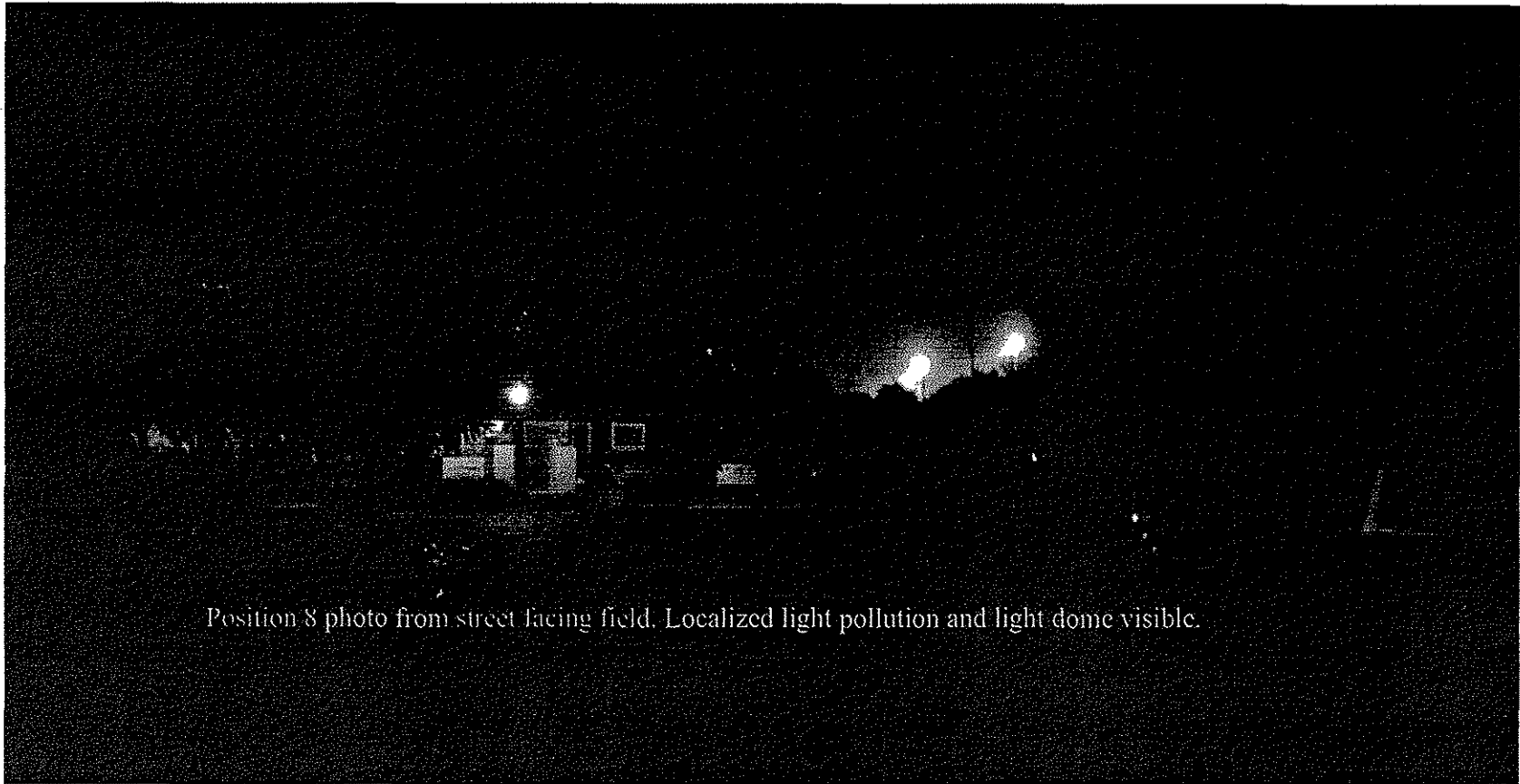




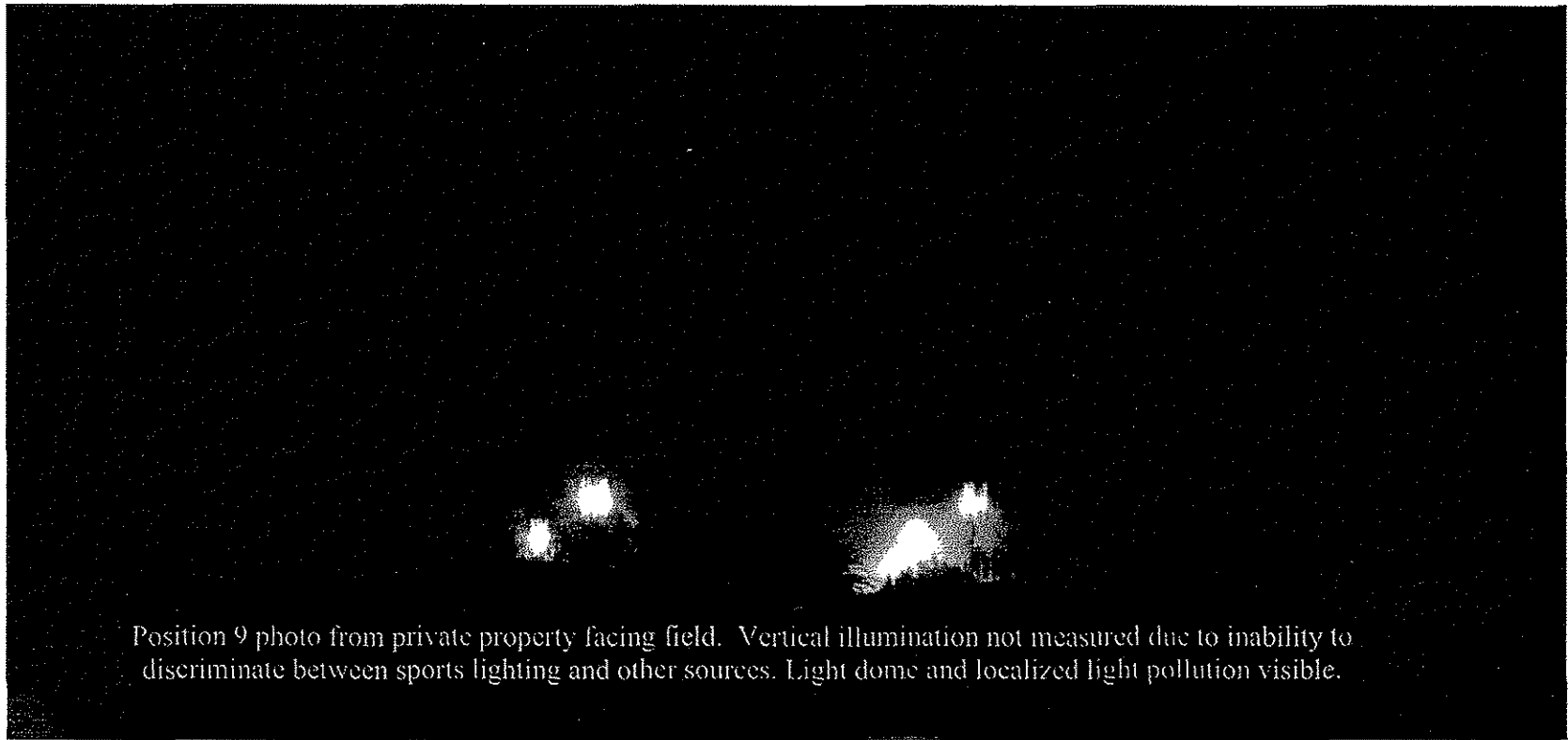
Position 6 photo from private back yard facing field. Light level not measured because streetlights could not be differentiated from sports lights.



Position 7 photo from street facing field. PPI ~.045 fc



Position 8 photo from street facing field. Localized light pollution and light dome visible.



Position 9 photo from private property facing field. Vertical illumination not measured due to inability to discriminate between sports lighting and other sources. Light dome and localized light pollution visible.

# **EXHIBIT D**



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

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April 23, 2014

Beverly Grossman Palmer  
Strumwasser & Woocher LLP  
10940 Wilshire Boulevard, Suite 2000  
Los Angeles, CA 90024

**Subject: Comments on the Draft Environmental Impact Report, Archer Forward Campus  
Preservation and Improvement Plan, Los Angeles County, California**

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Dear Ms. Grossman Palmer:

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.

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.

#### **NO<sub>x</sub> Emissions During Construction are Inadequately Mitigated**

Emissions of NO<sub>x</sub> during construction will constitute a significant and unavoidable impact. The DEIR states (p. I-37):

The maximum regional emissions would exceed the SCAQMD daily significance thresholds for NO<sub>x</sub> 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 NO<sub>x</sub> 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<sup>1</sup>). Use of such engines has been cited by the US EPA to reduce NOx emissions by up to 90%<sup>2</sup> as compared to the limited use of Tier 3 technology that is specified in mitigation measures in the FEIR.
- Substitute gasoline-powered equipment in place of diesel-powered equipment, where feasible.

<sup>1</sup> <http://news.thomasnet.com/fullstory/EPA-Certified-Tier-4-Final-Engines-reduce-NOx-fuel-consumption-20020673> and [http://www.cat.com/en\\_US/support/operations/technology/tier-4-technology.html](http://www.cat.com/en_US/support/operations/technology/tier-4-technology.html)

<sup>2</sup> <http://www.epa.gov/otaq/nonroad-diesel.htm>

- 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.

### 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. I-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 off 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.<sup>3</sup> 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

<sup>3</sup> <http://www.aqmd.gov/rules/reg/reg04/r403.pdf>



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.<sup>4</sup> Table 1 provides mitigation measures for trenching, cut-and-fill, truck loading, road maintenance, and earth-disturbing activities.<sup>5</sup> 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.

### 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. I-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 of ten 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  $\mu\text{g}/\text{m}^3$  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  $\mu\text{g}/\text{m}^3$  according to the modeling output file in Appendix F to the DEIR.

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<sup>4</sup> *Ibid.*, p. 403-6.

<sup>5</sup> *Ibid.*, p. 403-13.

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 of ten cancers per million.

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<sup>6</sup>. The table below was constructed using assumed construction schedule information provided in Transportation Analysis Report<sup>7</sup>.

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

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<sup>8</sup>. 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.

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

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

<sup>7</sup> Appendix P, Traffic Analysis and Los Angeles Department of Transportation Assessment Letter, Archer Forward: Campus Preservation and Improvement Plan DEIR, February 2014.

<sup>8</sup> Appendix F, Air Quality Worksheets, Archer Forward: Campus Preservation and Improvement Plan DEIR, February 2014.

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.

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<sup>9</sup>. 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.

Peak Day Scenario-Mitigated	DPM (lbs/day)	Months	Days	Avg/Peak Day	Avg/Peak Activity	Total Pounds
North Wing Onsite						
North Wing Offsite						
North Wing Total	1.2056	16	352	0.6	0.6	152.9
Phase 1--Excavation Onsite						
Phase 1--Excavation Offsite						
Phase 1--Excavation Total	1.1066	3	66	0.6	0.6	26.3
North Wing and Phase 1--Excavation Onsite						
North Wing and Phase 1--Excavation Offsite						
North Wing and Phase 1--Excavation Total						
Phase 1--Building Construction (Regional) Onsite						
Phase 1--Building Construction (Regional) Offsite						
Phase 1--Building Construction (Regional) Total						
Phase 1--Building Construction (Localized) Onsite						
Phase 1--Building Construction (Localized) Offsite						
Phase 1--Building Construction (Localized) Total	2.0317	24	528	0.6	0.6	386.2
Phase 2--Excavation Onsite						
Phase 2--Excavation Offsite						
Phase 2--Excavation Total	2.1777	3	66	0.6	0.6	51.7
Phase 2 Building Construction (A) Onsite						
Phase 2 Building Construction (A) Offsite						
Phase 2 Building Construction (A) Total	2.5762	19	418	0.6	0.6	387.7
Phase 2 Building Construction (B) Onsite						
Phase 2 Building Construction (B) Offsite						
Phase 2 Building Construction (B) Total	1.7706	19	418	0.6	0.6	266.4
Phase 2 Building Construction (C) Onsite						
Phase 2 Building Construction (C) Offsite						
Phase 2 Building Construction (C) Total						
		<b>Number of Days:</b>	<b>1848.0</b>			
					<b>Total Pounds:</b>	<b>1271.2</b>
					<b>Average Daily Pounds:</b>	<b>0.7</b>
					<b>Conversion to g/s:</b>	<b>0.0080</b>

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:

<sup>9</sup> Appendix F, Air Quality Worksheets, Archer Forward: Campus Preservation and Improvement Plan DEIR, February 2014.

$$\text{Emission Rate (g/s)} = \frac{1,271.2 \text{ lb}}{\text{Project}} \times \frac{1 \text{ Project}}{1,848 \text{ days}} \times \frac{1 \text{ day}}{8 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ sec}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.0108 \text{ g/s}$$

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).

$$\text{Emission Rate (g/s)} = \frac{1,271.2 \text{ lb}}{\text{Project}} \times \frac{1 \text{ Project}}{1,575 \text{ days}} \times \frac{1 \text{ day}}{8 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ sec}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.0127 \text{ g/s}$$

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.

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 overstating 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):

$$\text{Emission Rate (g/s)} = \frac{1,004.8 \text{ lb}}{\text{Project}} \times \frac{1 \text{ Project}}{1,430 \text{ days}} \times \frac{1 \text{ day}}{8 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ sec}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.011 \text{ g/s}$$

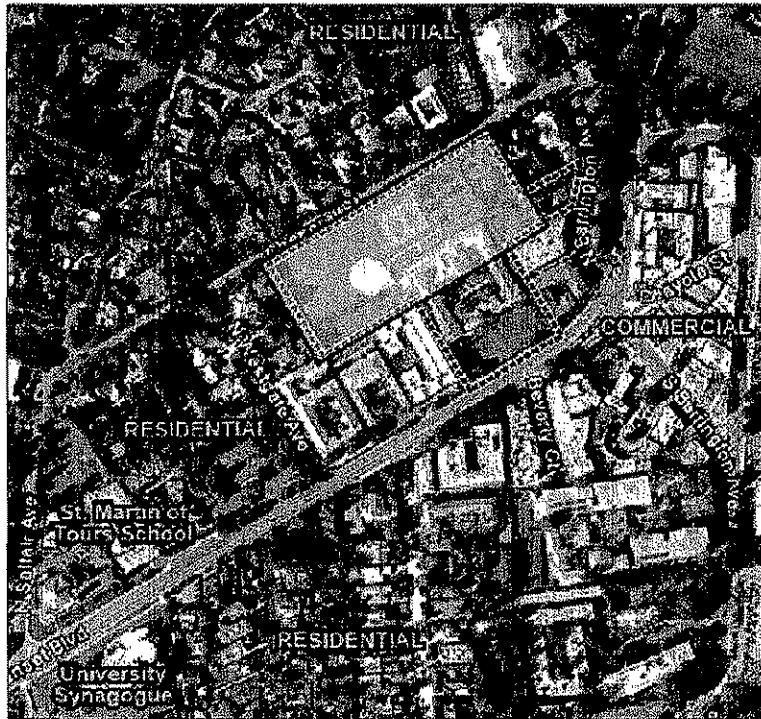
Phase 2 Option B (883.5 total pounds DPM emissions over 1,430 days):

$$\text{Emission Rate (g/s)} = \frac{883.5 \text{ lb}}{\text{Project}} \times \frac{1 \text{ Project}}{1,430 \text{ days}} \times \frac{1 \text{ day}}{8 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ sec}} \times \frac{453.6 \text{ g}}{\text{lb}} = 0.00973 \text{ g/s}$$

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.

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.



The EPA-recommended<sup>10</sup> 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.

#### 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<sup>11</sup> for screening-level air quality assessments, the maximum single-hour concentration output by the model

<sup>10</sup> EPA, 2011. Memorandum: AERSCREEN Released as the EPA Recommended Screening Model. U.S. EPA Air Quality Modeling Group, C439-01. April 11, 2011.

<sup>11</sup> EPA, 1992. Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised. EPA-454/R-92-019. U.S. EPA Office of Air Quality Planning and Standards. October 1992.

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)<sup>12</sup>. The total exposure duration in years (4.5) was taken from the mitigated exposure scenario provided in Appendix F to the DEIR.

#### 1,430 Construction Days - Phase 2 Option A Only

Parameter	Description	Units	Adult Exposure	Child Exposure
CPF	Cancer Potency Factor	1/(mg/kg-day)	1.1	1.1
Cair	Concentration	ug/m3	1.675	1.675
DBR	Daily breathing rate	L/kg-day	271	452
EF	Exposure Frequency	days/year	350	350
ED	Exposure Duration	years	4.5	4.5
AT	Averaging Time	days	25550	25550
Inhaled Dose			2.8E-05	4.7E-05
<b>Cancer Risk</b>			<b>3.08E-05</b>	<b>5.13E-05</b>

#### 1,430 Construction Days - Phase 2 Option B Only

Parameter	Description	Units	Adult Exposure	Child Exposure
CPF	Cancer Potency Factor	1/(mg/kg-day)	1.1	1.1
Cair	Concentration	ug/m3	1.473	1.473
DBR	Daily breathing rate	L/kg-day	271	452
EF	Exposure Frequency	days/year	350	350
ED	Exposure Duration	years	4.5	4.5
AT	Averaging Time	days	25550	25550
Inhaled Dose			2.5E-05	4.1E-05
<b>Cancer Risk</b>			<b>2.7068E-05</b>	<b>4.51E-05</b>

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.

<sup>12</sup> OEHHA, 2003. The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, Air Toxics Hot Spots Program Risk Assessment Guidelines. Office of Environmental Health Hazard Assessment. August 2003.

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 -  $0.35914 \mu\text{g}/\text{m}^3$  - was derived, given that the maximum concentration at an off-site receptor was  $36.41 \mu\text{g}/\text{m}^3$  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.

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.

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.

The DEIR calls for construction truck staging in the driveway areas along either the eastern or western boundary of the Project Site (p. II-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).

Sincerely,



Matt Hagemann, P.G., C.Hg.



Anders Sutherland



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

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Newport Beach, California 92660  
Tel: (949) 887-9013  
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Email: [mhagemann@swape.com](mailto:mhagemann@swape.com)

**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
- Geologist, Dames & Moore (1984 – 1986).

**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 nationwide 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., 2008.** Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F., 2008.** Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F., 2005.** Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

**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.

Brown, A., Farrow, J., Gray, A. and Hagemann, M., 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

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 tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and **VanMouwerik, M.**, 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

**VanMouwerik, M.** and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**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.

**Hagemann, M.F.**, **Fukunaga, G.L.**, 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F.**, **Fukanaga, G. L.**, 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.F.** and **Sabol, M.A.**, 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.



Adam Villani &lt;adam.villani@lacity.org&gt;

## Proposed Archer expansion plan

3 messages

**Stacia Thompson** <staciamaeve@gmail.com>  
 To: adam.villani@lacity.org, mike.bonin@lacity.org  
 Cc: archerneighbor@gmail.com

Fri, Apr 25, 2014 at 11:25 AM

April 25, 2014

Mr. Adam Villani  
 City of Los Angeles Department of City Planning  
 200 North Spring Street, Room 750  
 Los Angeles, CA 90012

Re: Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)

Dear Mr. Villani,

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.

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 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. 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.

Sincerely,

Stacia Thompson  
Upper Riviera Homeowners Association

cc: Mike Bonin, Council member, CD-11

**Stacia Thompson**  
**917.328.7347**  
staciamaeve@gmail.com

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**Adam Villani** <adam.villani@lacity.org>  
To: Stacia Thompson <staciamaeve@gmail.com>

Tue, Apr 29, 2014 at 2:01 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Stacia Thompson** <staciamaeve@gmail.com>  
To: Adam Villani <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:05 PM

Thank you. Yes, please add me to your mailing list. My address is:

Stacia Thompson  
1515 Umeo Road  
Pacific Palisades,  
CA 90272

**Stacia Thompson**

5/2/2014

City of Los Angeles Mail - Proposed Archer expansion plan

**917.328.7347**  
staciamaeve@gmail.com

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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**ENV-2011-2689-EIR - Support for Archer Forward**

2 messages

**Linda Behrendt** <lbehrendt@village-school.org>

Mon, Mar 17, 2014 at 11:53 AM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

Linda Behrendt

Assistant to the Head of School

310-459-8411, x115

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**Adam Villani** <adam.villani@lacity.org>

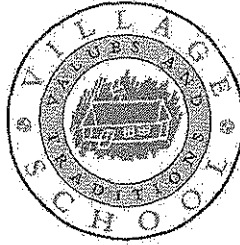
Wed, Mar 19, 2014 at 10:48 AM

To: Linda Behrendt &lt;lbehrendt@village-school.org&gt;

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



March 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,


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.

Sincerely,

  
Nora Malone  
Head of School



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**John Walter** <jwalter@wesleyschool.org>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Mon, Mar 17, 2014 at 12:24 PM

**RE: ENV-2011-2689-EIR**

Please accept my letter below in support of The Archer School and its Archer Forward initiative.  
Thank you. John

H John Walter III  
Head of School  
The Wesley School  
4832 Tujunga Avenue  
North Hollywood, CA 91601  
818.508.4542, x225  
jwalter@wesleyschool.org

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**Support for Archer Forward.doc.pdf**  
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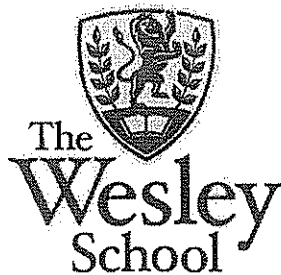
**Adam Villani** <adam.villani@lacity.org>  
To: John Walter <jwalter@wesleyschool.org>

Wed, Mar 19, 2014 at 10:49 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



17 March 14

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

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.

Sincerely,

H. John Walter III  
Head of School  
The Wesley School



# Westland School

March 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

**MAR 19 2014**

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

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.

Sincerely,

Scott Moran  
Head of School  
Westland School



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

2 messages

---

**Judith Joy** <jjoy@wnsk8.com>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Thu, Mar 20, 2014 at 8:51 AM

RE: ENV-2011-2689-EIR

Attached please find a letter of support from Brad Zacuto, Head of School at Westside Neighborhood School.

Judith Joy

Assistant to the Head of School  
Westside Neighborhood School  
5401 Beethoven St Los Angeles, CA 90066  
(310) 574-8650 x136

---

**Letter of Support - Archer.pdf**  
36K

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**Adam Villani** <adam.villani@lacity.org>  
To: Judith Joy <jjoy@wnsk8.com>

Thu, Mar 20, 2014 at 10:35 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

On Thu, Mar 20, 2014 at 8:51 AM, Judith Joy <jjoy@wnsk8.com> wrote:

RE: ENV-2011-2689-EIR

Attached please find a letter of support from Brad Zacuto, Head of School at Westside Neighborhood School.

Judith Joy

Assistant to the Head of School  
Westside Neighborhood School  
5401 Beethoven St Los Angeles, CA 90066  
(310) 574-8650 x136



4/24/2014

City of Los Angeles Mail - Support for Archer Forward

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



March 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

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.

Best regards,

A handwritten signature in black ink, appearing to read "Bradley Zacuto", written over a horizontal line.

Bradley Zacuto  
Head of School  
Westside Neighborhood School



Adam Villani &lt;adam.villani@lacity.org&gt;

## Support for Archer Forward

3 messages

**Landis Green** <lgreen@wildwood.org>

Mon, Apr 28, 2014 at 1:30 PM

To: "adam.villani@lacity.org" <adam.villani@lacity.org>

Cc: "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>

Dear Mr. Villani and Mr. Bonin,

Thank you, in advance, for including the attached letter of support with materials submitted on behalf of Archer School's current process.

Best regards,

Landis Green

Landis Green

Head of School

11811 Olympic Boulevard

Los Angeles, CA 90064

www.wildwood.org



**Wildwood School**



**Support for Archer Forward.pdf**

45K

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:43 PM

To: Landis Green <lgreen@wildwood.org>

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani

Planning Assistant

City of Los Angeles

Department of City Planning

Major Projects Section

Adam.Villani@lacity.org

(818) 374-5067

alternate: (213) 978-1454

**Landis Green** <lgreen@wildwood.org>

Wed, Apr 30, 2014 at 7:54 AM

To: Adam Villani <adam.villani@lacity.org>

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



**Wildwood School**

---

**From:** Adam Villani <adam.villani@lacity.org>

**Date:** Tuesday, April 29, 2014 2:43 PM

**To:** Landis Green <lgreen@wildwood.org>

**Subject:** Re: Support for Archer Forward

[Quoted text hidden]



## Wildwood School

Landis Green  
Head of School

**Elementary School**  
12201 Washington Place  
Los Angeles, CA 90066  
Phone 310.397.3134

**Middle & Upper School**  
11811 Olympic Boulevard  
Los Angeles, CA 90064  
Phone 310.478.7189

[www.wildwood.org](http://www.wildwood.org)

April 28, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,

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.

Best regards,



Landis Green



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

2 messages

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**TomGilder** <TomGilder@windwardschool.org>

Tue, Mar 18, 2014 at 2:11 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

RE: ENV-2011-2689-EIR

March 18, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room #750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani,  
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.

Best regards,

Tom Gilder  
Head of School  
Windward School

**Adam Villani** <adam.villani@lacity.org>  
To: TomGilder <TomGilder@windwardschool.org>

Wed, Mar 19, 2014 at 10:49 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

April 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 21 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Support for Archer Forward

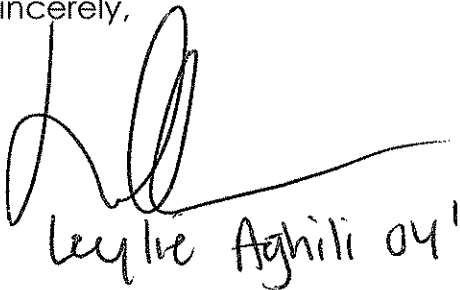
Dear Mr. Villani,

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.

Sincerely,



Leyle Aghili 04'

Cc: Councilman Mike Bonin





Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

2 messages

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**Karen Alberstone** <karenalberstone17@gmail.com>

Sun, Apr 20, 2014 at 9:36 PM

To: adam.villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org, Dale Alberstone &lt;dalekuma@aol.com&gt;

Re: ENV-2011-2689-EIR

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.

Best regards,

Karen and Dale Alberstone

---

**Adam Villani** <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 11:32 AM

To: Karen Alberstone &lt;karenalberstone17@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section

4/25/2014

City of Los Angeles Mail - Support for Archer Forward

Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Opposition to The Archer School's proposed expansion**

2 messages

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**Pamela** <pamelaalexander@verizon.net>

Fri, Apr 25, 2014 at 1:41 PM

To: adam.villani@lacity.org

Cc: Pamela alexander &lt;pamelaalexander@verizon.net&gt;

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.

---

 **Villani.archer school.pdf**  
1459K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:05 PM

To: Pamela &lt;pamelaalexander@verizon.net&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

On Fri, Apr 25, 2014 at 1:41 PM, Pamela <pamelaalexander@verizon.net> wrote:

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.

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

Pamela Alexander

11901 Sunset Blvd, #101, Los Angeles, California 90049

April 24, 2014

Adam Villani  
City of Los Angeles Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

Re: Oppose Archer School Forward Plan

Dear Mr. Villani,

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.

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....

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

- 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
- 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
  - 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!

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.

Respectfully,

*Pamela Alexander*

Pamela Alexander  
 11901 Sunset Blvd  
 Los Angeles, CA 90049

April 5, 2014

RECEIVED  
CITY OF LOS ANGELES

APR 08 2014

ENVIRONMENTAL  
UNIT

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

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.

Sincerely,



JAMEE ALPEROVICH

877 S. TREMAINE AVENUE

LA, CA 90005

CC: Councilmember Mike Bonin

**re Archer School**

**Subject:** re Archer School  
**From:** "Lynn K. Altman" <lka.lka@verizon.net>  
**Date:** 4/27/2014 3:53 PM  
**To:** mike.bonin@lacity.org

LYNN K. ALTMAN

---

382 NORTH SALT AIR AVENUE  
LOS ANGELES, CA 90049

April 27, 2014

Dear Councilman Bonin,

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 excess of one hour to reach that intersection. Santa Monica has embarked on grand scale building. More traffic. So back to Archer.

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 Chaparral 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 Chaparral, 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"?

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.

Sincerely,  
Lynn K. Altman



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Oppose Archer Forward plan as Proposed (ENV-2011-2689-EIR) Copy of letter I sent to Councilman Bonin**

2 messages

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**Lynn K. Altman** <lka.lka@verizon.net>  
To: Adam.villani@lacity.org

Sun, Apr 27, 2014 at 4:49 PM

**re Archer School**

**Subject:** re Archer School  
**From:** "Lynn K. Altman" <lka.lka@verizon.net>  
**Date:** 4/27/2014 3:53 PM  
**To:** mike.bonin@lacity.org

---

**LYNN K. ALTMAN**

---

382 NORTH SALT AIR AVENUE  
LOS ANGELES, CA 90049

April 27, 2014

Dear Councilman Bonin,

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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.

Sincerely,  
Lynn K. Altman



Adam Villani <adam.villani@lacity.org>  
To: "lynn K. Altman" <lka.lka@verizon.net>

Tue, Apr 29, 2014 at 2:38 PM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

On Sun, Apr 27, 2014 at 4:49 PM, lynn K. Altman <lka.lka@verizon.net> wrote:

**re Archer School**

**Subject:** re Archer School  
**From:** "lynn K. Altman" <lka.lka@verizon.net>  
**Date:** 4/27/2014 3:53 PM  
**To:** mike.bonin@lacity.org

LYNN K. ALTMAN

382 NORTH SALT AIR AVENUE  
LOS ANGELES, CA 90049

April 27, 2014

Dear Councilman Bonin,

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 excess of one hour to reach that intersection. Santa Monica has embarked on grand scale building. More traffic. So back to Archer.

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 surround 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"?

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.

Sincerely,  
Lynn K. Altman

4/30/2014

City of Los Angeles Mail - Oppose Archer Forward plan as Proposed (ENV-2011-2689-EIR) Copy of letter I sent to Councilman Bonin

Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

4/30/2014

City of Los Angeles Mail - Oppose Archer Forward Plan as Proposed (ENV-2011-2689-EIR) Copy of letter I sent to Bonin



Adam Villani <adam.villani@lacity.org>

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**Oppose Archer Forward Plan as Proposed (ENV-2011-2689-EIR) Copy of letter I sent to Bonin**

1 message

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**Lynn K. Altman** <lka.lka@verizon.net>

Sun, Apr 27, 2014 at 5:08 PM

April 6, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES  
APR 08 2014  
ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
Support for Archer Forward

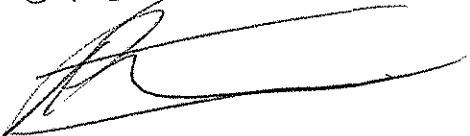
Dear Mr. Villani:

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.

Sincerely,

Phillipa Altmann  
2118 Pelham Avenue, Los Angeles, CA 90025  


Cc: Councilmember Bonin

March 20<sup>th</sup>, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 21 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan


Dear Mr. Villani:

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, 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.

Sincerely,  


Erika Amaya  
7418 Gaynor Avenue  
Van Nuys, CA 91406

Cc: Councilmember Mike Bonin

April 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 21 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
A letter in support of Archer Forward

Dear Mr. Villani,

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 21<sup>st</sup>-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.

Sincerely,

*Vanessa Anderson*

*Vanessa Anderson % 2003*

Cc: Councilman Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

Lisa Angel &lt;lisaangel.416@gmail.com&gt;

Thu, Apr 17, 2014 at 12:50 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org

### RE: ENV-2011-2689-EIR

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 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.

Sincerely,

Lisa Angel

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**Adam Villani** <adam.villani@lacity.org>  
To: Lisa Angel <lisaangel.416@gmail.com>

Wed, Apr 23, 2014 at 10:23 AM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454





Adam Villani &lt;adam.villani@lacity.org&gt;

## Archer Plan will ruin our neighborhood and further gridlock traffic.

4 messages

**Laura Applegate** <lauraapplegate@gmail.com>

Wed, Mar 19, 2014 at 4:05 PM

To: adam.villani@lacity.org

### **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.

**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 Chaparral 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.

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 Chaparral 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. Why should a school be allowed to have paid outside events come to our residential neighborhood? Lights at night blaring in home windows should never be a consideration. This is a residential neighborhood!!!!

And to make matters worse, Archer went back on their agreement. This should not be allowed.

Laura Applegate

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**Adam Villani** <adam.villani@lacity.org>

Thu, Mar 20, 2014 at 10:06 AM

To: Laura Applegate <lauraapplegate@gmail.com>

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
 Adam Villani  
 Planning Assistant  
 City of Los Angeles  
 Department of City Planning  
 Major Projects Section  
 Adam.Villani@lacity.org  
 (818) 374-5067  
 alternate: (213) 978-1454

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:34 PM

To: Laura Applegate <lauraapplegate@gmail.com>

Thank you once again for your comment on the Archer Forward Draft EIR. I received your comment in March and indicated that you would be included in future distribution for notices related to this project. I should clarify that in

5/12/2014

City of Los Angeles Mail - Archer Plan will ruin our neighborhood and further gridlock traffic.

order to do so, please forward me your USPS mailing address. You will then receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

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**Laura Applegate** <lauraapplegate@gmail.com>

Sat, May 3, 2014 at 7:33 PM

To: Adam Villani <adam.villani@lacity.org>

153 N Saltair Ave  
Los Angeles 90049

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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## We Support Archer Forward

2 messages

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**ellen aragon** <auchateau3@yahoo.com>

Thu, Apr 10, 2014 at 4:28 PM

Reply-To: ellen aragon &lt;auchateau3@yahoo.com&gt;

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "Councilmember.Bonin@lacity.org" &lt;Councilmember.Bonin@lacity.org&gt;

Re: ENV-2011-2689-EIR

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

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.

Sincerely,

Joseph and Ellen Aragon  
429 N. Oakhurst Drive  
Beverly Hills, CA 90210

cc: Councilmember Mike Bonin

---

**Adam Villani** <adam.villani@lacity.org>  
To: ellen aragon <auchateau3@yahoo.com>

Tue, Apr 22, 2014 at 11:02 AM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I Support Archer Forward

4 messages

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**Hillary Rollins** <hdrollins@verizon.net>

Thu, Apr 17, 2014 at 8:21 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

RE: ENV-2011-2689-EIR

Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

As a current Archer parent, I support of Archer's Campus Preservation and Improvement plan, Archer Forward.

The Archer Forward plan will allow the school to provide an even better education for Archer students, by adding modern classrooms, a regulation-size athletic field, a gymnasium and spaces for swim and performing and visual arts. In case you weren't aware, Archer students are actively involved in the community: they volunteer at Brentwood Green, tutor students at Brentwood Science Magnet School, participate in local recycling and conservation efforts, volunteer at Daybreak Women's Shelter and more.

Archer has an excellent track record as a responsible neighbor in the community. For example, much time and energy has been poured into the school's traffic control system. Every parent is well versed in parking and driving restrictions in the area during school hours, and we know that if we do not follow the rules there will be swift consequences. This is done out of Archer's high level of consideration and respect for its neighbors, who don't like sitting in traffic any more than I do.

The Archer School for Girls is a valuable and upstanding member of the local community, and has done everything in its power to ensure that this plan presents every benefit possible to its neighbors. I hope you'll help move this project quickly through the city's process.

Sincerely,

Hillary Rollins

1219 Ashland Avenue, Santa Monica, CA 90405

CC: Councilmember Mike Bonin

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**Bonnie Arnold** <bonnie.arnold@dreamworks.com>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org, archerforward@archer.org

Fri, Apr 18, 2014 at 1:53 PM

Mr. Adam Villani

Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR

Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

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.

Sincerely,

Bonnie Arnold

P.O. Box 49851

Los Angeles, CA 90049

Cc: Councilmember Mike Bonin

**Adam Villani** <adam.villani@lacity.org>  
To: Hillary Rollins <hrollins@verizon.net>

Wed, Apr 23, 2014 at 11:17 AM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

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**Adam Villani** <adam.villani@lacity.org>  
To: Bonnie Arnold <bonnie.arnold@dreamworks.com>

Wed, Apr 23, 2014 at 11:18 AM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454





Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)**

2 messages

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**Arrow, Paul** <PARROW@buchalter.com>

Wed, Apr 23, 2014 at 10:12 AM

To: "mike.bonin@lacity.org" &lt;mike.bonin@lacity.org&gt;, "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "Archerneighbor@gmail.com" &lt;Archerneighbor@gmail.com&gt;

Dear Councilman Bonin and Mr. Villani,

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.

Sincerely,

Pau Arrow

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**marketing, or recommending to another party any transaction or matter addressed herein.**

---

**Adam Villani** <adam.villani@lacity.org>  
To: "Arrow, Paul" <PARROW@buchalter.com>

Wed, Apr 23, 2014 at 4:03 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**Linda Arzt** <linda@thearztgroup.com>

Wed, Apr 9, 2014 at 9:55 AM

To: adam.villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org

RE: ENV-2011-2689-EIR

Dear Mr. Villani,

We are the 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.

Sincerely,

Linda and Tony Arzt  
Parents at The Archer School for Girls

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:34 PM

To: Linda Arzt &lt;linda@thearztgroup.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

March 3, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

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 environment of excellence. I am confident that with Archers new campus plan the school will become even more a beacon for education in the 21<sup>st</sup> 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 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.

Sincerely,



Chad Attie

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## I support Archer Forward

2 messages

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**Katie Baral** <katie@baralfamily.com>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Tue, Mar 11, 2014 at 8:33 PM

RE: ENV-2011-2689-EIR

To whom it may concern:

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,

Katie Baral

---

**Adam Villani** <adam.villani@lacity.org>  
To: Katie Baral <katie@baralfamily.com>

Thu, Mar 13, 2014 at 9:46 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

April 5, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
In favor of Archer Forward

RECEIVED  
CITY OF LOS ANGELES

APR 08 2014

ENVIRONMENTAL  
UNIT

Dear Mr. Villani,

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.

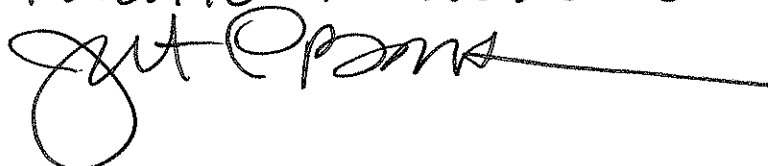
Since coming to Brentwood, Archer has been a model institution, strictly complying with the conditions mandated by the City, and in many cases going beyond what is required. Under Archer Forward the School will again make numerous commitments to reduce any burdens on its neighbors, including raising 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.

Sincerely,

Julie Bardin  
16668 Calle Jermaine  
Pacific Palisades CA 90272



Cc: Councilmember Bonin

RECEIVED  
CITY OF LOS ANGELES

APR 08 2014

ENVIRONMENTAL  
UNIT

April 3, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
I support Archer's Campus Plan

Dear Mr. Villani:

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.

Sincerely,



Jennifer L. Barnhill  
3616 Cardiff Ave Apt 107  
Los Angeles, CA 900034

CC: Councilmember Mike Bonin

March 22, 2014

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CITY OF LOS ANGELES

MAR 25 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Archer Forward

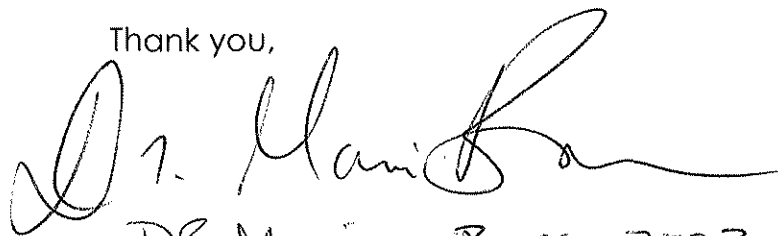
Dear Mr. Villani,

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.

Thank you,



Dr. Manissa Bass 2003  
8217 Beverly Blvd. Ste. 7  
LA, CA 90048  
Cc: Councilmember Mike Bonin





Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Support for Archer Forward (ENV-2011-2689-EIR)**

2 messages

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**ricky\_benfield@yahoo.com** <ricky\_benfield@yahoo.com>

Tue, Apr 29, 2014 at 3:02 PM

Reply-To: ricky\_benfield@yahoo.com

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmemberbonin@lacity.org" &lt;councilmemberbonin@lacity.org&gt;, "archerforward@archer.org" &lt;archerforward@archer.org&gt;, "ricky\_benfield@yahoo.com" &lt;ricky\_benfield@yahoo.com&gt;

Hi Adam,

Please reply to confirm receipt.

Thanks and best,  
Rick

---

 **Archer Forward Ltr 4 29 14.pdf**  
25K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 5:20 PM

To: ricky\_benfield@yahoo.com

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

**Richard L. Benfield**  
**735 Alma Real Drive**  
**Pacific Palisades, CA 90272**  
**(310) 592-0078**

---

April 29, 2014

VIA E-MAIL

Mr. Adam Villani  
Department of City Planning  
City of Los Angeles  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Dear Mr. Adam Villani:

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 7<sup>th</sup> 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.

Very truly yours,



Rick Benfield

March 7, 2014

RECEIVED  
CITY OF LOS ANGELES

MAR 11 2014

ENVIRONMENTAL  
UNIT

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:


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.

Sincerely,



Kristen Benjamin

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Draft EIR -Archer School, Brentwood-PacificPalisades District 11

2 messages

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**S. Bennett** <raindog125@gmail.com>

Mon, Mar 10, 2014 at 1:01 PM

To: "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Dear Mr. Villani,

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.

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.

Thank you for your attention,

Sharma Bennett

125 North Barrington Avenue

#205

Los Angeles Ca. 90049

Sent from my iPad

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Mar 11, 2014 at 9:45 AM

To: "S. Bennett" &lt;raindog125@gmail.com&gt;

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—

Adam Villani

Planning Assistant

City of Los Angeles

Department of City Planning

Major Projects Section

Adam.Villani@lacity.org

(818) 374-5067

alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## I Support Archer Forward

3 messages

---

**Marc Berger** <bergerbuddy@me.com>

Tue, Apr 22, 2014 at 8:34 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Re: ENV-2011-2689-EIR

Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

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.

Sincerely,

Marc Berger

233 S. Barrington Avenue  
Apt. 303  
Los Angeles, CA 90049

Cc: Councilmember Mike Bonin

---

**Adam Villani** <adam.villani@lacity.org>  
To: Marc Berger <bergerbuddy@me.com>

Wed, Apr 23, 2014 at 2:54 PM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Marc Berger** <bergerbuddy@me.com>  
To: Adam Villani <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 4:10 PM

Thank you Adam.

Sent from my iPhone

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Archer Expansion

2 messages

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**berglass@aol.com** <berglass@aol.com>

Thu, Apr 10, 2014 at 1:13 PM

To: adam.villani@lacity.org, councilman.bonin@lacity.org

To Whom IT May Concern,

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. 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.

Best,  
Tracy Berglass

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 22, 2014 at 11:01 AM

To: berglass@aol.com

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

April 6, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 08 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
Parent Support for Archer Forward

Dear Mr. Villani:

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.

Sincerely,



Bruce Berman

Cc: Councilman Mike Bonin

750 Malcolm Ave  
LA, CA 90024



Marcia and Steve Berman  
11922 Iredell Street  
Studio City, California 91604

March 7, 2014

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 12 2014

ENVIRONMENTAL  
UNIT

Re: Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

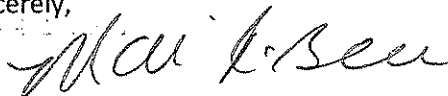
I am the Director of the Annual Fund at The Archer School for Girls and am writing in strong support of the Archer Forward Plan. I hope that the Los Angeles Planning Department will move the project forward quickly so that Archer can create the 21<sup>st</sup> century campus that its students genuinely 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 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.

Sincerely,



Marcia R. Berman

cc: Councilman Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)

2 messages

**Residential Neighbors of Archer** <archerneighbor@gmail.com>  
 To: mike.bonin@lacity.org, adam.villani@lacity.org

Wed, Mar 19, 2014 at 11:38 PM

I hereby strongly state my opposition to:

the Archer Forward Plan As Proposed (ENV-2011-2689-EIR)

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.

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. 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.

Phyllis Bernard  
 1433 Georgina Avenue  
 Santa Monica, CA 90402

---

**Adam Villani** <adam.villani@lacity.org>  
 To: Residential Neighbors of Archer <archerneighbor@gmail.com>

Thu, Mar 20, 2014 at 10:35 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
 Adam Villani  
 Planning Assistant  
 City of Los Angeles  
 Department of City Planning  
 Major Projects Section  
 Adam.Villani@lacity.org  
 (818) 374-5067  
 alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Archer School For Girls**

2 messages

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**RLB** <berney.law@gmail.com>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org, archerforward@archer.org

Tue, Apr 15, 2014 at 9:56 AM

Please see the attached letter from Russell L. Berney, Esq., dated April 15, 2014.

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**Archer Forward Letter.4.15.14.pdf**  
226K

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**Adam Villani** <adam.villani@lacity.org>  
To: RLB <berney.law@gmail.com>

Tue, Apr 22, 2014 at 12:10 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

On Tue, Apr 15, 2014 at 9:56 AM, RLB <berney.law@gmail.com> wrote:

Please see the attached letter from Russell L. Berney, Esq., dated April 15, 2014.

---

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

**BERNEY LAW CORPORATION**

11693 San Vicente Boulevard, Suite 320

Los Angeles, California 90049

Telephone: (310) 471-6543

Facsimile: (310) 471-6609

April 15, 2014

Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Support for Archer's Campus Improvement Plan

Dear Mr. Villani:

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 its 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.

4/15/14  
Page 2

I truly hope the city of Los Angeles will agree that this is a responsible plan and a necessary step for Archer.

Very truly yours,

BERNEY LAW CORPORATION

By:   
RUSSELL E. BERNEY, ESQ.

Cc: Councilmember Mike Bonin

March 3, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
In Support of Archer's Campus Plan

Dear Mr. Villani:

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.

Thank you sincerely for your time,



Shane Berning  
2211 Overland Ave  
Los Angeles, CA 90064

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer's Campus Plan

2 messages

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**Christina McIntosh** <cmcintosh@archer.org>

Tue, Apr 29, 2014 at 11:44 AM

To: adam.villani@lacity.org

Re: ENV-2011-2689-EIR

### Support for The Archer School for Girls and Archer Forward

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.

Kind regards,  
-Christina McIntosh

—  
**Christina McIntosh**  
Communications Office  
The Archer School for Girls  
11725 Sunset Blvd, Los Angeles, CA 90049  
310-873-7000  
www.archer.org

*ambitious, joyful learning for girls grades 6 through 12*

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#### 2 attachments

**Letter in Support of Archer 2.21.14.pdf**  
45K

**Archer Letter 2-25-2014.pdf**  
33K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:09 PM

To: Christina McIntosh &lt;cmcintosh@archer.org&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. Specifically, shall we add Patrick Cole and Robert D. Beyer to the mail distribution list for this project?

You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles

5/2/2014

City of Los Angeles Mail - Support for Archer's Campus Plan

Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



**ROBERT D. BEYER**

February 25, 2014

The Honorable Mike Bonin  
Los Angeles City Hall  
200 N. Spring Street, Suite 475  
Los Angeles, CA 90012

Dear Councilmember Bonin:

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.

My best regards,

Robert D. Beyer



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## We Support Archer Forward

2 messages

Loonb@aol.com &lt;Loonb@aol.com&gt;

Fri, Apr 18, 2014 at 10:41 AM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**Re: ENV-2011-2689-EIR**

Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

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 its 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.

Sincerely,

Natalie Blake and Steven Schwartz

2810 Mandeville Canyon Road

Los Angeles, California 90049

cc: Councilmember Mike Bonin

Natalie Blake  
loonb@aol.com  
310.471.6779

---

**Adam Villani** <adam.villani@lacity.org>  
To: Loonb@aol.com

Wed, Apr 23, 2014 at 10:57 AM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

April 8, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

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CITY OF LOS ANGELES

APR 10 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer Forward!

Dear Mr. Villani:

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.

Sincerely,



Cc: Councilman Mike Bonin

Terry Blechner  
1516 Oak Street  
Santa Monica, CA 90405

April 8, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 10 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani:

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.

Sincerely,



TRACY BLUM  
2573 GREENVALLEY RD  
LA CA 90046

Cc: Councilmember Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

## I Support Archer Forward

2 messages

**Matthew Bombeck** <mattbombeck@gmail.com>

Tue, Mar 18, 2014 at 2:54 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, kcourtney@archer.org

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Strong Support for Archer Forward!

Dear Mr. Villani,

I am an Archer parent writing in support of the Archer Forward plan. I also live in the 11<sup>th</sup> 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 is 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, 21<sup>st</sup> century facilities.

Thank you.

Sincerely,

Matthew Bombeck

Cc: Councilman Mike Bonin

**Adam Villani** <adam.villani@lacity.org>  
To: Matthew Bombeck <mattbombeck@gmail.com>

Wed, Mar 19, 2014 at 10:50 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles

4/24/2014

City of Los Angeles Mail - I Support Archer Forward

Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Archer Development Plan

2 messages

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**sdbomes@aol.com** <sdbomes@aol.com>

Mon, Apr 14, 2014 at 10:14 AM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

Please see the attached letter.

**Stephen D. Bomes**

12548 Promontory Road  
Los Angeles, CA 90049  
Telephone: (310) 472-2545  
Email: sdbomes@aol.com

**Archer\_Traffic.docx**

17K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 22, 2014 at 11:31 AM

To: sdbomes@aol.com

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Strong Support for Archer Forward!

Dear Mr. Villani,

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.

Thank you.

Sincerely,

Barbara and Stephen Bomes  
12548 Promontory Road  
Los Angeles 90049

Cc: Councilman Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Archer School for Girl Campus Improvement Plan RE: ENV-2011-2689-EIR**

3 messages

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**Ginger L. Bower** <gbower01@gmail.com>

Tue, Apr 8, 2014 at 4:57 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org, Elizabeth English &lt;eenglish@archer.org&gt;

Dear Adam,

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 everyday 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.

Best,

Ginger Bower  
gbower01@gmail.com  
cell 310-339-1333

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:29 PM

To: "Ginger L. Bower" &lt;gbower01@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning

4/25/2014

City of Los Angeles Mail - Archer School for Girl Campus Improvement Plan RE: ENV-2011-2689-EIR

Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Ginger L. Bower** <gbower01@gmail.com>  
To: Adam Villani <adam.villani@lacity.org>

Fri, Apr 18, 2014 at 2:05 PM

Thank you so much Adam.

[Quoted text hidden]

—

home 310-876-8808  
cell 310-339-1333

March 31, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 03 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

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.

Sincerely,



Susan Hamilton Brin  
8336 W 4th St.  
Los Angeles, CA 90048

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Support for Archer Forward**

3 messages

**Michael Brodsky** <brodskm@yahoo.com>

Wed, Apr 9, 2014 at 12:29 AM

Reply-To: Michael Brodsky &lt;brodskm@yahoo.com&gt;

To: "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;, "archerforward@archer.org" &lt;archerforward@archer.org&gt;

**RE: ENV-2011-2689-EIR**

Dear Mr. Villani and Councilmember Bonin:

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.

Sincerely,

Michael Brodsky  
11980 San Vicente Blvd. Suite 612  
Los Angeles, CA 90049  
(310) 622-4140

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:32 PM

To: Michael Brodsky &lt;brodskm@yahoo.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Michael Brodsky** <brodskm@yahoo.com>  
To: Adam Villani <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 7:53 PM

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



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

5 messages

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**Tena Fishman** <tenafishmanfrank@gmail.com>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org, archerforward@archer.org

Wed, Apr 9, 2014 at 3:36 PM

**RE: ENV-2011-2689-EIR**

I am the mother of a 7th grader at Archer School for Girls. We love Archer school. It is the perfect place for our daughter. The faculty is amazing Now all it needs is to improve its facilities, including modern classrooms, athletics facilities and spaces for performing and visual arts. Other independent and public schools have these facilities already.

Thank you for taking the time to read my letter.

Sincerely,  
Tena Frank

—  
please reply to TenaFishmanFrank@gmail.com

---

**Athene Noelle** <athene-noelle@sbcglobal.net>  
Reply-To: Athene Noelle <athene-noelle@sbcglobal.net>  
To: "Adam.Villani@lacity.org" <Adam.Villani@lacity.org>  
Cc: "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>, "archerforward@archer.org" <archerforward@archer.org>

Wed, Apr 9, 2014 at 5:17 PM

**RE: ENV-2011-2689-EIR**

To Whom It May Concern:

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.

Sincerely,

Noelle Brooks

---

**Adam Villani** <adam.villani@lacity.org>  
To: Athene Noelle <athene-noelle@sbcglobal.net>

Thu, Apr 17, 2014 at 5:42 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

--  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org



(818) 374-5067  
alternate: (213) 978-1454

---

**Athene Noelle** <athene-noelle@sbcglobal.net>  
Reply-To: Athene Noelle <athene-noelle@sbcglobal.net>  
To: Adam Villani <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:46 PM

Dear Mr. Villani,

I understand. Certainly. My address is 1116 S. Highland Ave. Los Angeles, Ca. 90019

Sincerely,

Noelle Brooks

---

**From:** Adam Villani <adam.villani@lacity.org>  
**To:** Athene Noelle <athene-noelle@sbcglobal.net>  
**Sent:** Thursday, April 17, 2014 5:42 PM  
**Subject:** Re: Support for Archer Forward

[Quoted text hidden]

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**Adam Villani** <adam.villani@lacity.org>  
To: Tena Fishman <tenafishmanfrank@gmail.com>

Fri, Apr 25, 2014 at 12:01 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

March 15, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani,

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.

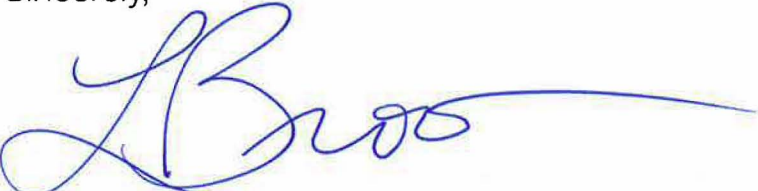
The Archer Forward plan is critical to the continued success of the school and in particular the growing engineering department. The construction will provide our students with the same facilities that their peers at other schools already enjoy: sufficient classroom space, modern classroom technology, 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.

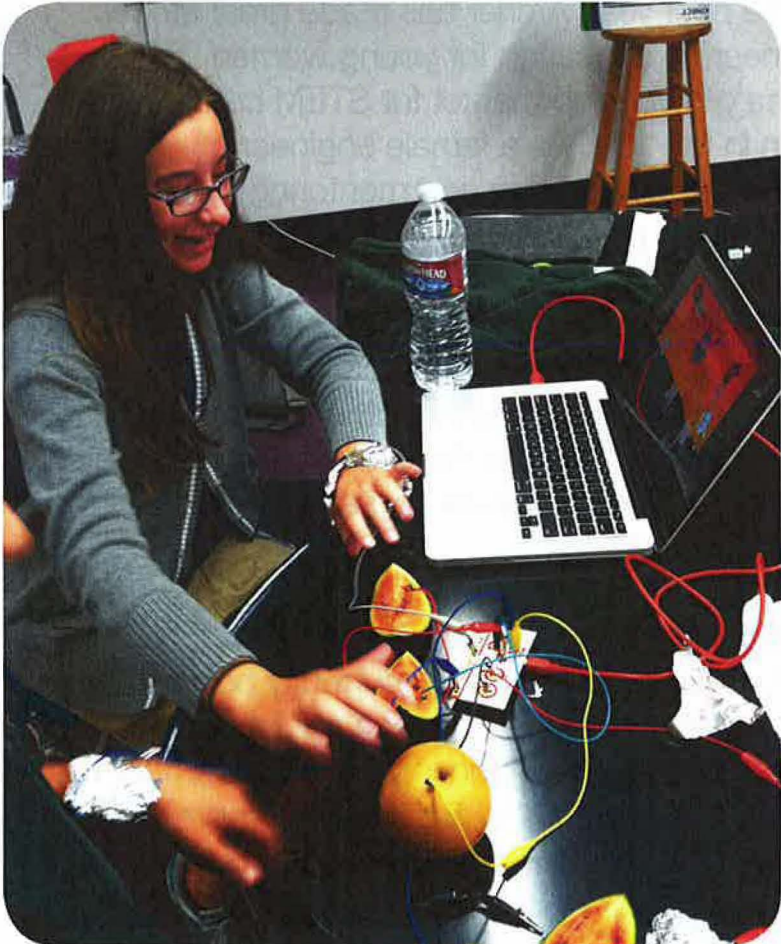
As you can see in the photos below, the girls have responded to the new engineering curricula with great enthusiasm and engagement. With deep sincerity, and with the hope that this engagement will continue to grow in the future, I humbly request that you support the Archer Forward plan.

Sincerely,



Lindsay Browder

Cc: Councilmember Mike Bonin



March 21, 2014

RECEIVED  
CITY OF LOS ANGELES

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

MAR 24 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

I am a parent of a current student at the Archer School for Girls and an 11<sup>th</sup> 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 21<sup>st</sup> 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.

Sincerely,

*Rachel Brown*  
3122 Grand View Blvd.  
Los Angeles, Ca. 90066

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Archer Forward Support Letter

2 messages

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**Barbara Bruser** <bbrusercfa@gmail.com>

Fri, Mar 28, 2014 at 12:41 PM

To: "adam.villani@lacity.org" <adam.villani@lacity.org>

Cc: councilmember.bonin@lacity.org, "info@brentwoodhomeowners.org" <info@brentwoodhomeowners.org>

March 28, 2014

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

ENV-2011-2689-EIR

### **Re: The Archer School for Girls and Archer Forward**

Dear Mr. Villani:

Archer's Campus Preservation and Improvement Plan will help ensure that girls in Los Angeles have the opportunity to obtain a first-class education in a diverse, ambitious and joyful environment. I am writing to request your support for the plan as the public review process moves forward.

Archer students train for and perform in award-winning arts programs, including: dance, theater, choir and orchestra. They also compete in a number of different sports with other local independent schools. Currently, Archer spends a great deal of resources renting off-site venues for practices, games and performances. Our plan envisions providing the essential facilities that

will allow our students to participate in these activities onsite – facilities that most independent schools in the area already have.

The new facilities we are proposing will greatly help advance the school's mission to provide a 21<sup>st</sup> century education for girls across the city. Our innovative plan is consistent with the promises we made to our community, and we will continue to be a good neighbor. We have had a continuous dialogue with the community throughout this process and we plan to continue to work with local residents and stakeholders moving forward.

As the Draft EIR for the Archer Forward Plan has now been released, we hope that you will add your support to this project. We look forward to working with you and your office.

Kind regards,

Barbara Bruser  
Co-Chair, Archer Board of Trustees

Cc: Councilmember Bonin

---

**Adam Villani** <adam.villani@lacity.org>  
To: Barbara Bruser <bbrusercfa@gmail.com>

Thu, Apr 17, 2014 at 3:25 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I support Archer Forward

2 messages

**Tanya Bryzgalova** <tanyabryz@hotmail.com>

Tue, Mar 18, 2014 at 7:54 PM

To: "Adam.Villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

RE: ENV-2011-2689-EIR

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

03.18.2014

Re: ENV-2011-2689-EIR

A letter in support of Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani,

I have a daughter at Archer and I live in CD 11. I am very excited and strongly in support of the Archer Forward plan.

My daughter chose to attend Archer because the School is truly unique in Los Angeles. The only secular girl's school in the west side of Los Angeles, Archer's student body reflects the diverse character of the entire City. With a high-quality curriculum, I believe that Archer is truly educating the future leaders of this country. But to fully deliver on Archer's promise to the City, the School needs adequate facilities to create a 21<sup>st</sup> century campus.

The Archer Forward plan would provide what the School really needs: modern classrooms, athletic fields and facilities and visual and performing arts spaces. Archer girls fully participate in academic, arts and athletics, and need the facilities to support these activities. You should see the girls trying to put on a performance on the small stage they currently have – girls are literally spilling off the ends! And the school currently doesn't have a space where the entire campus can be together to watch a performance, hear a speaker or listen to announcements from the Head of School.

I recognize that there are concerns about development in Brentwood, but it's important to acknowledge that Archer has fully complied with the most stringent conditions imposed by the City on any independent school in Los Angeles. In fact, Archer has gone beyond the City's requirements to ensure that the school has a minimal impact on traffic. I believe that track record should be celebrated, and the City should help Archer move forward with the reasonable new hours and operations they're proposing.

Archer is a jewel in Los Angeles, and I hope that you, Councilman Bonin and the rest of the City will help move the Archer Forward project quickly through the City process. Thank you.

Sincerely,

Tanya and Alex Bryzgalova

Cc: Councilman Mike Bonin

---

**Adam Villani** <adam.villani@lacity.org>  
To: Tanya Bryzgalova <tanyabryz@hotmail.com>

Wed, Mar 19, 2014 at 10:51 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



March 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 19 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:


My daughter is a student at Archer School for Girls, and I am writing to let you know that I support Archer's Campus Preservation and Improvement plan, Archer Forward.

The Archer Forward plan will allow the school to provide an even better education for Archer students, by adding modern classrooms, a regulation-size athletic field, a gymnasium and spaces for swim, performing and visual arts. Archer students are actively involved in the community: they volunteer at Brentwood Green, tutor students at Brentwood Science Magnet School, participate in local recycling and conservation efforts, volunteer at Daybreak Women's Shelter and more.

Archer has a great track record as a responsible neighbor in the community. For example, much time and energy has been poured into the school's traffic control system. Every parent is well versed in parking and driving restrictions in the area during school hours, and we know that if we do not follow the rules there will be consequences. This is done out of Archer's high level of consideration and respect for its neighbors, who don't like sitting in traffic any more than I do.

I believe that the Archer School for Girls is a valuable and upstanding member of the local community, and has done everything in its power to ensure that this plan presents every benefit possible to its neighbors. I hope you'll help move this project quickly through the city's process.

Sincerely,

  
1601 Marine St.  
Santa Monica, CA 90405

CC: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**2011-2689-EIR**

2 messages

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**Sue Bunzel** <sbunzel@gmail.com>

Mon, Apr 28, 2014 at 1:59 PM

To: adam.villani@lacity.org, mike.bonin@lacity.org

To Adam Villani and Mike Bonin:

I oppose the Archer Forward Plan as Proposed and recommend that the alternative be accepted.

I've lived here for 54 years, and have been a member of BHA since it started. Now I have signed the Archer Neighbors Alternative Plan Petition and am writing you to urge your denial of the proposed Archer Expansion Plan.

The traffic is already appalling and if the Archer proposal is accepted, it will make Brentwood and surrounding environs practically unlivable. I urge you to reject this proposal outright and accept the alternative plan proposed by the Residential Neighbors of Archer.

Thank you.

Suzanne Bunzel  
485 N. Bowling Green Way  
L.A. 90049

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:46 PM

To: Sue Bunzel &lt;sbunzel@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

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**Burks,Tami, GLENDALE, North America Procurement** <tami.burks@us.nestle.com> Mon, Apr 28, 2014 at 2:03 PM  
To: "Adam.Villani@lacity.org" <Adam.Villani@lacity.org>  
Cc: "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>, "archerforward@archer.org"  
<archerforward@archer.org>

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 **letter.docx**  
17K

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**Adam Villani** <adam.villani@lacity.org> Tue, Apr 29, 2014 at 2:47 PM  
To: "Burks,Tami, GLENDALE, North America Procurement" <tami.burks@us.nestle.com>

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
I Support Archer Forward

Dear Mr. Villani:

I'm an incoming Archer parent and I am writing to show my support for the school's campus plan Archer Forward.

There are several independent schools to choose from in Los Angeles, but after coming to Archer and meeting its current students and the faculty and staff, I knew this was the right choice for my daughter.

Archer is a innovative school that creates an atmosphere that encourages girls to take risks and try new things. In doing so, the girls realize their strengths and become leaders. The Archer faculty thinks outside of the box and caters their lessons to the way girls learn best. We know our child will thrive at Archer and we are excited to see the young woman she will become. The only thing that would make this school even better is if it had better facilities.

The school is proposing a plan that will allow them to build an aquatics center, a gym, and a performing and visual arts center. These facilities will enhance the girls' middle and high school experiences and I am excited that my daughter will be a part of that.

Archer is a treasure to Brentwood. I hope you see this and choose to support the school as they move forward.

Sincerely,

Tami Burks

5520 Eileen Ave, Los Angeles, CA 90043

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I Support Archer Forward

2 messages

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**Nina Bush** <ninabush@gmail.com>

Mon, Apr 21, 2014 at 8:03 AM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archer@archerforward.org

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

RE: ENV-2011-2689-EIR

Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

As the parent of an Archer student, I am proud of the fact that for the past 15 years, the Archer School for Girls has been a valuable and responsible member of the Brentwood community. I believe that the school is an extremely valuable resource to the city which is why I am writing in support of Archer Forward, the school's improvement plan.

Archer's student body includes girls from a wide range of cultural and socioeconomic backgrounds reflective of the city we live in: approximately 36% of Archer students come from minority backgrounds, and Archer students currently reside in 92 zip codes throughout Los Angeles County.

Archer offers more than a traditional, girl-centric learning environment—the school equally prepares young women for leadership in a global world.

The improvement plan embodies the essentials that nearly every other independent and public school has in Los Angeles, including gymnasiums, performing arts and visual arts facilities, regulation sized athletic fields and aquatic centers. Currently, the school spends significant resources renting offsite facilities for practices, games and performances, and lacks gathering spaces for the entire student body.

Archer believes that this is the most effective plan to meet the needs of the school and to offer a competitive array of opportunities for future students. I am proud to enroll my daughter at the Archer School for Girls because

not only is she receiving a world-class education, but also because the school is committed to doing its job well.

Please help move the Archer Forward plan forward quickly. Thank you.

Sincerely,

Nina Bush

4131 Madison Ave

Culver City, CA 90232

cc: Councilmember Mike Bonin

---

**Adam Villani** <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 11:33 AM

To: Nina Bush <ninabush@gmail.com>

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

March 3, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

My name is Andy Callender, and I am a mathematics teacher at the Archer School for Girls. Since starting in my position last August, I have been blown away by the incredible faculty, staff, and student body that make Archer an incredible place to work and learn.

Before coming to Archer, I worked as a public school teacher in the Seattle suburbs for 5 years. Frustrated by a bureaucratic educational system that focused more on standardized testing than true student learning, I resigned from my tenured position in 2012 without any intention of returning to teaching. After a year of exploring other opportunities, I returned to teaching when I was offered a full-time position at Archer.

The Archer School for Girls embodies everything that is right with education. It is a place that empowers young women to think critically and engage in the world and community around them. Archer's administration empowers faculty by granting autonomy to be inventive in the classroom. The integration of technology with individual creativity makes learning and teaching rewarding. My experience at Archer has truly reignited my passion for teaching.

The current state of Archer's facilities impedes students from achieving the full potential of their learning experience. My classroom is very small, with insufficient space for the limited number of students I currently have. Our facilities also lack an intercom system, which would complicate communication during an emergency situation. We also lack individual climate control in our classrooms, which makes the rooms very hot and uncomfortable during the fall and spring.

As Archer's Assistant Cross Country coach, I experienced the limitations of our athletic facilities during the fall season. Without a track or field to practice on, students are forced to run around the campus and in the Brentwood neighborhood, avoiding traffic along the way. We bussed the girls several miles away to Santa Monica each week so they could perform longer runs on outdoor paths in order to adequately prepare for competition. A track on campus would save the school money on transportation costs and decrease traffic flow in and

out of campus. Perhaps most importantly, it would also provide our student-athletes with several more hours during their athletic season to spend on academics, rather than on the road.

I ask that the City of Los Angeles support the Archer Forward Plan. These campus improvements will have a direct and positive impact on the education of our students by providing Archer with basic accommodations that most other schools enjoy. I plan to be a part of the Archer community for the next several years and am hopeful that I will have the opportunity to see these plans come to fruition. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Andrew Callender".

Andrew Callender

Cc: Councilmember Mike Bonin





Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**Danny** <dannyjcannon@gmail.com>

Mon, Apr 14, 2014 at 1:23 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org

**RE: ENV-2011-2689-EIR**Please find my letter of Support for Archer Forward *attached below*.

Thank you,

Danny Cannon  
466 Homewood Rd  
Brentwood CA 90049

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 **Archer Forward.pdf**  
75K

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**Adam Villani** <adam.villani@lacity.org>

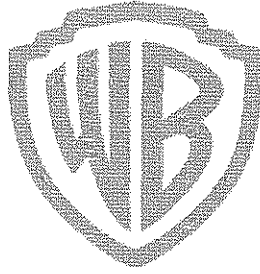
Tue, Apr 22, 2014 at 11:57 AM

To: Danny &lt;dannyjcannon@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
I Support Archer Forward

Dear Mr. Villani:

My daughter will soon be a member of the school that is at the forefront of the girls' educational movement in Los Angeles - The Archer School for Girls. I am writing as an incoming parent and a Brentwood resident, and I want to show my support for the plan.

Living in this area, I would always come into contact with Archer girls in the Brentwood Village. I was always impressed by the way they carried themselves and how they were respectful to others. When it was time to choose a school for my daughter, I was proud to select Archer.

Because I live in Brentwood, I understand what a big concern traffic is. However, Archer accounts for a very small percentage of the overall traffic on Sunset and it is my understanding that they are committing to an even higher busing requirement than they have now.

Please give these girls the opportunities their peers are being afforded at other schools and support their campus plan.

Sincerely,

Danny Cannon

466 Homewood Road  
Brentwood, CA 90049

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**Nicole Cannon** <nicolecannon88@gmail.com>

Sat, Apr 12, 2014 at 2:37 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org

Dear Mr Villani,

Please find attached a letter regarding Archer's Campus Improvement Plan.

Reference # ENV-2011-2689-EIR

Best Regards,  
Nicole Cannon**ArcherForward.doc**

879K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 22, 2014 at 11:27 AM

To: Nicole Cannon &lt;nicolecannon88@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

-

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
I Support Archer Forward

Dear Mr. Villani:

My daughter will soon be a member of the school that is at the forefront of the girls' educational movement in Los Angeles - The Archer School for Girls. I am writing as an incoming parent and a Brentwood resident, and I want to show my support for the plan.

Living in this area, I would always come into contact with Archer girls in the Brentwood Village. I was always impressed by the way they carried themselves and how they were respectful to others. When it was time to choose a school for my daughter, I was proud to select Archer.

Because I live in Brentwood, I understand what a big concern traffic is. However, Archer accounts for a very small percentage of the overall traffic on Sunset and it is my understanding that they are committing to an even higher busing requirement than they have now.

Please give these girls the opportunities their peers are being afforded at other schools and support their campus plan.

Sincerely,

Nicole Cannon

466 Homewood Rd

Los Angeles, CA 90049

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer School Expansion Case Number: ENV-2011-2689-EIR**

3 messages

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**Mark Caplow** <MCaplow@caplow.com>

Fri, Apr 25, 2014 at 11:20 AM

To: "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "mike.bonin@lacity.org" &lt;mike.bonin@lacity.org&gt;, "edenromick@yahoo.com" &lt;edenromick@yahoo.com&gt;, "Rodney Liber (rodliber@aol.com)" &lt;rodliber@aol.com&gt;, "stevenromick@gmail.com" &lt;stevenromick@gmail.com&gt;, "Thelma Waxman (thelma.waxman@gmail.com)" &lt;thelma.waxman@gmail.com&gt;, "info@brentwoodowners.org" &lt;info@brentwoodowners.org&gt;

Mr. Villani,

It is my understanding that you are the person handling responses to the Draft EIR for the Archer School Expansion in Brentwood. My family and I live in Brentwood and will be affected by this project. I have attached my comments to the Draft EIR and ask that you submit them to the case file.

Sincerely,

Mark Caplow

**Archer DEIR.docx**

17K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:01 PM

To: Mark Caplow &lt;MCaplow@caplow.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
 Adam Villani  
 Planning Assistant  
 City of Los Angeles  
 Department of City Planning  
 Major Projects Section  
 Adam.Villani@lacity.org

(818) 374-5067  
alternate: (213) 978-1454

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**Mark Caplow** <MCaplow@caplow.com>  
To: Adam Villani <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:02 PM

Thank you Mr. Villani,

I would like to sign up as an interested party for the Archer School Expansion project. My address is below.

Mark Caplow  
E. M. Caplow and Assoc.  
9533 Pico Blvd. Los Angeles,  
California, 90035

(310) 277-8688

**From:** Adam Villani [mailto:adam.villani@lacity.org]  
**Sent:** Tuesday, April 29, 2014 2:01 PM  
**To:** Mark Caplow  
**Subject:** Re: Archer School Expansion Case Number: ENV-2011-2689-EIR

[Quoted text hidden]

April 24, 2014

Adam Villani  
Department of City Planning  
City of Los Angeles  
City Hall  
200 N. Spring St. Room 750  
Los Angeles, California 90012

Re: Case Number: ENV-2011-2689-EIR

To whom it may concern,

I would like to respond to the Draft EIR for the Archer Forward project. My family and I live in Brentwood on Westgate Ave. which will be impacted by the Archer School expansion plan.

After reading the draft EIR, it is apparent that it is flawed in many ways. The crucial flaw is in the fact that a "once in a lifetime" multiyear, multibillion dollar Caltrans expansion of the 405 freeway is about to be completed after 4 years of construction. Because of the size and scope of the Caltrans project, and its proximity to the Archer school expansion, the above draft EIR had to use traffic counts that are several years old in an attempt to come up with some sort of traffic flow for the Archer expansion. They presented those estimates in the DEIR.

The only possibility of predicting how the Archer expansion will affect traffic flow is to wait till the 405 expansion is completed and seasoned in a few years. Then and only then can any traffic study have any credibility. In fact the new traffic counts taken two years after completion of the 405 may even benefit the Archer school and its expansion plans.

Using older traffic counts may not be of any great significance in most cases, but in this case, the Caltrans project is too large, and has taken too long to just

use data from previous years to come up with anything close to reliable traffic numbers. Even Caltrans traffic numbers are not very reliable because they are focused mostly on the 405 freeway itself, but not on the inevitable traffic a larger freeway brings to the neighboring community. Additionally, during the 4 year period of the 405 expansion project, there has been a prolific growth of the Santa Monica commercial core. Because of its proximity to the Pacific Ocean, the Santa Monica commercial core can only be serviced using just the west side of Los Angeles. That brings new traffic to our area that is not adequately dealt with in the DEIR.

The traffic flows from the breathtaking growth of Santa Monica over the last 4 years along with the expansion of the 405, has not been adequately taken into consideration by the Draft EIR. There simply is not enough information for any traffic engineer to determine the true effect of the Archer expansion at this time. The changes now occurring in traffic flow around the Archer expansion area is too large and too pivotal for our neighborhood, and the city as a whole.

I respectfully ask that the City table its action on the Archer expansion until the Caltrans expansion is completed and seasoned.

Sincerely,

Mark Caplow



March 7, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 11 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR

I Support Archer's Campus Plan

Dear Mr. Villani:

My name is April Carletto, I am the Admissions Coordinator for The Archer School for Girls. I am writing this letter in regards to the Campus Plan currently under consideration.

This plan embodies the essentials that nearly every other independent and public school has in Los Angeles, gymnasiums, performing and visual arts facilities, regulation-size athletic fields and modern classrooms. The plan meets Archer's core needs while limiting impacts to the greatest extent possible.

As an admissions representative at Archer, I am often asked about by our lack of facilities. Despite Archer's academic excellence and achievement, applicant families are sometimes underwhelmed with our current facilities in comparison to other independent schools they visit during the admissions recruitment season.

When implemented, the plan will allow Archer to remain at the forefront of secular girls school education well into the 21st century. The Plan will also allow Archer to continue providing educational opportunities to students of from a diverse ethnic and socio-economic backgrounds.

Please consider current and future Archer girls when making your decision. These girls are working hard to become confident leaders that will make their communities proud.

Sincerely,



April Carletto  
4953 Cahuenga Blvd, B  
Toluca Lake, CA 91601

Cc: Councilmember Mike Bonin

March 14, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 21 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

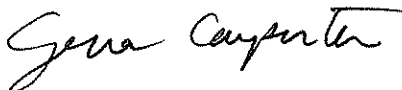
Dear Mr. Villani:

I have the pleasure of being a part of the Archer School for Girls. I have seen for myself the tremendous efforts that the school goes to in order to be a good neighbor. From a detailed and well-monitored traffic program to consistently reaching out to neighbors, they strive to make positive contributions to the neighborhood. The campus is a safe and welcoming space for girls from throughout Los Angeles. Here they learn to be confident in themselves and how to be a force for good in the world. However, many facilities are missing from our campus. These facilities would further empower our girls to be leaders and shakers out in the world at large.

The school's reasonable request for these facilities has been made with careful consideration of the impact on neighbors and the neighborhood, with many discussions taking place with neighbors and local organizations. The Archer Forward plan will deliver needed facilities to a deserving school, one that has gone to great lengths to work with neighbors while still delivering a quality education to girls from throughout Los Angeles.

I encourage you to support the very reasonable Archer Forward plan, which will provide even greater opportunities for the girls of Los Angeles.

Sincerely,



Gena Carpenter  
2028 Avenida Vista Del Monte #1  
Simi Valley, CA 93063

Cc: Councilmember Mike Bonin

March 4, 2014

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

ENVIRONMENTAL  
UNIT

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

cc: Councilmember Mike Bonin

re: ENV-2011-2689-EIR

in support of Archer's campus plan

Dear Mr. Villani:

I joined the Archer School for Girls last fall to launch a new program in Integrated Design & Engineering Arts as a way of engaging girls with Science, Technology, Engineering and Math (STEM).

Right away, I was struck by how much Archer differed from what I had stereotypically thought of as a private school. Archer really cares about its students and in helping them to become caring, upstanding contributors to the community. Moreover, unlike any private school I've ever encountered, Archer sincerely believes in the value of an ethnically and economically diverse student body. I am proud that I work for a school that takes students from more than 90 different zip codes around Los Angeles and offers so much financial aid. The compassionate, confident and poised young women that Archer graduates are a benefit not only to the neighborhood but to the community as a whole.

Although I believe that Archer is doing some truly great work, we could be doing even more for our students. This year I have experienced first-hand the constraints of limited physical space and old infrastructure. As we work to convince our students of the value of science and math, we often have to limit what we can do with them due to a lack of facilities.

My Engineering & Design students currently meet in a cramped classroom in the non-historic, non-climate-controlled section of the building. We often need to shuffle projects and equipment between closets and offices across the campus due to a lack of space. And, this semester in particular, students who are genuinely excited about using our new engineering room can't do so because we need to use the space to hold other, unrelated, classes at the times they need access. Similarly, my engineering students have run afoul of other classes when trying to access larger spaces needed to test things like our US FIRST competition.

Without more space, it will be impossible to properly offer engineering and design resources to all of our students, and research shows that lack of exposure while teenagers is a primary reason why girls don't pursue engineering in college.

Not only will Archer's campus plan provide the space we need for more effective teaching, but it will beautify and green the neighborhood by moving parking underground and adding new landscaping.

My students and I will greatly appreciate your support for Archer's campus plan.

Thank you for our time and consideration.

Most Sincerely,

A handwritten signature in black ink that reads "Mike Carter". The signature is written in a cursive, flowing style.

Mike Carter



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Fwd: Archer School Expansion**

2 messages

---

**Sal Casola** <salcasola@me.com>  
To: "adam.villani@lacity.org" <adam.villani@lacity.org>

Tue, Apr 1, 2014 at 4:19 PM

Hi Adam

Please see attached

Sal Casola  
MCC Hospitality Group  
310.696.9201 c  
818.841.5040 o  
818.841.5001 f

MCCHGroup.com

Begin forwarded message:

**From:** Leticia Heredia <lheredia@mcchgroup.com>  
**Date:** April 1, 2014 at 3:42:16 PM PDT  
**To:** salcasola <salcasola@me.com>  
**Subject:** Archer School Expansion

Please see attached letter.

*Leticia Heredia*  
*MCC Hospitality Group*  
*156 W. Verdugo Ave.*  
*Burbank, CA 91502*  
*office (818) 841-5040*  
*fax (818) 841-5001*

**Archer School.docx**

14K

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**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 3:42 PM

To: Sal Casola <salcasola@me.com>

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

Adam Villiani  
City of LA Department of Planning

Councilman Mike Bonin  
Council District 11

Dear Mr. Villiani and Councilman Bonin;

I am writing today to urge you to not approve the expanded plan for Archer School on Sunset Boulevard as it has been set forth by the school. I am a neighborhood resident. I live approximately half a mile north of Archer School.

Traffic in the area is at a standstill much of the afternoon. To go east from my home, I must access Sunset Blvd. The cut-through so many are using now on Barrington Avenue is creating so much traffic for me to leave my home. It often takes me 15-25 minutes to get from my house to Sunset Blvd., a half mile away.

A reasonable alternative to what is being proposed is a one-phase construction, maintain the current number of special events and athletic events, increase the setback of the buildings placed adjacent to Chaparral Street, and expand and renovate the campus within the current footprint of the school. Only two new buildings should be allowed, not the proposed four.

Thank you for your consideration. I implore you to drive south on Barrington (starting north of Sunset) at 4:30 to see this traffic yourself. It is unreasonable. And until it is significantly different, additional traffic created in the area by this expansion should not be approved.

Sincerely,

Sal Casola  
321 N. Saltair Ave.  
Los Angeles, CA 90049



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Typical traffic getting out of our neighborhood**

2 messages

**Sal Casola** <salcasola@me.com>

Tue, Apr 1, 2014 at 4:27 PM


To: adam.villani@lacity.org

Archer school opposition

Sal Casola  
MCC Hospitality Group  
310.696.9201 c  
818.841.5040 o  
818.841.5001 f

MCCHGroup.com

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 **IMG\_5740.MOV**  
3051K

**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 3:43 PM

To: Sal Casola &lt;salcasola@me.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

On Tue, Apr 1, 2014 at 4:27 PM, Sal Casola <salcasola@me.com> wrote:

Archer school opposition

Sal Casola  
MCC Hospitality Group  
310.696.9201 c  
818.841.5040 o  
818.841.5001 f

MCCHGroup.com



4/24/2014

City of Los Angeles Mail - Typical traffic getting out of our neighborhood

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

April 11, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 16 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

I am a parent of a current student at the Archer School for Girls. 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 21<sup>st</sup> 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. With these facts, it is evident that this school is a benefit 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 that offers high quality education to students. These students then go on to contribute to this community in an extremely positive way. Archer has 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. I am highly invested in the school's mission and its success and strongly support Archer Forward.

Sincerely,

Andrea Cayton  
2379 EARLS COURT  
L.A., CA 90077

CC: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

3 messages

Lisa Cerone &lt;lisahcerone@gmail.com&gt;

Tue, Apr 8, 2014 at 11:36 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org

**RE: ENV-2011-2689-EIR**

Dear Mr. Villani,

Archer's high standards are breeding a new generation of young leaders who are directly serving the community that is nurturing them. This year, Mayor Eric Garcetti presented our 9th grade daughter Lulu, an Archer student, with The Brentwood Youth Citizen Award. Assemblymember Richard Bloom of the 50th District awarded her the California Legislature Assembly Certificate of Recognition for her "exemplary contribution to the community and dedication toward improving the lives of others." Councilmember Mike Bonin of the 11th District presented her with a citizenship award for helping "to enhance community betterment and further the common good of making our city a better place in which to live." And for the past two years, President Obama has awarded Lulu the President's Volunteer Service Award and has written her personally to praise her achievements in serving her community.

Not only did these honors reflect well on my daughter, they drew positive attention to the entire Brentwood community where Lulu attends school. For Archer to remain a national leader in community service, however, the school must continue to improve and upgrade its facilities so that it can remain viable and competitive.

Ever since Lulu started a charity organization, we've learned firsthand that there's fierce competition from other Los Angeles private schools to attract high achieving girls and strong families who are invested in creating a generation of global citizens. There's also competition to attract the best and brightest teachers and faculty leaders to nurture these young minds. I fear that without improvements, Archer – along with the community it serves – will lose girls like Lulu to schools that are evolving and growing to keep up with the type of learning environment required to educate a 21st century leader. If Archer is permitted to upgrade its facilities, it can continue to attract and develop a generation of young ladies who are longing to give back to the community that nurtures them.

Lisa and Daniel Cerone  
818-398-0403

---

Adam Villani <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:31 PM

To: Lisa Cerone &lt;lisahcerone@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant

City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Lisa Cerone** <lisahcerone@gmail.com>  
To: Adam Villani <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 10:20 PM

Please add me as an interested party in regard to the Archer Forward campaign.  
Lisa Cerone  
4907 Densmore Ave  
Encino CA 91436

Thank you  
Lisa Cerone  
818 398-0403

Sent from my iPhone  
[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**Amanda Chang** <amanda@thebrownchangs.com>

Mon, Apr 21, 2014 at 9:52 AM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;, "archerforward@archer.org" &lt;archerforward@archer.org&gt;, Justin Chang &lt;jchang@colonyinc.com&gt;

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April 18, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**ENV-2011-2689-EIR****Re: In Support of The Archer School for Girls and Archer Forward**

Dear Mr. Villani:

As a mother of four daughters in Los Angeles, I am deeply invested in the mission and the success of the Archer School for Girls. I am a strong supporter of the Archer Forward Campus Preservation and Improvement Plan, not only for my daughters, but for the girls of Los Angeles for many years to come. I am writing to request your support for the plan as the public review process moves forward.

From the founding of the school in 1995, Archer has been a good neighbor and good citizen, working proactively with others in its neighborhood. Importantly, Archer listens to its neighbors' concerns, addresses them proactively and with respect, and communicates transparently and frequently. The Archer leadership has met frequently with stakeholder groups in the community, soliciting feedback and responding to concerns to ensure that it lives up to its commitment to be a responsible neighbor.

It can be expected that issues may arise between a school and its neighbors, but I believe that Archer has seized every opportunity to go the extra mile to tackle these problems and find tenable solutions for the benefit of the entire community. Archer parents and students have been very respectful of the school's requirements as laid out by their Conditional Use Permit, particularly with regard to traffic management. For example, Archer is the only independent school in Brentwood which has and enforces a strict policy of busing its students, significantly limiting its impact on local traffic, especially when compared with other schools in the community.

Over 19 years, Archer has built a community of excellence and inclusiveness in education, serving girls from across Los Angeles. In addition to academics, Archer students participate in award-winning visual arts programs including photography, painting, drawing, and ceramics. They also participate in a number of league sports with other local independent schools. Currently, Archer spends a great deal of resources renting off-site venues for practices, games and performances. This plan envisions facilities that will allow Archer girls to participate in these activities onsite,

consistent with the facilities that other schools in the community, both public and independent, already have.

Thank you for your consideration and support.

Sincerely,

Amanda Brown  
243 South Mapleton Drive  
Los Angeles, CA 90024  
amanda@thebrownchangs.com

Cc: Councilmember Bonin

---

**Adam Villani** <adam.villani@lacity.org>  
To: Amanda Chang <amanda@thebrownchangs.com>

Wed, Apr 23, 2014 at 11:39 AM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

4 messages

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**Justin Chang** <JChang@colonyinc.com>

Wed, Mar 26, 2014 at 11:23 AM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;, "info@brentwoodhomeowners.org" &lt;info@brentwoodhomeowners.org&gt;

March 26, 2014

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

**ENV-2011-2689-EIR****Re: In Support of The Archer School for Girls and Archer Forward**

Dear Mr. Villani:

As a Trustee of The Archer School for Girls in Brentwood, I am deeply invested in the school's mission and its success. We have developed the Archer Forward Campus Preservation and Improvement Plan to ensure that our facilities will match our standards of excellence in education in the years to come. I am writing to request your support for the plan as the public review process moves forward.

From the founding of the school 19 years ago, Archer has been a good neighbor and good citizen, working proactively with others in its neighborhood. Importantly, Archer listens to its neighbors' concerns, addresses them proactively and with respect, and communicates transparently and frequently. Our school leadership has met frequently with stakeholder groups in the community as we have developed Archer Forward, soliciting feedback and responding to concerns to ensure that we live up to our commitment to be a responsible neighbor.

It can be expected that issues may arise between a school and its neighbors, but I believe that Archer has seized every opportunity to go the extra mile to tackle these problems and find tenable solutions for the benefit of the entire community. Archer parents and students have been very respectful of the school's requirements as laid out by their Conditional Use Permit, particularly with regard to traffic management. For example, Archer is the only independent school in Brentwood which has and enforces a strict policy of busing its students, significantly

limiting its impact on local traffic, especially when compared with other schools in the community.

Over 19 years, Archer has built a community of excellence and inclusiveness in education, serving girls from across Los Angeles. In addition to academics, Archer students participate in award-winning visual arts programs including photography, painting, drawing, and ceramics. They also participate in a number of league sports with other local independent schools. Currently, Archer spends a great deal of resources renting off-site venues for practices, games and performances. Our plan envisions facilities that will allow our students to participate in these activities onsite, consistent with the facilities that other schools in the community, both public and independent, already have.

With the release of the Draft EIR for Archer Forward last month, we plan to continue the outreach to our neighbors in the upcoming public process and hope that you will add your support to this project. We look forward to working with you and your office.

Sincerely,

Justin Chang

Trustee, Archer School for Girls

Principal, Colony Capital

Chief Executive Officer, Colony American Homes

243 South Mapleton Drive

Los Angeles, CA 90024

jchang@colonyinc.com

Cc: Councilmember Bonin

---

**Adam Villani** <adam.villani@lacity.org>  
To: Justin Chang <JChang@colonyinc.com>

Thu, Mar 27, 2014 at 2:06 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section



Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Justin Chang** <JChang@colonyinc.com>  
To: Adam Villani <adam.villani@lacity.org>

Thu, Mar 27, 2014 at 2:12 PM

Thank you very much.

My mailing address is:

Justin Chang  
243 South Mapleton Drive  
Los Angeles, CA 90024

Thank you.

Justin Chang

**From:** Adam Villani [mailto:adam.villani@lacity.org]  
**Sent:** Thursday, March 27, 2014 2:07 PM  
**To:** Justin Chang  
**Subject:** Re: Support for Archer Forward

[Quoted text hidden]

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**Adam Villani** <adam.villani@lacity.org>  
To: Justin Chang <JChang@colonyinc.com>

Thu, Mar 27, 2014 at 2:13 PM

Thank you.  
[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Oppose Archer Forward Proposed Plan

2 messages

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**Toni Goldsobel** <toni@sgoldsobel.com>  
To: adam.villani@lacity.org, councilman.bonin@lacity.org  
Cc: archerneighbor@gmail.com

Fri, Mar 21, 2014 at 9:00 AM

Dear Councilman Mike Bonin,

I oppose the Archer School for Girls' Archer Forward Plan as currently proposed. The size of this expansion in a residential neighborhood, the intensification of use of the school and its new facilities and the resulting increase in traffic from this use on an already over burdened area will adversely affect our local community as well the community at large. Please do not support a plan that will have significant impacts that cannot be mitigated on six key intersections in Brentwood. Please support a downsized alternative that is very reasonable to reduce the impact on our neighborhood.

I live on Bundy north of Sunset and have been in the neighborhood for over 13 years. It takes me 20-45 minutes to go from my house to Barrington Recreation, our local park which is a scant few miles, because it takes so much time to cross Sunset in the afternoon -- not even to get onto Sunset. On Tuesdays, I travel from my house to University Synagogue on Saltair three times. More often than not, the intersection on Sunset and Saltair is blocked. I've picked up my daughter from Archer for a sports event and it took me a ridiculous amount of time just to get onto Sunset to pull into Archer. Even during the day, with all of the residential construction, I now avoid Barrington north of Sunset to avoid the construction trucks which are parked on both sides of the street. Archer can easily have improvements using the existing footprint and abiding by the existing conditional use permit which is how they were allowed to come to Brentwood in the first place.

Thank you,

Antonia Chan-Goldsobel

---

**Adam Villani** <adam.villani@lacity.org>  
To: Toni Goldsobel <toni@sgoldsobel.com>

Thu, Mar 27, 2014 at 1:46 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we

4/24/2014

City of Los Angeles Mail - Oppose Archer Forward Proposed Plan

are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

## Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)

6 messages

**Amy Jones Chapman** <aholdenj@me.com>

Wed, Mar 19, 2014 at 5:05 PM

To: adam.villani@lacity.org

I live on North Saltair and my life has been horribly impacted already by Archer School and all the other schools allowed to exist in our neighborhood. We already have Brentwood upper and lower school, Mount St. Mary's, St. Martin of Tours school, the Temple school, the Sunshine preschool, Brentwood Science Magnet, Kenter Canyon School, and The Brentwood Presbyterian school within a 1 MILE RADIUS of Archer School. The traffic between 7:30 am and 9:30 a.m. and from 2:30 pm to 7:00 pm is complete gridlock. Many of these schools have NO CARPOOL POLICY at all. Allowing Archer to grow yet again will destroy our lives. I cannot leave my house between the hours listed above. It isn't just the neighbors who are impacted. Traffic backs up on Sunset all the way to Bel Air to the east and to 26th Street to the west. It also backs up on Barrington and every feeder street to Sunset and now on San Vicente, too. It is clear this is mainly school traffic because as soon as there is a school holiday, the problem goes away.

PLEASE DO NOT ALLOW any further school development of any kind. It is irresponsible environmentally and in every other possible way. Would you want 9 schools in a one mile radius of your house? It's insufferable. Thank you for your consideration.

Amy Jones Chapman  
621 N. Saltair Ave.  
Los Angeles, Ca 90049

**Adam Villani** <adam.villani@lacity.org>

Thu, Mar 20, 2014 at 10:08 AM

To: Amy Jones Chapman &lt;aholdenj@me.com&gt;

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

**Amy Jones Chapman** <aholdenj@me.com>

Thu, Mar 20, 2014 at 10:10 AM

To: Adam Villani &lt;adam.villani@lacity.org&gt;

Please be aware you will be deluged by mail from parents at archer who are rich and organized and don't live in the neighborhood. Their nannies drive thru the traffic.

Sent from my iPhone

[Quoted text hidden]

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:36 PM

To: Amy Jones Chapman <aholdenj@me.com>

Thank you once again for your comment on the Archer Forward Draft EIR. I received your comment in March and indicated that you would be included in future distribution for notices related to this project. I should clarify that in order to do so, please forward me your USPS mailing address. You will then receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

---

**Amy Jones Chapman** <aholdenj@me.com>

Tue, Apr 29, 2014 at 3:41 PM

To: Adam Villani <adam.villani@lacity.org>

621 n saltair ave  
Los Angeles 90049

Sent from my iPhone

[Quoted text hidden]

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**Amy Jones Chapman** <aholdenj@me.com>

Wed, Apr 30, 2014 at 7:08 PM

To: Adam Villani <adam.villani@lacity.org>

Amy Jones Chapman  
621 N. Saltair Ave.  
Los Angeles, Ca. 90049

Thank you for your help.

[Quoted text hidden]

March 10, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

In August 2013, I began my dream career position as the Director of Learning Services at the Archer School for Girls. As the Director of Learning Services, my role is to review a student's learning profile from psychological-educational assessments, to implementing and facilitating school-based accommodations, and to maintain student-centered support. Archer values hands-on exploration, ambitious learning and meaningful collaboration when working with parents, students, teachers, and outside professionals to support an Archer girl's self-advocacy, growth, and ultimate independence.

The Archer student body includes girls from a wide range of cultural and socioeconomic backgrounds: approximately 36% of Archer girls are students of color, and Archer students currently reside in 92 zip codes throughout Los Angeles County. As for the Department of Learning Services at Archer, I provide services and essential school-based accommodations to students with a variety of learning styles. These school-based accommodations vary on a case-by-case basis and are specific to each student's academic, social and personal needs.

Regularly, I have meetings with students, parents, teachers, and administration in my office or in a small conference room across from my office to hold larger 'Team Meetings' and 'Student Study Team' meetings that could range anywhere from 2 to 15 people for one meeting. In addition, students use this one room for in-class academic group projects, club meetings, tutoring and proctored extended-time assessments. We are managing with the space we have to support the diverse needs of our students and community, but it is evident that for us to do our best work more space is required. The Archer Forward plan will add critical new facilities that will allow the school to continue to provide the 21<sup>st</sup> century education that its students deserve. To appropriately and successfully provide opportunities for student learning outcomes and collaborating within meetings, workshops, accommodations, and school projects we would truly appreciate unwavering support for our campus improvement plan.

I have contributed positive changes to the Department of Learning Services over the last seven months (i.e., a very specific example: PAWS – *Peer Academic Work Support* an on-

campus peer tutoring and mentoring program for all subjects and grades), but yet I have so many more goals that would enhance positive changes for best support practices for students with learning disabilities and differences including but not limited too; adaptive learning technology, tutoring, mentoring, meetings, implementing accommodations, and self-advocacy and study skill workshops and trainings. I have worked as a learning specialist in higher education for 10 years prior to my position at Archer, and I cannot stress the importance of an educational institution that has adequate facilities to service and support students, faculty, families, and school events for an enriched learning environment of their own.

Archer, a leading 21<sup>st</sup> century nationally-recognized independent girls' school on the Westside is of great value to the Brentwood community and to greater Los Angeles. I invite you to come visit Archer for yourself and see what an innovative community we are building for an ambitious and joyful place with a specific mission to teach girls in how they learn best. We appreciate your thoughtful consideration as we ask for your support with Archer's Campus Preservation and Improvement Plan. Should you have further questions about the Department of Learning Services or if I can further support Archer Forward please don't hesitate to contact me directly.

Most sincerely,



Catie R. Chase  
3765 Calle Mazatlan  
Newbury Park, California  
91320

Cellular: (805) 450-6434  
E-mail: [chase.catie@gmail.com](mailto:chase.catie@gmail.com)

Cc: Councilmember Mike Bonin

March 17, 2014  
Mr. Adam Villani  
Los Angeles Departments of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 19 2014

RE: DNV-2011-2689-EIR  
I Support Archer's Campus Plan

ENVIRONMENTAL  
UNIT

Dear Mr. Villani:

My name is Maria Chavez, I came to work at Archer School for Girls in March of 2000. I enjoy my work for many reasons and see lots of room for improvement throughout the school. Archer need updated laundry facilities, kitchen areas, and larger capacity refrigeration for all the special events and food storage. All of the teachers and students are very nice and I enjoy talking a working alongside them. I am from Guatemala and thank god every day that I have a job and hope for a better school for the children. Please support our construction plan.

Sincerely,

Maria Chavez  
475 S New Hampshire #103  
Los Angeles CA 90028 (310) 720-50-10

Cc: Councilmember Mike Bonin



March 21, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 25 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

My name is John Chen and I am the Director of Information Technology at The Archer School for Girls. I have enjoyed working at the school and supporting the students here for the five years that I've served as a member of Archer's staff. I've helped develop our student laptop program, and in updating our classroom hardware to assist in the goal of 21<sup>st</sup> century learning. The connections and knowledge our students are accessing around the world is happening on a daily basis, and is unparalleled in many respects. I'm proud to be part of this cutting-edge community.

Students at Archer use technology to advance their individual as well as collaborative learning skills, and one of my duties is to provide them with the adequate tools to foster their ability to do so. Technology use and integration has become part of our curriculum, and has grown so fast in the last 5 years. However, I often feel that the progress we've made in developing a 21<sup>st</sup> century learning environment has been constrained by our facilities. The modern classrooms Archer is proposing in Archer Forward will not only provide more space but also the necessary infrastructure to support a 21<sup>st</sup> century education.

Currently, the classrooms are filled with cords, and finding a power outlet to charge their laptops, toward the end of the day, is always difficult. This is heavily due to the fact we are dealing with the challenges of functioning in a building that was constructed in 1931. The proposed facilities are critical in overcoming obstacles in the classroom and supporting the students' basic technological needs.

I hope you and the city will support Archer and Archer Forward. Thank you for your time and consideration.

Sincerely,



CC: Councilmember Mike Bonin

March 5, 20014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 11 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

- I work in the facilities department along with 3 other highly skilled workers who have been with the school for over ten years.
- Archer is a wonderful place for girls to expand their minds during and after school.
- The Archer students will use every inch of the new campus to train longer and harder in academics, arts and athletics.
- Today and every day until construction is finished, the girls do not have any locker rooms, showers, or a place to properly perform music and dance performances.
- I have been working with The Archer School for almost a year, this will be my job until I retire in 35 years, I will make sure the building is in perfect condition and ready for every event that takes place on campus, with your support the city of Los Angeles will benefit from the production of an expanded campus.

Sincerely,

Anthony Chicco, 5225 Blakelee Ave,  
APT 419, N Hollywood CA 91601



Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**Kyong Suk Chon** <stacykyongsukchon@gmail.com>

Wed, Apr 16, 2014 at 11:29 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

RE: ENV-2011-2689-EIR

Hello,

My name is Stacy Chon. I am the mother of a 10th grade student, Rachel Yi, who currently attends the Archer School for Girls and I believe Archer is truly a wonderful and amazing school. My daughter has discovered herself and her capabilities under the guidance of caring teachers and advisors. She has definitely developed confidence and leadership skills and I am so thrilled to see my daughter drastically transform into this independent and confident woman. The Archer Forward plan is essential for the future of Archer and girls' education in Los Angeles because the modern facilities will help the students of Archer learn at their best and allow the students to flourish even more in the athletics and arts programs.

Thank you.

---

**Adam Villani** <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 9:24 AM

To: Kyong Suk Chon &lt;stacykyongsukchon@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward ENV-2011-2689-EIR

3 messages

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**Bruce Chorpita** <bchorpita@gmail.com>

Wed, Apr 9, 2014 at 8:30 AM

To: Adam.Villani@lacity.org, councilmember.bonin@lacity.org, archerforward@archer.org

I am writing as a homeowner in the Brentwood community, as a parent of a student at Archer, and a Professor at UCLA.

The Archer Forward plan will offer badly needed facilities that will help support some of the best girls' education in the country. Archer has been a model school and community member—its impact on the surrounding traffic has been minimal through extremely responsible policies regarding campus visits and student arrivals and departures. Other private schools should follow the Archer example.

The city of Los Angeles benefits from having a world class school for girls—it helps attract bright and talented families to our city, who are considering where to raise their children. This is an investment in girls education, which is an investment in all of our futures.

Best wishes,  
Bruce Chorpita, PhD

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**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:33 PM

To: Bruce Chorpita &lt;bchorpita@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Bruce Chorpita** <bchorpita@gmail.com>

Fri, Apr 18, 2014 at 7:36 AM

To: Adam Villani &lt;adam.villani@lacity.org&gt;

Thanks, Adam. My home address is 13764 Raywood Dr. Los Angeles, 90049. I appreciate being kept informed.

This seems like a no-brainer for making our community a better place to live. How could someone not support girls' education?

Bruce Chorpita  
[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer's Campus Plan

2 messages

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**Christina McIntosh** <cmcintosh@archer.org>

Tue, Apr 29, 2014 at 11:44 AM

To: adam.villani@lacity.org

Re: ENV-2011-2689-EIR

### Support for The Archer School for Girls and Archer Forward

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.

Kind regards,  
-Christina McIntosh

—  
**Christina McIntosh**  
 Communications Office  
 The Archer School for Girls  
 11725 Sunset Blvd, Los Angeles, CA 90049  
 310-873-7000  
 www.archer.org

*ambitious, joyful learning for girls grades 6 through 12*

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### 2 attachments

**Letter in Support of Archer 2.21.14.pdf**  
45K

**Archer Letter 2-25-2014.pdf**  
33K

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:09 PM

To: Christina McIntosh &lt;cmcintosh@archer.org&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. Specifically, shall we add Patrick Cole and Robert D. Beyer to the mail distribution list for this project?

You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
 Adam Villani  
 Planning Assistant  
 City of Los Angeles

5/2/2014

City of Los Angeles Mail - Support for Archer's Campus Plan

Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

February 21, 2014

The Honorable Mike Bonin  
Los Angeles City Hall  
200 N. Spring Street, Suite 475  
Los Angeles, CA 90012

Dear Councilmember Bonin:

My home is located directly next door to the residence where Archer's Head of School currently resides. I am proud to have Archer as a next-door neighbor and am writing to express my support for the Archer Forward Campus Preservation and Improvement Project.

I have seen the detailed plans and understand that the property next door to mine as well as the Barrington property behind me will be used as the sites for the Performing and Visual Arts Centers and the Aquatics Center. I fully support the school's use of the residential properties that immediately border mine for all of these facilities. I know that across the City of Los Angeles independent schools have used residential properties for school purposes, and I believe that Archer's use of residential properties is similarly appropriate. Archer should be able to use the properties it owns to provide its students with the new facilities that will help the school and its students thrive. Archer has been an excellent neighbor, and I believe the Archer Forward plan should be approved.

I understand that the Draft Environmental Impact Report for the project is going to be released soon, and I look forward to it passing quickly through the City process so that Archer can modernize its campus and become the premier learning institution for girls in Los Angeles. Archer is a benefit to our community, and I believe that the school deserves the new facilities and other improvements that it is requesting.

I hope that Archer can count on your support.

Thank you,

Patrick Cole  
11718 Chaparal Street  
Los Angeles, CA 90049



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR) - absolutely!**

2 messages

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**Danielle Collins** <decollins@verizon.net>

Thu, Apr 24, 2014 at 7:41 PM

To: mike.bonin@lacity.org, Adam.villani@lacity.org

Cc: archerneighbor@gmail.com

Gentlemen, I live in an apartment in the Sunset West Apartment Building (a Scott Properties building) – next door (west side) of The Archer School; the address is 11747 W. Sunset Boulevard.

I moved into the building in January of 1998 – almost 16.5 years ago. Back then The Archer School was The Eastern Star Home – very quiet, no expansion plans. When the Archer School moved in, the quiet nature (Sunset Boulevard excluded) of my immediate neighborhood was eliminated. And it's gotten worse and worse every year as the school enrollment and scope of activities and athletic games grew and grew and grew and grew.

To be fair, traffic all over has gotten worse and worse every year. But while there's no way to stop that, there IS a way to stop further growth by Archer – do not permit the Archer Forward Plan to go through.

I could list endless examples of the noise, disturbances, inconsiderate behavior (primarily on the part of the students and parents), and forward all the e-mails I've sent to Archer over the many years. But it's really just a matter of simple physics – there's no more room in Brentwood.

The only possible way the Archer Forward Plan might work is if you make the entire Brentwood area a gated community: only 90049 residents and Archer families will be allowed inside the perimeter. And then all of Greater WLA, LA, Pacific Palisades, Santa Monica, Bel Air, Beverly Hills, the San Fernando Valley, etc. etc. etc. will have to find another way to navigate around the area without the use of Sunset Boulevard, Bundy, Barrington, Church and ALL the other streets.

Don't get me wrong – I'm thrilled for Archer that they are doing so well and that they want to provide an even more enriching scholastic environment for the current and future students. But if they can't do it with their current size and self-agreed upon limits, then they need to break ground elsewhere.

There is a clear choice: the homeowners, renters and merchants of Brentwood and the citizens of LA County on one side, and the interests of The Archer School on the other side.

Thank you.

**Danielle Collins**



4/30/2014

City of Los Angeles Mail - Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR) - absolutely!

11747 W. Sunset Boulevard, #224  
Los Angeles, CA 90049  
(310) 471-1229 - home  
decollins@verizon.net

---

**Adam Villani** <adam.villani@lacity.org>  
To: Danielle Collins <decollins@verizon.net>

Tue, Apr 29, 2014 at 1:59 PM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani <adam.villani@lacity.org>

**Re: archer school-----no changes permitted-----h j cornyn owner PLS--ADD ME TO MAILING LIST thnx !!**

1 message

**jpcomyn@cox.net** <jpcomyn@cox.net>  
To: Adam Villani <adam.villani@lacity.org>

Wed, Apr 30, 2014 at 12:16 AM

H J Cornyn--110 Old Course Dr--Newport Beach--CA 92660 Thank You ,Mr Villani

— Adam Villani <adam.villani@lacity.org> wrote:

> Thank you for your comments. They have been received and will be included  
> in the Final EIR. If you have not already signed up as an interested  
> party, please forward me your USPS mailing address and we will add you to  
> the list. You will receive mailed notice as this project moves forward  
> through the City process. At this time we are only able to provide  
> notification of interested parties by US mail.

> On Tue, Apr 29, 2014 at 3:56 PM, Jean Cornyn <jpcomyn@cox.net> wrote:

> > dear mr villani i am owner @ 11831 chaparal st directly across from  
> > archer it is a disgrace & lack of integraty that they are proposing  
> > these offensive changes after all earlier agreements with us—their  
> > neighbors li disagree with all the requests outlined in Project  
> > Descripton,permits,—&the terrible env effects duly noted!hjcornyn.

> Adam Villani  
> Planning Assistant  
> City of Los Angeles  
> Department of City Planning  
> Major Projects Section  
> Adam.Villani@lacity.org  
> (818) 374-5067  
> alternate: (213) 978-1454

April 10, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 15 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer Forward

Dear Mr. Villani:

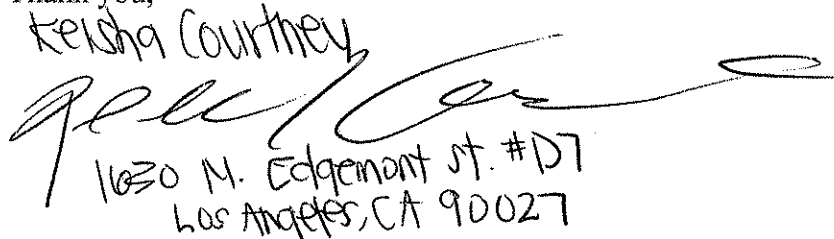
I am a staff member at The Archer School for Girls and I work in the Communications Department. I have only worked at Archer for a few short months, but in that time I have seen what an asset this school is to the community. Not only are the girls who attend the school high-spirited, well mannered, and eager to learn, but they are also committed to making their community better. Several of the students are involved with after-school activities, and yet, they still find time in their schedules to give back to other organizations in the area. This is an attribute that not many children possess and I think many of them have Archer to thank for that.

Furthermore, I am amazed at how much this school is able to do with the few facilities that they do have. The basketball, track, and swim teams have to travel several miles in order to practice. These girls are so committed to their chosen sports that they are willing to do it! However, because they have to travel such long distances, they aren't able to practice as much as they would like because they are using most of that time to commute.

I think it is only fair that these girls have the same opportunities and experiences that almost every other independent and public school in the area has already.

I hope that you support the school, the girls, and the expansion plan and move it through the City process quickly.

Thank you,

*Keisha Courtney*  
  
1630 N. Edgemont St. #D7  
Los Angeles, CA 90027

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Opposed to Archer Forward Pain as Proposed(ENV-2011-2689-EIR)

3 messages

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**Robert Cox** <coxcoxr@gmail.com>

Tue, Apr 22, 2014 at 8:39 AM

To: mike.bonin@lacity.org, adam.villani@lacity.org

Cc: archerneighbors@gmail.com, "Lewis, Mary Ann" &lt;mlewis@ucla.edu&gt;, Ira Pianko &lt;irapianko@gmail.com&gt;

Messers, please know I am opposed and appalled that any further disruption to Sunset Blvd in Brentwood area is being considered when congestion has already increased even after "405 widening"...more has to be done to relieve current traffic.

-

Robb Cox/RLA  
Retail Real Estate Leasing  
11661 San Vicente Blvd/Suite 820  
Los Angeles, CA 90049  
cell-310-600-5721  
office 310-820-5008  
coxcoxr@gmail.com

---

**coxcoxr@gmail.com** <coxcoxr@gmail.com>

Tue, Apr 22, 2014 at 9:11 AM

Reply-To: coxcoxr@gmail.com

To: mike.bonin@lacity.org, adam.villani@lacity.org

Cc: archerneighbors@gmail.com, "Lewis, Mary Ann" &lt;mlewis@ucla.edu&gt;, Ira Pianko &lt;irapianko@gmail.com&gt;, thelma.waxman@gmail.com

[Quoted text hidden]

Sent via BlackBerry by AT&amp;T

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**Adam Villani** <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 11:46 AM

To: coxcoxr@gmail.com

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

-

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Archer School Expansion Plan

2 messages

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**Dorothy Crawley** <dcrawleymft@gmail.com>  
To: adam.villani@lacity.org

Wed, Apr 9, 2014 at 1:09 PM

Mr. Villani:

Please find attached my letter with my thoughts regarding Archer School Expansion Plans.

Dorothy F. Crawley



**tom&mike.doc**  
27K

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**Adam Villani** <adam.villani@lacity.org>  
To: Dorothy Crawley <dcrawleymft@gmail.com>

Thu, Apr 17, 2014 at 5:38 PM

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

April 9, 2014

To: Adam Villani

To : Mike Bonin

Re: Archer School's Expansion Plan.

I am writing this letter to voice my deep concern over Archer's current plan to expand their school. I have lived on Sunset Boulevard a block from the school for over 10 years now, and I am probably one of the most informed to discuss the traffic, the noise, and dirt that we live with on a day to day basis.

Starting at 6 in the morning, traffic is lined up from the freeway west past to Bundy. When there is less traffic, although the speed limit is school zone mandatory at 25 miles, I have witnessed vehicles going up much faster and almost to freeway speeds.

Regardless of the work being done in the 405 freeway, this is one of the most congested areas in the city.

There are car accidents and also pedestrian accidents almost weekly; I was a victim of one a few years ago. I also work in the neighborhood and have staidly lost business from people who no longer would come to Brentwood. If requested I would be happy to take photographs of the congestion and to try and take videos of the speeds they go up the Sunset is clear.

Also, when there are both; construction and traffic, the dirt, the congestion and the noise increases greatly, producing car exhaust and black grim.

The condominium I live in has a majority of older people, many of whom are not well, some with lung disease, and this plan of expansion concerns me as this will affect peoples' health. I would like to add that in general I love and am proud of Archer School and all they have accomplished. I understand their wish to expand at this point, however I feel the enormity of their plan to be potentially harmful for this neighborhood.

At this moment I feel they are being greedy, selfish and unconcerned for the rest of us, let them scale their plans back and re-present it to their neighbors.

Yours pleadingly,

Dorothy F. Crawley

11901 W. Sunset Blvd, Unit 201

L.A. CA. 90049



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Feed Back on Archer School Expansion

2 messages

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**Dorothy Crawley** <dcrawleymft@gmail.com>

Mon, Apr 28, 2014 at 2:31 PM

To: adam.villani@lacity.org, mike.bonin@lacity.org, archerneighbor@gmail.com

Mr. Villani, Mr. Bonin:

I understand final report is coming out this week about the Archer project, but I want to make sure that you understand that there are five enrollment schools in an area of approximately six blocks.

I think with full enrollment there is University Temple School, Brentwood Lower and Upper School, Saint Martin Of Tours and Archer.

Despite the traffic caused by the 405 freeway construction; I wish you could see what is like in the morning and also in the afternoon when there is drop off and pick up times at these schools.

It will be so destructive if Archer proceeds with its full plan. I can only hope something fair comes out of all of this.

Regards,

Dorothy F Crawley

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:51 PM

To: Dorothy Crawley &lt;dcrawleymft@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

I would like to add that there is no final report coming out this week. This week is the close of the public comment period for the Draft Environmental Impact Report. The preparation of the Final EIR will address, among other things, all comment letters received during the DEIR public comment period, and will take some time to prepare.

[Quoted text hidden]

-

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

3 messages

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**Adele Cygelman** <acygelman@gmail.com>

Wed, Apr 9, 2014 at 10:21 AM

To: Adam.Villani@lacity.org

Cc: Bob Moore &lt;bobmoore@criminaltrial.com&gt;, councilmember.bonin@lacity.org, archerforward@archer.org

We are proud Archer parents who want to add our voices of support for the Campus Preservation and Improvement Plan.

Archer provides a dynamic, forward-thinking learning environment, and the school deserves to have a full complement of new classrooms, athletic facilities and performing arts spaces to match its unique vision.

We see first-hand the impact Archer is having on our daughter's education. It is an experience that will guide her through life, and we know future generations of Archer girls will benefit from the much-needed and thoughtfully planned improvements.

Regards,

Adele Cygelman and Bob Moore  
Parents of Annie Moore, Class of 2017

Adele Cygelman  
acygelman@gmail.com

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:34 PM

To: Adele Cygelman &lt;acygelman@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

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**Adele Cygelman** <acygelman@gmail.com>

Thu, Apr 17, 2014 at 7:55 PM

To: Adam Villani &lt;adam.villani@lacity.org&gt;

Thank you.  
Our address:



4/25/2014

City of Los Angeles Mail - Support for Archer Forward

9750 Yoakum Dr.  
Beverly Hills, Ca. 90210

Sent from my iPhone  
[Quoted text hidden]

March 6, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 11 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

I write as a resident of Brentwood, and as Archer's Head Librarian. In August I returned to California (after spending 13 years in New York) specifically to work at Archer, whose reputation as an innovative program dedicated to providing girls with the very highest quality education is known throughout the country.

The written word cannot possibly do this school, and the community it fosters, justice. It is not an exaggeration that I marvel *every single day* at the dedication of Archer's faculty, the informed efforts of the administration, and, most importantly, the inquisitive, creative, and ambitious nature of Archer students. I have worked as an educator in a number of settings; none rivals Archer's effectiveness in developing its students into well-rounded, passionate, confident, socially aware and adept individuals.

I think that it is incredibly important that the City recognize the value of developing female leaders, and that the City publicly demonstrate a commitment to educating girls through supporting the development plans of a phenomenally run institution eager to strengthen its academic and athletic programs. It is more important than ever that girls have access to the top tier technology, equipment and facilities required to foster top tier leadership and innovation.

I urge you to prioritize the development of this deserving community of innovators.

Warmly,



Stefanie Daehler  
11706 Mayfield Ave. #9  
Los Angeles, CA 90049

Cc: Councilmember Mike Bonin

7 March 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 11 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

I have been an educator for over 33 years, and at The Archer School for Girls for the last seven. I have taught for LAUSD, the Archdiocese of Los Angeles, and at independent schools: Curtis, Harvard Westlake and John Thomas Dye. In my many years of teaching, I can honestly say, I have never been prouder of a school in its entirety. As Dean of incoming 6<sup>th</sup> graders, history teacher, yearbook moderator and number 1 sports fan, I spend a lot of time on Archer's campus with this phenomenal group of students, faculty and staff. They are incredible.

Archer has a profound mission statement "to support and challenge young women to discover their passion and realize their potential" - that is a lived experience every day. Without a gym, a theater, a dance studio or even a covered area large enough to gather the entire student body, this institution continues to provide its students with a quality education across the board. Athletics; the arts, academics, community service...all of this and so much more is offered to these girls in a caring, joyous and ambitious environment. Imagine what could be accomplished with a facility equal to that of other schools in the area?

Archer students and faculty deserve these updated resources to enhance and expand their education: not because we cannot win games without a gym, not because air conditioning will elucidate mathematical concepts, not even to lure prospective students from other institutions. They deserve these new facilities so we can fully live up to our ambitious mission statement and so that these girls will receive all that they are entitled to.

No student should have to choose where to go to school based on its physical plant; pools don't make you a better person. Caring teachers, good teaching, and involved parents make for better students. Still, aren't those teachers, parents and students deserving of the same benefits as their peers? I ask in all sincerity for the City to support this well researched and thoughtfully designed plan that will allow Archer to continue to grow and provide an excellent education for young women who will, in turn, give back to the community that has supported them.

Yours,



Theresa M. Dahlin

Cc: Councilmember Mike Bonin

March 18, 2014

RECEIVED  
CITY OF LOS ANGELES

MAR 21 2014

ENVIRONMENTAL  
UNIT

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

For the past 15 years, the Archer School for Girls has been a valuable and responsible member of the Brentwood community. As a parent of an Archer student, I believe that the school is a tremendously valuable resource to Los Angeles, and I am writing in support of Archer Forward, the school's improvement plan.

Archer's student body includes girls from a wide range of cultural and socioeconomic backgrounds: approximately 36% of Archer students come from minority backgrounds, and Archer students currently reside in 92 zip codes throughout Los Angeles County. Archer offers more than a traditional, girl-centric learning environment—the school equally prepares young women for leadership in a global world.

This plan embodies the essentials that nearly every other independent and public school has in Los Angeles, including gymnasiums, performing arts and visual arts facilities, regulation sized athletic fields and aquatic centers. Currently, the school spends significant resources renting offsite facilities for practices, games and performances. It also lacks gathering spaces for the entire student body.

Archer believes that this is the most effective plan to meet the needs of the school and to offer a competitive array of opportunities for future students. I am proud to enroll my daughter at the Archer School for Girls because not only is she receiving a world-class education, but also because the school is committed to being an asset in the community. Please help move the Archer Forward plan forward quickly. Thank you.

Sincerely,



SHANNON E. DALEY | BRIAN VARNUM

602 12<sup>TH</sup> ST. SANTA MONICA, CA 90402

CC: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I support Archer Forward

2 messages

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**edg29@aol.com** <edg29@aol.com>

Fri, Mar 28, 2014 at 4:17 PM

To: adam.villani@lacity.org

Cc: councilmember.bonin@lacity.org

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR

Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani,

I am writing to you as I strongly support Archer's plan for the future, Archer Forward. I am an Archer parent and I also live in the 11<sup>th</sup> District. I have seen firsthand Archer's commitment to being a good neighbor and creating a beautiful new environment to educate the girls of Los Angeles. I hope that the city will help Archer by moving this plan forward through the review process.

As an Archer parent, I know that the Archer Forward Plan is critical to Archer remaining competitive among independent schools. Arts and athletics are fundamental in middle and high school, but without a gym, regulation athletic fields or a pool, Archer is challenged to support their students who want to compete. Today Archer girls spend hours travelling to practices or games, and the school has to rent facilities all over town. Schools can't be expected to operate like this – Archer quite simply needs to have these facilities on campus. The school is proposing a wonderful and beautiful plan for a campus that provides these facilities and it is respectful to the surrounding neighborhood.

Archer has held numerous meetings with the community and has demonstrated a willingness to share information and discuss significant changes to the plan over the last two years. I know that those conversations are continuing. The Draft EIR plan incorporates many changes – and is responsive to the neighbors' key concerns.

I hope that the Planning Department, along with Councilmember Bonin, will work with Archer to move this plan forward in the city review process. Thank you.

Sincerely,

Ellen Danna, Archer Parent  
13129 Sherry Lane  
Los Angeles, CA 90049

Cc: Councilman Mike Bonin

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 3:27 PM

To: edg29@aol.com

Thank you for your comments. They have been received and will be included in the Final EIR. You will receive mailed notice as this project moves forward through the City process.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I support Archer Forward

2 messages

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**Mirella Dapretto** <mirella@ucla.edu>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Thu, Mar 20, 2014 at 10:53 PM

RE: ENV-2011-2689-EIR

Please see attached for my letter of support of the Archer Forward Campus Preservation Pla,

Mirella Dapretto, Ph.D.  
Professor  
UCLA Dept. of Psychiatry and Biobehavioral Sciences  
Ahmanson-Lovelace Brain Mapping Center, Room 215  
660 Charles E. Young Drive South  
Los Angeles, CA 90095-7085  
Phone (310) 206-2960  
Fax (310) 794-7406  
mirella@ucla.edu

---

**Dapretto\_for\_Archer.pdf**  
72K

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**Adam Villani** <adam.villani@lacity.org>  
To: Mirella Dapretto <mirella@ucla.edu>

Thu, Mar 27, 2014 at 11:44 AM

Thank you for your comments. They have been received and will be included in the Final EIR. You will be included in future mailings related to this project.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



MIRELLA DAPRETTO, Ph.D.  
AHMANSON-LOVELACE BRAIN MAPPING CENTER  
DEPARTMENT OF PSYCHIATRY & BIOBEHAVIORAL SCIENCES  
SEMEL INSTITUTE FOR NEUROSCIENCE AND HUMAN BEHAVIOR  
DAVID GEFKEN SCHOOL OF MEDICINE AT UCLA

EMAIL: MIRELLA@UCLA.EDU  
660 CHARLES E. YOUNG SOUTH, ROOM 101  
LOS ANGELES, CA 90095-7085  
PHONE: (310) 206-2960  
FAX: (310) 794-7406

March 20, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

I am an Archer parent and 11th District resident and I 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 deserve.

The Archer Forward Plan proposes only the facilities that most public and independent schools already have: modern gyms, playing fields, performing and visual arts facilities and a pool. The way these facilities are designed, there will be limited impact on the neighbors from light or noise, 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 modifications to its original plan to meet the concerns of its neighbors. The modifications to the plan will make a quieter, greener campus, a benefit to both the school and the community.

I know that Archer is continuing to work with the community on this plan, but it is important for the school to keep this plan 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.

Sincerely,

A handwritten signature in black ink that reads "Mirella Dapretto".

Mirella Dapretto, Ph.D.  
Professor

Cc: Councilman Mike Bonin





Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

4 messages

**Stephanie Darrow** <stephdarrow@gmail.com>

Wed, Mar 19, 2014 at 2:51 PM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;, "info@brentwoodhomeowners.org" &lt;info@brentwoodhomeowners.org&gt;

March 19, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

ENV-2011-2689-EIR

**Re: In Support of the Archer School for Girls**

Dear Mr. Villani:

I currently serve on the Board of Trustees at The Archer School for Girls and I can attest firsthand to the school's efforts to reach out to its neighbors and be a responsible member of the community. Now that the Draft EIR for Archer Forward has been released, I am hoping that we can count on the support of your office.

Archer constantly strives to be a good neighbor. Throughout the year, our administration offers meetings for neighbors with our Community Liaison, Maria Servello. At these meetings, neighbors are kept apprised of ongoing events at the school as well as upcoming projects and are offered an opportunity to pose questions and voice any concerns they may have.

Archer has a robust community service program designed to inspire students to become involved, compassionate citizens. Students are actively engaged in bettering the community through projects that help local elementary school students, the homeless, and the environment.

The Archer Forward Plan is an essential step forward for the school. The facilities and upgrades that make up this plan will greatly help advance the school's mission to provide a 21<sup>st</sup> century education for girls. It is also consistent with the promises we have made to our neighbors and we plan to continue a dialogue with local residents and stakeholders throughout the public review process.

With many months of project reviews still ahead, we hope you will agree that Archer Forward is a good and thoughtful plan, and that you will ultimately lend your support to the project.

Best regards,

Stephanie Darrow

Trustee, The Archer School for Girls

Cc: Councilmember Bonin

Sent from my iPhone

---

**Adam Villani** <adam.villani@lacity.org>  
To: Stephanie Darrow <stephdarrow@gmail.com>

Thu, Mar 20, 2014 at 10:04 AM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Adam Villani** <adam.villani@lacity.org>  
To: Stephanie Darrow <stephdarrow@gmail.com>

Tue, Apr 29, 2014 at 3:33 PM

Thank you once again for your comment on the Archer Forward Draft EIR. I received your comment in March and indicated that you would be included in future distribution for notices related to this project. I should clarify that in order to do so, please forward me your USPS mailing address. You will then receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

---

**Stephanie Darrow** <stephdarrow@gmail.com>  
To: Adam Villani <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:56 PM

425 n croft ave  
La 90048

Many thanks

Sent from my iPhone

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer School Plans**

4 messages

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**Raphael Darvish, MD, MBA** <rdarvish@gmail.com>

Wed, Mar 19, 2014 at 7:31 PM

To: adam.villani@lacity.org, councilman.bonin@lacity.org

Cc: Residential Neighbors of Archer &lt;archerneighbor@gmail.com&gt;

Dear Mr. Bonin and Mr. Villani,

I am writing to express my severe opposition of the Archer plans for expansion. I have lived and worked in Brentwood since 1990 and find their plans absolutely unacceptable.

This is a very big deal for me and my family. Their plans will cause added traffic and severely negatively impact the residential community behind the school. Their plans are aggressive and illegal.

I feel that this school is destroying my community. On an another annoying point, Archer's tennis team now plays tennis on the public courts on Barrington and so I can not play at the hours I want because their school plays there in the afternoons...

The community is united against this expansion. I am preparing myself and my lawyer for a fight should you choose to support such plans.

Thank you for your time.

Sincerely,

Raphael Darvish, MD

---

**RAPHAEL DARVISH, M.D., M.B.A.**

T 310-826-2555 x115 F 310-826-2552

11611 San Vicente Boulevard, Lobby Level

Los Angeles, California 90049

\*\*\*DISCLAIMER\*\*\* This is a confidential e-mail transmission. This mail is intended for the sole use of the person or entity to which it is addressed and may contain information that is privileged and/or confidential. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. If you are not the intended recipient, please immediately notify Dr. Darvish by return email and delete this message from your computer.

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Mar 20, 2014 at 10:22 AM

To: "Raphael Darvish, MD, MBA" &lt;rdarvish@gmail.com&gt;

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:34 PM

To: "Raphael Darvish, MD, MBA" <rdarvish@gmail.com>

Thank you once again for your comment on the Archer Forward Draft EIR. I received your comment in March and indicated that you would be included in future distribution for notices related to this project. I should clarify that in order to do so, please forward me your USPS mailing address. You will then receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

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**Raphael Darvish, MD, MBA** <rdarvish@gmail.com>

Tue, Apr 29, 2014 at 4:08 PM

To: Adam Villani <adam.villani@lacity.org>

Thank you Adam.

My mailing address is:  
11907 Chaparal St.  
Los Angeles, CA 90049

Best,  
Dr. Darvish

---

RAPHAEL DARVISH, M.D., M.B.A.  
T 310-826-2555 x115 F 310-826-2552  
11611 San Vicente Boulevard, Lobby Level  
Los Angeles, California 90049

\*\*\*DISCLAIMER\*\*\* This is a confidential e-mail transmission. This mail is intended for the sole use of the person or entity to which it is addressed and may contain information that is privileged and/or confidential. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. If you are not the intended recipient, please immediately notify Dr. Darvish by return email and delete this message from your computer.

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Re: Support for Archer Forward**

2 messages

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**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 24, 2014 at 3:13 PM

To: Allie Davis &lt;allisonrosedavis@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

On Thu, Apr 3, 2014 at 7:45 PM, Allie Davis <allisonrosedavis@gmail.com> wrote:

RE: ENV-2011-2689-EIR

Dear Mr. Villani-

I am an Archer graduate and I am writing to voice my support for Archer's campus improvement plan, Archer Forward.

I know that I would not be the woman I am today if it wasn't for the incredible education and experience that I received at the Archer School for Girls. Archer taught me to stand up for what I believe in, to be confident, to be passionate, and so much more.

I was an active member of Dance Troupe at Archer and I loved it! However, I think the campus itself could have been better if the school had the facilities that every other public and private school near it had, including: a gymnasium, a performing and visual arts center and an aquatics center.

I truly hope you will support this plan.

Sincerely,

Allison Davis, Class of 2007  
(310) 415 8845

---

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 1:55 PM

To: Allie Davis &lt;allisonrosedavis@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to

the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer Forward

2 messages

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**Nicole Wright** <nicole.wright@me.com>

Wed, Apr 23, 2014 at 2:22 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, info@brentwoodhomeowners.org

RE: ENV-201102689-EIR

Please find attached the letter from Geena Davis.

Best,

*Nicole Wright**mobile: 818.425.8524**fax: 310.314.3687**nicole.wright@me.com*

---

 **Archer\_CityPlanning.pdf**  
1668K

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**Adam Villani** <adam.villani@lacity.org>

Wed, Apr 23, 2014 at 4:17 PM

To: Nicole Wright &lt;nicole.wright@me.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



April 23, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

ENV-2011-2689-EIR  
Re: Support for Archer Forward

Dear Mr. Villani:

My daughter and I are extremely excited to join the vibrant and innovative Archer community next year! As an incoming parent, and someone who believes deeply in the school and its girl-serving mission, I am writing to express my support for the Archer Forward Campus Plan. This thoughtful plan will ensure that the school can continue to deliver on its powerful mission for years to come.

Although Archer is a relatively young institution, it has quickly positioned itself as a national leader in research-based teaching practices. Recently, the school has partnered with Stanford, UPenn, USC, UCLA and others to contribute to the national conversation about the benefits of single-sex education. In fact, Archer is a significant contributor to the research on the rapidly changing educational landscape.

The Archer School for Girls plays a unique and important role among independent schools in Los Angeles. It is a place where girls are empowered to take risks and become leaders. Archer students drive their own learning and are given the freedom to create and explore their passions. The annual Archer Film Festival is a perfect example of a program where the students are at the center of it all. According to a 2012 study conducted by the Center for the Study of Women in Television and Film, women hold only 18% of behind-the-scenes occupations in the film industry, primarily as editors (20%) and producers (25%). Archer's film festival is designed to empower student female filmmakers by not only showcasing their work, but introducing them to industry professionals who offer advice and insight on a male-dominated business.





Geena Davis Institute on Gender in Media

Archer's programs are exemplary; however, the students and faculty need facilities that will fully support the curriculum. Archer Forward will provide students with spaces that most public and independent schools already enjoy. The plan is a necessary next step for this thriving institution.

I applaud Archer's track record in educating and shaping future female leaders and I fully support their proposal for this campus enhancement project. I truly hope the Planning Department will work with Archer to move this plan forward in the city review process.

Sincerely,

Geena Davis

Founder and Chair, Institute on Gender in Media

Cc: Councilmember Mike Bonin, Brentwood Homeowners Association

March 6, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 11 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

As a staff member for the Archer School for Girls, I am writing to voice my support for Archer's Campus Plan.

Over the past four years since I joined Archer, I am continuously amazed at how special a place this really is. I have had the opportunity to see girls literally grow up before my eyes and the life changing experience that is the result of an education at Archer.

Unfortunately, the lack of basic school facilities such as a gym or performing arts center limits the school's ability to offer what other schools in this area are able to offer. These additional facilities will greatly enhance the Archer Girl's education.

I am asking the City of Los Angeles to please support this plan so that Archer can grow and flourish in the coming years.

Sincerely,



Jane P. Davis  
4323 Campbell Drive  
Los Angeles, CA 90066

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**SUPPORT FOR ARCHER FORWARD RE: ENV-2011-2689-EIR**

3 messages

---

**Marsha de Vera** <deveram2000@yahoo.com>

Mon, Apr 14, 2014 at 12:24 PM

Reply-To: Marsha de Vera &lt;deveram2000@yahoo.com&gt;

To: "adam.villani@lacity.org" &lt;adam.villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;, "archerforward@archer.org" &lt;archerforward@archer.org&gt;

Dear Mr. Villani,

We are parents of an 8th grader at the Archer School for Girls. We first discovered Archer in 2011 when we attended an Open House at the recommendation of a friend. As much as the idea of our daughter attending an all girl school was ideal in our minds, we weren't certain it was an environment she would buy into. As parents, we only want the best for our children, and for our daughter, we loved that Archer emphasized nurturing young girls to become independent thinkers, ambitious, confident and articulate leaders. The campus itself was impressive, but moreover was the positive and exciting energy we felt from the staff and especially from the student speakers from various grades. Each of the girls were very articulate in their presentation and carried themselves very well. We were quite impressed and REALLY wanted this type of environment for our 11 year old daughter. After our daughter's campus tour, visiting a few classes and meeting some student guides, she announced very loudly from across the lawn to where she spotted us, "I LOVE IT HERE!" We were of course delighted and since her admission in 6th grade, she has been proud to be an Archer Girl.

Archer is a wonderful school and we truly appreciate all that it has offered, and continues to offer, to our daughter. Every young girl deserves a great education and a healthy, positive environment that encourages intellect, individuality, community service and GRIT. The Archer Forward plan is truly essential for the future of Archer and the education of young girls in Los Angeles. Growth and improvement are important for all schools, whether independent or public. It's Archer's time to grow in order to continue to provide our daughters and future Archer Girls with the opportunity to achieve their academic, athletic and leadership goals. The new modern classrooms, athletic facilities and performing and visual arts building are very much needed and an investment Archer families are more than willing to make for future generations of Archer Girls to thrive.

We hope you will support the Archer Forward plan!

Very truly,

Marsha & James de Vera  
deveram2000@yahoo.com

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 22, 2014 at 11:39 AM

To: Marsha de Vera &lt;deveram2000@yahoo.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

-

Adam Villani

Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Marsha de Vera** <deveram2000@yahoo.com>  
Reply-To: Marsha de Vera <deveram2000@yahoo.com>  
To: Adam Villani <adam.villani@lacity.org>

Tue, Apr 22, 2014 at 1:21 PM

mailing address:

9864 Wilshire Boulevard  
Beverly Hills, CA 90210

Thank you,

Marsha de Vera  
deveram2000@yahoo.com

---

**From:** Adam Villani <adam.villani@lacity.org>  
**To:** Marsha de Vera <deveram2000@yahoo.com>  
**Sent:** Tuesday, April 22, 2014 11:39 AM  
**Subject:** Re: SUPPORT FOR ARCHER FORWARD RE: ENV-2011-2689-EIR

[Quoted text hidden]

March 21, 2014

RECEIVED  
CITY OF LOS ANGELES

MAR 24 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Approval for Archer Forward

Dear Mr. Villani,

As an Archer graduate, I am writing to request that you support Archer Forward, their campus plan. I think Archer Forward is exactly what the school needs so that the current students can have a middle and high school experience that is even better than what I had.

Archer girls are talented athletes, performers, musicians, and artists yet they don't have adequate facilities to fully support these passions. A small theatre and an art room in the basement are simply not enough. Archer is a unique school and I hate to think that families are choosing other options simply based on the fact that Archer lacks common facilities. Archer girls are worthy of new facilities and I hope the school is granted permission to build a campus that will support their amazing programs.

I believe Archer Forward is a good and thoughtful step for the school and I hope you support it.

Sincerely,

Olivia K. DeCarlo '04  
3376 Rowena Ave #205  
Los Angeles, CA 90022

Cc: Councilmember Mike Bonin

March 14, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 21 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

My name is Carla Delgado and I am an employee at the Archer School For Girls. I am proud to be the Assistant Director of Admissions and work for an outstanding school. Growing up, I dreamed of a school like Archer, where girls have endless opportunities to become confident, ambitious and intelligent leaders.

Often, I think about the Archer girls who matriculate as confident, ambitious leaders. But, who would they be, if Archer's classrooms were less cramped and were able to accommodate specific needs and learning styles? Or if Archer had a proper venue on campus for performances instead of our current theatre box that seats seventy-five? How would an athlete's life be affected if we had proper athletic facilities?

Archer continues to be a supportive contributing member of the Brentwood community. The improvement plan includes many features and details that are accommodating to Archer's neighbors. Numerous steps to reduce the noise, traffic, and aesthetics are detailed in the improvement plan. It is Archer's hope that the community will too, take pride in having a nationally recognized independent all-girls' school on the Westside of Los Angeles. There is no telling how much more empowering Archer will become once the improvement plan is in place.

I implore you to support Archer's improvement plan and ask you to believe in all of the girls who want to be much more than what they are now. Archer is a special place and I am honored to be part of it. I gladly ask for your support which will allow Archer to provide 21st Century classrooms, a regulation sized athletic field, a gymnasium and spaces for swim, performing and visual arts. But most important, with your support, Archer will be the school that will provide each Archer girl with the opportunity to change her community.

Sincerely,



Carla Delgado  
4867 West 21<sup>st</sup> Street  
Los Angeles, CA 90016

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer School Expansion --- Opposition**

2 messages

**Barbara Deming** <westwoodstu@aol.com>

Tue, Mar 25, 2014 at 1:22 PM

To: adam.villani@lacity.org, mike.bonin@lacity.org, archerneighbor@gmail.com

Adam Villiani  
City of LA Department of Planning

Councilman Mike Bonin  
Council District 11

Dear Mr. Villiani and Councilman Bonin;

I am writing today to urge you to not approve the expanded plan for Archer School on Sunset Boulevard as it has been set forth by the school. I am a neighborhood resident. I live approximately half a mile north of Archer School.

Traffic in the area is at a standstill much of the afternoon. To go east from my home, I must access Sunset Blvd. The cut-through so many are using now on Barrington Avenue is creating so much traffic for me to leave my home. It often takes me 15-25 minutes to get from my house to Sunset Blvd, a half mile away.

A reasonable alternative to what is being proposed is a one-phase construction, maintain the current number of special events and athletic events, increase the setback of the buildings placed adjacent to Chaparal Street, and expand and renovate the campus within the current footprint of the school. Only two new buildings should be allowed, not the proposed four.

Thank you for your consideration. I implore you to drive south on Barrington (starting north of Sunset) at 4:30 to see this traffic yourself. It is unreasonable. And until it is significantly different, additional traffic created in the area by this expansion should not be approved.

Sincerely,

Barbara Deming

320 N. Saltair Ave  
Los Angeles, CA 90049

---

**Adam Villani** <adam.villani@lacity.org>  
To: Barbara Deming <westwoodstu@aol.com>

Thu, Mar 27, 2014 at 2:03 PM

Thank you for your comments. They have been received and will be included in the Final EIR. You will be included in future mailings related to this project.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454





Adam Villani &lt;adam.villani@lacity.org&gt;

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## I support Archer Forward

2 messages

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**Rosy DePaul** <rosy.depaul@gmail.com>

Mon, Mar 3, 2014 at 9:43 AM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org

RE: ENV-2011-2689-EIR

To Whom It May Concern,

As an alumnae of The Archer School for Girls, I have had a chance to see how Archer influenced my life. In the 7 years I spent at Archer, I developed from a shy, self-conscious girl, into an independent, confident young woman. How does Archer do this, you may ask? In my experience, the Archer community wants every single girl to succeed in every way possible, and supports her goals and aspirations while helping her strengthen the aspects of her that may not be as forthcoming. An Archer alum is not afraid to speak her mind and support those around her in the most loving of ways. In addition, Archer is a rigorous academic institution, which creates women with worldly knowledge and the ability to think critically in adverse situations.

I believe that Archer is committed to the cultivation of bright young women, many of whom have not realized their potential when they first come to the school. As a student at Archer I was given the opportunity to serve in many leadership positions around the school. I was the captain of varsity cross country and swimming, the cello section leader in the orchestra, the special donor tour guide for the Ambassador program, and was even given the responsibility of the CEO position of the entirely-run Student Store. Each of these activities taught me important life lessons that I see reflected in my every day life at college. For example, being part of a team, but also being able to recognize that every team needs a motivated leader. This can be a tough balance to maintain, but Archer allows girls to practice it in and out of the classroom. In addition, I was shown my true potential in business through the Student Store. I was charged with serious organizational tasks, found myself negotiating with many vendors, and was asked to be on top of student feedback and giving appropriate responses. Archer wants girls to be active and engaged members of their immediate communities and, eventually, the larger society. The encouragement and support the teachers and administrators have for each other and for each student shows just how much Archer cares for the well-being and success of the girls who attend.

I support the Archer Forward Campus Plan because, with extended facilities and a more open space, Archer girls will have even more opportunities to pursue passions, old or new, at a deep level. I want generations of Archer girls to come to be able to experience the beautiful community of Archer, but with the new options and outlets for creativity and learning the Campus Plan will achieve.

Thank you very much for your time and consideration,

Rosy DePaul  
The Archer School for Girls Class of 2013  
Bates College Class of 2017

---

**Adam Villani** <adam.villani@lacity.org>  
To: Rosy DePaul <rosy.depaul@gmail.com>

Fri, Mar 7, 2014 at 3:47 PM

4/24/2014

City of Los Angeles Mail - I support Archer Forward

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I support Archer!

2 messages

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**asticou2@aol.com** <asticou2@aol.com>

Wed, Apr 16, 2014 at 12:56 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archer@archerforward.org

Mr. Adam Villani  
 Los Angeles Department of City Planning  
 200 N. Spring Street, Room 750  
 Los Angeles, CA 90012

Re: ENV-2011-2689-EIR  
 Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

As a proud parent of an Archer graduate, I would like to lend my voice in support of the school and their campus plan, Archer Forward. My Archer girl was involved in varsity swimming, soccer and orchestra, and because of the leadership skills she learned on these teams she is now a freshman at Bates College in Maine. While my daughter attended the school, I was truly disappointed that there wasn't more space on campus for parents to attend her games and various school events. It was very difficult as a parent to know that my daughter was limited in who could come support her due to inadequate space.

With Archer Forward, I can tell that generations of girls will not only be able have the facilities they need, but the neighbors will also benefit. The proposed landscaping that will be added to the campus will make for an even greener neighborhood.

I believe that Archer has been both a great neighbor and an asset to this community since it arrived in 1999. I ask that you please support the school and approve Archer Forward.

Sincerely,  
 Steven DePaul & Beth Rendeiro  
 Cc: Councilmember Mike Bonin

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 22, 2014 at 3:12 PM

To: asticou2@aol.com

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
 Adam Villani  
 Planning Assistant  
 City of Los Angeles  
 Department of City Planning

4/25/2014

City of Los Angeles Mail - I support Archer!

Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I support Archer Forward

2 messages

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**Dohr, Jennifer** <jdohr@hw.com>

Sat, Mar 29, 2014 at 12:57 PM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

Re: ENV-2011-2689-EIR. Thank you- Jen Dohr

*Jennifer Dohr*

Harvard-Westlake School

**Archer letter.docx**

16K

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**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 3:27 PM

To: "Dohr, Jennifer" &lt;jdohr@hw.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

March 29, 2014

Re: ENV-2011-2689-EIR  
I Support Archer Forward!

Dear Mr. Villani:

I am writing in full support of The Archer School for Girls Campus Improvement plan as an Archer parent and faculty member at Harvard-Westlake School. I hope that you and the Los Angeles Planning Department will help move the project along in the City process.

Our daughter, Hollis, is in her third year at Archer; she has found her voice and is thriving. Simply put, no other school in Los Angeles develops female leaders like Archer. Archer's facilities, while beautiful, no longer allow the school to fulfill its unique mission: a joyous, stress-free education for its diverse, creative, impassioned students. Without improved learning spaces, field space, a pool and gym, and performing and visual arts facilities, Archer cannot continue to thrive. However, Archer is maintaining its vision as a small school, so the campus improvements will not impact Brentwood village at large. And the Archer students fully support Brentwood's local businesses.

Archer is a truly unique school and is an important piece of the educational landscape in Los Angeles. Archer is one of the most diverse independent schools in the area— with students coming from 92 different zip codes. Importantly, 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. However, in order for Archer to continue to thrive, 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 a faculty member at Harvard-Westlake School during its Middle School campus renovation five years ago, I am intimately familiar with the community concerns that can arise during renovations. However, in my experience, the concerns are short-lived as the community quickly learns that the support of the finest educational institutions is of paramount importance to any metropolitan city, and especially to Los Angeles.

The Archer Forward plan provides these much needed facilities in a way that is very respectful to the residential community in which it is located. As they continue to meet with their neighbors, Archer has made numerous changes to the plan to meet their neighbors' concerns. Even though these modifications come at a financial cost to Archer, they have agreed to make these changes to create a project that benefits both the school and the community around them.

I hope that you will recognize Archer's commitment to the community and help the school by moving the project through the City process as quickly as possible. Thank you.

Sincerely,  
Jennifer Dohr  
Mother, Hollis Dohr, Class of 2017

Cc: Councilman Mike Bonin

March 4<sup>th</sup>, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**RECEIVED**  
CITY OF LOS ANGELES

**MAR 10 2014**

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

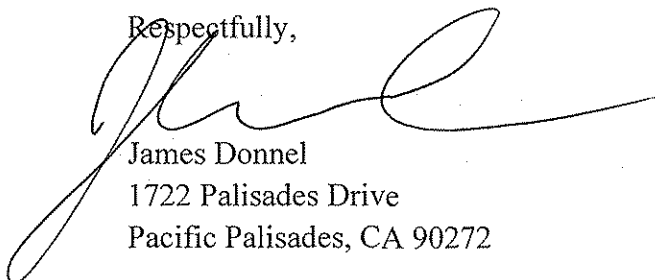
Dear Mr. Villani:

I am a faculty member in the English Department at The Archer School for Girls, and I am writing to encourage your support for Archer's plan to upgrade its existing campus facilities. I am now in my eleventh year teaching at Archer, and my wife, who is the Head of the Upper School, has been at Archer for twelve years. To be frank, Archer has kept us in Los Angeles. We both love working for the school, our interactions with the students, the true camaraderie among the faculty, and the remarkable support from the parents. The school community is vibrant, engaging, challenging, and the students appreciate their involvement in ways that I never did when I was their age. I have no particular connection with my own high school; every year, I see scores of Archer alumni return to our campus genuinely excited to catch up with faculty and share news of their ongoing academic adventures. The place is special.

At the same time, I teach in an oddly shaped room of approximately 300 square feet that was once a double-occupancy hospital ward. It was never intended as a classroom. It's cozy, but I don't have an air conditioner. It's an intimate venue for a Socratic discussion, though if any of my students want to use the bathroom during class, her getting to the door is something of an adventure. The walls are cracking, and the heating system hasn't functioned for several years. The space has ample character, but it needs so much maintenance that, at this point, significant renovation would be vastly better than simple repair. The prospective campus plan would transform the learning environment and foster our dynamic curriculum, helping me in my ongoing commitment to our students and to the surrounding community.

Please support our initiative, and thank you very sincerely for your consideration.

Respectfully,



James Donnel  
1722 Palisades Drive  
Pacific Palisades, CA 90272

Cc: Councilmember Mike Bonin

March 17, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 19 2014

ENVIRONMENTAL  
UNITY

RE: ENV-2011-2689-EIR

I Support Archer's Campus Plan

Dear Mr. Villani:

I am the Upper School Director at The Archer School for Girls, and I have been at this school for 12 years. Archer's mission is compelling, and it is why I stay in Los Angeles. We have a unique responsibility in helping to raise confident, resilient young women who will become the future female leaders in their communities. Archer serves an especially important role in a city that is dominated by media messages, and our girls are constantly bombarded with negative messages about girls and women. Archer is an educational community that encourages girls to develop their own voice and to follow their passions.

Archer deserves facilities that support the needs of our community. Our classrooms are too small for faculty to develop responsive lesson plans that consider multiple modalities of learning. We don't have a single indoor space for our entire community to come together. This limits our ability to celebrate milestones and accomplishments, invite prominent speakers, and gather as one community. We spend considerable amount of time and resources managing our programs in small, inadequate spaces. That money could be spent on our program or to increase financial aid for students in need. Our athletic teams spend incredible amounts of time travelling to and from practice facilities when they could be focusing on their academics.

Archer has been a good neighbor and have made positive contributions to the Brentwood community. We support local businesses, we team with local non-profits to support community service initiatives (save the coral trees, safety on sunset, adopt-a-family), and we provide a first class education for girls across the city. I urge you to support Archer's Campus Plan, so that we can provide our students and faculty with the facilities that they need in order to do their best work.

Sincerely,



Samantha Coyne Donnel

Cc: Councilmember Mike Bonin





Adam Villani &lt;adam.villani@lacity.org&gt;

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## Support for Archer School

2 messages

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**Suzie Doran** <sdoran@singerlewak.com>

Mon, Apr 28, 2014 at 8:06 AM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;, "info@brentwoodhomeowners.org" &lt;info@brentwoodhomeowners.org&gt;

April 28, 2014

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

ENV-2011-2689-EIR

Dear Mr. Villani:

As a member of the Board of Trustees at The Archer School for Girls, I am writing to request your support for the school's Campus Preservation and Improvement Plan, Archer Forward. Time and again, Archer has proven its commitment and value to the community, and we believe that this plan is critical in ensuring the future success of the school.

In the past few years as a Board member, I have come to appreciate how the young ladies that have blossomed from a young, precocious lady into passionate, emboldened women who are willing to not only contribute to society, but provide a platform of future leaders. These are women that are taught to have a voice, shown how to constructively use it and most of all, given the confidence to pursue their dreams in a world where women are often not given choices that we have in America. As an audit partner, I look back at my career and realize that most of all my development has come from mentors and encouragement from leaders like yourself.

I am proud of how faithfully Archer has complied with our Conditional Use Permit, which sets a high bar for relations with our neighbors and the city. We hold meetings with neighbors regularly to inform them of campus events and provide ample opportunity to voice their questions or concerns. Archer's transportation management program ensures that no Archer students, parents, or faculty park in the neighborhood. Our students are active in the Brentwood community as volunteers for a variety of local organizations.

Starting with the scoping meeting on the Archer Forward Plan in January 2012 through the release of the Draft EIR last month, we have provided numerous opportunities for our neighbors to learn more about the project and give us feedback, including an extensive stakeholder process. We plan to continue our outreach throughout the entire public review process.

I hope that this letter will help demonstrate Archer's commitment to the community and that we can count on your support as we continue the public process for the Archer Forward Plan. We look forward to working with your office.

Sincerely,

Suzie Doran



**Suzie Yoon Doran, CPA | Partner**

sdoran@singerlewak.com


10960 Wilshire Blvd, Suite 700

Los Angeles, CA 90024

T: 310-477-3924 ext 1838

F: 310-478-6070

www.singerlewak.com

 Please consider the environment before printing this email.

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**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 2:40 PM

To: Suzie Doran <sdoran@singerlewak.com>

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

March 21, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 24 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

I am writing to you because I strongly support Archer's plan for the future, Archer Forward: Campus Preservation and Improvement Plan. As a staff member at the school, I have seen first-hand Archer's commitment to creating a beautiful new environment to educate the girls of Los Angeles.

Archer students are bright, engaged, and driven. However, our campus is outdated and we struggle to provide the girls the same opportunities that other schools have, whether it's adequate sized classrooms, a gym for basketball, or a space for the community to gather. With older buildings we also deal with the lack of climate control in offices and classrooms. During the summer while it's 80 degrees outside, we have portable fans blowing in each room.

By adding the City's support, we hope the plan will be quickly moved through process so that Archer girls will soon have the facilities they need and so greatly deserve. Thank you.

Sincerely,



Amy Duarte

14350 Addison St. #212, Sherman Oaks, CA 91423

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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**RE: ENV-2011-2689-EIR**

2 messages

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**Betty Duffy** <bduffysf@me.com>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Wed, Mar 26, 2014 at 6:51 PM

Dear Mr. Villani,

Change for the better can sometimes be difficult to achieve in the arena of public opinion. Discretionary zoning actions and new construction can generate considerable discussion. This can be complicated by the fact that stakeholders are not always rational when faced with a perceived conflict between self interest and the public good.

We believe that Archer has been, and will continue to be, sensitive and responsive to their neighbors. More to the point, Archer's thoughtfully conceived plans will provide a great many benefits in, and beyond, our community.

The extraordinary young women who attend Archer are among our brightest hopes for the future. Please support their campus plan.

Sincerely yours,

David Reddy and Betty Duffy  
Principals / Design

R&amp;D Architects

12811 Venice Boulevard  
Venice CA 90066  
310-450-7409

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**Adam Villani** <adam.villani@lacity.org>  
To: Betty Duffy <bduffysf@me.com>

Thu, Mar 27, 2014 at 2:09 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani

4/24/2014

City of Los Angeles Mail - RE: ENV-2011-2689-EIR

Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

March 4, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

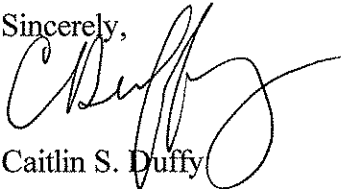
Dear Mr. Villani:

My name is Caitlin Duffy and I am a middle school math teacher at The Archer School for Girls. Working at Archer has been a huge pleasure. It is a progressive and vibrant learning community. As a product of a women's college, I personally know how valuable and rewarding the opportunity of a single-sex education is.

However, one of my biggest challenges this year has been trying to teach dynamic, hands-on, student-centered lessons in the confines of a small classroom. Archer really and truly needs facilities that allow our students to learn in the way that they learn best. Archer's Campus Plan will allow for classroom space that appropriately accommodates the great learning and teaching for which we strive. These new facilities will also allow access to convenient and comfortable space for all of our co-curricular activities that ensure our students are well-rounded, empowered young ladies. In short, these facilities are key to Archer fulfilling its mission of creating women ready to learn and lead.

We need the city's support in making sure our school has the facilities it needs. Please help me have a space where I can teach dynamic, hands-on, and student-centered math lessons.

Sincerely,



Caitlin S. Duffy  
3596 S. Centinela Ave, #212  
Los Angeles, CA 90066

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Archer Improved Campus -ENV-2011-2689-EIR**

2 messages

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**Iyad Duwaji** <iyadduwaji@gmail.com>

Sat, Apr 12, 2014 at 6:56 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org

Dear Mr. Villani,

As a new comer to LA, I have to share with you a general observation about LA vs. other cities that I lived in such as Dallas and Dubai. Both cities, and at varying degree, realize that to stay globally competitive and to have a healthy economy, construction or renovation is a nuisance that the community has to accept for its overall well being.

In every place, every neighborhood and locality would prefer to not to live with any form of construction if they can prevent it. The trouble, is that collectively, this is a recipe for disaster, as lengthy and costly procedures make it really hard to upkeep the infrastructure, and this will in turn reflect on job creation and economic growth, and this is true of LA today.

Archer is a top notch educational institution and an exemplary member of its community. It needs to be able to move forward with a well thought of plan to add athletic facilities and spaces for performing and visual art.

I certainly support Archer in its plans to bring its campus up and provide its students with a superior learning experience, and I hope that you do to.

Respectfully,

E Duwaji  
Archer Parent

---

**Adam Villani** <adam.villani@lacity.org>

Tue, Apr 22, 2014 at 11:28 AM

To: Iyad Duwaji &lt;iyadduwaji@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)**

4 messages

**Bunni Dybnis** <bdybnis@livhome.com>

Thu, Mar 20, 2014 at 11:15 AM

To: "mike.bonin@lacity.org" &lt;mike.bonin@lacity.org&gt;, ":" &lt;adam.villani@lacity.org&gt;

Cc: "archerneighbor@gmail.com" &lt;archerneighbor@gmail.com&gt;

To All It May Concern,

As an individual, who lives, shops, dines and on a daily basis needs to leave Brentwood, the proposed Archer School expansion project will seriously reduce my ability to travel on Sunset Blvd and the surrounding streets. It will tremendously impact, the already compromised, quality of life in our community. In addition, the Department of Transportation has found that these impacts CANNOT be physically mitigated. Sunset Boulevard is already gridlocked. Adding more cars will mean even longer driving times and diminished response times for emergency vehicles. After enduring four years of construction due to the 405-widening project, Archer is now asking Brentwood to endure six more years of construction. And once the project is completed, traffic will be forever altered on Sunset as thousands of cars travel to our neighborhood to attend Archer events.

The City Planning Department Environmental Impact Report (DEIR), for Archer School's proposed expansion plan, *Archer Forward* make clear the negative impact to our neighborhood and community. Archer's current plan proposes a massive expansion that will not only increase the size of the campus, but also increase traffic and set dangerous precedents for other schools that operate with a Conditional Use Permit in a residential area. This expansion will bring thousands of new car trips to our area. The Department of Transportation has stated in the DEIR that the proposed project will create SIGNIFICANT impacts at the following intersections on six separate intersections on both Barrington and Sunset.

I would support an alternative plan that reduces the size and scope of the proposed project and traffic and puts less of a burden on our neighborhoods

Regards,

Barbara (Bunni) Dybnis



Bunni Dybnis  
Director of Professional Services  
**LivHOME, Inc.**  
Live long. Live well. LivHOME.  
5670 Wilshire Blvd, Suite 500  
Los Angeles, CA 90036  
Direct: 323-547-1643  
Tel: 323-932-1308 ext 1130 | Fax: 323-933-9554  
LinkedIn: [www.linkedin.com/in/bunnidybnis](http://www.linkedin.com/in/bunnidybnis)  
e: [bdybnis@livhome.com](mailto:bdybnis@livhome.com) | w: <http://www.livhome.com/la>

---

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. To reply to our email administrator directly, send an email to [postmaster@livhome.com](mailto:postmaster@livhome.com).

---

**Adam Villani** <[adam.villani@lacity.org](mailto:adam.villani@lacity.org)>  
To: Bunni Dybnis <[bdybnis@livhome.com](mailto:bdybnis@livhome.com)>

Thu, Mar 27, 2014 at 11:26 AM

Thank you for your comments. They have been received and will be included in the Final EIR. You will be included on the list of interested parties for this project.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
[Adam.Villani@lacity.org](mailto:Adam.Villani@lacity.org)  
(818) 374-5067  
alternate: (213) 978-1454

---

**Adam Villani** <[adam.villani@lacity.org](mailto:adam.villani@lacity.org)>  
To: Bunni Dybnis <[bdybnis@livhome.com](mailto:bdybnis@livhome.com)>

Tue, Apr 29, 2014 at 3:36 PM

Thank you once again for your comment on the Archer Forward Draft EIR. I received your comment in March and indicated that you would be included in future distribution for notices related to this project. I should clarify that in order to do so, please forward me your USPS mailing address. You will then receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

---

**Bunni Dybnis** <[bdybnis@livhome.com](mailto:bdybnis@livhome.com)>

Tue, Apr 29, 2014 at 4:20 PM

5/6/2014

City of Los Angeles Mail - Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)

To: Adam Villani <adam.villani@lacity.org>

356 N. Skyewiay Road  
L.A. 90049

*Sent from my Verizon Wireless 4G LTE DROID*

[Quoted text hidden]



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Archer Forward Expansion

3 messages

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**debora edmunds** <debora.edmunds@gmail.com>

Fri, Mar 21, 2014 at 11:21 AM

To: adam.villani@lacity.org

Adam,

I have lived on Cordelia Rd for 30 years. I was supportive of an all girls' school, Archer, but with the impact on traffic, I see it was a grave mistake. If I leave my house at 4 pm or after it takes me 1 to 1 1/2 hours or more to get to the 405 freeway on Sunset. This should take 10 to 20 minutes. Last night Sunset was blocked up before Kenter Canyon going east. I tried Wilshire, Santa Monica, Olympic, then finally Pico to cross under the freeway. My destination was the Beverly Hills Hotel on Sunset Blvd.

Please do not allow any expansion of Archer school because of nightmare traffic which is already here. Please remove Archer School completely. I am a prisoner in my home after 4 pm.

Debora Edmunds  
2576 Cordelia Rd.  
310-472-7565

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Mar 27, 2014 at 1:48 PM

To: debora edmunds &lt;debora.edmunds@gmail.com&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

-

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**debora edmunds** <debora.edmunds@gmail.com>

Thu, Mar 27, 2014 at 2:19 PM

To: Adam Villani &lt;adam.villani@lacity.org&gt;

Debora Edmunds  
2576 Cordelia Rd  
Los Angeles, CA 90049

[Quoted text hidden]

April 10, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 15 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
Support for Archer Forward

Dear Mr. Villani:

Since moving to Brentwood in 1998, The Archer School for Girls has been an outstanding neighbor, going above and beyond what the City requires of it. Now it has come forward with a plan to update and modernize its campus. I am writing in support of this plan as an 11<sup>th</sup> District resident, and request that the City and Councilman Bonin work together to help Archer move through the City process and secure approval.

As an example of Archer commitment to being a good neighbor, the School is subject to the most restrictive regulations of any independent school in the City. Yet, Archer goes beyond what is required in their traffic management program. Over 50% of girls arrive on campus by bus, and the rest of the girls arrive by carpool. Nobody from Archer is permitted to park in the neighborhood, and the School has a community outreach coordinator who 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.

Sincerely,

Noa Ehrlich  
2266 Oceano Drive  
Los Angeles, CA 90049

Noa Ehrlich (BHA Member)

Cc: Councilmember Bonin



Adam Villani <adam.villani@lacity.org>

## Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)

5 messages

Brett Elkins <brett@trafficeducation.net>

Thu, Mar 20, 2014 at 2:26 PM

To: adam.villani@lacity.org

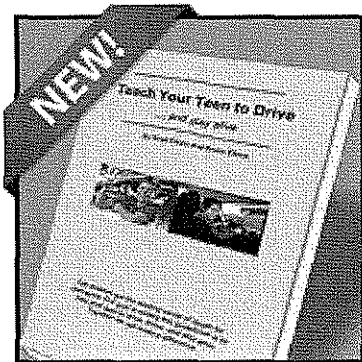
Cc: mike.bonin@lacity.org, archerneighbor@gmail.com, Deborah <brettdeb@aol.com>

We oppose the archer plan unless all students are bused into archer and cars are not allowed on campus... enough school expansion in Brentwood....we should know we live on it. Thanks

Thank you.

Sincerely,

Brett Elkins



### Teach Your Teen to Drive...and stay alive (#2 best-selling book on Amazon for its group)

By Brett Elkins and Bruce Elkins

*Teach Your Teen to Drive...and stay alive* is a fun and highly effective way to cover the requirement of up to 60 hours hours of parent-teen driving in every state. Driving is the leading cause of teenage deaths,

yet research shows that about 33% of teen accidents could be prevented through parent-teen driving practice. Our goal in writing this book is to help your teen to drive, thrive and stay alive. Together we will make a difference.

Available via Amazon.com

---

**Adam Villani** <adam.villani@lacity.org>  
To: Brett Elkins <brett@trafficeducation.net>

Thu, Mar 27, 2014 at 11:29 AM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Brett Elkins** <brett@trafficeducation.net>  
To: Adam Villani <adam.villani@lacity.org>

Thu, Mar 27, 2014 at 12:22 PM

Hi Adam

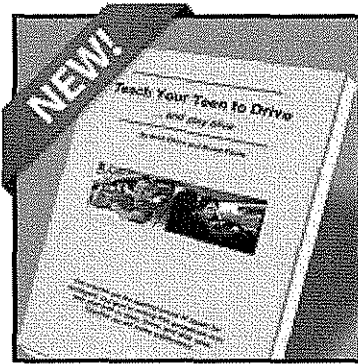
Thank you very much

Its 11592 West Sunset Blvd, LA CA 90049...also for what it is worth I reported that our sidewalk on the public portion of the street had been uplifted and never heard back...if you are able to help with that process that would be appreciated...

Thank you.

Sincerely,

Brett Elkins



## Teach Your Teen to Drive...and stay alive

(#2 best-selling book on Amazon for its group)

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*Teach Your Teen to Drive...and stay alive* is a fun and highly effective way to cover the requirement of up to 60 hours hours of parent-teen driving in every state. Driving is the leading cause of teenage deaths, yet research shows that about 33% of teen accidents could be prevented through parent-teen driving practice. Our goal in writing this book is to help your teen to drive, thrive and stay alive. Together we will make a difference.

Available via Amazon.com

**From:** Adam Villani [mailto:adam.villani@lacity.org]  
**Sent:** Thursday, March 27, 2014 11:29 AM  
**To:** Brett Elkins  
**Subject:** Re: Oppose Archer Forward Plan As Proposed (ENV-2011-2689-EIR)

[Quoted text hidden]

---

**Adam Villani** <adam.villani@lacity.org>  
 To: Brett Elkins <brett@trafficeducation.net>

Thu, Mar 27, 2014 at 1:40 PM

Thank you for your address. My recommendation on the sidewalk would be to follow up with the Council office.  
 [Quoted text hidden]

**Brett Elkins** <brett@trafficeducation.net>  
To: Adam Villani <adam.villani@lacity.org>

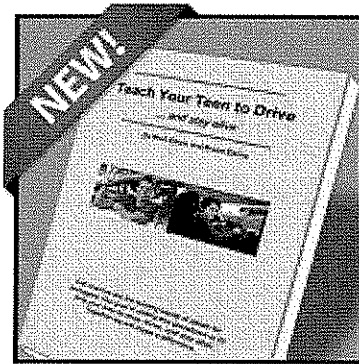
Thu, Mar 27, 2014 at 2:00 PM

Good point and thanks

Thank you.

Sincerely,

Brett Elkins



**Teach Your Teen to Drive...and stay alive**  
**(#2 best-selling book on Amazon for its group)**

*By Brett Elkins and Bruce Elkins*

*Teach Your Teen to Drive...and stay alive* is a fun and highly effective way to cover the requirement of up to 60 hours hours of parent-teen driving in every state. Driving is the leading cause of teenage deaths, yet research shows that about 33% of teen accidents could be prevented through parent-teen driving practice. Our goal in writing this book is to help your teen to drive, thrive and stay alive. Together we will make a difference.

Available via [Amazon.com](http://Amazon.com)



**From:** Adam Villani [mailto:adam.villani@lacity.org]

**Sent:** Thursday, March 27, 2014 1:40 PM

[Quoted text hidden]

[Quoted text hidden]

March 19, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 21 2014

ENVIRONMENTAL  
UNIT

Re: ENV-2011-2689-EIR  
A letter in support of Archer

Dear Mr. Villani,

I am proud to call myself a graduate of The Archer School for Girls. I am writing today to express my support for the school's plan to expand the campus.

I chose to attend Archer because the school is unique and I believe that the school is doing an important thing by educating girls in a way that honors our specific learning styles. However, in order for Archer to continue this mission, it needs adequate facilities.

All Archer alums would agree that the education they received was top-notch. The faculty were among the best in the country and their dedication made the Archer experience even more impactful. However, most alums will also tell you that they wished Archer had better facilities. 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 to hold meets on campus. I firmly believe the school deserves these improvements.

I personally don't think the school is asking for more than they need and I hope that you support this plan and move it through the city process quickly.

Sincerely,



Katrina Eron

1606 Viewmont Dr., Los Angeles, CA 90069

Cc: Councilman Mike Bonin

March 2nd, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

ENVIRONMENTAL  
UNIT

Dear Mr. Villani:

For the past three years I have lived at 11730 West Sunset Blvd, across the street from The Archer School for Girls. Born and raised in a small European town, when I moved to L.A, I deliberately chose to live in the Brentwood Village because of its homey feel in the heart of the megapolis. I immediately loved the area and was delighted to see children everywhere, young girls in Archer uniform studying in cafés, helping elderly people cross the street, gathering around a puppy, giggling, or seriously discussing a biology project.

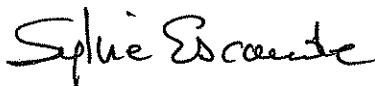
Thanks to the Archer newsletter that I regularly receive in my mailbox, I am aware of the promising and exciting development and transformation of the school campus, which represents important progress towards the long-term vision of a more integrated and lively presence of The Archer School for Girls in Brentwood.

The new campus will preserve the authenticity of the main Spanish style building but be shaped for the next century with spaces that encourage collaboration, spur experimentation, foster connections between Archer's boundlessly imaginative students, faculty and staff and infinitely varied disciplines.

Archer is expanding inside, inward. Instead of explosion it's an implosion. An implosion that will resonate in the life of these young women who travel from every corner of the city to receive the best education to become our future leaders. And will also resonate in everyone's life in the neighborhood in a positive way.

For these reasons, I fully support Archer's campus improvement project moving forward. I feel honored to be part of this exciting mission. Please support the plan with me.

Sincerely,



Sylvie Escande  
11730 W Sunset Blvd.  
Los Angeles, CA 90049



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## Support for Archer Forward

4 messages

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**marnieshel** <marnieshel@earthlink.net>

Tue, Apr 8, 2014 at 8:41 PM

To: Adam.Villani@lacity.org

Cc: councilmember.bonin@lacity.org, archerforward@archer.org

Re: ENV-2011-2689-EIR

Dear Mr Villani,

I am a PROUD parent of a graduating senior and and incoming 7th grader to the Archer School for Girls. I have been involved with Archer for 7 years and with all the choices of private education in Los Angeles, Archer provides a unique learning experience. A single sex education has turned my somewhat quiet daughter into an insightful, intuitive, passionate and confident young woman with a voice. She has learned to stand up for what she believes in and that she can make a difference in her community.

Archer has grown and changed so much since it was established in 1995. The campus improvement plan not only will benefit the students of Archer, but will also enhance the community in which it resides in. The plan will allow for their students to have the modern facilities that our girls not only deserve, but they NEED. Air conditioned rooms, ample parking, and better athletic facilities will allow provide a better environment to learn, host other schools, and provide better security for the students and visitors to the campus.

**PLEASE APPROVE THIS CAMPUS PRESERVATION AND IMPROVEMENT PLAN!**

Mami Eshel

Archer Mom of Ari (Class of 2014) and Chloe (Class of 2020)

---

**Adam Villani** <adam.villani@lacity.org>

Thu, Apr 17, 2014 at 5:31 PM

To: marnieshel &lt;marnieshel@earthlink.net&gt;

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
 Adam Villani  
 Planning Assistant  
 City of Los Angeles  
 Department of City Planning  
 Major Projects Section  
 Adam.Villani@lacity.org  
 (818) 374-5067  
 alternate: (213) 978-1454

---

**marnieshel@earthlink.net** <marnieshel@earthlink.net>

Thu, Apr 17, 2014 at 5:31 PM

Reply-To: nobody@earthlink.net

To: Adam Villani &lt;adam.villani@lacity.org&gt;

This is an automatic reply from marnieshel@earthlink.net.

Please fill out this form to take your email out of my spam folder. You wil=  
I only have to do this once.=20  
Thanks,  
Marni

Click the link below to fill out the request:

<https://webmail.atl.earthlink.net/wam/addme?a=marnieshel@earthlink.net&id=11e3-c690-c1770ef4-a950-002128140e30>

---

**Adam Villani** <adam.villani@lacity.org>  
To: marnieshel <marnieshel@earthlink.net>

Wed, Apr 23, 2014 at 10:41 AM

I clicked on the link but received an error message saying it was unable to process Allowed Sender request.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

## I support Archer Forward

2 messages

---

**Geoffrey Evans** <geoffevans@earthlink.net>  
Reply-To: Geoffrey Evans <geoffevans@earthlink.net>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Thu, Mar 20, 2014 at 9:04 PM

Re: ENV-2011-2689-EIR

I Support Archer Forward

Dear Mr. Villani:

My daughter is currently enrolled at The Archer School for Girls in Brentwood, and I'd like to personally urge the City to support the school's improvement project, Archer Forward. It's in the best interest of the school and the students, and therefore, it is a good step forward for the community and the city as well.

Our students spend hours commuting to practices, games, and performances because Archer lacks the facilities necessary to allow these events to happen on campus. It's a wonderful school that is offering our girls a comprehensive, 21st century education, but in order for the school to continue to adhere to its mission, it needs the facilities and space every modern school requires.

I am proud that Archer prides itself on being a responsible and active member of the community. As parents, we abide by many rules, particularly with regards to carpools and buses, to make sure that the school is doing its part to reduce traffic in Brentwood. The school administration values community service, something they put into practice by participating in local neighborhood councils and groups, and requires all students to complete community service hours in the local area.

Archer Forward is a good plan for the students, the school, and the city. I respectfully request the city's support.

Sincerely,

Geoffrey Evans

Cc: Councilman Mike Bonin

---

**Adam Villani** <adam.villani@lacity.org>  
To: Geoffrey Evans <geoffevans@earthlink.net>

Thu, Mar 27, 2014 at 11:43 AM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant

4/24/2014

City of Los Angeles Mail - I support Archer Forward

City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

---

**I support Archer Forward!**

4 messages

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**Tatiana Evans** <evans.tatiana@rocketmail.com>

Tue, Mar 4, 2014 at 2:01 PM

To: "Adam.Villani@lacity.org" &lt;Adam.Villani@lacity.org&gt;

Cc: "councilmember.bonin@lacity.org" &lt;councilmember.bonin@lacity.org&gt;

**RE: ENV-2011-2689-EIR**

Greetings,

My name is Tatiana Evans and I am a former Archer student. I graduated from Archer last year in June, 2013; however, I now find myself on a gap year in Salvador, Brazil, where I am engaged in various service work projects. I often find myself taking the time to reflect on the various forces that have led me here and trying to identify the most influential one. Over the many reflections had so far, I have been able to identify numerous forces that have led me to Salvador, but none of them that have been so influential as Archer's core ideology of taking risks.

My experience in Salvador has been filled with risk-taking. I took my first risk when I decided to come here on a pilot program with an organization I was not very familiar with. Since then, I have been constantly outside of my comfort zone. Sometimes taking a risk involves starting a conversation with the coconut water vendor I pass on my daily walk to work or ignoring my nerves and sambaing with the members of my homestay family. Other times, it involves trying a new teaching style with my seven elderly students or venturing into the favela of Uruguai with the nuns I work with. Whatever the nature of the risk I take, I remain eternally grateful for the time I had at Archer, where I learned to embrace risk-taking.

I also remain eternally grateful for the time I had at Archer for other reasons too. There, I was taught by teachers who simultaneously inspired and challenged me, had classmates that stretched my mind and introduced me to many new perspectives, received encouragement to discover and follow my passions, and developed into a leader. I loved my time at Archer and consider the seven years I spent there to have been the most formative years of my life so far.



However, although I present a romanticized version of Archer here, it is not to say that I did not notice any flaws during my time there. I thought the school lacked all the necessary facilities for its students. Our varsity sport teams were forced to spend hours in traffic driving to other gyms, soccer fields, and pools just to practice. The members of our Dance Troupe were forced to have their performances at the American Jewish University because Archer didn't have a large enough performance space for them. In addition, because there was no indoor space where the whole school could gather for assemblies, we were forced to sit for hours in the hot sun when a school-wide assembly needed to be held.

Archer offers such a rich educational experience and so many opportunities for personal growth to its students; but without the proper facilities, the school will never be able to live up to its complete potential. I can't imagine how many potential students have been attracted to Archer's unique environment, but have chosen to enroll elsewhere due to the lacked facilities. Having been a tour guide during my time there, I can recollect families who have questioned, "Why should we choose Archer when we can enroll in a comparable school like Marlborough that offers both a great education and the necessary facilities".

Right now I consider Archer to be a great institution. However, with the addition of the facilities the school would gain if the Campus Improvement Plan was approved, it would turn into an extraordinary one. With knowing how much the status quo Archer was able to transform my life, I believe with the addition of the facilities, the school will go on to transform the lives of its future students in incomparable ways.

I would not waste my time and yours by writing this letter if I did not wholly believe in the mission and the vision of Archer. However, I do and I hope this letter shines a light on the unique gem of an institution that Archer is and on the necessity of the expansion for the success of Archer's future.

Thank you for your time.

Sincerely,

Tatiana Evans

---

**Adam Villani** <adam.villani@lacity.org>  
To: Tatiana Evans <evans.tatiana@rocketmail.com>

Fri, Mar 7, 2014 at 3:49 PM

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

---

**Adam Villani** <adam.villani@lacity.org>  
To: Tatiana Evans <evans.tatiana@rocketmail.com>

Tue, Apr 29, 2014 at 3:23 PM

Thank you once again for your comment on the Archer Forward Draft EIR. I received your comment in March and indicated that you would be included in future distribution for notices related to this project. I should clarify that in order to do so, please forward me your USPS mailing address. You will then receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

---

**Tatiana Evans** <evans.tatiana@rocketmail.com>  
Reply-To: Tatiana Evans <evans.tatiana@rocketmail.com>  
To: Adam Villani <adam.villani@lacity.org>

Tue, Apr 29, 2014 at 3:31 PM

Hi Mr. Villani, I'd love to receive the future notices for this project.  
My mailing address is:  
19440 Coslin Avenue  
Carson, CA 90746

Thank you and have a great afternoon!  
- Tatiana

[Quoted text hidden]

March 15, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 21 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

Throughout my career at The Archer School for Girls, I have witnessed students with more dedication and talent than can be found in any other place. I hold the position of film teacher where I have designed a program that gives students the opportunity to learn about an industry that is so important to our community. For example, we founded the annual Archer Film Festival to encourage and celebrate women in film. We accept submissions from students all over; this year we received a submission from a young woman in Vietnam. Film at Archer is unique, much like many other departments, in that it gives girls true, professional experience. Our students go on to top film schools and future successes. In order to foster and support the education of women and women in film, this expansion is needed.

Archer's campus plan gives our students the facilities that most other Los Angeles area schools have. Our students do great work artistically, educationally and in the community therefore they need the facilities to make these strides. In order to give our students the opportunities to learn and grow in our modern society, we must give them improved facilities. By improving facilities, we improve learning and development giving us all a brighter future. This expansion will provide the facilities to offer more classes, give back to the community and provide the best education possible for our students.

I am actively involved in all of the performances involving Archer students. For example, over the past few weeks, I have had to leave campus early to travel to another location for our annual dance show. After rehearsing for hours, I finally get home to plan for the upcoming day. This is the life of a teacher, but we are also putting great demands on our students and parents. If we had the facilities to perform on campus, we would save precious time from our already busy students' scholastic careers. Currently, our facilities for performance are sparse. We have one black box theater that is a basement room that has been converted. Due to this space restriction, our 80 student dance show must be performed elsewhere where we pay to rent space. In addition, we can only hold 75 audience members. Our performances on campus cannot be seen by our entire student body and many miss out on the chance to see their peers perform because shows are off campus.

My years at Archer have been wonderful and I can only imagine how great the next will be when we have improved facilities. It is what our talented students deserve. Please support Archer students by supporting our plan.

Sincerely,

  
Reed Farley

Cc: Councilmember Mike Bonin

Wednesday, March 5, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

ENVIRONMENTAL  
UNIT

Dear Mr. Villani:

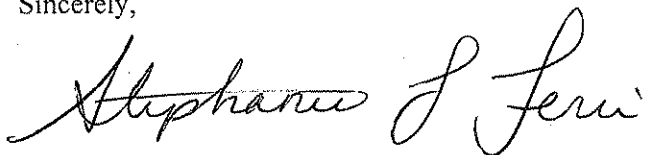
My name is Stephanie Ferri and I am a Fitness and Wellness teacher at the Archer School for Girls. I am also the Middle School and Upper School swimming coach and Director of Outdoor Education. Archer has been my home for the past seven years and I couldn't imagine working anywhere else. The community of students, faculty and staff here is like a family to me. We here at Archer take pride in our community and we support and celebrate each other in all facets.

I love my job being a fitness teacher and coach at Archer, however, lack of facilities makes the job quite challenging at times. To name one example, right now we have no indoor space that would hold all the students we have in a class period, which poses quite a challenge on hot and rainy days. A gym would create an indoor learning and training environment away from the elements like heat, sun and rain. In addition to a gym, a larger weight training facility would allow us to take a full class of Upper School students inside to exercise and train. Presently we can fit less than fifteen girls comfortably, which is not enough space for a full sports teams to condition or for a full fitness class to workout.

In addition to teaching, I am the proud coach of both Middle School and Upper School swimming. Both my teams have to travel off campus every day to practice. Using off campus facilities poses many challenges. For one, it takes us twenty-five minutes each way to travel to UCLA for practice, which is valuable time we could use for training. Hosting home meets is often difficult and near impossible. Most of the community here has never been to one of our swim meets because they either do not have transportation to get there or they cannot get there in time. While on campus, the community celebrates the team's victory but it is not the same as having them cheering the girls on poolside.

I ask the city to please support Archer's plans to build. The facilities at Archer will impact this community in the most positive way. It will provide the community with the space to learn and grow for years to come. It will bring this community together providing spaces to join together and celebrate all the amazing things we do here.

Sincerely,



Stephanie Ferri

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I support Archer Forward

2 messages

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Lauren Finkelstein <laurenfinkelstein1@gmail.com>  
To: "Adam.Villani@lacity.org" <Adam.Villani@lacity.org>  
Cc: "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>

Mon, Mar 3, 2014 at 1:14 PM

RE: ENV-2011-2689-EIR

Dear Mr. Villani,

My name is Lauren Finkelstein and I am an alumna from the class of 2001 at the Archer School for Girls – also known as the school's first graduating class.

With this special distinction comes a hefty responsibility:

I am grateful for the experiences I had at Archer and want to ensure the school continues to grow and impact students like myself, who are fortunate enough to receive a quality education, the attention in the classroom they yearn for and the confidence to believe they can do anything they dream.

This is something I don't take for granted in my life, nor do I take it lightly.

I came to Archer a somewhat shy young woman in the fall of 1997, my freshman year. The attention I received and the relationships that I made, greatly helped to inform who I am today. In the spring of 2001, I emerged strong and self-assured, becoming videographer of the school throughout my time there. In addition, I received the school's first annual and distinctive Gary David Goldberg creativity award (in honor of the late wonderful and inspired director/writer/producer) for "having a vision and working to make it happen."

I was proud to be an Archer girl then and I can't begin to tell you what it means to me today.

In casual exchange or during professional conversation, I will often hear "oh, you went to Archer? WOW!" or "how do I get my daughter in?!" This isn't often the response one would expect to hear when mentioning where they went to high school. But I know I'm not alone and that many of my fellow Archer alums hear this as well.

I am a strong supporter of Archer and the students (past and present), faculty and parents who take the time to make their passion for the school heard loud and clear.

I am also a strident advocate for the Archer Campus Plan which will benefit generations of Archer girls to come. The school's beautiful campus and services will only be further enriched by expanding its presence and opportunities. I am confident when I say the value it provides the community and city at large, is priceless.

Thank you for taking the time to read this.

Sincerely,

Lauren (Hochberg) Finkelstein  
Class of 2001  
310-993-9419

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Adam Villani <adam.villani@lacity.org>  
To: Lauren Finkelstein <laurenfinkelstein1@gmail.com>

Fri, Mar 7, 2014 at 3:48 PM

4/24/2014

City of Los Angeles Mail - I support Archer Forward

Thank you for your comment on the Archer Forward Draft EIR. I have received it into the public record and will address any questions in the Final EIR, for which you will be included in the distribution.

[Quoted text hidden]

—

Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454

March 3, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

MAR 10 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

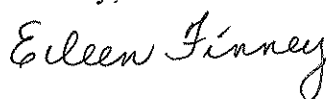
I am writing to you as a relatively new member of the Archer community. Six years ago, I came from Michigan to join Archer's Math Department. The level of ingenuity teachers possessed to deliver high quality curriculum and extra-curricular activities in limited space was impressive. As a mother of four, I know how important adequate facilities are to a learning environment. Our students have adapted to smaller classrooms, long bus rides for athletics, and no common place to congregate as a community or view student productions. As a teacher, my classroom lacks decent temperature controls and space to create essential discussion groups for my students.

Archer's Campus Plan is a work of love for not only the Archer community, but the Brentwood community as well. The faculty and staff were an integral part of its design and looked at its impact not only in regards to how it affected our students, but the surrounding community as well. I don't know another school that would have taken this into consideration.

We need your positive, enthusiastic and genuine support for Archer's Campus Plan. We are asking for the opportunity to impact <sup>the</sup> lives of girls from all areas of Los Angeles. The plan is ambitious, in a good way; maintaining the beauty of the Eastern Star's historic significance while using the surrounding grounds to design state of the art facilities our students deserve.

Please add my unwavering support for the Archer Campus Plan.

Sincerely,



Eileen Finney

Cc: Councilmember Mike Bonin



April 13, 2014

Mr. Adam Villani  
Los Angeles Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES

APR 16 2014

ENVIRONMENTAL  
UNIT

RE: ENV-2011-2689-EIR  
I Support Archer's Campus Plan

Dear Mr. Villani:

I am a science teacher at The Archer School for Girls here in Brentwood. Archer is unique because it truly empowers girls to reach a level of confidence, leadership and enlightenment that simply does not exist at any other school I have ever seen. Archer is producing the leaders of tomorrow, and lives by their motto "giving girls their voice."

I am one of few teachers who have been fortunate enough to have the privilege to teach in a modern science lab with proper science facilities. Unfortunately, this is not the case for almost any of my other colleagues who have to teach in converted dorm room/bathrooms lacking basic facilities such as air conditioning, a proper lab and workspaces, or reasonable amounts of safe storage for science equipment. Archer has a faculty, mission, drive and student body that is ready to change the world; they need the facilities to back that up and make it a reality.

Brentwood is our home. Support our future leaders to thrive and approve Archer's plan to become a hub of learning and world change.

Sincerely,



Lane Fischman

Cc: Councilmember Mike Bonin



Adam Villani &lt;adam.villani@lacity.org&gt;

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## I Support Archer Forward

2 messages

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Lauren Fite <lgfite@gmail.com>  
To: Adam.Villani@lacity.org  
Cc: councilmember.bonin@lacity.org

Wed, Mar 26, 2014 at 10:14 AM

Mr. Adam Villani

Los Angeles Department of City Planning

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Re: ENV-2011-2689-EIR

Archer Forward: Campus Preservation and Improvement Plan

Dear Mr. Villani:

As a parent of Alexandra Fite, alumna of The Archer School for Girls, I remain committed to this wonderful school am a strong supporter of the Archer Forward Plan.

I believe that Archer's stringent compliance to its Conditional Use Permit and its dedication to the surrounding Brentwood neighborhood has become ingrained into the culture and character of the school as a whole. Archer girls are taught the importance of community and being a good neighbor, and this value of responsible stewardship instills in our daughters a real spirit of community service. While at Archer my child was on the soccer team, and began a video news program about the school called Archer Broadcasting. While she very much loved her school, she had to edit and work on her broadcasting episodes at home due to a lack of space at school to do editing and technical work. For a school that does so much for our daughters and our community, I think it is only fair that they have the facilities they need on campus; including: a performing and visual arts center, a gymnasium, and an aquatics center.

I hope that you will agree with me that Archer Forward is a good plan for the school and the community. I strongly support it and hope that you will help Archer move quickly through the city's process. Thank you very much for your attention to this matter.

Sincerely,

Lauren G. Fite

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**Adam Villani** <adam.villani@lacity.org>  
To: Lauren Fite <lgfite@gmail.com>

Thu, Mar 27, 2014 at 2:04 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section  
Adam.Villani@lacity.org  
(818) 374-5067  
alternate: (213) 978-1454



Adam Villani &lt;adam.villani@lacity.org&gt;

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**Archer Forward Expansive (ENV - 2011 - 2689 - EIR)**

2 messages

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**Margaret Michaels Fleming** <piejon2@gmail.com>  
To: adam.villani@lacity.org, bonin@lacity.org  
Cc: Rodney Liber <rliber@brentwoodhomeowners.org>

Sun, Mar 30, 2014 at 3:07 PM

Dear Mr. Villani

Earlier this month we attended the Brentwood Homeowners meeting at the University Synagogue. Councilman Mike Bonin spoke, and the homeowners association displayed the massive plans for the **Archer School** for girls. Archer schools complete disregard for the Westside area of Los Angeles, especially Brentwood, is shocking. Almost as shocking was the **gasp from the audience** upon seeing the plans displayed on a big screen. That this can even be going on without the knowledge of most in the community, is amazing.

We did know about their plans to expand and while the school may need to make appropriate, and neighborhood friendly improvements, their current plan to drastically expand this school will shut down traffic on the Westside of Los Angeles until we are completely locked in. We might as well live on an island.

The Westside already dismal and I have to wonder if the next "Big Fire" will repeat the Bel Air fire, only this time you'll have automobiles filled with families trapped, while trying to get out of Brentwood.

It isn't just the school itself, but their added events six days a week to late in the evening, the addition of "TWO" Gyms, their Pool Pavilion, the Visual Arts Center, and the endless construction forced on a community that has already endured the freeway construction. For the life of me I can not understand how the city can even entertain this massive project. How will anyone get a **timely emergency response from 911**, when traffic will be blocking the already congested two arteries, Sunset and San Vicente, both east and west bound leading to hospitals. Please give the Westside of Los Angeles a break and keep this massive expansive planned by Archer School, to a minimum. Please consider the devastating results if this expansive is allowed to move forward.

Thank you for your time,

Margaret Michaels Fleming

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**Adam Villani** <adam.villani@lacity.org>  
To: Margaret Michaels Fleming <piejon2@gmail.com>

Thu, Apr 17, 2014 at 3:28 PM

Thank you for your comments. They have been received and will be included in the Final EIR. If you have not already signed up as an interested party, please forward me your USPS mailing address and we will add you to the list. You will receive mailed notice as this project moves forward through the City process. At this time we are only able to provide notification of interested parties by US mail.

[Quoted text hidden]

—  
Adam Villani  
Planning Assistant  
City of Los Angeles  
Department of City Planning  
Major Projects Section

4/24/2014

City of Los Angeles Mail - Archer Forward Expansive (ENV - 2011 - 2689 - EIR)

Adam.Villani@lacity.org  
(818) 374-5067  
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