

III. Responses to Comments (Continued)



Comment Letter No. 471

Courtney Teller
2131 Century Park Ln., No. 216
Los Angeles, CA 90067

Comment No. 471-1

I am an Alum of the Archer School For Girls (Class of 2010)—and I am a proud supporter of Archer's plan and their "Move Forward" project. As a former student and member of the Alumnae Board, I have seen the changes through the years that have enriched the lives and education of so many girls. This project would only further that and I hope that you can stand behind them and support them.

I would not be the same person today if it were not for this school and I know so many girls would benefit greatly from the project.

So please support Archer and help us educate girls across Southern California.

Response to Comment No. 471-1

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

Comment No. 471-2

2131 Century Park Lane #216
Los Angeles, CA 90067

Thank you.

Response to Comment No. 471-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 472

Ivan and Jana Tether
11901 W. Sunset Blvd., No. 209
Los Angeles, CA 90049

Comment No. 472-1

Thank you for your attention to the attached.

Response to Comment No. 472-1

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

Comment No. 472-2

Ivan has lived in the neighborhood for over sixteen years, and Jana almost ten. While we are proud to have the Archer School in our community and thank them for preserving the former Eastern Star retirement home, we are seriously concerned by the current configuration of its proposed expansion. In a phrase, “Archer Forward” in its full version is more than the traffic will bear and will do substantial harm to the neighborhood. We recommend the project be scaled back to at least the level provided in Alternative 4 Option B set out in the Draft Environmental Impact Report.

Response to Comment No. 472-2

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City’s residential neighborhoods. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood. Overall, the Project’s net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures

presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level.

As summarized on page V-140 of Section V, Alternatives, of the Draft EIR, while Alternative 4, the Reduced Program within Existing Campus Boundary Alternative, would reduce the greatest number of Project impacts, all of the Project's significant and unavoidable impacts would remain under Alternative 4. In addition, Alternative 4 would not meet or would only partially meet most of the Project's objectives.

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

Comment No. 472-3

The Archer-proposed plan, as set out in the (DEIR) prepared by Matrix Environmental, LLC, calls for the following additions to Archer's small property in the middle of a residential neighborhood:

- *An increase of 75,930 square feet of new floor area
- *Construction and operation of a 41,400 square foot "Multipurpose Facility"
- *Construction and operation of a 22,600 square foot Performing Arts Center
- *Construction and operation of a 7,400 square foot Visual Arts Center
- *Enlargement of the existing outdoor athletic fields,
- *Construction and operation of a new underground parking structure for approximately 212 cars.
- *The expanded project will also absorb and destroy two buffering adjacent residences.

Archer also seeks extended construction hours—from earlier than was allowed for the existing conversion to much later—sure to seriously interrupt family life, and threatening the precious "between the dark and the daylight" which Robert Louis Stevenson referred to as "the children's hour," and important to all family members.

We are particularly concerned with the following impacts, which the Draft EIR does not adequately address:

- *Air Quality
- *Public Safety
- *Noise
- *Light
- *Cumulative Impacts

Response to Comment No. 472-3

This comment correctly summarizes the Project components as described in the Draft EIR. As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the proposed buildings, a reduction in the number of seats within the Performing Arts Center, a reduction in the number of events and athletic activities, and a reduction in the number of parking spaces. Specifically, the Multipurpose Facility would be reduced from approximately 41,400 square feet to 39,300 square feet and the Performing Arts Center would be reduced from 22,600 square feet to 19,025 square feet. The reduced Performing Arts Center would provide a maximum seating capacity of 395 seats, reduced from 650 seats. In addition, the North Wing Renovation would be reduced by approximately 8,671 square feet. The Project has also been further refined to include a reduction in the number of parking spaces from 212 spaces to 185 spaces, which would be expandable to 251 spaces with attendant assisted parking. To reduce noise to the adjacent uses, the Project has also been refined to fully enclose the pool within the proposed Aquatics Center. These refinements would increase the square footage of the Aquatics Center from approximately 2,300 square feet to 9,675 square feet. The Visual Arts Center would remain at approximately 7,400 square feet. Overall, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet. In addition, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has been refined to eliminate the athletic field lighting.

Refer to Topical Response No. 13, Use of Existing Residential Properties, for an analysis of the use of residential properties for school uses. As described therein, school uses are permitted in the RE and R3 zones with a conditional use permit.

As discussed on page II-39 in Section II, Project Description of the Draft EIR, the Project would comply with the LAMC, which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. Pursuant to the LAMC, no construction activities are permitted on Sundays. Construction hours may be extended with approval from the Executive Director of the Board of Police Commissioners. Archer may seek approval from the Executive Director to extend the construction hours for the Project to Sunday from 8:00 A.M. to 6:00 P.M. With extended construction hours, the estimated duration of the haul could be significantly reduced.

This comment does not raise specific issues regarding the topics referenced. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 472-4

Air Quality

Our primary concern is with Diesel emissions from construction trucks. Curiously, the DEIR on Page IV.B-16 states: “[T]he Project Site is located with a cancer risk zone of 626 in one million over a 70-year duration. In general, the risk of the Project Site is comparable with” and does not complete the sentence.

We are aware that Diesel particulate emissions create a substantial risk of cancer, and that these emissions have been identified by the SCAQMD as presenting up to 70% of the Air Basin’s cancer risk. We know that there will be many diesel trucks coming to, leaving from and idling at the Project Site as well as heavy construction equipment operating on the site for up to six years. While the DEIR mentions many comparisons and CEQA thresholds, the important questions are:

*Will the number of daily diesel trucks over the six year period increase the cancer risks to the neighbors of Archer?

*If the increase is within a CEQA threshold, how does this protect the neighbors or the students? Under this individual project threshold check, could any number of projects with serious cancer risk be built in series as long as these could (just barely) duck under the CEQA threshold (see question below re 9.2)?

*How will Archer’s share of the overall risk be mitigated?

*Further, how will the projected 10-month contribution of construction emissions to exceedence of the SCAQMD daily significance thresholds be mitigated? (IV.B-34.)

*Please explain in greater detail how the Project scraped below the 10 in one million MICR threshold with a reading of 9.2, less than one-millionth of the total. Could 9.2 been a range of possible levels based on the assumptions and screening that also went over the threshold at the upper end of the range?

*Will the various on-site combustion emissions, such as from cooking and water heating be subject to SCAQMD Rule 1147, which has an applicability to sources of one pound of emissions or more?

Response to Comment No. 472-4

It appears that a printing error occurred during the distribution of the Draft EIR with respect to cancer risk within the Project vicinity. The missing text is as follows and was provided at the top of page IV.B-22 of Section IV.B, Air Quality, of the Draft EIR: "...other urbanized areas in the central Los Angeles area that are near large diesel sources (e.g., freeways, airports, and ports)." The completed sentence is included in Section II, Corrections and Additions, of this Final EIR. The text provided information regarding background risks within the Project vicinity as compared to the central Los Angeles area and the additional sentence does not change the results or conclusions of the Draft EIR. In addition, please note that the subheadings "(d) Existing Project Site Emissions" on page IV.B-20 and "(c) Surrounding Uses" on page IV.B-23 were mislabeled and are corrected in Section II, Corrections and Additions, of this Final EIR.

The Draft EIR evaluates health risks related to the Project and evaluates the potential for the Project to result in significant emissions of pollutants, which can contribute to health risks. The SCAQMD threshold for carcinogenic or toxic air contaminants is a maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.³² According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended thresholds for project-specific impacts would also cause a cumulatively considerable health risk impact. As provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, with the incorporation of the enhanced mitigation measures, the Project would not result in a significant impact to air quality or cause an exceedance of health risks standards during construction or operations.

The Draft EIR acknowledged that the Project vicinity is located within a cancer risk zone of 626 in one million over a 70-year duration. Refer to Figure IV.B-2, SCAQMD Mates III Study, on page IV.B-20 of the Draft EIR. The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., Interstate 405). In general, the risk of the Project Site is comparable with other urbanized areas in the central Los Angeles area that are near large diesel sources (e.g., freeways, airports, and ports). However, this is less than the average carcinogenic risk from air pollution in the Air Basin which is approximately 1,200 in one million over a 70-year duration.

The commenter asks about the impact of diesel truck trips on cancer risks. The potential health risks of the Project, including from diesel trucks on-site, were evaluated in the Health Risk Assessment (HRA) in the Draft EIR. The HRA was conducted consistent with OEHHA and SCAQMD guidance and the results of the HRA were compared to SCAQMD established significance thresholds. As provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, the HRA has been updated to include analysis of each month of construction activity based on the peak daily construction activity for that month (Appendices C.1 and C.2 of the Draft EIR). A summary of the construction emissions is provided in Appendix F-2 of this Final EIR, which shows the construction phase, construction month, start and end date, number of days per week, number of days per month, and unmitigated and mitigated DPM emissions from the accompanied CalEEMod output files. Subsequent to completion of the Draft EIR, AERMOD (the refined dispersion model used in the Draft EIR and recommended by SCAQMD for performance of health risk assessments) and the meteorological data representative of the Project area have both been updated. Therefore, the updated health risk assessment provided in this Final EIR reflect use of AERMOD Version Date 14134 and SCAQMD meteorological data.³³

The Final EIR also incorporates mitigation measures included in the Draft EIR and this Final EIR into the HRA. Specifically, the HRA incorporates Mitigation Measure B-4, which requires the use of Tier 3 construction equipment throughout the duration of proposed construction activities and front-end loaders used for Phase 1—Excavation and Grading would meet Tier 4 interim standards. Mitigation Measure B-7 was also quantified in the HRA, which minimizes exhaust emissions by requiring trucks and vehicles in loading and unloading queues will have their engines turned off after 5 minutes when not in use. While Mitigation Measure B-7 would also serve to reduce DPM emissions from on-road trucks, this mitigation measure was not quantified in the HRA. Based on refined assessment, the HRA demonstrates that health risks from the Project would be 5.0 in a million for off-site receptors, which is below the applicable significance threshold. For potential on-site student and staff exposure at the School, the maximum mitigated cancer risk is 8.2 and 4.9 in a million, respectively, which is below the applicable significance threshold. It is noted that this risk assumes an outdoor exposure for the entire length of construction and does not account for any reductions from the time spent in indoors where air quality tends to be better. Consistent with the results of the health risk assessment included in the Draft EIR, potential impacts to sensitive receptors within the Project area

³² *Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose non-cancer health risks.*

³³ *SCAQMD. Table 1 Meteorological Sites. Available at www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/aermod-table-1, accessed August 2014.*

(i.e., nearby residences and Archer's students) would be less than significant with incorporation of mitigation measures included in the Draft EIR.

Based on the proposed uses, it is not anticipated that potential on-site combustion sources would be subject to SCAQMD Rule 1147 (Miscellaneous NO_x Sources). Instead, boilers would potentially be subject to specific emission limitations provided in SCAQMD Rules 1146, 1146.1, and 1146.2. Residential-type natural-gas-fired water heaters would be subject to Rule 1121, and natural-gas-fired fan-type furnaces would be subject to Rule 1111.

It is noted that in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. As with the proposed six-year schedule, under a five-year construction schedule, the maximum daily impacts would occur during the mass excavation and export phase. In addition, when compared with the six-year schedule, the five-year construction schedule would not increase the use of on-site equipment or number of trips on a daily basis during this phase of construction. As a result, the maximum daily construction impacts presented in Section IV.B, Air Quality, of the Draft EIR, would also represent peak construction impacts under the five-year construction schedule. Refer to Topical Response No. 11, Overview of Construction Refinements.

Comment No. 472-5

Public Safety

The increased traffic from a six-year proposed construction period and greatly increased on-campus events, including third party events such as weddings and club sports events will seriously exacerbate the already critical mass of traffic jams, delay and chaos in the immediate neighborhood.

Response to Comment No. 472-5

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures

presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Regarding filming, as further discussed in Topical Response No. 1, Refinements to Proposed Operations, filming on the campus for commercial purposes would continue to be prohibited except when the School is not in session. Filming would be permitted for no more than 24 days per year. All trucks and equipment would be required to use the School's underground parking structure and parking on neighborhood streets would be strictly prohibited. Hours would be restricted, with filming beginning no earlier than 9:00 A.M. and concluding no later than 6:00 P.M.

Comment No. 472-6

We find the DEIR's reliance for support on the following statement in the LA General Plan curious: "The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service." The implication is apparently that the Archer Forward expansion will enhance transit service. Unless the City plans to replace Sunset Blvd with a light rail line and limit vehicular traffic to residences and emergency vehicles (and enforce these limits), which is not in any plan we have heard of, Archer expansion will only contribute further to an extremely bad and dangerous transportation crisis on Sunset Blvd. It can take more than one and one-half hours for eastbound traffic to reach or go beyond the 405 freeway between 3 pm and 8 pm on weekdays. Further, this intense jamming of traffic creates a critical threat to public safety by making it extremely difficult for fire trucks and ambulances to pass through and/or access this neighborhood. This threat will increase, potentially dramatically, during the projected 6 year construction period required by the full project

*How can the Project's proponents assure neighbors—as well as neighboring communities that rely on the passage of emergency vehicles past the school along Sunset Boulevard—that their access to emergency services will not be materially exacerbated by the additional traffic from the Project, especially during construction and events?

Response to Comment No. 472-6

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Regarding public safety, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR and Topical Response No. 9, Emergency Vehicle Access, regarding emergency vehicle access.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. Regarding transit service, the mitigation program includes increasing the private busing requirement from 50 percent of Archer students to 70 percent of Archer students.

Comment No. 472-7**Noise**

*How will the noise from the outdoor loudspeaker communications be mitigated?

*How will the noise from the increased events, especially the third party events, such as weddings and club sports be mitigated?

Response to Comment No. 472-7

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has eliminated the proposal for use of a non-permanent audio system for public address and amplified music in conjunction with Instruction, Interscholastic Athletic Competitions, and School Functions. Archer would continue to use a non-permanent audio system for use during Graduation as permitted under Archer's existing CUP.

The Project in the Draft EIR proposed community use of the facilities a maximum of 24 days per year as well as the rental, lease, and use of the facilities for non-School Use (e.g., club athletics, weddings, private parties) a maximum of 24 days per year. As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, community use of the school facilities or the rental, lease, and use of the facilities for non-School Uses has been removed from the Project. Elimination of community use and the rental, lease, and use of the facilities for non-School Uses would further reduce the incidence of noise in the community.

Comment No. 472-8

Light

The Project calls for substantially increased light on campus.

*How will this lighting increase be mitigated to avoid light pollution in the nature of a commercial mall toward the neighbors?

Response to Comment No. 472-8

As discussed on pages IV.A-36 through IV.A-38 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the Project proposes additional lighting on the campus to: (1) provide clear identification of circulation, gathering spaces, and parking facilities; (2) provide for the security of students, faculty, staff, and visitors; and (3) support extracurricular activities. Pedestrian path lighting would be of low intensity and integrated within the architectural features. All on-site lighting would be directed onto the site. Lighting would be designed and installed to reduce glare to adjoining and adjacent properties. In addition, outdoor lighting would be designed and installed with shielding to limit views of the light source from adjacent properties.

Project Design Feature A-8 on pages IV.A-32 through IV.A-33 in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR provides that a Lighting Plan shall be implemented as part of the Project, that would employ lighting guidelines adopted from design principles and recommendations provided by the Illuminating Engineering Society of North America (IESNA) and the International Dark-Sky Association (IDA). The Lighting Plan would ensure that the Project would: (1) generate light intensity levels of less than 2.0 foot-candles at the property line of the nearest off-site residence or other light-sensitive use; (2) avoid creating new high-contrast conditions that also exhibit high context and coverage; and (3) minimize skyglow. In addition, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, the Project has removed the athletic field lighting from the Project. With the

removal of the athletic field lighting, light and glare impacts from the Project would remain less than significant.

Comment No. 472-9

Cumulative Effects

As the DEIR frequently attempts to push to the side as background levels of impact, for which the Project should not have to be concerned, Archer exists in a community that is already heavily impacted, particularly as to traffic, public safety concerns and noise.

*How will the Project mitigate the fact that the traffic background is already so severe that any significant increase in traffic whatsoever will cause a steep rise in gridlock of current traffic—to the breaking point?

*How will the Project mitigate the increased threat to public safety that will come, particularly during construction and during events, from increased vehicle traffic?

Response to Comment No. 472-9

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Regarding safety, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Topical Response No. 9, Emergency Vehicle Access, regarding emergency vehicle access.

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Regarding noise, as discussed on page IV.I-113 in Section IV.I, Noise, of the Draft EIR, cumulative operational noise impacts would be less than significant. Refer to Topical Response No. 4, Additional Measures to Reduce Noise, for a description of additional mitigation measures proposed to be implemented to reduce noise associated with campus operations.

Comment No. 472-10

*How will the Project avoid being held responsible for increased cancer risk over a threatening threshold that already exists?

Response to Comment No. 472-10

The Draft EIR acknowledged that the Project vicinity is located within a cancer risk zone of 626 in one million over a 70-year duration. Refer to Figure IV.B-2, SCAQMD Mates III Study, on page IV.B-20 of the Draft EIR. The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., Interstate 405). In general, the risk of the Project Site is comparable with other urbanized areas in the central Los Angeles area that are near large diesel sources (e.g., freeways, airports, and ports). However, this is less than the average carcinogenic risk from air pollution in the Air Basin which is approximately 1,200 in one million over a 70-year duration. The SCAQMD threshold for carcinogenic or toxic air contaminants is a maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.³⁴

As discussed above in Response to Comment No. 472-4, potential impacts to sensitive receptors within the Project area (i.e., nearby residences and Archer's students) would be less than the SCAQMD threshold for carcinogenic risk with incorporation of mitigation measures included in the Draft EIR and this Final EIR. Specifically, the refined HRA in this Final EIR demonstrates that health risks from the Project would be 5.0 in a million for off-site receptors, which is below the applicable significance threshold. For potential on-site student and staff exposure at the School, the maximum mitigated cancer risk is 8.2 and 4.9 in a million, respectively, which is below the applicable significance threshold. Consistent with the results of the health risk assessment included in the Draft EIR, potential impacts to sensitive receptors within the Project area (i.e., nearby residences and Archer's students) would be less than significant with incorporation of mitigation measures included in the Draft EIR.

³⁴ Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose non-cancer health risks.

Comment No. 472-11**Conclusion**

We appreciate your consideration for our concerns, which we understand are widely held. Again, we are proud to have Archer in our neighborhood, and we strongly believe they could achieve virtually all of their goals within the bounds of Alternative 4B with a more limited negative impact on the neighbors and the community.

Response to Comment No. 472-11

This comment expressing support for Alternative 4B is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 473

Chelsea Thomas

Comment No. 473-1

I [sic] I'd like to personally urge you and the city of Los Angeles to support Archer'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 what an inconvenience it was to spend hours commuting all over the city just to practice for athletics. I know current Archer girls are doing the same thing and it is time for them to have the facilities they need on campus. 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 part of the Brentwood community. I hope you will do the right thing and support the school's plan.

Response to Comment No. 473-1

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

Comment Letter No. 474

Jackie Thompson
3256 Mandeville Canyon Rd.
Los Angeles, CA 90049

Comment No. 474-1

I live in Council District 11 and my daughter is enrolled at the Archer School for Girls. As a member of the Archer Parent Association, I am writing in support of the Archer Forward Campus Preservation and Improvement Plan. This project will allow the school to continue providing an excellent education for girls from all kinds of backgrounds and neighborhoods in our city.

Even from my first days involved with the school, I saw Archer's commitment to abide by its promises to its neighbors and the City as defined in its CUP. With regards to traffic and parking, we are clearly instructed each year on the restrictions that we have to abide by when we drop and pick up our girls from school. Most parents elect to send their children by the bus. This is fully due to the school administration's efforts to reduce its traffic burden in the area and be a responsible neighbor.

The school has continued its commitment to being a good neighbor throughout the introduction of the Archer Forward plan, with the School holding many community and stakeholder meetings specifically about the plan at Archer in the last year. These meetings have included community groups and individuals from around the immediate area, creating productive dialogue to create a plan that is good for Archer and the community.

This project will promise a bright future for the school and for generations of young women who will walk through its doors. I fully support this plan and look forward to the City's approval.

Response to Comment No. 474-1

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

Comment Letter No. 475

Jackie Thompson
3256 Mandeville Canyon Rd.
Los Angeles, CA 90049

Comment No. 475-1

We have two daughters that attend Archer School for Girls. They are ages 12 and 14 and are in middle school.

Archer has been a safe and nurturing environment for our girls during their middle school years. We have always believed that an all girls education would benefit our daughters and we have not been disappointed. Our girls excel in academics and participate in many after school activities, including art, dance and sports. Archer creates joyful learners and that is how I would describe the experience the girls are having.

Archer stays on the cutting edge of “how girls learn”. Each year the school has a theme for the year. This year it is “grit”. They are teaching our girls how to have “grit”. I think Archer is showing their grit by their unending commitment to the campus plan. It has been a long and arduous journey and they have been unwavering in their dedication.

I firmly believe that an education at Archer would be greatly enhanced by the Archer Forward Plan. The girls will definitely benefit from updated buildings with larger class sizes, dedicated sporting fields, a gym, performing and visual art centers. These girls deserve the best that Archer has to offer and this campus improvement plan will deliver a better education for our kids. That’s all we want!!

I hope that you will support Archer Forward.

Response to Comment No. 475-1

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

Comment No. 475-2

My address is 3256 Mandeville Canyon Road, Los Angeles, CA 90049

Please add me to the list.

Thank you very much!

Response to Comment No. 475-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 476

Vince Thompson
3256 Mandeville Canyon Rd.
Los Angeles, CA 90049

Comment No. 476-1

If we're going to have a great city we've got to have great schools... public and private.

Archer is an amazing school for many reasons. Here's just a few:

Excellence: Archer serves the educational needs of girls in the best way. They are experts in learning and in how girls learn.

Diversity: Archer has girls from well over 40 zip codes. This is a school that services the larger LA area.

Citizenship: Archer has been well ahead of other institutions when it comes to community impact. They've been leaders in bussing and minimizing traffic impact. A school dedicated to community service.

As a father of two girls at Archer I can go on and on.

I'm asking you to join me and my wife in supporting the school's Archer Forward Plan. Better buildings, more outdoor space and more programs to offer should be a no-brainer for an [sic] City working to build its world-class status.

Thanks for you [sic] consideration.

Feel free to call me.

Response to Comment No. 476-1

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

Comment No. 476-2

Thanks

Vince Thompson
3256 Mandeville Canyon Rd.
LA, CA 90049

Response to Comment No. 476-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 477

Wendy Thornton
111 Marquez Pl., #304
Pacific Palisades, CA 90272

Comment No. 477-1

I am a new teacher at the Archer School for Girls. I teach seventh and tenth grade English.

After teaching at exemplary public schools (Mira Costa High School in Manhattan Beach, CA & RJ Fisher Middle School in Los Gatos, CA) for ten years, I chose to leave public education (and tenure) because Archer was hiring an English teacher, and I got the job! I did not leave public education because I wanted to teach at any independent school—I **left because I wanted to teach at Archer.**

Our mission at Archer is an important one: to empower young women from across the socioeconomic spectrum to find and use their unique voices to become the leaders of tomorrow. This special mission requires facilities that support dynamic learning opportunities in all disciplines.

My classroom is small. 15 girls in the room makes it hard to maneuver from one side to the other, no matter how many desk configurations I try in the attempt to generate more space. For creative projects and group collaboration the lack of space is a hindrance to the learning process. Even for writing an in-class essay, the girls have little room to spread out resources and build a productive space. Then, when the hot months are upon us, this cramped room becomes a sauna and the sensory overload of circulating fans and 90-degree heat further degrades the learning environment.

To halt a lesson because it is too hot too [sic] focus, to thwart a creative idea because we don't have the physical space to accommodate it, to not merge classes across the disciplines because we lack space is unfair to these young women. I would love to see what the female leaders of tomorrow could do with facilities that allow for both proper collaboration and self-directed learning, the kind of facilities that most students have access to in the greater LA area.

Please do the right thing and support the plan to upgrade our facilities for the purpose of supporting student learning and our very important mission.

Response to Comment No. 477-1

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

Comment Letter No. 478

Olivia Tiffany
2044 Glencoe Ave.
Venice, CA 90291

Comment No. 478-1

I am a strong supporter of the Archer Forward Campus Plan and I am a proud Archer graduate.

Going to Archer was an incredible experience, but the school lacked the space it needed to accommodate all of the extracurricular activities that it offered. I believe that Archer girls need (and deserve!) better facilities.

Archer students are taught the importance of community and being a good neighbor and this value of responsible stewardship is translated into a real spirit of community service. While at Archer, I volunteered for several organizations and I still feel the need to do so today in order to make my community a better place.

Please support this plan and students who will benefit from the new facilities.

Response to Comment No. 478-1

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

Comment Letter No. 479

Suzanne Todd
suzanne@team-todd.com

Comment No. 479-1

I support The Archer School for Girls and their innovative Campus Preservation and Improvement Plan, Archer Forward. (ENV-2011-2689-EIR)

This plan will provide the essential facilities that nearly all of the comparable local public and independent schools already have—including adequate space for athletics, performing and visual arts facilities, and modern classrooms. These spaces are critical to Archer being able to provide the programs that are integral to the school's high-quality curriculum and girl-centered learning environment.

Under this plan, the School will increase the percentage of students brought in by bus every day from 50 to 70 percent, while continuing its exemplary compliance with its traffic management program—the most stringent of any independent school in Los Angeles. Archer awards nearly \$3 million a year in scholarships and the school prides itself in reflecting the face of greater Los Angeles. Currently, students come from 146 different feeder schools and 92 different zip codes across the city. It is also important to note that Archer will not be increasing its enrollment cap as part of the Archer Forward plan.

Archer's community outreach for Archer Forward is unprecedented. The School has worked hard to conduct an open, transparent process, sharing information with community leaders and neighbors as it became available. Archer has held over 70 outreach meetings, knocked on over 100 neighborhood doors and sent over 11,000 pieces of mail. As a result of these meetings and outreach, Archer made a number of modifications to the plan, all designed to reduce burdens on the neighborhood.

Archer Forward honors and preserves the historic main building on Sunset Boulevard while supporting environmental best practices. Most importantly, this plan provides Archer girls access to the facilities they need and deserve.

I hope you will support Archer Forward so that generations of girls in Los Angeles are able to receive a top notch, 21st century education.

PS: I am a former Archer School for Girls Trustee and vigorously support Archer Forward. I appreciate your time reading this letter. Thank you.

Response to Comment No. 479-1

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

Comment Letter No. 480

Miranda Tollman
mirtollman@gmail.com

Comment No. 480-1

I am a life-long resident of the West Side of Los Angeles, and parent of a 7th grade girl at The Archer School for Girls. I am writing to lend my support to Archer Forward for many important reasons.

As you may know, Archer is the only non-secular girl's school in West Los Angeles, and meets a critical need for education in our city. The school's campus improvement plan, Archer Forward, will give our students the facilities that they deserve, and that most other schools in the area already have. I am writing to support this plan and to urge the Planning Department to move forward on this project quickly.

Like so many other young women, my daughter has flourished at this incredible school. As a family we know firsthand the commitment that Archer has not only to upholding its wonderful core values, but also to being a good neighbor that lives harmoniously within the Brentwood community. From its strict compliance with the most stringent Conditional Use Permit in the City, (over 80% of the student body gets bused in and out ever [sic] day!) the school has shown that it is a leader and a true asset to the community. Starting with our top administration and carrying on down to each family, as a school Archer has gone above and beyond expectations to comply and communicate with neighbors and community leaders openly, even altering plans along the way as a result of these conversations. This has shown that the school is willing to ensure that the project has the least impact on its neighbors.

Thank you for taking the time to consider this letter. I know I am one of thousands of voices on the West side of Los Angeles that would like to see the Archer Forward Campus Preservation and Improvement Plan come to fruition. It is time for this unique school to have the facilities to carry forward the important work that they are doing, now and for generations to come.

Thank you.

Response to Comment No. 480-1

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

Comment Letter No. 481

Noelle Tongue
5503 Village Green
Los Angeles, CA 90016

Comment No. 481-1

I am a proud graduate of The Archer School for Girls and I am writing to you today in support of Archer Forward, the school's campus improvement plan. Since graduating from Archer, I have become a proud, successful, and determined woman. I don't think I would have all of these qualities without Archer.

Archer helped me blossom into a confident, self-assured person by giving me an education that was challenging and rigorous yet steeped in experiential programs and extra curricular activities. I will be forever grateful for the opportunities afforded to me while I attended Archer.

The school is not asking for much, only for what is fair—for the current Archer students to be able to have the facilities on campus that their peers have at other schools.

I hope that you recognize what a gem this school is in Brentwood and support Archer Forward.

Response to Comment No. 481-1

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

Comment Letter No. 482

Elizabeth Topkis
etopkis@aol.com

Comment No. 482-1

I am the proud parent of an Archer graduate, class of 2011. I wanted to reach out to express my support for the school, the girls, and the school's campus improvement plan, Archer Forward. I cannot even put into words how great of a school Archer is, but I can tell you that in my opinion, it is one of the best schools in the city of Los Angeles.

It was important to me that my child attended a school that was not homogenous and I found that at Archer. The girls who attend the school come from all different walks of life and represent the diversity that exists within Los Angeles.

Archer helped my daughter grow into an independent, confident, self-assured woman who is pursuing her dreams at the University of Rochester as a business major. She hopes to continue her education by earning her MBA and then finding an amazing career in the business field back in Los Angeles. I know I have Archer to thank for this change.

Although we are no longer attending Archer and will not benefit directly from the campus plan, I fully support the school's proposal. The administration is simply asking for facilities that every other school in this area already have on their campuses, including: on-site parking, a performing and visual arts center, and a regulation-sized field. I do not think this is too 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.

Response to Comment No. 482-1

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

Comment Letter No. 483

Kim and Kevin Traenkle
1107 Chautauqua Blvd.
Pacific Palisades, CA 90272

Comment No. 483-1

I am writing as a parent of a current seventh grader at Archer School for Girls in support of the Archer Forward Plan which is decidedly essential for the future of Archer, its current and future students, and to girls' education in Los Angeles. My husband and I are passionate supporters of education programs geared toward teaching to girls' learning patterns and are well aware of having struck gold with landing a spot for our daughter, Sarah, at Archer. She is unbelievably well placed there and has approached her middle school years with enthusiasm and dedication and a sense of connectedness unlike what we've witnessed in her to date. We couldn't be happier.

Our daughter is an ardent basketball player. The benefits of being part of a school team and enjoying healthy competition against neighboring school teams are immense. The Archer basketball teams have done consistently well in years past. They are a force to be reckoned with. However, their facilities fall short. The girls can't practice when it's raining as their courts are outside. When they take a spill during a game, they take a beating on the hard top. The seating for spectators leaves much to be desired.

Archer intends to improve its athletics facilities as part of the Archer Forward plan. This would make a tremendous difference in the lives of the athletes at the school. It would cut back on travel time to off site practice fields and pools, and provide an opportunity for the girls to host games on regulation size fields and meets in their pool. Underground parking is also part of the plan, providing spectators a place to park their cars when they come to watch the games and meets.

The plan encompasses much more than just an improvement in the athletics facilities. The school would also have more adequately sized classrooms, meeting spaces and visual and performing arts spaces, all of which would greatly improve the girls' related experiences at Archer. These types of facilities can be found at many other schools in Los Angeles. The girls at Archer deserve the same. We wholeheartedly support the Archer Forward plan.

Response to Comment No. 483-1

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

Comment No. 483-2

Dear Adam, thank you for your email about your receipt of my family's sentiments regarding the Archer Forward plan. Yes, we would like to [sic] added to the list of interested parties. Our address is:

Kim and Kevin Traenkle
1107 Chautauqua Blvd.
Pacific Palisades, CA 90272

Response to Comment No. 483-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 484

Richard and Hazel Trevor
11901 Sunset Blvd.
Los Angeles, CA 90049

Comment No. 484-1

We live at 11901 Sunset Boulevard and the back of our residence leads onto North Westgate only seventy five yards from the intersection with Chaparal, some thirty yards from the Archer School and have lived here peacefully for the past twelve years. Our concern as to the proposed construction and eventual usage of the new facilities at the Archer School present to us a challenge that we could never have foreseen.

Response to Comment No. 484-1

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

Comment No. 484-2

At present the overwhelming traffic on Sunset Boulevard and the Chaparal Road which runs parallel to Sunset to the north and is used as a short cut, is almost impossible to bear at the moment and increases every year in volume. You have to live here to experience the hideous nature of this and as to how unbearable it has become. The impact on this neighborhood is **HUGE!**

I am sure Mr. Villani that you can easily appreciate the existing problem that we already face and can recognize our shock when we first heard of the plans to extend the Archer School facilities. The traffic problem if this proposal goes ahead will be beyond tolerance and is surely a moral dilemma that the city has to face right now in making their determination as to whether to allow this to proceed or not. The horrendous nature and repercussions to the residents who already live here and have invested their future in this area will be beyond our endurance. If the school has outgrown its potential and wishes to expand then surely morally and civically it must do so in a more appropriate area where their new needs and aspirations can be fulfilled in a civilized manner and not subject, without recourse, the people who live here with such a nightmare.

Response to Comment No. 484-2

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparral Street. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 484-3

The attendant **air pollution** will additionally have a devastating, major effect on my wife's medical condition who suffers from **CHRONIC OBSTRUCTIVE PULMONARY DISEASE**, which is the third major cause of **DEATH** in this country. The air pollutants alone from the construction will severely affect my wife's life span.

Response to Comment No. 484-3

As discussed in the Draft EIR, the Project would result in significant construction regional NO_x impacts and less than significant localized NO_x, CO, PM₁₀, and PM_{2.5} construction impacts with incorporation of mitigation measures. Proposed additional mitigation would reduce this regional short-term NO_x impact to less than significant. Refer to Section II, Corrections and Additions, of this Final EIR, for the revised mitigation. The Project would also result in less than significant regional and localized operational impacts. Localized emissions were analyzed to address potential impacts at sensitive land uses in close proximity to the Project Site (i.e., adjacent residences). It is important to note that the SCAQMD localized significance thresholds were established to support compliance with National and State Ambient Air Quality Standards. These standards provide public health protection, including protecting the health of "sensitive" populations, such as asthmatics, children, and the elderly.³⁵ Thus, no changes to the construction air quality analyses or additional mitigation measures to protect at-risk populations are warranted based on this comment.

³⁵ USEPA. *National Ambient Air Quality Standards*. Available at www.epa.gov/air/criteria.html, accessed August 2014.

Comment No. 484-4

I will not enter into the other disadvantages of this plan as I wanted to focus squarely on our primary concerns which if this plan goes ahead will most certainly become a reality. This is a sincere appeal to you to recognize our plight in the face of such a predicament which can be stooped [sic] with your decision alone. What a wonderful opportunity to perform, with moral courage, a humane and fair service to your fellow citizens in need at this important time.

Response to Comment No. 484-4

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

Comment Letter No. 485

Leonard Turner
lturnerjr@outlook.com

Comment No. 485-1

I am a father of Madison Turner and [sic] 9th grader at Archer and my youngest daughter Mackenzie is entering Archer this Fall as a sixth grader. My wife and I have enjoyed being members of the Archer family for three years and we look forward to another six years. The Archer School for Girls is a prime example of a complete education. The faculty is excellent and the teaching methods encourage students to perform to the best of their abilities. Staff is continually being trained in the latest techniques and outcomes are measured and analyzed leading to growth and development. The Head of School, Elizabeth English, has a clear vision and the faculty follows through on her plans for Archer. As parents we not only respect the mission to be the finest all around educational institution in Los Angeles, but we are able to also take an active role in it. Archer parents are always welcome to provide input and suggest ideas which may help the school in different ways.

The Archer plan will be a benefit to the community and girls' education in Los Angeles. These facilities are fundamental to Archer's educational mission and vision for the future. Presently, Archer's classrooms are not properly sized for modern learning. In addition, there is no gym, regulation athletic field or pool. There is no performing arts center which would prove to be an invaluable resource. The Archer plan would provide essential, contemporary facilities that girls need and deserve. The plan focuses on athletics, arts and classroom learning which will provide the girls with cutting-edge technology integration.

I look forward to an even better Archer School For Girls and hopefully once my youngest daughter reaches High School, she can enjoy and take advantage of the positive changes.

Response to Comment No. 485-1

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

Comment Letter No. 486

Kamil Turowski
400 S. Cloverdale Ave.
Los Angeles, CA 90036

Comment No. 486-1

We are writing in enthusiastic support of Archer's Campus Preservation and Improvement Plan. We are parents of an Archer 9th grade student. Our daughter has been attending the school for the past two years. Based on her reports, our own observations, as well as our interactions with the school, students and their parents, we rush to testify that the school is a phenomenally effective pedagogical organization. The school has triggered in our daughter a consistent expansion of her intellectual, academic and emotional horizons. Almost as importantly for us, the school maintains a climate of casual, unpretentious collegiality in which students and parents from all sorts of backgrounds, and from all over the city (and beyond), come together, at ease, joyfully. In order to continue their success, the faculty, students, and administrators do need to improve the grounds where the teaching, learning, sports and frolics take place. With the record of Archer's responsibility, care, transparency, and approachability, the school's plans for self-contained expansion (inside the parameter of its interior grounds) are, in our conviction, impressive in their modesty and visionary in their projected longevity, outstanding aesthetics, and architectural agreement with the neighborhood. Most importantly, the accomplishment of the plan will result in a significant betterment of the educational facilities. How cool is that? Insanely cool, as Steve Jobs used to observe and as our daughter and we agree.

Please help strengthen in every possible way you can your support for this extremely important educational project. And please let us know what else we can do to make sure this plan moves forward.

Thank you so much for your consideration and care,

Response to Comment No. 486-1

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

Comment Letter No. 487

Efren Tuxpan
etuxpan@yahoo.com

Comment No. 487-1

My relationship to archer is that have two daughter enrolled there. One is in the seventh grade and the other is in the sixth grade. To me archer is a great school becuase it is chanllengin for tyhe girls which will require them to think. Also becuase there are smaller class which means that there are more chances that if the girls need help the teacher will have time because there aren't many girls. Archers foward plan is essentionfor the future becuase at archer they are many girls that enjoy doning sports. I think that it would be much easier for archer to have thier own gym and swimming pool rather than having to go to UCLA University for swim practice.

Response to Comment No. 487-1

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

Comment Letter No. 488

Susan Van Horn
11730 Mayfield Ave., #201
Los Angeles, CA 90049

Comment No. 488-1

My daughter is currently enrolled at The Archer School for Girls in Brentwood and we will [sic] in the 11th District. 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 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 make good on 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 requiring 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.

Response to Comment No. 488-1

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

Comment Letter No. 489

Carol Velasquez
11701 Texas Ave., #213
Los Angeles, CA 90025

Comment No. 489-1

Archer is the only non-secular girl's [sic] school in West Los Angeles, and meets a critical need for education in Los Angeles. The School has developed an appropriate new plan, Archer Forward, that will give them the facilities they deserve, and that most other schools in the area already have. I am writing to support this plan and urge the Planning Department to move this project forward quickly.

My daughter is a student at Archer and I live in the 11th District. I know firsthand the commitment that the school has to being a good neighbor and living harmoniously with its neighbors in Brentwood. From its strict compliance with the most stringent Conditional Use Permit in the City to its extensive public outreach for the proposed Archer Forward plan, Archer has shown that it is a leader and valuable asset to the community. This plan continues that thoughtfulness and leadership. They have made numerous alterations to the plan as a result of conversations with the community, including adding additional landscaping and changing the locations of the facilities. These are not insignificant changes, but Archer has been willing to do these things in order to ensure that the project has the least impact on its neighbors.

I understand that these conversations will continue, but as a parent at the school, I hope that you will help Archer move this project quickly through the City process so that we can begin to build the school that our girls deserve.

Response to Comment No. 489-1

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

Comment Letter No. 490

Isaac Velasquez
2911 Redondo Blvd., No. 3
Los Angeles, CA 90016

Comment No. 490-1

My name is Issac [sic] Velasquez and I have been working for the facilities department since the year 2000. I enjoy my job very much and love working with the children, teachers, and facilities staff at Archer School for Girls. The students need bigger space to perform their dance moves and train for soccer. I came to the USA from Guatemala and love the diversity at the Archer campus. Everybody is from a different town and country at Archer. We need a lot more space at the school for facilities storage. The school also does not have a large soccer field and the grass is not perfect like at Santa Monica College. Please support out [sic] construction plan.

Response to Comment No. 490-1

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

Comment Letter No. 491

Helen Vera
helen.vera@aya.yale.edu

Comment No. 491-1

As an alumna of the Archer School for Girls (class of 2002), I am writing to express my support for the Archer Campus Plan.

I attended Archer from 1996 until I graduated in 2002. Over the course of those six years, Archer helped me grow from a thoughtful but shy and guarded girl into a confident and ambitious woman. Archer was, and still is, unlike any other school in Los Angeles. As you know, it is one of only two non-parochial all-girls schools in the city, and it has never waived [sic] from its mission to help girls learn the way girls learn best. We were encouraged to be “pioneers” at Archer—pioneers in the creation of a new school, pioneers in the development of activities and curricular programming, and pioneers in our own stories, forging our own paths and following our dreams with passion as well as determination and hard work. I founded the debate team at Archer, and I was the first student from our school to go to Yale for college. I graduated from Yale Law School last year and am now a human-rights attorney in Washington, D.C.

Today, Archer students have stability that we, for obvious reasons, didn’t have during those early years. They have a beautiful, permanent campus and attend a firmly established, top-notch school. But today’s Archer students still understand the challenges of a developing campus. They lack the athletic and artistic spaces that allow a school to host home games in its own gym, or put on a big main-stage musical production in a proper theater space. They are a new generation of Archer pioneers, looking toward necessary and responsible improvements to our beautiful school. Archer is clearly here to stay. It’s time to approve these improvements.

I may have graduated from Archer twelve years ago, but seeing this plan become a reality is as much my dream as it would be if I were still a student there. As a proud alumna of Archer, I am filled with joy imagining the school, a few years from now, with its own gym and artistic spaces. I support the Archer Campus Plan because it will permit essential improvements to students’ quality of life and extracurricular options, while respecting Archer’s neighbors and enhancing the integrity and beauty of its historic campus.

Thank you for taking the time to read my letter.

Response to Comment No. 491-1

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

Comment No. 491-2

Thank you. Unless it will make my letter more effective, I do not need to be on the list of interested parties for notification purposes. I'm sure I will receive updates via the Archer alumnae network. But please let me know if becoming an official interested party will help my letter reach more decision-makers.

Response to Comment No. 491-2

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

Comment Letter No. 492

Maria Vera
3176 Stoner Ave.
Los Angeles, CA 90066

Comment No. 492-1

I am an Archer graduate and am writing in support of the Archer Forward campus plan. I was fortunate to attend the Archer School for Girls for middle and high school and am extremely grateful for the amazing education that I received.

When I came to Archer as a sixth grader back in 1997, I had no sense of who I was or who I would become. I was reserved, fairly shy, and definitely not sure what my true interests were. But for the seven years I spent at Archer I got to try myriad things—ceramics, public speaking, student government, dance, even co-teaching my own elective course with a classmate. It was that freedom to try different things in a safe, supportive environment where talent and achievements were celebrated that I credit with truly making me who I am today.

Because I am an Archer girl, I had the intellectual curiosity to raise my hand to ask questions in large, co-ed classes when I got to Yale as a freshman in college. Because I am an Archer girl, I have the confidence to hold my own with colleagues many years my senior in my job. And because I am an Archer girl, I am committed to making the amazing institution that made me who I am today even better.

When I went to Archer, it was a new school on the brink of establishing itself, and while it was an incredible place to learn, it lacked (and still lacks) the facilities that most schools have—a gym, an auditorium, among others. Despite that, Archer has become one of the foremost schools in LA. And now Archer finds itself at another crossroads—it's time for the great institution I know and love to take its next step towards becoming greater.

But we need your help. With the Archer Forward plan, Archer will be able to develop the next generation of leaders by offering girls the campus that will enable them to grow and thrive. I strongly encourage you to support it.

Thanks so much.

Response to Comment No. 492-1

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

Comment Letter No. 493

Carol Vernon
cvemon426@gmail.com

Comment No. 493-1

As a resident of Barrington Avenue north of Sunset, I am already impacted by the traffic on Sunset both in the morning and far worse in the evening. Any project, which will add more cars and more car trips into our area, should be postponed until there is a way to handle the current traffic.

Some afternoons it can take 30 to 40 minutes from my house, less than ½ mile north of Sunset, to get to Sunset. Then as the first car at Sunset, it can take more than one or two lights to make the left turn onto Sunset. This is not the quality of life we neither wanted nor expected when we moved to Brentwood.

Response to Comment No. 493-1

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 493-2

While I believe in the Archer School and their mission, I do not believe their desire to change the Conditional Use Permit as worked on so carefully and diligently by all the parties should be changed to the detriment of the rest of the community.

Thank you for your consideration of my comments,

Response to Comment No. 493-2

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval

governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

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

Comment Letter No. 494

Nancy Vescovo
250 Amalfi Dr.
Santa Monica, CA 90402

Comment No. 494-1

The Archer Forward plan will help enhance the school with new and improved facilities and as a parent of a current student at Archer, I am writing to show my strong support for the school and Archer Forward.

Archer is an active member of the Brentwood community. It participates in the Brentwood Community Council, and hosts meetings for parents, neighbors, stakeholders, officials and trustees throughout the year. At these meetings, the school administration provides updates on upcoming school events and projects, and provides a forum for participants to air their questions and concerns. Through the Archer Forward community outreach process, the School has been transparent and has attempted to create a dialogue. The School wants to make sure that the neighbors concerns are addressed. I think this is unique for a school development project.

The Archer Forward plan has been in the works for many months and I am excited to see what it does for the school in the future. The plan encompasses the much-needed athletics, arts and parking facilities that nearly every other independent school in the area already has. I know that Archer has made every effort to address the concerns of the neighbors with regards to this plan, and I am confident that this is the best result for the school and community alike.

I am proud to be member of the Archer Parent Association and share Archer's commitment to excellent education and a heart for service and the community. I hope you will help Archer by moving this project forward quickly through the review process.

Response to Comment No. 494-1

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

Comment Letter No. 495

Bruce Wagner
11919 Currituck Dr.
Los Angeles, CA 90049

Comment No. 495-1

I have resided in CD 11 since 1985 and was here when the community nervously allowed Archer to move to the architecturally significant Sunset location. I have seen how Archer has respectfully improved this beautiful facility while limiting the traffic impact to an extraordinary degree.

The Archer School for Girls has been an outstanding neighbor, and has educationally and culturally enhanced our community.

Now it has come forward with a plan to update and modernize its campus. I support this plan 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's commitment to being a good neighbor, the School is subject to the most restrictive regulations of any independent school in the City and 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. No one 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.

I am now a parent of an Archer student and I have see [sic] first hand how Archer has conducted extensive outreach about the plan and has made serious efforts to inform and work cooperatively with the community. The plan creates more open/green space and replaces current above ground parking with an underground garage. It should also be noted by all that this plan does not increase the student population.

I hope that the City recognizes how the Archer plan will benefit our community and help Archer secure approval for this tremendous improvement.

Thank you.

Response to Comment No. 495-1

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

Comment Letter No. 496

Clint Walker
11940 Chaparal St.
Los Angeles, CA 90049

Comment No. 496-1

I live on Chaparal Street in Brentwood and The Archer School for Girls is my neighbor since we moved in 2001. I am writing to express my support for the school and the Archer Forward plan. Throughout my years as a resident of Brentwood, Archer has been a great neighbor. I am pleased with the ways in which they respect their location in our neighborhood—their commitment to busing, carpooling, keeping noise on campus at a minimum, etc.

With regards to Archer's plans to improve its campus facilities, the school has provided me with ample information and they have been quick to respond to my questions. Their plan calls for facilities that nearly every other independent and public school already has, including ample space for athletics and the arts.

I believe that having an all-girls school in Brentwood is a huge asset to the community and to Los Angeles. Archer needs and deserves new facilities and I support them using the residential homes they own to build their campus.

Thank you for your consideration and please call me with any questions at 310-567-8138.

Response to Comment No. 496-1

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

Comment Letter No. 497

Christine Walsh

Comment No. 497-1

I am writing to say that I am opposed to Archer's proposed project, *Archer Forward: Campus Preservation and Improvement Plan*. Archer's project represents a substantial expansion in a quiet residential neighborhood that will result not only in an increase in use but in a significant impact on traffic. I am concerned about the potential adverse effects Archer's expansion will have on our community due to the intensification of use and the resulting increase in traffic.

Response to Comment No. 497-1

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

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City's residential neighborhoods. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level. As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on Archer's operations are proposed, including additional limitations on the hours of operation and additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Comment No. 497-2

Archer proposes constructing four large-scale buildings that include two gyms that could potentially accommodate 600 spectators as well as a performing arts center that could seat 650. In addition to the two gyms and performing arts center, the aquatic center and visual arts center, as well as the outdoor athletic field, could be used simultaneously after school from 3:30pm to 10:00pm and on weekends. This simultaneous use will lead to an increase in traffic as thousands of visitors use Sunset Boulevard as well as the 405 freeway to get to the campus during peak traffic periods (3:30pm to 7:00pm). With two gyms, an aquatic center, an outdoor field and a softball diamond, Archer proposes moving the majority of its athletic activities onto campus, increasing the number of games held on campus from the current 39 to 145. This increase will bring 6,800 visitors into the area during the peak traffic periods when previously only 1,300 visitors came to the area.

Response to Comment No. 497-2

As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the number of seats within the Performing Arts Center, a reduction in the number of events and athletic activities, and a reduction in the number of parking spaces. Specifically, the Multipurpose Facility would be reduced from approximately 41,400 square feet to 39,300 square feet and the Performing Arts Center would be reduced from 22,600 square feet to 19,025 square feet. With the reduced Performing Arts Center, the maximum seating capacity within the Performing Arts Center would be reduced from 650 seats to 395 seats.

As discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. The additional mitigation measures would further limit the number of cars permitted to enter the campus, whether there is a single or simultaneous School Function and/or Interscholastic Athletic Competition.

Additionally, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation.

Comment No. 497-3

With an expanded campus that now includes five buildings instead of one, Archer proposes an increase in other activities that will lead to more visitors and car trips. Archer's plan includes

- Doubling the number of special events to 98 from the currently allowed 47, bringing 24,000 visitors to the campus during the school year, an increase of 16,000 guests,
- 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, will bring 4,800 visitors that currently do not come to the campus, thus adding a new use that will contribute to traffic and noise;
- Expanding the size of events held on campus to include special events with attendance of 650 people as well as 10 Athletic Tournaments with 200 visitors in attendance will increase use on the weekends and add to traffic and noise.

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. Not only will this increase the number of vehicles on Sunset Boulevard, but the surrounding neighboring streets that have already seen an increase in cut through traffic from the five other schools in a one mile radius. We know from experience that our neighborhood will suffer from the impact of more traffic coming into our area at peak hours as Sunset becomes gridlocked and cars cut through our neighborhood to avoid the congestion on Sunset.

Response to Comment No. 497-3

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation and additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities, the rental, lease, or use of the facilities for non-School Uses.

With regard to parking, as described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, proposed refinements to the Project include a

reduction in the number of parking spaces from 212 spaces to 185 spaces, which can be expanded to accommodate a total of 251 parking spaces when necessary with use of attendant assisted parking.

As further discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. As described in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, traffic in the area of the Project has been improving as construction on the I-405 Sepulveda Pass Improvement Project has neared completion, with the opening of the HOV lane on the northbound I-405, and substantial completion of the I-405/Sunset Boulevard interchange refinements. The surrounding streets saw an increase in cut-through traffic as motorists attempted to avoid the increased congestion along Sunset Boulevard during the construction of the I-405 Sepulveda Pass Improvement Project. With improvement in conditions along Sunset Boulevard, this cut-through traffic is expected to reduce.

Comment No. 497-4

For the last five years my community has had to endure the effects of the I-405 widening project—cars backed up on Sunset Boulevard for miles making it difficult to get to our homes and an increase in cars cutting through our neighborhood trying to avoid the congestion on Sunset Boulevard to get onto the 405 freeway. 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; Archer School Expansion.

Not only is traffic increased because of road closures and lane reduction, but the insertion of thousands of slow moving construction vehicles into the flow of traffic. And what began as a temporary inconvenience becomes a permanent one as traffic patterns are forever altered as cars seek new ways (i.e. cutting through our neighborhood) to get to points east of the freeway.

Response to Comment No. 497-4

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparal Street. Although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to \$15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street.

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

The Draft EIR considered the effects of related infrastructure improvements including traffic diversions due to the Wilshire Bus Rapid Transit Project. Refer to page IV.K-21 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR for a discussion of these effects. In regard to the pending California Incline reconstruction, since the California Incline primarily carries traffic destined to the downtown Santa Monica area, the primary effect of its temporary closure would be to divert traffic to Chautauqua/Channel and to Moomat Ahiko Way in Santa Monica, not to Sunset Boulevard in Brentwood. The traffic analysis also explicitly took into account traffic generated by known development projects in the Brentwood area and included a background growth factor to represent traffic generated by other growth outside of Brentwood but within the Westside. Refer to page IV.K-20 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR for a discussion of this analysis.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 497-5

If Archer reduces the size and number of buildings, traffic will be mitigated through reduced programming—less events means less cars coming to campus. Archer can mitigate the impacts of traffic by reducing the size of its expansion and still meet its academic and athletic objectives. I support Alternative 4 Option B (Reduced Program within Existing Campus Boundary, No Aquatic Center) with the following modifications:

- 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,
- Renovate the North Wing,
- Eliminate the Visual Arts Center,
- 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,
- Continue to use the two residences adjacent to the school as residences,
- Maintain softball field's current orientation of northwest,
- Add more landscaping on the northern and western property lines to provide an attractive buffer between the school and residences,
- Increase the set back of the building placed adjacent to Chaparal Street,
- Maintain the number of special events at the current level permitted in the Conditional Use Permit, which, as set forth in the DEIR's analysis of Alternative II, reduces impacts to traffic to a level less than significant after mitigation;
- 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;
- Improve the school's facilities with only one phase of construction.

Alternative 4-B has reduced impacts over the Project and the other alternatives in almost every area evaluated in the DEIR. With the modifications set forth above, the impacts are further reduced and Archer can meet nearly all of its objectives.

Response to Comment No. 497-5

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project. Specifically, in

response to comments on the Draft EIR, refinements are proposed to the Project, including reducing the square footage and massing, width, and length of some of the proposed buildings; reducing the number of parking spaces; and creating expanded landscape buffers. Overall, the Project's net new floor area would be reduced from 75,930 square feet to 68,989 square feet.

Additionally, as described in detail in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, the Project is incorporating additional operational mitigation measures to reduce significant operational traffic impacts (related to School Functions and Interscholastic Athletic Competitions to below a level of significance. Further, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, the Project proposes additional restrictions on School operations are proposed, including additional limitations on the hours of operation including hours of operation on Saturday, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Comment Letter No. 498

Gretchen R. Warner

Comment No. 498-1

My name is Gretchen Warner, and I am the Dean of Students at the Archer School for Girls. I have been working at Archer for the past 9 years, and I am writing to lend my support to Archer's Campus Plan. Archer is a special place, and it is a school that I am proud to work at and support. Our students are happy, well-rounded, passionate, and genuine. Our faculty is comprised of some of the most skillful teachers I have ever worked with, and I am proud to call them all my colleagues.

As Dean of Students, I oversee all aspects of student life at Archer, and the Campus Plan will enhance and benefit every aspect of Student Life. For example, one of the hallmark events at Archer each year is the annual Diversity Conference. Over 45 different guests and organizations, most of whom volunteer their time, come to Archer to engage with our students in seminars ranging from LGBTQ, race, and socioeconomic class discussions to hearing from former gang members and holocaust survivors. One of the greatest challenges with hosting this conference is providing adequate and ideal space for these presentations and discussions. In addition, we currently do not have a facility that allows the entire community to come together to hear a guest speaker or reflect as a whole. With the Campus Plan, we would be able to enhance this annual conference.

Similarly, though Los Angeles is traditionally blessed with temperate and dry weather, not having an indoor space that can comfortably fit out student body population makes planning events a challenge. For example, the Student Council plans a "Spirit Week" every year, and bring the community together with festive competitions, events, and rallies. Students work for weeks to design and execute plans that will benefit the entire community, and their hard work is occasionally lost because of a rain storm that cancels the activities. If Archer had an indoor space that could accommodate all the students, plans would not have to be radically changed or scratched at the last minute.

I ask that you please support Archer's Campus Plan—this is a unique school with a powerful mission, and we need all the resources of any other school to best serve our students.

Response to Comment No. 498-1

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

Comment Letter No. 499

Thelma and Eric Waxman
11840 Chaparral St.
Los Angeles, CA 90049

Comment No. 499-1

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

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

Response to Comment No. 499-1

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

Comment No. 499-2

This letter is submitted in response to the Draft Environmental Impact Report (the “DEIR”) submitted by the Archer School for Girls (“Archer” or “the School”) for the massive project (the “Project”) the School proposes. As detailed below, the number of significant impacts standing alone mandates that Archer move forward with a substantially smaller project, one more in keeping with both the size of its property and its location in a residential neighborhood. The significant impacts, many of which cannot be mitigated, is not the only reason Archer needs to scale back its overly ambitious project. The history of the property, the conditions imposed on Archer to protect the residential nature of the location into which Archer chose to move when there were alternative locations available and the harm caused by the project to Archer’s neighbors, regardless of whether those effects fit within the artificial constraint of a “significant effect” under CEQA, all argue against the enormous expansion Archer seeks. Archer not only understates those effects, but also fails to seriously consider several alternatives all of which are superior to its massive expansion, including among others:

- A substantially smaller project;
- Dividing itself between two locations as many schools do, one for the middle school a separate one for the upper school; or

- Leaving for a new location altogether as Archer's ambitions have outgrown its current location.

Response to Comment No. 499-2

As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, refinements are proposed to the Project, including reducing the square footage and massing, width, and length of some of the proposed buildings; reducing the number of parking spaces; and creating expanded landscape buffers. Overall, the Project's net new floor area would be reduced from 75,930 square feet to 68,989 square feet.

Additionally, as described in detail in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, the Project is incorporating additional operational mitigation measures to reduce significant operational traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. Further, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation including hours of operation on Saturday, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. These restrictions, which would be incorporated as part of Archer's CUP, would also reduce traffic along the surrounding streets. In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project would include additional measures to reduce noise associated with campus operations. Also, as discussed in Comment Letter No. 29 and summarized in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, additional mitigation has been provided to reduce the Project's air quality impacts.

Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives, particularly those related to improving the existing Archer campus and ensuring the continued preservation of the historic Main Building. Further, as described therein, splitting the School onto two separate sites would fail to meet Project objectives.

Comment No. 499-3

In discussing these issues, this letter is divided into several parts: (I) a background section that reviews the history of the location and the protections for residents contained in the

existing CUP, which Archer's Project, if not substantially reduced, will eviscerate; (II) an analysis of the substantial and deleterious effects of the Project, and (II) an explanation of how an alternative, smaller project would substantially meet the School's objectives while preserving some measure of protection for the residents who bear the burden of Archer's aggressive expansion.

Response to Comment No. 499-3

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

Comment No. 499-4

I. BACKGROUND

As a starting point, it's worth noting that prior to Archer moving into its current facility, the property (the "Property") was utilized as a retirement home for elderly women. In effect, the Property consists of two lots. The first lot fronts Sunset Boulevard and had upon it the "historic building" that Archer now uses as its primary facility or main building. Next to that lot on its east and west sides are multi-resident buildings. The second or "back lot" where the school currently has its athletic field, basketball and volleyball courts lay vacant for decades. The back lot borders Chaparal on the north, a very narrow, quiet residential street. Immediately adjacent on the east and west border of the back lot are residential houses. We own the house immediately adjacent to Archer's athletic field on the western boundary with approximately six feet separating our house from the field.

In reviewing Archer's DEIR, it is important to separate fact from fiction and to deconstruct the mythology Archer is attempting to create when it confuses "wants" with "needs." When the School chose the Eastern Star Home for its location, it knew the limitations of the property, including the size of the lot and the location of the back lot squarely within a quiet residential neighborhood. Significantly, even the Eastern Star Home, whose operations were far less intense than the School's, had to maintain a set back of 200 feet from Chaparal. Despite these known limitations, Archer chose the location over other available locations. That decision to fundamentally change the nature and intensity of use of the Property drew numerous objections from the immediately adjacent neighbors—the group that then and now bears the primary burden arising from Archer's decision to operate within a residential community. As a result, Archer had to negotiate a Conditional Use Permit ("CUP") designed to protect and preserve the residential character of the neighborhood by, among other things:

- Limiting the physical size of the school, both with regard to the number of buildings permitted and requiring a substantial setback from Chaparal;
- Limiting hours of operations so as to protect the neighbors' ability to enjoy the peace and quiet of their homes particularly at night and on the weekends;
- Limiting enrollment;
- Limiting the number of special events that could take place at night and on the weekends;
- Restricting the number of cars that could come onto campus;
- Prohibiting lights on the athletic field and banning the use of amplified sound or loud music outside with graduation as the sole exemption;
- Prohibiting outside use of the School's facilities.

While Archer likes to characterize those conditions as the most restrictive of any private school in Los Angeles, those "restrictions" were necessary to preserve the residential character of the neighborhood. Archer's characterization also ignores significant differences between itself and many of those other schools. Those significant differences include the size of the school's property, that many of those schools have been in the same location for decades and that none are in as close proximity to neighboring homes as is Archer. As discussed below, Archer's mythology also ignores that its Project includes facilities significantly greater than those possessed by other schools, many of which are located on much larger properties. Thus, rather than being overly restrictive, the conditions are "fair" as was specifically noted by the Zoning Administrator Dan Green who created those conditions:

Stasis exists because the balance established by the Conditions is fair... The Archer School's initial approval for this location required the cobbling together of Conditions and restrictions that allowed it to be shoe horned into a residential neighborhood on a lot previously occupied for many years by retired nuns.¹

¹ Page 10 of Zoning Administrator Dan Green's November 14, 2007 determination letter regarding Archer's Plan Approval for that year.

Moreover, if the restrictions are too onerous, as Archer now maintains, it could have chosen a different location, one that would not have necessitated the very conditions about which Archer now complains. Instead, Archer accepted the conditions and moved onto the property formerly occupied by the Eastern Star Home.

Another chapter in the mythology Archer propagates is that it has been a “good neighbor” and that it somehow is now entitled to dismantle the protections put in place to preserve the neighborhood simply because the School generally abided by the conditions that allowed it to move into the neighborhood in the first instance. Putting aside that “good fences (the CUP) make for good neighbors” and that there is no extra credit for following the rules, Archer’s tale ignores that the School sought at every instance to undermine the protections obtained by the neighbors. As shown in Chart 1 below, Archer forced its neighbors to defend the protections they had negotiated in good faith at every Plan Approval.

Chart 1. Timeline of Modifications to CUP made by Archer at Plan Approvals

	1998	2001	2004	2007
Number of Special Events	38	38	38	47
Change in time and days of special events	3 open houses on Sundays	4 open houses (3 on Sunday, 1 on Saturday)	5 open houses (4 on Sundays, 1 on Saturday) Graduation moved to a Saturday from a weekday	added one hour after end of event for strike time (events can end as late as 9, 10 or 11pm)
Timing of next Plan Approval (from date of determination)	1 year	3 years	3 years	5 years
Traffic monitoring	twice a year for the first five years	twice a year for the first five years	once a year for the next five years	relieved of submitting report; if required to submit one, earliest would be 2012
Amplified Music or Loud Music Outside	no amplified music or loud non-amplified music		allowed at three special events annually, including graduation, school fair and sports day	
Enrollment	450	450	518	518

That constant assault by Archer on the conditions to which it originally agreed led Zoning Administrator Dan Green to note²:

There is no established procedure for neighbors to file applications seeking greater protections, resulting in the overall appearance to the neighbors that the protections they have worked diligently to obtain in order to maintain the balance are under constant attack.

² Page 10 of Zoning Administrator Dan Green’s November 14, 2007 determination letter regarding Archer’s Plan Approval for that year.

Indeed, with the benefit of hindsight, it is not unreasonable to ask whether Archer ever intended to live up to its promises or did it instead enter into the CUP under false pretenses. That Archer purchased at such an early stage the two residential homes it now intends to destroy to expand the School's footprint certainly suggests Archer never intended to abide by the agreement it made with its neighbors. Whatever Archer's original intent, their present intent is unmistakable. Archer's Proposal simply eviscerates all of the protections inherent in the CUP that resulted from months of tough negotiations where both sides compromised in order to reach a final agreement

Archer's contempt for the current CUP and its effort to ignore the reasons, which gave rise to those protections in the first instance (the need to protect and preserve the residential character of the neighborhood so that Archer's neighbors can continue the quiet enjoyment of their homes) is unmistakable. What Archer studiously ignores in its aggressive approach is that its neighbors are not now less entitled to the quiet enjoyment of their homes than they were 15 years ago. Simply stated, while the scope of Archer's ambitions may have changed, the residential character of the neighborhood has not.

Rather than respecting neighbors' quality of life, the School has chosen to sacrifice the neighbors' interests so that Archer can participate in the existing arms race amongst private schools to build the largest, most grand facilities, regardless of whether those facilities are appropriate to the location in which the schools reside. To support its aggressive expansion, Archer proclaims that it "needs" the massive Project to offer a 21st century education for its students. According to Archer's construct, it cannot offer a first class educational experience unless the School is permitted to build all four new buildings it seeks (over 90,000 additional square feet complete with not one but two gymnasiums in the multipurpose facility, a performing arts center that would seat more than the Geffen Playhouse and other community performing arts centers, a swim stadium and visual arts center). Apparently, the education needs of the 21st century also require Archer to gut the existing CUP and exponentially expand the intensity of use without regard to the effect on the neighborhood. As Chart 2 illustrates, those changes are both dramatic and wildly disproportionate to any reasonable expansion plan.

Chart 2. Significant Changes to Current Conditions by Archer's Proposed Project

		Current CUP	Proposed	Consequence
Condition 5	Physical Size of Plant	2 buildings for total of 96,887 sq ft ³	5 buildings for a total of 174,253 sq ft ⁴	3 additional buildings 80% increase in sq ft
Condition 6	Enrollment ⁵	450	518	15% more students
Condition 7	Use Restrictions	No rental or lease of the facilities with or without a fee No filming	24 days of outside use of all facilities for private parties, weddings 24 days of outside use of athletic facilities Filming allowed 30 day summer school	78 days of outside use plus unspecified days for filming
Condition 8	Gymnasium	1 gym allowed at 12,000 sq ft with a 75 foot setback	2 gyms at 41,400 sq ft with a 25 foot setback	1 additional gym 245% increase in sq ft
Condition 11	Hours of Operation	Monday - Friday 7:00am to 6:00pm	Monday - Saturday 7:00am to 6:00pm	Additional 11 hours of use every Saturday for 36 week school year (in addition to Saturday Special Events)
Condition 12	Parking on Campus	109	212 (282 max with attendant parking)	103 more cars on campus every day and 173 more cars for large special events
Condition 33	Lights on Field	No lights on athletic field allowed	Addition of lights on the field	Two extra hours of field use five days a week plus glare
Condition 34	Noise Mitigation	No amplified music or loud non-amplified music	Amplified and loud music allowed	Significant noise impact

³ A small maintenance building of 709 square feet was also allowed in addition to the main building and proposed gym. The actual square footage of the main building is 84,178 but the CUP cites 95,000. The correct square footage is used for this calculation.

⁴ This reflects Archer's preferred plan of Alternative 3 with an enclosed Aquatic Center.

⁵ In 2004 Zoning Administrator Dan Green set the maximum enrollment at 518 with the following explanation:

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 enrollment is not intended to be reached. This number recognizes the inability of school admissions staff to know with precision the number of students who will actually matriculate relative to 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.

Response to Comment No. 499-4

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

Regarding the physical site plan, as described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, and as discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments, the Project has been refined, including reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Overall, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet, leaving approximately 229,547 square feet of open space. The Multipurpose Facility, which includes gymnasium space for Archer's Upper School and Middle School, would be reduced from 41,400 square feet to 39,300 square feet. A Project objective is to provide separate gymnasiums for the Middle School and Upper School so there is a sufficient number of courts to allow both the Middle School and Upper School volleyball and basketball teams to practice and compete on the Archer campus. With the Middle School gymnasium located below grade, the Multipurpose Facility has been designed to be consistent with the height of adjacent residential development. Approximately 19,950 square feet of the Multipurpose Facility would be above grade.

Regarding enrollment, as discussed on page II-2 of Section II, Project Description, of the Draft EIR, the existing CUP provides for a maximum enrollment at 518 students. The Project does not propose to increase the maximum enrollment cap of 518 students.

Regarding use restrictions and operations, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation on Saturday, reducing the number of proposed School Functions from 98 to 86, and eliminating community use, the rental, lease, or use of the facilities for non-School Uses, and Interscholastic Athletic Tournaments.

Regarding parking, as described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the Project has been refined to include a reduction in the

number of parking spaces from 212 spaces to 185 spaces, which can be expanded to accommodate a total of 251 parking spaces when necessary with use of attendant assisted parking.

As discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has been further refined to remove the athletic field lighting.

Additionally, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has also been refined to eliminate the proposal for use of a non-permanent audio system for public address and amplified music in conjunction with Instruction, Interscholastic Athletic Competitions, and School Functions. Use of a non-permanent audio system for use during graduation, as permitted under Archer's existing CUP, would continue.

Also, as described in Topical Response No. 13, Use of Existing Residential Properties, school uses are permitted in the RE and R3 zones with a conditional use permit. Archer currently operates pursuant to a Conditional Use Permit (CUP No. 98-0158).

Comment No. 499-5

Archer's construct is false for several reasons. First, Archer has stated for years and continues to claim on its website and elsewhere that it provides the highest quality education, comparable to that available at any other private school in Los Angeles. Not surprisingly, Archer has been able to do so for 15 years with its existing facility and CUP.

Nor is it true that Archer needs the enormous expansion it desires in order to meet "new" needs that it did not foresee 15 years ago when it chose to move into the neighborhood knowing the limitations attendant with that decision. Indeed, that suggestion is ludicrous for at least two reasons. First, Archer currently has all of the programs and activities that suddenly require four new buildings and a 212-space underground parking facility. For example, Archer has a swim team despite its lack of an on campus stadium. Archer has dance, drama and music programs despite the lack of a 650-seat performing arts center. Archer has basketball and volleyball teams for both its middle and upper school despite the absence of any gymnasium (including the 12,000 square foot gymnasium with a 75-foot setback permitted under the current CUP which Archer elected not to build) let alone the two gymnasiums it seeks to construct totaling 41,400 square feet set back only 25 feet from Chaparral.

Like most other private schools, Archer simply has to conduct some of those activities off campus, something it was aware of when it chose the current location in the first instance. While there can be no doubt that Archer would prefer the convenience and attractiveness of having all of those off campus activities moved onto campus, that is simply not a new 21st century “need” which if left unfulfilled would deprive its students of an excellent education. Rather Archer’s Project and its elimination of every important protection in the current CUP is a 21st century “want” that places all of the burden on Archer’s immediate neighbors to make life more convenient for the School. Simply stated, swimming, volleyball, dance and music are not “new.” If Archer “wants” to now have all of those activities on campus than it needs to pursue an alternative location that would allow for a campus of that size and scope rather than trying to “*shoe horn [that expansion] into a residential neighborhood on a lot previously occupied for many years by retired nuns.*”

Response to Comment No. 499-5

Refer to Response to Comment No. 499-4. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

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

Refer to Topical Response No. 15, Alternative Locations, for a discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives, particularly those related to improving the existing Archer campus and ensuring the continued preservation of the historic Main Building.

Comment No. 499-6

Given that background and as more fully explained below, it is hardly surprising that Archer’s DEIR is not only riddled with flaws, but also based on faulty analysis and assumptions. Archer has failed to adequately study the numerous alternatives, any of which would eliminate or substantially mitigate the current unmitigated impacts that Archer admits will occur as a result of its Project. Indeed, believing that Archer should be allowed

a **reasonable upgrade** to its existing facilities, a large group of neighbors has proposed the plan described in Section III, a plan that is very similar to Archer's Alternative 4-B. That alternative, with specific modifications, would not require subjecting Archer's neighbors to over six years of continuous construction or require evisceration of the current CUP.

Thus, contrary to Archer's suggestion, viable alternatives exist in lieu of building what is in effect a community college campus in the midst of a neighborhood already burdened by seven private schools in a two mile radius. Whether it's a smaller project more appropriate to Archer's location, splitting into a middle and upper school in different locations or relocating to a much larger property not immediately adjacent to residential uses, those alternatives are vastly preferable to Archer's gargantuan 21st century "vision" that results in so many unmitigated impacts that even Archer admits will result from its plan.

Response to Comment No. 499-6

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. The impact analyses for the issue areas analyzed in the Draft EIR are comprehensive and are based on technical analyses from experts in the relevant fields, input from numerous other agencies and input received in response to the Notice of Preparation of the Draft EIR.

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

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

Comment No. 499-7**II. ANALYSIS**

The DEIR makes it clear that Archer's Project is inconsistent with the residential character of the neighborhood.

The massive physical size of the project is detrimental to the environment.

Archer's Project, as well as its preferred Alternative 3, represents a large-scale and aggressive development that does not fit the location of the school and is not environmentally sensitive. The design focuses on large buildings for separate uses, rather than shared use, which results in significant impacts on the environment.

Response to Comment No. 499-7

As described on page II-32 of the Draft EIR, the Project would incorporate features to support and promote environmental sustainability. The new buildings and infrastructure have been designed to be environmentally sustainable and to achieve the standards of the Silver Rating under the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED®) green building program or equivalent green building standards. The Project would also be designed to comply with all applicable state and local codes, including the City's Green Building Ordinance.

As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Specifically, as described therein, the Multipurpose Facility would be reduced from approximately 41,400 square feet to 39,300 square feet and the Performing Arts Center would be reduced from 22,600 square feet to 19,025 square feet. In addition, the North Wing Renovation would be reduced by approximately 8,671 square feet. Overall, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet.

Comment No. 499-8

Building four large buildings and expanding the main building by 9,000 square feet will place a burden on the environment and its limited resources. The school will require more water and electricity to operate 174,000 square feet of buildings versus the 84,000 it currently operates. In addition, constructing such a large-scale project will mean significant

impacts on the surrounding air quality as well as traffic and noise over an unreasonably long time—75 months, which is longer than the 405-widening project. The DEIR fails to compare the burden on the neighborhood's infrastructure as the demand for water and electricity is increased by the construction and use of these buildings. Has Archer considered solar heating to reduce electrical costs? What type of water conservation plan will be implemented since California is in a severe drought?

Response to Comment No. 499-8

Refer to Response to Comment No. 499-7. As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

As discussed on page IV.L.1-25 of Section IV.L.1, Utilities and Service Systems—Water Supply, of the Draft EIR, with implementation of the proposed water infrastructure improvements, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. In addition, LADWP has determined that enough capacity is available within the existing off-site water infrastructure serving the Project Site (refer to Appendix Q of the Draft EIR). Further, as set forth in Project Design Feature L.1-3, the Project shall implement the following water conservation features: use of high-efficiency irrigation systems, maximized use of native/adapted/drought tolerant plants, use of artificial turf on the proposed athletic field, and use of high-efficiency plumbing fixtures.

As summarized on page VI-21 of Section VI, Other CEQA Considerations, of the Draft EIR, the analysis of electricity use was conducted as part of the Initial Study for the Project (refer to Appendix A of the Draft EIR). As discussed therein, the Project-related net increase in electricity demand would represent approximately 0.003 percent of LADWP's 2020 electricity consumption and approximately 0.03 percent of the forecasted growth in electricity consumption between 2009 and 2014. Therefore, the Project would be within the anticipated electrical service capabilities of LADWP. In addition, as provided in Appendix R of the Draft EIR, LADWP confirmed that the Project's electricity demand can be served by the facilities in the Project area.

Pages II-32 through II-35 of Section II, Project Description, of the Draft EIR identify the Project's sustainability features, including provision of conduit appropriate for future photovoltaic panels. The installation of photovoltaic panels is planned and would be completed based on the availability of funds.

Comment No. 499-9

The proposed buildings are too large for their intended use.

It is interesting to note that a high school basketball court is 4,200 square feet and a volleyball court is 1,800 square feet. Under the current CUP Archer is allowed to build a more appropriately sized gym of 12,000 square feet that could accommodate 450 spectators. Rather than proceeding with a gymnasium appropriate in size to the neighborhood, Archer instead proposes building a two story 41,400 square foot Multipurpose Facility that includes two gyms. The two gyms could accommodate two basketball games and three volleyball games on the lower level gym and one basketball game and one volleyball game on the upper level gym as well as hundreds of spectators.

Archer's assumption that it needs two gyms to accommodate athletic games and practices is not accurate. Rather, Archer has designed its objectives from the top down to justify the end result and as such the School objectives are misleading. The specificity of Archer's objective to hold simultaneous practices during after school hours is not an objective but rather a wish or desire. By stating this as an objective, Archer hopes to validate the building of large-scale buildings that are unnecessary.

Moreover, Archer's need for two gyms for basketball and volleyball teams to compete on campus is not consistent with other private schools' practice. The following schools have one gym on campus and field the same number, if not more, teams:

- Marlborough School
- Sierra Canyon School
- Crossroads School
- Windward School

Games and practices do not have to be scheduled simultaneously, but can be staggered or occur off-site. It is not uncommon for schools to use nearby parks for practice or games, for example Windward's use of Mar Vista Park for soccer games. In addition, Archer can accommodate more gym use by eliminating the stage since it proposes building a performing arts center for just that purpose. Therefore, the DEIR is flawed in suggesting that Archer's needs and objectives can only be met by having two gyms.

Response to Comment No. 499-9

With respect to the gymnasium space in the Multipurpose Facility, the School consists of a Middle School and Upper School, each with its own athletic program. A Project objective is to provide separate gymnasiums for the Middle School and Upper School so there is a sufficient number of courts to allow both the Middle School and Upper School volleyball and basketball teams to practice and compete on the Archer campus. With the Middle School gymnasium located below grade, approximately 19,950 square feet of the Multipurpose Facility would be above grade.

A regulation-size high school volleyball court, including out-of-bounds space required by California Interscholastic Federation (CIF) regulations, is 3,024 square feet. A basketball court sized to CIF-recommended dimensions is 7,280 square feet. A Project objective is to provide basketball and volleyball courts for the Middle School and Upper School that comply with CIF regulations. CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives." *California Oak Foundation v. Regents of University of California*, 188 Cal.App.4th 227, 276–277 (2010). "CEQA simply requires the agency to thereafter prepare and certify a legally adequate EIR that provides the agency and the public alike with detailed information regarding the proposed project's significant environmental impacts, as well as reasonable alternatives that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen [those impacts]." *Id.* (internal citations omitted); see also CEQA Guidelines, Section 15126.6, subd. (a); *In re Bay-Delta etc.*, 43 Cal. 4th 1143, 1166 (2008) (Although a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal.)

Here, the Project objectives included in the Draft EIR satisfy CEQA. The CEQA Guidelines explain that 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...." CEQA Guidelines Section 15124(b). The Project Objectives are provided on pages II-13 through II-17 of Section II, Project Description, of the Draft EIR. Here, a basic objective of the Project is to provide new athletic facilities on the existing Archer campus. Therefore, the Draft EIR appropriately stated the Project's objectives.

Finally, the stage is a necessary component of the Project. A Project objective is to provide new facilities on the Archer campus that can accommodate the entire Middle School and Upper School separately and simultaneously, as the Archer campus does not have an assembly space indoors where the entire school can meet together. In addition,

the existing assembly space is very limited. As discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, the Project has been refined to reduce the size of the Performing Arts Center and the number of seats from 650 seats to 395 seats. Because the Performing Arts Center has been reduced in size, assembly space in the Multipurpose Facility would provide the only indoor assembly space where the entire Middle School and Upper School can meet together. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

Comment No. 499-10

Archer also proposes building a 22,600 square foot Performing Arts Center. This building, with 650 seats, would seat more than the Geffen Playhouse (610), the Wallis Annenberg Center for the Performing Arts Center (500) and the Broad Stage (499). In addition, Archer's objective of accommodating an entire school assembly in one building or a middle school and upper school assembly in two places could be met with one gym and a smaller performing arts center that could seat 300. Why should Archer have a performing arts center that seats more than professional playhouses? Is it environmentally sound to build three buildings to accommodate a program for 450 students when two, downsized buildings would meet the School's objective? Archer's special event list shows the maximum number of visitors for a school play is 150, so why do they need 650 seats?

Smaller, more environmentally conscious buildings would better suit Archer's needs and be in keeping with the operations of other private schools.

Response to Comment No. 499-10

A specific Project objective is to provide new facilities on the Archer campus that can accommodate the entire Middle School and Upper School separately and simultaneously, as the Archer campus does not have an assembly space indoors where the entire school can meet together. In addition, as described on page II-7 of the Draft EIR, the existing assembly space within the campus is very limited. Accordingly, the Project proposed the Multipurpose Facility and Performing Arts Center, which can accommodate the entire Middle School and Upper School separately and simultaneously. As discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, the Project has been refined to reduce the size of the Multipurpose Facility and the Performing Arts Center. Specifically, the Multipurpose Facility would be reduced from approximately 41,400 square feet to 39,300 square feet, and the Performing Arts Center would be reduced from 22,600 square feet to 19,025 square feet. With the reduction in the size of the Performing Arts Center, the

number of seats within the Performing Arts Center would be reduced from 650 seats to 395 seats. These changes would still enable the Project to meet the objective to accommodate the entire Middle School and Upper School separately. However, because the Performing Arts Center has been reduced in size, assembly space in the Multipurpose Facility would provide the only indoor assembly space where the entire Middle School and Upper School can meet together.

Regarding Project sustainability, refer to Section II, Project Description, of the Draft EIR, pages II-32 through II-35.

Comment No. 499-11

Archer's buildings are inconsistent with the residential quality of the neighborhood.

The DEIR is misleading when it states in the Project Description that the Project Site is located within an urban area that includes commercial uses associated with parking when all of Archer's property lines are shared with residential units. The following residences are immediately adjacent to Archer:

- Western border—two single family homes on Chaparal
- Eastern border—two houses on Chaparal and two multi-family residences on Barrington
- Northern border—eight houses on Chaparal face the school (Chaparal is 20 ft wide);
- Southern border—two multi family residences

On a small parcel surrounded by residences on all sides, Archer proposes tearing down two residences and placing large institutional buildings. The DEIR is incorrect when it states the Project will maintain the residential quality of the neighborhood and that the placement of the Multipurpose Facility would “maintain a compatible street character.” The buildings Archer proposes to place in the residential neighborhood do not resemble a house, either in size or use.

Under Alternative 3, which is Archer's preferred plan, Archer proposes building the 22,000 square foot Performing Arts Center and 41,400 square foot Multipurpose Facility on the Chaparal side of its back lot. The houses directly across from the School on Chaparal are situated on lots that are smaller than the size of the buildings. On average, these residential lots are 12,000 square feet, which is half the size of the buildings proposed.

The average house size ranges from 3,500 to 6,000 square feet so the proposed buildings would be four to seven times larger than the average house.

In addition, Archer now proposes placing the two largest buildings side by side closest to the Chaparal side (which has no sidewalks and feels more rural than urban) on the back lot that has had no structures of any kind (including since Archer has moved in) for decades. Two buildings of over 60,000 square feet will now sit next to each other (assume 20,700 for the above ground level of the Multipurpose Facility). While the height of the buildings will not exceed the residential limit, the width of the buildings will be twice as large as that of a house. For example, our house, which is directly adjacent to Archer, is 63 feet wide by 62 feet deep. Compare this to the Multipurpose Facility, which would be 170 feet wide along the Chaparal border and 120 feet deep. It is simply absurd to say these massive buildings will either look like a house or have the low impact utilization that characterizes a single-family residence. Rather, the buildings are completely inconsistent with the character of the neighborhood.

The School-owned house on Chaparal is correctly described in the DEIR as a Traditional Ranch that is 4,224 square feet. How is replacing this one story home with a 22,000 square foot performing arts center in keeping with the residential character of the neighborhood? In addition, why should residential height requirements apply to buildings that are for institutional use? A building that is over 20,000 square feet with a 36-foot height will look much different than a 5,000 square foot house with the same height restriction. Conditions should be applied that diminish the appearance by placing more of the building underground.

Response to Comment No. 499-11

Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. As described therein, the Project would include the use of architectural features that add visual interest and reduce massing to maintain the residential street character when viewed from Chaparal Street and Barrington Avenue. The new School buildings would be proportioned to modulate height and maintain the residential street character when viewed from Chaparal Street and Barrington Avenue. For example, the Multipurpose Facility would comprise two general levels with an average height of 28 feet on the north elevation near Chaparal Street, which is lower than many of the surrounding residences. Additionally, in response to comments, refinements to the Project are proposed, including reducing the square footage and massing, width, and length of some of the proposed buildings. In particular, the Multipurpose Facility would be reduced from approximately 41,400 square feet to 39,330 square feet, and the Performing Arts Center would be reduced from 22,600 square

feet to 19,025 square feet. Approximately 19,950 square feet of the Multipurpose Facility would be above grade. The Project has been designed to minimize building footprints and increase green space within the campus. The Project would provide more open space as a percentage of total campus area than most of the adjacent residences. Upon buildout of the Project, approximately 72 percent of Archer's campus would be open space.

For example, 125 Barrington Avenue is approximately 13 percent open space, 11755 Chaparal Street is approximately 57 percent open space, and 11840 Chaparal Street is approximately 66 percent open space. Further, the refined Project would maintain approximately 457 feet, or 64 percent, of the frontage along Chaparal Street as open space. At full build out, the Project's floor area would comprise approximately 22 percent of the total allowable floor area.

With respect to the use of residential properties, the Performing Arts Center, Visual Arts Center, and Aquatics Center would meet residential height and front yard setback requirements for both the Barrington and Chaparal Parcels.

The Project also proposes enhanced landscaping buffers to further enhance the residential quality of the neighborhood, integrate proposed buildings, and provide privacy and reduce noise to nearby properties. Specifically, in response to comments on the Draft EIR, additional trees would be provided along Chaparal Street and a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street, limiting private views of the campus.

Comment No. 499-12

Condition 5 of the Current CUP states that the proposed 12,000 square foot gym must be set back 75 feet from the southern property line. What justification does Archer have for placing two buildings twice the size of the allowed gym only 25 feet from the property line? It is interesting to note that the history of the Property includes a 1931 ruling by the Zoning Administrator that states buildings must be set back at least 224 feet from Chaparal. In 1950 the Zoning Administrator denied a building to be built 80 feet from Chaparal Street but partially granted an addition to the Eastern Star Home building with a setback of 200 feet from Chaparal Street. The placement and size of these new buildings will obstruct the view of the neighbors across the street on Chaparal as well as those on the western border of Archer and the apartment dwellers on the southern side. Neighbors will now see 60,000 square feet of building rather than sky or trees or buildings off in the distance. (See Appendix B for photos of the current view from across the street on the north side of Chaparal.) In addition, Archer's landscape proposal does nothing to visually enhance the view or to diminish the impact of these large buildings. What will the aesthetic impact be to

now have over 200 linear feet of boxy buildings next to an eight foot fence and a narrow row of trees?

Response to Comment No. 499-12

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

The Project proposes landscaping additions along the perimeter of the campus that would maintain or enhance views from neighboring properties and integrate new and existing campus buildings. Specifically, in response to comments on the Draft EIR, additional trees would be provided along Chaparal Street and a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. In response to comments on the Draft EIR, the Project has also shifted the athletic field approximately 7 feet 6 inches to the east. This expanded setback would allow for an enhanced landscape buffer along the western property boundary of the campus. In addition, the southern row of parking spaces in the parking structure previously proposed to remain uncovered would be eliminated and replaced with an expanded landscape buffer. Further, the planting area between the southern edge of the underground parking structure and the southern property line would be increased from 7 feet 10 inches to 22 feet to accommodate an expanded landscape buffer that would enhance the views from neighboring apartments to the south and eliminate views of parked cars. In addition, in response to comments, the Project would more than double the width of the landscape planting strip along the southern boundary of the Barrington Parcel and add a row of evergreen trees to further enhance this landscape buffer. Additional landscaping improvements would also be provided along Sunset Boulevard and Barrington Street. Regarding private views of the campus, refer to Response to Comment No. 27-49.

Residences to the north, directly across Chaparal Street from proposed buildings, are set back approximately 55 feet from the north edge of the street (approximately 95 feet from the northern edge of campus, and 120 feet from proposed buildings) behind a row of mature landscaping over 40 feet in height. These include one- and two-story residences

surrounded by densely planted trees and shrubs. Views from these residences are primarily of their own landscaping, site walls, and gates. To the extent proposed buildings would be visible at all from these residences, only portions of the proposed buildings would be visible through new and existing landscaping.

Comment No. 499-13

Adding over 80,000 square feet of buildings will fundamentally alter the character of a neighborhood that is marked by its narrow non-conforming roads, lack of sidewalks, and rural feel. Given the above analysis, the DEIR errs when it says the proposed buildings will be compatible with the residential neighborhood.

Response to Comment No. 499-13

Refer to Response to Comment No. 499-7.

Comment No. 499-14

The DEIR states significant and unavoidable impacts from operational noise cannot be mitigated, which is unacceptable.

The design of Archer's Project places all of the expansion of the campus directly next to residences. Activity on campus will take place not just in the main building as it primarily occurs now, but will be pushed toward the outer edges of the campus closest to the residences as 518 students use the gym or the performing arts center or the aquatic center. In addition, 212 cars will now park underground and visitors will enter the campus through the North Garden, which is a large outdoor area next to the Chaparal property line. With daily use from 7:00am to 10:00pm, noise will be generated from the ingress and egress to the parking garage by faculty, staff, students and visitors. In addition, noise will be generated as people travel from the main building and other buildings on the eastern side of the campus toward the residential property line to the north to access the parking garage. How will this noise be mitigated? Trees and landscaping do not mitigate noise. The DEIR fails to show why all of the new buildings are placed directly next to residential properties and not closer to the main building toward the center of campus.

In short, the placement and design features of the buildings show a total disregard for the residential neighbors of Archer. This is evident in the design and placement of the Multipurpose Facility. As part of its original negotiations to operate on its current location, Archer agreed to a specific size and placement of the proposed gym—12,000 square feet and setback 75 feet from the Chaparal property line. In addition, Condition 34 of the CUP states that the proposed gym cannot have operable windows and all doors must open

toward the main building or toward the south. No doors shall be oriented north, east or west. Rather than conform to these reasonable protections for the residents, Archer proposes instead to build two gyms in the 41,400 Multipurpose Facility setback only 25 feet from the Chaparal property line and with doors oriented toward the west in the direction of Archer's residential neighbors.

The DEIR fails to show how the noise will be mitigated from the use of this facility. Why has this condition been discarded? What is the reasoning behind this layout, which results in significant noise impacts? In order to reduce the impact from operational noise from the buildings, Archer should reduce the size either locate the building at the current 75 setback or place it underground, which would completely mitigate the noise and visual disruptions.

Response to Comment No. 499-14

Refer to Topical Response No. 1, Refinements to Campus Operations. As discussed therein, in response to comments on the Draft EIR, the Project has been refined to include additional restrictions on its operations including additional limitations on the hours of operation, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has been refined to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M.

In addition, as discussed on pages IV.I-82 through IV.I-83 in Section IV.I, Noise, of the Draft EIR, Project Design Feature I-4 would provide that the Multipurpose Facility and the Performing Arts Center would be designed to provide a minimum composite noise reduction of 40 dBA. With the incorporation of Project Design Feature I-4, noise levels from weekday or weekend events within the Multipurpose Facility and the Performing Arts Center would be less than significant. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

Further, refer to Topical Response No. 8, Summary of Impacts from Parking Structure. As described therein, in response to comments on the Draft EIR, refinements have been made to the Project that including reducing the size of the parking structure and redesigning the structure to provide for increased buffers with adjacent uses. The use of

the underground parking structure would have less than significant noise impacts and noise associated with the parking structure would be lower than existing conditions.

In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has eliminated School Functions within the North Garden. Elimination of School Functions in the North Garden would further reduce the incidence of noise in the community.

The Draft EIR also included an analysis of potential noise impacts due to talking on pedestrian pathways and access routes as part of the Project. As described on pages IV.I-84 and IV.I-85 in Section IV.I, Noise, of the Draft EIR, pedestrians currently use pedestrian pathways and access routes prior to and after Interscholastic Athletic Activities or School Functions. As part of the Project, new pedestrian pathways and access routes would be provided to access the Multipurpose Facility, the Visual Arts Center, the Aquatics Center, the Performing Arts Center, and the underground parking structure. Pedestrians may talk in these areas prior to and after Interscholastic Athletic Activities or School Functions. The analysis demonstrated that the noise associated with people talking on the pedestrian pathways and access routes would be less than significant. See the Draft EIR Noise Study Tables 45 through 55. While the Draft EIR determined that there would be less than significant impacts associated with use of the outdoor pedestrian pathways and access routes, in response to comments, the Project has been refined to provide mandatory use of the underground pedestrian pathway, which runs from the underground parking garage to the Multipurpose Facility and the Performing Arts Center, after 8:00 P.M. Mandatory use of the underground pedestrian pathway would further reduce the incidence of noise in the community.

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

Further, in response to the comment regarding operable windows, please refer to Project Design Feature I-6 on page IV.I-31 in Section IV.I, Noise, of the Draft EIR. As provided therein, as part of the Project, non-operable windows shall be installed on the sides of buildings directly adjacent to Chaparal Street and Barrington Avenue. On the Barrington Parcel, non-operable windows shall be installed along the residential property boundary with 11718 Chaparal Street, 11706 Chaparal Street, and 125 North Barrington Avenue. On the Chaparal Parcel, non-operable windows shall be installed along the residential property boundary with 11718 Chaparal Street.

Comment No. 499-15

At the compliance hearing held on May 23, 2013 regarding Archer's CUP, the Zoning Administrator modified a condition to limit noise from the field from students congregating too closely to the shared wall of the school and the neighbors.

Response to Comment No. 499-15

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. Refer to Topical Response No. 4, Additional Measures to Reduce Noise, regarding additional measures that have been proposed to reduce noise associated with campus operations.

Comment No. 499-16

Why would Archer propose the following change in operations that would significantly impact the neighbors when the current CUP was recently strengthened to mitigate a similar noise impact?

- Adding lights on the field for nighttime use
- Allowing the use of amplified music, a public address system and loud music outside
- Creating access and circulation on the property that results in more people congregating outside for events and to use the buildings
- Creating a large outdoor garden space for outdoor instruction and gatherings

Response to Comment No. 499-16

Regarding the athletic field lighting, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has been refined to remove the athletic field lighting. In addition, as discussed in Topical Response No. 1, Refinements to Proposed Operations, the Project has been further refined to eliminate use of the athletic field until 8:00 P.M. With the proposed refinements, use of the athletic field would end by 6:00 P.M. Therefore, nighttime use of the athletic field is no longer proposed. With regard to noise, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been refined to eliminate the proposal for use of a non-permanent audio system for public address and amplified music in conjunction with Instruction, Interscholastic Athletic Competitions, and School Functions. Archer would

continue to use a non-permanent audio system for use during graduation as permitted under Archer's existing CUP.

Regarding noise from pedestrian pathways or the North Garden, refer to Response to Comment No. 499-14.

Comment No. 499-17

In addition, what will the impact from noise be when events overlap and the parking garage is at capacity several times a day? What will the effect of this noise be on the residents who are trying to put children to bed at 8:00pm or enjoying a barbecue outside at 7:00pm and Archer has 300 person events occurring where 282 cars arrive at 7:30pm and leave at 10:00pm and people are outside making their way into and out of the garage?

The DEIR acknowledges significant noise impacts from this operational use, which includes activities and design features not currently allowed in the CUP, yet Archer proposes no real mitigation measures.

Response to Comment No. 499-17

Refer to Topical Response No. 4, Additional Measures to Reduce Noise, which provides the proposed refinements to reduce noise associated with campus operations, including reduction of hours for use of the athletic field, elimination of certain School Functions, and mandatory use of the underground pedestrian pathway during specified hours. With the incorporation of additional mitigation measures, all operational noise impacts would be reduced to less than significant Monday through Friday. With the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M.

Further, refer to Topical Response No. 8, Summary of Impacts from Parking Structure. As described therein, refinements have been made to the Project that including reducing the size of the parking structure and redesigning the structure to provide for increased buffers with adjacent uses. The use of the underground parking structure would have less than significant noise impacts and noise associated with the parking structure would be lower than existing conditions.

In addition, as discussed on pages IV.I-111 and IV.I-112 in Section IV.I, Noise, of the Draft EIR, a composite noise analysis was conducted to evaluate noise from all of the Project's operation noise sources including on-site mechanical/electrical equipment, use of the underground parking structure, events at the Multipurpose Facility and the Performing Arts Center, outdoor school activities, use of the public address system, and outdoor

athletic activities. As presented therein, the composite noise level increase would be less than significant. In addition, noise impacts from each of the Project's on-site noise sources were based on the worst case condition, with the noise source located nearest to each of the off-site noise sensitive receptors. If simultaneous activities were to occur, the noise impact would be based on this worst case condition and activities that could occur elsewhere on the Project Site would not increase the overall impacts of the Project. Therefore, the Project's composite noise analysis provides a worst-case analysis that accounts for noise impacts from simultaneous activities.

Comment No. 499-18

Archer's Project results in an intensification of use that puts the sole burden of its campus operations on the neighbors.

Archer's Project would construct four large-scale buildings that include two gyms that could potentially accommodate 400 spectators each as well as a performing arts center that could seat 650. In addition to the two gyms and performing arts center, the aquatic center and the visual arts center as well as the outdoor athletic field could be used simultaneously after school from 3:30pm to 10:00pm and on weekends. The large-scale size of Archer's physical plant leads directly to an increase in use. As outlined in the DEIR Project Description, Archer's proposed campus operations reflect its desire to "maximize" use of its facilities by operating seven days a week from 7:00am to 10:00pm. This maximization of Archer's facilities comes at the expense of the neighbors and minimizes their right to the quiet and peaceful enjoyment of their homes. This increased use completely upsets the delicate balance carefully negotiated in the CUP between the School and the neighbors. There can be no dispute that the best way to constrain excessive use is to limit the physical scope of the project.

With two gyms, an aquatic center, an outdoor field and a softball diamond, Archer proposes moving the majority of its athletic activities onto campus, increasing the number of games held on campus from the current 39 to 145. As the chart below illustrates, this would result in an almost **300% increase** in the number of athletic events on campus.

Chart 3. Increase in Athletic Competitions on Campus

	# of teams	Days of Competition	Total Visitors
Currently played on campus	7	39	1,332
Proposed with Project	22	145	6,848
Change in use	+15	+106	+5,516

This increased use will result in significant impacts to the community from traffic as well as noise. For example, in the fall, volleyball will occur on campus in two gyms, field hockey will be played on the outdoor athletic field and water polo will occur in the aquatic center all after school. If the average attendance for volleyball is 48, and two volleyball teams are playing, this means 96 visitors, along with 48 players, will be exiting and entering the gymnasiums while 111 visitors and athletes are arriving or departing from field hockey and 74 athletes and spectators are arriving or leaving for water polo. This would result in over 200 people using Archer's campus between the hours of 3:30pm and 10:00pm. And as Archer states in the DEIR, the impact from noise with this increased level of use will be significant and unmitigated.

Everyone will be exiting and entering the campus from the North Garden and then walking the length of the campus to get to the aquatic center or to the outdoor field where bleachers are located right next to the Chaparal Street front yard (DEIR p. II-24) only 20 feet from surrounding houses (the width of Chaparal). Archer has proposed no mitigation measures for the impact from this noise. The few trees proposed along with the existing eight-foot fence will not mitigate the significant increase in noise. Currently spectators for softball and soccer stand along the field closest to the center of the campus and parking lots, away from the houses.

Response to Comment No. 499-18

Specifically refer to Topical Response No. 1, Refinements to Proposed Operations, for a detailed description of the proposed additional restrictions on School operations, including additional limitations on the hours of operation. Further, as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, proposed refinements to the Project include incorporating additional operational mitigation measures to reduce operational significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. Additionally, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the

Project has been refined to include additional measures to reduce noise associated with campus operations. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to less than significant Monday through Friday. In addition, with the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M.

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

Comment No. 499-19

Why should all of Archer's athletic events take place on campus when many comparable schools conduct athletic competitions off campus?

- Marymount School—softball and tennis
- Marlborough School—softball and soccer
- Crossroads—softball
- Sierra Canyon School—softball and tennis
- Windward School—tennis and soccer

Response to Comment No. 499-19

As described on page II-7 of Section II, Project Description, of the Draft EIR, the School's existing space for athletics, performing arts, and visual arts is limited. Due to the inadequate athletic and visual and performing arts spaces, Archer currently rents off-site venues for athletic practices, games, and arts performances. These off-site venues require that students be routinely bused, adding to traffic congestion and reducing instructional time. As shown in Appendix B-1 of the Draft EIR, by constructing a Multipurpose Facility and an Aquatics Center and enhancing its existing softball and soccer fields, Archer would be able to conduct more of its practices and host additional Interscholastic Athletic Competitions on campus. Archer would still host certain athletic team practices and competitions off-site. In particular, Middle School and Upper School equestrian, tennis,

beach volleyball, cross-country, and track practices and/or competitions would remain off-site

Comment No. 499-20

In addition to the athletic use outlined above, Archer could simultaneously host an event in the Performing Arts Center that would result in 100 more visitors. Simultaneous use of all of its buildings would not only impact traffic, but create an enormous noise impact as literally hundreds of visitors are on campus using both the indoor and outdoor facilities.

With an expanded campus that would include five buildings instead of one, Archer not only proposes an increase in school activities that will lead to more visitors, but proposes an increase in outside use. Archer's plan, as outlined in DEIR pages II-35–37 includes

- Conducting summer academic and camp programs for six weeks when school is not in session between the hours of 8:00am and 6:00pm Monday through Friday, thus adding a new use that will contribute to traffic and noise;
- 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, will bring 4,800 visitors that currently do not come to the campus, thus adding a new use that will contribute to traffic and noise;
- Allowing community use of the facilities for up to 200 guests, 24 times a year, Monday through Saturday, 8:00am to 10:00pm, will bring 4,800 visitors that currently do not come to the campus, thus adding a new use that will contribute to traffic and noise;
- Allowing filming on campus for commercial purposes when school is not in session that will bring large trucks, trailers and activity from the film crew, thus adding a new use that will contribute to traffic and noise.

These significant increases have not been explained and carefully examined as to whether they are essential to the school's operations or just a wish list that benefits the school as a commercial enterprise and places the entire burden on the adjacent neighbors. As the chart below illustrates, the increase in use on Archer's facilities will be substantial. Archer's proposal to increase not only existing events but to allow new uses of the facilities is the key factor in contributing to the significant impacts with respect to noise and traffic that CANNOT be mitigated. In addition, increased use will occur at times of the day and on the weekend when previously NO USE occurred. Currently the residents surrounding Archer look forward to weekends and the summer to enjoy the peace and quiet of their homes. Adding 30 days for summer school, 48 days for outside use, and filming on days when the school would otherwise be closed could increase the operations of the school by another

two months, meaning residents will have only the possibility of one month without the noise and traffic generated by the school.

Chart 4. Increase in Use from Archer's Proposed Operations

	# Currently Held on Campus	Average Attendance ⁶	Total Attendance
Current			
Athletic events	39	23	1,332
Special Events	47	180	8,300
Outside Use	0	0	0
	86	203	9,632
Proposed⁷			
Athletic events	145	47	6,848
Special Events	98	249	24,450
Community Use	24	200	4,800
Rental Use	24	200	4,800
Summer School	30	200 ⁸	6,000
	321	897	46,898

⁶ Average attendance is calculated by dividing the total attendance by the number of events.

⁷ See page II-37 of the Project Description in the DEIR for proposed outside use of facilities. See Appendix B for Current and Proposed Athletic and Special Events.

⁸ The DEIR does not specify how many students would attend summer school, so 200 is assumed based on proposal for other outside use.

Response to Comment No. 499-20

Specifically refer to Topical Response No. 1, Refinements to Proposed Operations, which describes additional restrictions on School operations, including additional limitations on the hours of operation, reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Regarding filming, as further discussed in Topical Response No. 1, Refinements to Proposed Operations, filming on the campus for

commercial purposes would continue to be prohibited except when the School is not in session. Filming would be permitted for no more than 24 days per year. All trucks and equipment would be required to use the School's underground parking structure and parking on neighborhood streets would be strictly prohibited. Hours would be restricted, with filming beginning no earlier than 9:00 A.M. and concluding no later than 6:00 P.M.

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

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has also been refined to include additional measures to reduce noise associated with campus operations.

Comment No. 499-21

Archer also proposes doubling the number of special events to 98 from the currently allowed 47. Not only is Archer increasing the number of events, but the size of events as well, without explanation. Of the current 47 special events, 85% are for an event with a maximum of 200 guests (40 events) and only 15% for 300 or more guests. In Appendix B, Archer proposes increasing the number of events with 300 to 800 events to 39, or 40% of its total {compared to the current 7 events with 300 or more attendees). What has changed in the school's operations and curriculum to warrant such a marked increase in large events? The DEIR is incomplete and cannot be analyzed without a breakdown of each event by type and time to better understand its relationship to School operations.

Increasing the number of visitors from 9,600 to 47,000 directly impacts the neighborhood. Why should the neighborhood bear the burden of outside events such as speaker series and athletic tournaments that will attract thousands of guests who are not Archer students or families? Why does Archer need to double the number of shows and performances if enrollment will not be increased? All of Archer's 47 current special events support school functions and activities with a current enrollment of 455 students.

Archer's proposed use of its facilities for summer school and camp as well as for weddings, private parties and community use is purely for financial reasons. These uses of the School's facilities for members outside of the Archer community are not essential to the operations of the school and reflect a business operation rather than an educational one.

Under its current CUP, the City has upheld the limitation on no outside use for rental or lease of the facilities as well as no filming (except for one day every five years for the LA conservancy) during subsequent Plan Approvals. Why should this change? Why should the current restrictions not be kept in place to balance the needs of the neighbors with Archer's operations? Private schools in close proximity to residential uses should never be allowed to lease out their premises to outside entities, whether for filming, athletics or otherwise. Neighbors already burdened with the School use should not be subject to additional burden simply so the school can generate income. That exclusion should also apply to summer school, where a majority of the "students" are not currently admitted as students to the school. Simply put, those outside revenue generation activities are not entitled to any deference that might be accorded to day-to-day school operations.

Response to Comment No. 499-21

Refer to Response to Comment No. 499-20 regarding refinements to proposed School operations. Also refer to Topical Response No. 1, Refinements to Proposed Operations, for a discussion of the proposed summer academic and camp programs.

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

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

Comment No. 499-22

Archer's proposed change in operational hours and use is significant and unnecessary.

On page II-35 of the DEIR Archer discusses its proposed campus operations and states that with a new CUP "the School would continue to be subject to numerous conditions of approval, which would ensure that the School's operations and its facilities would remain compatible with the residences in the vicinity of the campus." This statement is false and misleading. As Chart 2 of this letter illustrates, Archer's proposed changes to the CUP significantly alter the way in which the School operates in a residential neighborhood. Archer not only proposes doubling the size of its campus, but extending its hours of operations and increasing the number of days the facilities on campus are used for events

outside of instructional use. In effect, Archer proposes eliminating all of the restrictions that balanced the rights of the neighbors to the quiet enjoyment of their homes with the School's ability to operate. Archer's proposed campus operations, which would include the following, increase the impacts on the neighborhood:

- Increasing the hours of operation that would allow more night time use and weekend use of facilities
- Doubling the number of special events that take place at night and on the weekends
- Increasing the use of the field on weekends and adding lights on the field
- Eliminating noise restrictions by allowing amplified or loud music outside
- Placing large buildings on the campus directly next to single family homes
- Increasing the enrollment from the targeted 450 baseline to 518 students
- Doubling the number of parking spaces from 109 to 212 (282 maximum)
- Locating an outdoor gathering space (North Garden) adjacent to residential properties on Chaparal

As Chart 4 of this letter illustrates, the increase in use under Archer's proposed new CUP would be enormous. In addition to school functions and athletic events as well as outside use and rental of the School's facilities, Archer proposes extending the school week to include every Saturday, adding lights on the field to extend use of the outdoor athletic field by two hours and adding Saturday use for four hours during the day.

By extending its operating hours to include every Saturday and additional hours during the week, Chart 5 illustrates just how substantial an increase this will be. It is illogical to extend the operations of the School when the DEIR has shown that the impacts from operational noise will be significant and cannot be mitigated. The DEIR is deficient in showing what this increase in operations will achieve. In addition, one can extrapolate that at least for the instructional use on Saturday, if half the student body is permitted to come to campus each Saturday that would be a potential 250 students or new visitors each week. Even 100 students each Saturday would reflect a new and significant use.

Chart 5. Increase in Use from Extending Operating Hours

	Proposed	New Use	Additional Hours
Instructional Use	Every Saturday 7:00am to 6:00pm	11 hours 36 Saturdays	396 hours
Weekly Athletic Field (addition of lights)	Monday- Friday 6:00pm to 8:00pm	2 hours 5 days per week/36 weeks per year	360 hours
Saturday Field Use	Every Saturday Four hours during 10:00am to 6:00pm	4 hours 36 Saturdays	144 hours
TOTAL			900 hours

By extending its operating hours, Archer creates a significant cumulative impact on the neighbors with 900 more hours of noise from operational use. Even more significant, however, than the number of increased hours that the School's indoor and outdoor facilities would be utilized, is the fact that they would all occur during a time when currently there is NO USE. Under the current CUP, Archer's instructional hours are Monday through Friday and the field use ends at 6pm because no lights are allowed. And while Archer currently is allowed to use the field four Saturdays during the school year for a four-hour time period, it must be noted that Archer has NEVER used the field on a Saturday for practice or for a game.

The DEIR fails to assess the cumulative noise impact from these new hours. Previously, neighbors were able to enjoy the peace and quiet of their homes after work and during the weekend. Now Archer proposes eliminating even that time by extending the hours of operation, resulting in a significant impact. In addition, quiet summer hours will vanish with the inclusion of summer camp now. Again, why should the neighbors bear the burden of Archer's expansion?

Response to Comment No. 499-22

Refer to Response to Comment No. 499-4 and No. 499-14 regarding proposed refinements to the Project, including additional limitations on the hours of operation on weekends, reducing the number of proposed School Functions, and eliminating community use of the facilities, the rental, lease, or use of the facilities for non-School Uses; reducing the size of the underground parking structure and associated number of parking spaces; and eliminating the previously proposed athletic field lighting. It is noted that, as permitted under the existing CUP (ZA 98-0158(CUZ)(PA4)), Archer has used the athletic field for Extracurricular Activities (for example, athletic practices) on Saturdays.

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

With regard to noise, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional measures to reduce noise associated with campus operations are proposed. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to below a level of significance Monday through Friday. With the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M. In addition, in response to comments on the Draft EIR, the Project has been further refined to eliminate the proposal for use of a non-permanent audio system for public address and amplified music in conjunction with Instruction, Interscholastic Athletic Competitions, and School Functions. Archer would continue to use a non-permanent audio system for use during graduation as permitted under Archer's existing CUP.

Regarding noise from the North Garden, refer to Response to Comment No. 499-14. Use of the North Garden was discussed on pages IV.I-83 through IV.I-84 of Section IV.I Noise, of the Draft EIR. As stated therein, the Project did not propose to use the North Garden to conduct large gatherings or all-school assemblies; however, the analysis conservatively analyzed that up to 650 people could be within the North Garden and determined that noise impacts associated with such use would be less than significant. To clarify the limited use of the North Garden, the Project has been refined to prohibit School Functions in the North Garden. To further ensure that the North Garden would not be used for School Functions, large gatherings, or all-school assemblies, hardscape and landscape features have been added to the design of the North Garden.

Pages IV.I-111 through IV.I-122 of Section IV.I, Noise, of the Draft EIR included an evaluation of noise from all the Project's operational noise sources (i.e., composite noise level) to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations. The Draft EIR evaluated the combined noise effect of the on-site mechanical/electrical equipment, underground parking structure, events at the Multipurpose Facility and the Performing Arts Center, outdoor school activities, use of the public address system, and outdoor athletic activities. The Draft EIR determined that the composite noise level impacts due to operation of the Project would be less than significant.

The Draft EIR also included an analysis of cumulative operational noise impacts on page IV.I-113 of Section IV.I Noise. As discussed therein, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less

than significant. In addition, cumulative noise impacts due to off-site mobile noise sources would be less than significant.

Comment No. 499-23

Archer proposes putting lights on the outdoor athletic field so that one sport can use the field an extra two hours for three months in the fall before daylight savings time extends the daylight hours. An important feature of the current CUP is the condition that no lights are allowed on the athletic field. Why would Archer propose this in every alternative except one (Alternative 2 which follows the current CUP) when they have received complaints from neighbors about the glare from security lighting in their parking lot? Given that it is surrounded on all sides by residences, lights on the athletic field is not appropriate for this location.

But more importantly, no other private school similarly situated has lights on its field (and no private school in Brentwood has lights on the field): Marlborough School, Brentwood School, Campbell Hall and Sierra Canyon to name a few.

Response to Comment No. 499-23

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

Comment No. 499-24

Archer's proposed expansion plan will have a significant impact on traffic that the DEIR states cannot be mitigated.

Archer's proposed change in campus operations coupled with its large scale building plan will lead to an increase in traffic as thousands of visitors use Sunset Boulevard as well as the 405 freeway to get to the campus during peak traffic periods (3:30pm to 7:00pm). In addition, constructing a 96,000 square foot underground parking garage to hold, at capacity, 282 cars, from its current 109 parking spaces, will add to the traffic as over 200 cars enter and exit throughout the day.

Chaparral and Barrington are already over-burdened with cut-through traffic from cars avoiding Sunset during peak hours. How will 72 to 212 cars (assuming the parking garage is at capacity) leaving the school from after school events and school functions affect the traffic on these streets?

Response to Comment No. 499-24

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparral Street. Although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to \$15,000 toward the development and implementation of a traffic calming plan for Chaparral Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced. Also refer to Section II, Project Description, of the Draft EIR, for a discussion regarding egress from the parking structure.

Comment No. 499-25

How will Archer prevent cars from turning right out of the parking garage onto neighboring side streets during peak hours when cars cannot go east on Sunset because of traffic? What will the Chaparral Street Traffic Calming Plan consist of? How effective will it be?

Response to Comment No. 499-25

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparal Street. Based on field observations and a license plate matching survey, few vehicles exiting Archer are anticipated to cut-through Chaparal Street. In addition, although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to \$15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street. Potential measures that could be investigated could include (but are not limited to) turn prohibitions, curb bulb-outs, partial closures, chicanes, speed cushions, etc. The effectiveness of the plan will depend on the types of measures that are ultimately included in the plan.

As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced. Also refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding egress from the parking structure.

Comment No. 499-26

If Archer increases their enrollment to the maximum of 518, how many new buses will be added? How will increasing the busing requirement from 50% to 70% alleviate traffic impacts? Especially since Archer states that they are currently busing close to 80% of their current 450 enrollment?

Response to Comment No. 499-26

As set forth in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, Archer operates the eight school bus routes that exclusively serve Archer students during the morning peak hour (7:00 A.M. to 8:00 A.M.), school dismissal (3:00 P.M. to 4:00 P.M.), and after school activity or event completion (5:00 P.M. to 6:00 P.M.). It is not anticipated that the School will need to add new buses to accommodate the maximum enrollment of 518 with 70 percent of students using busing.

The traffic impacts identified in Section IV.K, Traffic, Access, and Parking, of the Draft EIR associated with the maximum enrollment of 518 are overestimated. This is because the existing and baseline conditions against which Project traffic is measured assume that approximately 85 percent of the students used the school bus (meaning less trips generated). The future traffic projections assume that 50 percent of the students use

the school bus, which is the percentage of students required to take the bus in the existing CUP (meaning more trips generated). The Draft EIR determined that, with implementation of the 70-percent busing requirement and the other mitigation measures identified in the Draft EIR, the Project would not result in a significant traffic impact at the 17 study intersections during a non-event day. See Draft EIR at IV.K-112, IV.K-124.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 499-27

Will the increase in arrival and departures from Archer's expanded athletic program and school functions not only increase drive time during the peak hours but also serve to extend peak hours of traffic during the week and on the weekend? How can Archer enforce only 72 cars arriving and departing during certain hours during peak traffic time during the week and 244 during one hour on Saturday as LADOT has suggested? Given the nature of traffic in LA, how can one arrive during a specific time? How will limiting the number of arrivals and departures at certain times during the week reduce traffic unless the overall number of cars allowed to come to campus is not reduced? What will keep parents and visitors from coming to the campus and driving around the neighborhood to find parking?

Response to Comment No. 499-27

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

As part of Project Design Feature K-7 Archer would develop an Event Parking and Transportation Management Plan which shall include appropriate tools to manage and control traffic and parking for events. The Event Parking and Traffic Management Plan would include measures potentially including a parking reservation system to manage event vehicle trips and parking demands. Also refer to Mitigation Measure K-2. As discussed in Topical Response No. 16, Environmental Review and Conditional Use Permit Process, a new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including

conditions regarding the compatibility of the School's operations and its facilities with the surrounding neighborhood. In addition, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, as part of Project Design Feature K-1, the Project would include implementation of a comprehensive Traffic Management Program. To ensure implementation of the Traffic Management Program, the School shall continue to inform parents, students, faculty, and staff in writing on an annual basis of all rules regulating School traffic and parking, including no vehicle parking on residential streets.

Parking on the street and walking onto the site would be prohibited by requiring that persons walking onto the campus have a walking permit issued by Archer and check in with security upon arrival to the campus.

Comment No. 499-28

What will the effect be on traffic from the 30 days of summer school as well as the 24 days of outside use of the facilities? Did Archer's traffic study include an analysis of this significant increase in use from outside groups?

Response to Comment No. 499-28

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a detailed discussion of potential traffic impacts associated with proposed campus operations. Regarding summer school, as part of the Project, summer academic and camp programs are proposed to occur for up to six weeks when the academic year is not in session between the hours of 8:00 A.M. and 5:00 P.M. Monday through Friday. The number of students attending summer academic and camp programs will not exceed 350, which is less than the number that attend Archer when the academic year is in session. As described in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, all participants in the summer programs would arrive and depart on buses. There would be no parent drop-offs or pick-ups allowed at Archer or in the surrounding neighborhood. Trip generation associated with this use would be less than the typical school day during the academic year and traffic volumes are generally lower in the summer months compared to months when schools are in session. Thus, traffic impacts of the summer use would be less than significant.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Regarding filming, refer to Response to Comment No. 499-20.

Comment No. 499-29

As the analysis above shows, Archer's large-scale expansion plan will burden the neighborhood with increased traffic as more than 30,000 new visitors come to the campus on streets that are already congested and overly burden. How is this impact assessed if 2006 numbers were used for the traffic study?

Response to Comment No. 499-29

The transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, the City of Los Angeles 2006 CEQA Thresholds Guide, and LADOT Traffic Study Guidelines, which provide for evaluation of traffic impacts during peak hours on a daily basis. The comment refers to increased traffic related to more than 30,000 new visitors. Such a number is far larger than the amount of persons that would attend events on a given day.

Further, as discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, Year 2006 numbers were not used for the assessment of potential Project traffic impacts. CEQA Guidelines Section 15125(a) states that the physical environmental conditions in the vicinity of the Project as they exist at the time the notice of preparation is published "will normally constitute the baseline physical conditions." At certain times, however, it is not appropriate to use existing conditions as the baseline by which a Lead Agency determines the significance of impacts. As explained in the California Supreme Court's ruling *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal. 4th 439, 452, "[a]n agency may, where appropriate, adjust its existing conditions baseline to account for a major change in environmental conditions that is expected to occur before project implementation." Such an adjustment to the baseline is appropriate when "an analysis based on existing conditions would be uninformative or because it would be misleading to decision makers and the public." (*Neighbors for Smart Rail*, 57 Cal. 4th at 451.)

As discussed in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, construction of the I-405 Sepulveda Pass Improvement Project has temporarily increased congestion along the major east-west thoroughfares of Sunset Boulevard and

Wilshire Boulevard and has resulted in suppressed traffic volumes at intersections along these corridors. The Project is not anticipated to begin operations prior to completion of the I-405 Sepulveda Pass Improvement Project. The I-405 Sepulveda Pass Improvement Project is currently anticipated to be completed by the end of 2014. The heaviest periods of Project construction are not anticipated to begin until after completion of the I-405 Sepulveda Pass Improvement Project. Accordingly, an analysis of traffic impacts based on traffic counts taken while construction of the I-405 Sepulveda Pass Improvement Project is ongoing would be uninformative or potentially misleading to decision-makers and the public because the counts would be reflective of a temporary condition that would not exist when the Project starts the heaviest periods of construction or when the Project begins operation. Therefore, the Baseline Conditions scenario was developed in the Draft EIR to evaluate Project impacts against a baseline that does not include the existing, temporary, traffic congestion associated with construction of the I-405 Sepulveda Pass Improvement Project. An ambient growth rate of 1 percent per year was applied to 2006, 2008, and 2011 counts during the morning peak hour of 7:00 A.M. to 8:00 A.M. and afternoon peak hours of 3:00 P.M. to 4:00 P.M., 5:00 P.M. to 6:00 P.M., and 6:00 P.M. to 7:00 P.M. to represent 2012 baseline conditions. Applying a 1-percent per year growth rate is conservative because studies and available count data throughout the City indicate that minimal growth, i.e., less than 1 percent per year, has occurred in recent years due to the effects of the economic downturn from 2008 through 2012.

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

Comment No. 499-30

Does the traffic study reflect the increase in use from extended hours on Saturdays? If this use does not occur now, how did Archer measure it?

Response to Comment No. 499-30

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the traffic study evaluated the potential for project impacts associated with proposed Saturday afternoon events. See page IV.K-28 of the Draft EIR (describing level of service during Saturday afternoon events).

Comment No. 499-31

The effects on traffic from construction are not temporary.

For the last five years our community has had to endure the effects of the I-405 widening project—cars backed up on Sunset Boulevard for miles making it difficult to get to our homes and an increase in cars cutting through our neighborhood trying to avoid the congestion on Sunset Boulevard to get onto the 405 freeway. With Archer's overly ambitious Project, we would have to endure another six years of construction that would 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; Archer School Expansion. Not only is traffic increased because of road closures and lane reduction, but the insertion of thousands of slow moving construction vehicles into the flow of traffic. And what began as a temporary inconvenience becomes a permanent one as traffic patterns are forever altered as cars seek new ways (i.e. cutting through our neighborhood) to get to points east of the freeway.

The Brentwood community as well as the surrounding communities of Pacific Palisades and Westwood cannot sustain the impacts from Archer's proposed construction schedule. The DEIR states that Archer will build its Project over three phases (North Wing Renovation, Phase I—Construction of the underground parking structure and Multipurpose Facility, Phase II—Construction of the Performing Arts Center, Visual Arts Center and Aquatic Center) lasting 75 months. This translates into over six years of 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. This will result in significant impacts to the community from noise pollution, air pollution, and construction traffic.

The three phases of construction require adding 260,000 construction vehicle trips onto Sunset Boulevard and smaller residential. Over 10,000 large, double haul trucks will be required to excavate the property, which will slow traffic during non-peak hours and contribute to more congestion on Sunset Boulevard and significantly impact the intersection at Barrington Avenue at Sunset Boulevard.

Response to Comment No. 499-31

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion

regarding construction traffic. As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving in recent months as construction on the I-405/Sepulveda Pass project has neared completion, with the opening of the HOV lane on the northbound I-405 freeway and substantial completion of the I-405/Sunset Boulevard interchange modifications. It should also be noted that the highest level of Archer truck generation and impacts would be for relatively short periods during Phase 1 construction activities (e.g., Phase 1 excavation and haul, which is anticipated to occur over the summer months when Archer and other schools are not in session). Impacts at other times would be lower. Further, as described on page II-38 in Section II, Project Description, of the Draft EIR, the Project is proposed to be developed in phases to facilitate continued School operations and minimize disruptions to neighbors with access for haul trucks and equipment/material delivery trucks varying between the different phases of construction. Refer to Table IV.K-30 and Table IV.K-31 of the Draft EIR for a summary of the significant impacts during construction. The level of activity on the Project Site will vary throughout the construction periods. To be conservative, the analysis of the construction activities in the Draft EIR was conducted for the worst-case days within each construction phase. It is anticipated that the impacts would be lower throughout much of each phase than the worst-case identified in the Draft EIR.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. The Draft EIR includes mitigation measures to reduce the potential impacts of Project construction. These include development and implementation of a worksite traffic control plan (Mitigation Measure K-4), a construction Traffic Management Plan (Mitigation measure K-5), a construction Parking Management Plan (Mitigation Measure K-6), and a construction Pedestrian Routing Plan (Mitigation Measures K-7).

As discussed on pages IV.K-83 through IV.K-84 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR the preferred truck route for construction vehicles is Sunset Boulevard to the I-405 Freeway (Haul Route Option A). However, to provide for a contingency in the case of congestion, if necessary, additional truck routes could be used temporarily. These additional truck routes include: along Wilshire Boulevard to the I-405 Freeway via Barrington Avenue: one with and one without using San Vicente Boulevard (Haul Route Option B and Haul Route Option C, respectively) and accessing I-405 from Wilshire Boulevard, via westbound Sunset Boulevard to Kenter Avenue, Bundy Drive, and San Vicente Boulevard (Haul Route Option D).

Construction activities would also be scheduled to avoid peak traffic times. The Phase 1 excavation activities are anticipated to occur over the summer months when

Archer and other schools are not in session. In addition, as described on page IV.K-82 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, haul and equipment/material delivery trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.), Monday through Friday, and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize generating truck trips during the weekday P.M. peak hours.

The comment refers to 260,000 construction vehicle trips. Regarding the estimate of construction vehicle trips, the transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide, and the LADOT Traffic Study Guidelines, which provide for evaluation of traffic impacts during peak hours on a daily basis.

The Draft EIR considered the effects of related infrastructure improvements including traffic diversions due to the Wilshire Bus Rapid Transit Project. Refer to page IV.K-21 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. Regarding the pending California Incline reconstruction, since the California Incline primarily carries traffic destined to the downtown Santa Monica area, the primary effect of its temporary closure would be to divert traffic to Chautauqua/Channel and to Moomat Ahiko Way in Santa Monica, not to Sunset Boulevard in Brentwood. The traffic analysis also explicitly took into account traffic generated by known development projects in the Brentwood area and included a background growth factor to represent traffic generated by other growth outside of Brentwood but within the Westside. Refer to page IV.K-20 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR.

As described in Section IV.B, Air Quality, of the Draft EIR, and Topical Response No. 11, Overview of Construction Refinements, with incorporation of the mitigation measures in the Draft and Final EIR, Project-level and cumulative localized construction emissions and regional construction emissions would be reduced to a less than significant level.

Refer to Section IV.I, Noise, of the Draft EIR for a discussion of the noise impacts of construction activities. Also refer to Topical Response No. 6, Overview of Construction Traffic and Parking, regarding construction noise. Although, the construction period would be reduced, the noise impacts would be similar to the noise levels presented in the Draft EIR. As discussed on page IV.I-114 in Section IV.I, Noise, of the Draft EIR, Mitigation Measure I-1 provides for the design of a Construction Noise Management Plan to reduce noise impacts associated with Project construction. Nevertheless, consistent with the conclusions reached in the Draft EIR, even with implementation of mitigation measures,

noise impacts from on-site construction activities would be temporary and would remain significant and unavoidable.

Comment No. 499-32

The DEIR does not study how the project will be affected if they are unable to move the construction vehicles to and from campus on schedule. Given the gridlock and congestion of the area, how will the project be affected if it takes longer than the summer months to excavate? What happens if the proposed timing and staging of trucks to export the dirt is inaccurate? How will a delay affect traffic and the length of the project?

Response to Comment No. 499-32

As discussed on pages IV.K-83 through IV.K-84 of Section IV.K, Traffic, Access, and Parking, of the Draft EIR the preferred truck route for construction vehicles is Sunset Boulevard to the I-405 Freeway (Haul Route Option A). However, to provide for a contingency in the case of congestion, if necessary, additional truck routes could be used temporarily. These additional truck routes include: along Wilshire Boulevard to the I-405 Freeway via Barrington Avenue: one with and one without using San Vicente Boulevard (Haul Route Option B and Haul Route Option C, respectively) and accessing I-405 from Wilshire Boulevard, via westbound Sunset Boulevard to Kenter Avenue, Bundy Drive, and San Vicente Boulevard (Haul Route Option D).

Construction activities would also be scheduled to avoid peak traffic times. The Phase 1 excavation activities are anticipated to occur over the summer months when Archer and other schools are not in session. In addition, as described on page IV.K-82 of Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, haul and equipment/material delivery trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.), Monday through Friday, and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize generating truck trips during the weekday P.M. peak hours. Contingencies have been included in the construction schedule to account for typical environmental conditions that may halt or slow the excavation activities, such as traffic, rain, or excessive windy conditions.

Furthermore, as described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving since spring of 2014 as a result of construction on the I-405/Sepulveda Pass project nearing completion, the opening of the HOV lane on the northbound I-405 freeway, and substantial completion of the I-405/Sunset Boulevard interchange modifications.

Comment No. 499-33

How will the air pollution created by the trucks effect children if construction must be done during the school year?

Response to Comment No. 499-33

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

As stated on page 3-3 of the LST methodology, "The closest receptor distance on the mass rate LST lookup tables is 25 meters. It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."³⁶ Based on this guidance, sensitive receptors (e.g., adjacent residential uses and Archer's students) in close proximity to proposed construction activities were evaluated using the 25 meter mass rate LST lookup tables. As shown in Table IV.B-14 on page IV.B-62 of the Draft EIR, construction of the Project would not exceed SCAQMD localized thresholds (i.e., LST lookup values) with incorporation of mitigation measures. As a result, consistent with SCAQMD LST methodology, the Project would not cause an exceedance of the LST standards and no project-specific air quality modeling was required. Moreover, as provided in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, additional mitigation incorporated into the Final EIR would further reduce Project construction emissions related to regional and localized impacts.

Comment No. 499-34

How will the large trucks carrying thousands of cubic feet of dirt exit onto Chaparal and Sunset? What will the impact on traffic and queuing on Barrington be with one truck waiting to turn right onto Barrington from Chaparal?

³⁶ SCAQMD. *Final Localized Significance Threshold Methodology*, June 2003, Revised July 2008. Available at www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2; accessed August 2014.

Response to Comment No. 499-34

Construction trucks will be able to turn onto Sunset Boulevard. As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. Mitigation Measure K-5 requires development and implementation of a construction Traffic Management Plan. Among other things, the mitigation measure requires that flaggers be used to control trucks moving into and out of the Project Site. Exiting trucks would be able to utilize the existing center left-turn lane that is present on Sunset Boulevard in front of the Archer campus while westbound flows on Sunset Boulevard are stopped by the upstream traffic signal at the Sunset Boulevard/Barrington Avenue intersection. As described on page IV.K-82 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the haul and equipment/material delivery trips on weekdays would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) Monday through Friday and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize impacts during the weekday P.M. commute peak period and facilitate turning movements into and out of the Project site at the Sunset Boulevard driveways.

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

The intersection of Barrington Avenue and Chaparal Street is controlled by a stop sign on Chaparal Street. A truck waiting to turn right onto Barrington Avenue from Chaparal Street would not substantially affect traffic and queuing on Barrington Avenue since the truck would need to wait for a gap in traffic on Barrington Avenue before making the turn.

Comment No. 499-35

Will large construction trucks be able to turn onto Sunset? Where will the construction workers park and how will their car trips to the construction site affect traffic? How will Archer compensate the residents for potential damage to their residences due to months of excavation?

Response to Comment No. 499-35

Refer to Response to Comment No. 499-34.

Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, regarding construction traffic and parking. As described therein, revised Mitigation Measure K-6 requires the preparation of a construction-period parking plan. Refer to Topical Response No. 8, Summary of Impacts from Parking Structure, regarding excavation activities associated with the underground parking structure. In addition, refer to pages IV.I-62 and IV.I-64 in Section IV.I, Noise, of the Draft EIR for a discussion of on-site construction vibration impacts associated with potential building damage. As noted therein, with implementation of Project Design Feature I-1, which provides that pile drivers and vibratory rollers shall not be used during construction and requires that the use of large bulldozers and hoe rams occur a minimum of 15 feet from the nearest off-site building, vibration impacts associated with potential building damage during on-site construction activities would be less than significant.

Comment No. 499-36

Archer proposes placing temporary classrooms on the athletic field. How many will be required? If there are delays in the project, how long must the proximate neighbors be affected by the noise from these classrooms?

Response to Comment No. 499-36

As discussed on page II-20 of Section II, Project Description, of the Draft EIR, during the timeframe that the North Wing Renovation occurs, as part of the Project a Temporary Classroom Village is proposed to be installed on the athletic field that would comprise temporary modular buildings to accommodate classrooms, a dance studio, offices, and

changing rooms to be used for classroom functions. The Temporary Classroom Village would include approximately 15 temporary modular classroom structures with two rooms each (totaling 30 classrooms) and two ancillary restroom structures that would be approximately 14 feet in height. The temporary modular classroom structures would be set back approximately 50 feet away from the western property boundary and would be placed as close to the westerly surface parking lot as practical.

Construction of the North Wing Renovation is anticipated to take 14 months, and once construction is completed, the Temporary Classroom Village would be removed and these activities would return to the North Wing.

As discussed on pages IV.I-54 through IV.I-55 of Section IV.I, Noise, of the Draft EIR, the analysis of the noise associated with the Temporary Classroom Village determined that the estimated noise levels associated with use of the Temporary Classroom Village would not exceed the significance threshold, and noise impacts from the Temporary Classroom Village would be less than significant.

Comment No. 499-37

Throwing out the existing Conditional Use Permit will set a dangerous precedent and is not acceptable.

We live in close proximity to eight educational institutions within a short two miles of our house. We know first hand the impact of traffic and noise from the schools' operational use and the importance of Conditional Use Permits. One need look no further than a few weeks ago during Spring Break when there was an enormous decrease in traffic, noise and other disruptions because the private schools were not in session.

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 on a small parcel of land situated in a densely populated residential neighborhood.

The continued expansion of private schools at the expense of the residential neighborhoods in which they operate is not "smart" development. 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.

If approved, Archer's 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 is meant to balance the needs of the residents with the needs of the school. There is a certain level of trust since it is very difficult for neighbors to force hearings about CUP compliance. If Archer succeeds in changing the majority of its original conditions, it will set a dangerous precedent for all schools that operate within 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, 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 is currently not allowed in the current CUP. It would set a dangerous precedent if a School can merely discard a CUP by proposing a new one that totally disregards the original protections.

Response to Comment No. 499-37

In reference to the CUP process, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A CUP is a discretionary approval issued after environmental review and a public process. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

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

Comment No. 499-38**III. ALTERNATIVE**

The only logical way to mitigate the impacts of Archer's plan is to build a more reasonable plan.

The neighbors, understandably so based on Archer's past actions, have no faith that the compromises reached initially will not be unwound in future years. The only way to protect the neighborhood from Archer's massive plan that will seriously erode the quality of life in the area is to reduce the size of the expansion physically and operationally.

Given the significant impacts of Archer's plan, as outlined in the DEIR, we support an alternative project that balances the needs of the community with the needs of the school. Specifically, we support Alternative 4 Option B (Reduced Program within Existing Campus Boundary, No Aquatic Center) with the following modifications:

- Increase the current size of the school by adding two new buildings, not four, including one gym underground and a 300-seat Performing Arts Center;
- Renovate the North Wing;
- Eliminate the Visual Arts Center;
- 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;
- Continue to use the two residences adjacent to the school as residences;
- Add more landscaping on the northern and western property lines to provide an attractive buffer between the school and residences;
- Maintain the softball field's current orientation of northwest;
- Increase the set back of the building placed adjacent to Chaparal Street;
- Maintain the number of special events at the current level permitted in the Conditional Use Permit, which as set forth in the DEIR's analysis of Alternative 2, reduces impacts to traffic to a level less than significant after mitigation;
- 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;
- No outside use of the facilities for rental or lease, as required by the current Conditional Use Permit, which would eliminate and/or reduce noise, aesthetic and traffic impacts;
- Improve the school's facilities with only one phase of construction lasting three years;
- Build an underground parking structure that could accommodate 160 cars;
- Design direct access from the parking to the campus buildings;
- Eliminate the North Garden to reduce the noise impact;
- Maintain the current condition of no filming on campus.

Response to Comment No. 499-38

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

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

Regarding designing direct access from the parking lot to the campus buildings, as described on pages IV.I-84 and IV.I-85 of Section IV.I, Noise, of the Draft EIR, pedestrians currently use Archer's pedestrian pathways and access routes prior to and after Interscholastic Athletic Activities or School Functions. As part of the Project, new pedestrian pathways and access routes would be provided to access the Multipurpose Facility, the Visual Arts Center, the Aquatics Center, the Performing Arts Center, and the underground parking structure. Pedestrians may talk in these areas prior to and after Interscholastic Athletic Activities or School Functions. As detailed in Topical Response No. 4, Additional Measures to Reduce Noise, the Draft EIR conducted an analysis of potential noise impacts due to talking on the pedestrian pathways and access routes and demonstrated that the noise associated with people talking would be less than significant. While the Draft EIR determined that there would be less than significant impacts associated

with use of the outdoor pedestrian pathways and access routes, in response to comments on the Draft EIR, the Project would include mandatory use of the underground pedestrian pathway, which runs from the underground parking garage to the Multipurpose Facility and the Performing Arts Center, after 8:00 P.M. Mandatory use of the underground pedestrian pathway would further reduce the incidence of noise in the community.

Regarding filming, refer to Response to Comment No. 499-20. Regarding the continued use of the residences as residences, as described on page III-1 in Section III, Environmental Setting, of the Draft EIR, the Project Site includes two residential parcels adjacent to the east of the campus. The residence on the Chaparal Parcel, located at 11728 West Chaparal Street, was renovated in 2008 to house the Head of School. The residence on the Barrington Parcel, located at 141 North Barrington Avenue, is vacant. Refer to Topical Response No. 13, Use of Existing Residential Properties.

Comment No. 499-39

Alternative 4-B has reduced impacts over the Project and the other alternatives in almost every area evaluated in the DEIR. With the modifications set forth above, the impacts are further reduced and Archer can meet nearly all of its objectives. This alternative would provide Archer with the following:

- Modern classrooms
- Regulation Athletic Field and Gym
- Performing Arts Center
- Gathering and meeting spaces
- Flexibility

Response to Comment No. 499-39

As summarized on page V-140 of Section V, Alternatives, of the Draft EIR, while Alternative 4, the Reduced Program within Existing Campus Boundary Alternative, would reduce the greatest number of Project impacts, all of the Project's significant and unavoidable impacts would remain under Alternative 4. However, Alternative 5, the Reduced Excavation, Export, and Program Alternative, would eliminate the Project-level and cumulative significant impacts with respect to regional air quality during construction. As such, Alternative 5 was identified as the environmentally superior alternative.

Comment No. 499-40

Two buildings. not four. would allow Archer to accommodate the majority of its athletic program.

A gym of approximately 21,000 to 25,000 square feet placed underground would allow Archer to host volleyball and basketball games on campus for multiple teams. A gym of this size would allow for ancillary uses like locker rooms, training rooms, yoga studio, offices and would fit multiple volleyball courts and a full size high school basketball court. Practices and games would be staggered at the gym, which would help alleviate traffic impacts. In addition, with seating for over 600 with telescoping bleachers and movable folding chairs the entire school could assemble in the gym. This gym would be twice as large as the proposed gym in the current CUP.

Placing a 17,000 square foot Performing Arts Center above the underground gym that would hold 300 people and provide a dedicated space for the performing arts would give Archer a state of the art facility for performances as well as an additional meeting area for half of the school. The building would be positioned so its doors open toward the main building (south), which is in keeping with the original placement of the gym in the CUP that states:

No doors shall be oriented to the north, east or west unless required by law, and then, only for emergencies or deliveries. All windows shall be double-glazed. Windows and door shall remain closed whenever there is active use (except door may be used for entry/exit purposes).

In addition, this building would be setback further than 25 feet from the property line in recognition of the current 75-foot setback requirement. The setback would depend on the design of the building. In addition, the North Wing would be renovated, adding 9,000 square feet of new classroom and meeting space

These physical improvements would increase the physical plant size of Archer's campus to 135,178 square feet. The total additional square feet of 51,000 vs. the 12,000 granted in the current CUP, would be a 61% increase over the current physical plant.

Response to Comment No. 499-40

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project. Specifically, the

Project includes reducing the square footage and massing, width, and length of some of the proposed buildings; reducing the number of parking spaces; and creating expanded landscape buffers. Overall, the Project's net new floor area would be reduced from 75,930 square feet to 68,989 square feet.

Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. As described therein, the Project has been designed to be consistent with adjacent residential development, to shield neighbors from internal campus activities and noise, and to be cognizant of the boundaries between the Project Site and adjacent residential lots. Further, the Project has been designed to substantially comply with residential front yard and side yard requirements.

Comment No. 499-41

Archer should Expand and renovate the campus within the current footprint of the school. thus preserving the two residences.

By keeping the houses, Archer would maintain the residential quality of the neighborhood, create a needed buffer between the neighbors and the institutional use of the school and still have enough room to add 51,000 square feet of buildings. Leaving structures between the campus and residences will help mitigate noise in a way that landscaping alone cannot.

Response to Comment No. 499-41

Refer to Response to Comment No. 499-40 above. In addition, as described in Topical Response No. 13, Use of Existing Residential Properties, school uses are permitted in the RE and R3 zones with a CUP. As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project would include additional measures to reduce noise associated with campus operations.

Comment No. 499-42

Not building the aquatic center or visual art center will NOT significantly impact Archer's operations.

Of the 22 sports team proposed to compete on campus, eliminating swimming and water polo would mean 19 teams could use the school's facilities. Soccer, volleyball, basketball, softball, and field hockey would now all take place on campus. Swimming and tennis would not. Even without the aquatic center, Archer would be increasing the number of

days of competition on campus from 39 to 116. (See Chart 6) Eliminating the aquatic center does not have a Significant impact on Archer's sports program. They would still field swimming teams, but they would occur off campus. As noted on page 6 of this letter, many schools use outside facilities to accommodate their teams.

Chart 6. Athletic Competition Analysis

	# of teams	Days of Competition	Total Visitors
Currently played on campus	7	39	1,332
Total allowed to play on campus	11	73	3,204
Proposed with Aquatics Center	22	145	6,848
Proposed without Aquatics Center	19	116	5,436

The classrooms and gallery space of the Visual Arts Center could be incorporated into the North Wing Renovation as well as the Performing Arts Center. The lobby of the Performing Arts Center could be used as a gallery to display art.

Response to Comment No. 499-42

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer, which proposed eliminating the Aquatics Center and Visual Arts Center. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

With respect to off-site athletics, with implementation of the Project, Archer would continue to host certain athletic team practices and competitions off-site. In particular, Middle School and Upper School equestrian, tennis, beach volleyball, cross-country, and track practices and/or competitions would remain off-site.

Refer to Appendix B-1, Interscholastic Athletic Program, of the Draft EIR for an overview of Archer's interscholastic athletic program. With the exception of the Aquatics Center, the existing CUP authorizes all of these proposed competitions on campus.

Comment No. 499-43

A reduction in underground parking from 212 to 160 would still meet Archer's needs.

Reducing the underground parking spaces would allow Archer to put ancillary uses they need off the gym underground and still give them enough parking. 160 parking spaces would accommodate Archer's daily parking demands of 143 and still leave spaces for visitors due to functions such as trustee meetings. 160 parking spaces would mean a 50% increase over the 109 Archer has now. Archer's current practice under the existing CUP is to utilize off campus parking lots for larger events. This practice is successful and should continue. In addition, 59 of Archer's proposed events, for up to 200 guests, who would be able to park on site in the 160 parking spaces (220 expanded for attendant parking).

Response to Comment No. 499-43

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

A reduced parking alternative, such as Alternative 5 would satisfy parking requirements for a non-event school day. On days when Archer has an interscholastic athletic competition or school function, a reduced parking alternative would generate the same amount of parking demand as the Project. On days with 300-attendee events with arrivals between the hours of 3:00 P.M. and 4:00 P.M., and then another 300-attendee event with arrivals between 6:00 P.M. and 7:00 P.M. in the evening, a peak parking demand of 263 spaces at 4:00 P.M. is estimated. On event days with up to 650-attendee event with arrivals between 6:00 P.M. and 7:00 P.M. in the evening, a peak parking demand of 434 spaces was estimated at 7:00 P.M. Alternative 5 would allow for up to 160 spaces on non-event school days. This supply could be expanded to 196 spaces with use of attendants on event-days. Therefore, with the reduced on-site parking, Alternative 5 would require Archer to use off-site parking facilities to a greater degree than the Project.

Comment No. 499-44

The North Garden would be eliminated because of the new physical layout, which would mitigate the significant noise impact.

Visitors would enter the gym directly from the parking garage underground. With just one building above level to access, majority of ingress and egress to the performing arts center can be through an internal staircase to the building.

The soccer field could still be expanded and moved even further away from the western property line so more landscape buffers can be added. The softball diamond would remain in its current location, oriented northwest rather than northeast. Eliminating the north garden would mitigate outdoor noise, which the current CUP acknowledges is a concern for the neighbors.

Response to Comment No. 499-44

Regarding noise from pedestrian pathways or the North Garden, refer to Response to Comment No. 499-14.

As described in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments, the Project shifted the athletic field approximately 7 feet 6 inches to the east. Shifting the athletic field would move the athletic field as far away as possible from the neighbors to the west of the campus property boundary while still maintaining regulation size soccer and softball fields. This expanded setback would allow for an enhanced landscape buffer along the western property boundary of the campus. Further, in response to comments on the Draft EIR, the Project proposes to maintain the softball field in its existing northwest orientation and located in the southeast corner of the athletic field to reduce the Project's significant impact from softball activities on weekdays from 3:00 P.M. to 6:00 P.M. to a level that is less than significant with mitigation.

Comment No. 499-45

This alternative would mitigate impacts from construction by building the project in one phase lasting three years.

By reducing the number of buildings, Archer could finish the project in one phase. Based on Archer's construction schedule, the renovation of the North Wing would last 14 months. With only two buildings to construct of approximately 40,000 square feet (the size of the proposed Multipurpose Facility) construction could be completed in an additional two years.

Response to Comment No. 499-45

As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 499-46

Archer should maintain its current use of its facilities, which is appropriate for the neighborhood in which it operates.

The proposed increase in operational hours and days as well as the number of special events and outside use should not be allowed. The current condition of no lights on the athletic field should be maintained as well as no Saturday use of the athletic field. Large interscholastic tournaments are not right for this location and therefore should not be scheduled for the gym or athletic field, especially on the weekends.

Response to Comment No. 499-46

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation and additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, including eliminating Interscholastic Athletic Tournaments, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Regarding lighting, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the proposed athletic field lighting has been removed from the Project.

Comment No. 499-47

There should be no outside use of the School's facilities for rental or lease; no filming; no summer school and no community use.

One of the major concerns of residents in the original CUP and at every Plan Approval has been outside use of the school. 30 days of summer school plus 48 days of outside use and rental means an additional 78 days of use for non school-related activities. This extended use is not essential to the School's operations. Rather it imposes an unnecessary burden to the proximate neighbors who would have less time to enjoy the peace and quiet of their residential neighborhood.

The current CUP allows for no outside use at all except for one day every five years for LA Conservancy. We support maintaining the current conditions of the CUP, which states:

The current CUP expressly states rental or lease of the facilities is not permitted. [The term "rental of the facilities" is not dependent upon the payment of a fee. The use by homeowner and civic groups or an

athletic contest not including an Archer Team, for example, is not permitted.]

Rental or lease of the property for filming shall not be permitted at any time.

Response to Comment No. 499-47

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on Project operations are proposed, including eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Refer to Topical Response No. 1, Refinements to Proposed Operations, for a discussion of the proposed summer academic and camp programs.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, the Project proposes additional restrictions on filming. Also refer to Response to Comment No. 499-20.

Comment No. 499-48

We support the current restriction of no amplified music outside or loud non-amplified music outside.

Response to Comment No. 499-48

As detailed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, the Project has been refined to eliminate the previous proposal for use of a non-permanent audio system for public address and amplified music in conjunction with Instruction, Interscholastic Athletic Competitions, and School Functions. Archer would continue to use a non-permanent audio system for use during graduation as permitted under Archer's existing CUP.

Comment No. 499-49

For the reasons stated above, the DEIR is deficient and fails to analyze all of the potentially significant impacts of the Project.

Response to Comment No. 499-49

The Draft EIR for the Project was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide. In accordance

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

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

Comment No. 499-50

Appendix A—Complaints from Archer’s Call/Email log as Outlined in the 2013 CUP

Page 29 of the July 29, 2013 determination letter by Zoning Administrator Sue Chang lists the following complaints received by the school:

- **too much water from sprinklers on Chaparal Street,**
- **AC units cycling on and off at night,**
- **talking loudly in the parking lot,**
- **loud music on the weekend before 7 a.m.,**
- **fire alarm going off during the night,**
- **students being picked up across the street from school,**

- students being dropped off at Barrington Court,
- girls screaming during the day,
- students and parents parking on residential streets,
- neighbors playing soccer on the field,
- inconsiderate drivers driving in an unsafe and reckless manner,
- mattresses being left by the west entrance gate,
- brown patches on the lawn,
- playing music on their phone during lunch,
- girls sitting by the neighbor's window having lunch,
- blasting music on the weekend,
- noise and overgrown trees from the easterly adjoining property,
- a light left on in the building,
- class being held outside after 8 a.m. and the level of noise,
- the metal manhole covers in the east driveway making loud noise when drivers drove over them,
- girls littering on Barrington Avenue.

In addition the ZA notes the following:

- The neighbors have been concerned about the use of and lack of landscape around the school owned property at 141 North Barrington Avenue. Until the hearing for the subject application had been scheduled, the school has not maintained the property well resulting in a blighting appearance.
- The single-family dwelling at 141 North Barrington has been vacant and such a vacant appearance may cause health and safety issues to the surrounding neighbors.

Response to Comment No. 499-50

This comment transmits Appendix A of the commenter's letter. This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed

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

Comment No. 499-51

Appendix B—View from North Side of Chaparal Street Looking at Back Lot of Archer

Appendix B—View from North Side of Chaparal Street Looking at Back Lot of Archer



Appendix B—View from North Side of Chaparral Street Looking at Back Lot of Archer

**Response to Comment No. 499-51**

This comment transmits Appendix B of the commenter's letter. This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 500

Kate Webster
11676 Chenault St., No. 9
Los Angeles, CA 90049

Comment No. 500-1

As an Archer graduate and current Brentwood resident, I am voicing my support for Archer Forward, the Archer School for Girls' campus improvement plan.

For me, as for so many of Archer's alumnae, this campus is more than a school—Archer uses the channels of math, science, English, and history, among numerous interdisciplinary explorations, to guide girls on the path of genuine intellectual curiosity that extends beyond the walls of Archer into the community and the world.

It is for this reason that I support extending our beloved walls to include a gymnasium, a performing and visual arts center, and an aquatics center. Only good can come from expanding the fertile ground that produces the community of confident female leaders that are Archer's students.

I hope you will support this plan.

Response to Comment No. 500-1

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

Comment Letter No. 501

Jill Weinstein
11919 Currituck Dr.
Los Angeles, CA 90049

Comment No. 501-1

As an Archer parent and CD 11 resident I support Archer and their campus plan. Archer Forward is an important step forward for the only secular girls' school in West Los Angeles. I hope that both you and Councilmember Bonin will support this crucial project and help it move forward as quickly as possible.

Archer has been an excellent neighbor since moving to Brentwood in 1998. It has gone above and beyond what was required in compliance with the City's mandates, as shown by the excellent reports during its plan approvals. As a parent at the school, I can attest to the importance Archer leadership places on ensuring that we comply with the traffic management program—which is designed to reduce any burden on the neighbors.

There is no way around it. The Archer Forward plan is simply critical for the School. The girls need spaces where they can compete and perform as well as enjoy the outdoors. The current campus has no gym, no regulation-sized playing fields and inadequate performing and visual arts spaces. Nearly all other independent and public schools have these, or have the ability to build them under their CUP's. Archer is at a severe disadvantage without the ability to provide these things for its hardworking students who deserve the facilities to pursue their passions.

I hope that the City and the Councilman will support this plan and move it quickly through the review process. Thank you.

Response to Comment No. 501-1

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

Comment Letter No. 502

Fredda Weiss
Box 49655
200 S. Barrington Ave.
Los Angeles, CA 90049

Comment No. 502-1

The impact of the Archer Forward Plan as proposed would be a nightmare for residents and business owners as far west as Pacific Palisades, East to Beverly Hills and South to Santa Monica Blvd. The plan reveals no regard for the quality of life that has brought, and brings, people to live on the West side for decades. The impact on traffic flow (already horribly congested) would become untenable, air quality would be negatively impacted—even the noise factor would be unbearably increased.

I have lived in Mandeville Canyon for 40 years. I have seen the environment in the entire area from Sunset to Santa Monica Blvd. and Pacific Palisades to the 405 “morph” from a sleepy hamlet (still rural in feeling) to a bustling, traffic-clogged, highly commercial neighborhood that is very close to driving current residents away and decreasing property values considerably. There is absolutely NO WAY that this plan’s impact could benefit either the residents or the remaining small commercial businesses around Barrington Place, San Vicente and Montana Avenues. The environment, as well as the “ethos” of this area, which has already suffered, would collapse—and with them—property values.

This plan is a classic recipe for the degeneration of a once stable, hospitable and delightful neighborhood. Please make sure that it doesn’t pass in any form that would impact the Brentwood and Pacific Palisades areas negatively. It is an arrogant and “care”less plan!

Response to Comment No. 502-1

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving in recent months as construction on the I-405/Sepulveda Pass project has neared completion,

with the opening of the HOV lane on the northbound I-405 freeway and substantial completion of the I-405/Sunset Boulevard interchange modifications. Refer to Section IV.B, Air Quality, of the Draft EIR for the analysis of Project air quality impacts. As discussed therein, air quality impacts from Project operational emissions would be less than significant.

As discussed on pages IV.I-110 through IV.I-111 in Section IV.I, Noise, of the Draft EIR, off-site traffic noise impacts associated with the Project would be less than significant. Refer to Topical Response No. 4, Additional Measures to Reduce Noise, for a description of additional mitigation measures proposed to be implemented to reduce noise associated with campus operations.

Comment Letter No. 503

John Weissenbach
12824 Evanston St.
Los Angeles, CA 90049

Comment No. 503-1

Traffic on Sunset Boulevard west of the 405 is already unacceptable, particularly eastbound on weekday afternoons. Consequently, I urge you to oppose the proposed expansion of Archer School, which undoubtedly would exacerbate the problem significantly.

From what I know, Archer School is a fine institution. But it is relatively new to the area, and certainly understood the local conditions, including traffic issues in its immediate vicinity, when it commenced operations at that location. If the school wants to expand, it should move to a different location.

Response to Comment No. 503-1

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project.

Comment Letter No. 504

Candace and Barry Weisz
aceweisz@gmail.com

Comment No. 504-1

We are opposed to ANY permits allowing an increase in parking, hours of operations (incl. weekends), additional construction and extracurricular activities. The way it is, we avoid travel on Sunset Blvd., traveling east from Bundy to Church, after 2:30pm, Monday through Friday, as our 3 mile/10 minute commute becomes a nightmarish 45–60 minute ordeal. This situation has drastically and forever changed our work, social and casual commute throughout the city. We feel like we are slaves of the schools' schedules already. It is shocking that Archer was allowed to join the Brentwood community in the first place.

Thank you for your consideration.

Response to Comment No. 504-1

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

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Also refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Comment Letter No. 505

Angela Weltman, Ph.D.
14376 Millbrook Dr.
Sherman Oaks, CA 91423

Comment No. 505-1

My name is Angela Weltman. My husband, Josh, and I send our 15-year-old daughter, Gabriella, to the Archer School for Girls. We love the school. Gabriella is getting a wonderful academic education. And the school has helped her become a strong and independent young lady who feels confident in her ability to make the world a better place. With the school stressing empowerment and confidence through embracing and overcoming challenges, I'm sure many leaders of tomorrow are at Archer today.

I am writing this letter to let you know that we strongly believe the Archer Forward plan is essential for the future of Archer and girls' education in Los Angeles. Archer is doing great things for our girls, and thus for our community. The school prides itself on being very modern and avant garde in its thinking, and very social and responsible in its actions. The facilities of Archer should live up to Archer's standards too. The school needs modern classrooms, athletic facilities, and spaces for performing and visual arts. These are all facilities that other independent and public schools have.

We hope you will support the Archer Forward Plan, and this gem in Los Angeles, the Archer School for Girls.

Response to Comment No. 505-1

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

Comment Letter No. 506

John Whitesell
11706 Chaparal St.
Los Angeles, CA 90049

Comment No. 506-1

Attached you will find my comments on the Draft DEIR for the Archer School project. I have dropped a hard copy in the mail but wanted to make sure that your office received the letter before the deadline. I look forward to the responses to my comments.

Response to Comment No. 506-1

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

Comment No. 506-2

I am writing to inform you of my objections to the Archer School 's [sic] plan to double its size by adding four buildings and almost a new 100,000 square feet. I have looked over the DEIR and see many major problems, and no real solutions proposed. I feel that the Archer School has not truly considered the impact of their plan on the neighbors. First let me introduce myself, my name is John Whitesell. Along with my wife Jolie and my daughters, Juliette and Abigail, we live at 11706 Chaparal St. Which [sic] is the on the corner of Barrington and Chaparal. I have lived here for a little over 14 years. We love the neighborhood and our family has really enjoyed living here. When I decided to purchase this house I was concerned about what the Archer School effect would be on traffic and the neighborhood. I made ten or more trips to the area and observed traffic and noise and was convinced that there was very little impact, so I bought the house. However, two things now concern me greatly. Traffic and the fact that the Archer School wants to double its physical size, and build a huge swimming pool behind my house.

Response to Comment No. 506-2

As described in Section II, Project Description, of the Draft EIR, the Project's net new floor area would encompass approximately 75,930 square feet. As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the proposed buildings, a reduction in the number of seats within the Performing Arts Center, a reduction in the number of events and athletic

activities, and a reduction in the number of parking spaces. Overall, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet. Also refer to Topical Response No. 13, Use of Existing Residential Properties, for a discussion of the use of residential properties for school uses, including the proposed Aquatics Center.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to below a level of significance.

With regard to noise, as described on page II-27 of Section II, Project Description, of the Draft EIR, the buildings would be designed to shield neighbors from internal campus activities and noise, including having no operable windows that open on the sides of buildings directly adjacent to Chaparal Street and Barrington Avenue. In addition, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant noise impacts of the Project. With implementation of such mitigation measures, noise impacts associated with use of the athletic field for athletic activities on weekdays and use of the Aquatics Center would be reduced to below a level of significance.

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

Comment No. 506-3

During the ongoing construction of the 405 for the last five years traffic has become a nightmare. Between 4 and 7 pm it will often take over 25 minutes to get to Sunset, which is only 700 feet away! Often I can't turn into my own driveway because traffic is blocking it. To leave or the return to my home from 4 to 7pm can often take over 30 minutes. We all live with the hope that this will get better once the 405 is finally done, but I know it will never go back to the way it was six years ago. After looking at DEIR I am shocked and upset that The Archer School proposed project that [sic] will make the current traffic situation even worse. What baffles me is that after Archer read their own study and seeing that they are going to create a significant impact on the two most important intersections that cause the traffic to back up on Sunset Blvd, is that they think it's fine to continue with an overreaching plan. This alone should have made them go back to the drawing board and reduce the scope of the project. What this shows is that their desire to get what they want is more important than the good of the community.

Response to Comment No. 506-3

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparral Street. Although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to \$15,000 toward the development and implementation of a traffic calming plan for Chaparral Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 506-4

It is important to keep in mind that the half-mile of Sunset Blvd from Saltair to Barrington Pl. services SEVEN schools. Brentwood Lower, St Martin of Tours, University Synagogue Dayschool, Sunshine, Archer, Mount St Mary's, and Brentwood Upper School. If any neighborhood has supported schools it has been this one. We had all six schools here when Archer chose to move here despite the restrictions that were put in place.

I want to say that I do admire the Archer School. I think they provide a great education to their young women; many have done very well in college and in the work force. What is amazing is that they have been doing it for the last 15-years, and without building a gym that was approved in the current CUP. What now has changed is that they now require tearing down two residential homes, and adding almost 100,000 square feet to the physical plant! All at the neighbors [sic] expense. The DEIR projects 266,000 construction trips over the project. This reminds me of another famous project called the Big Dig in Boston. That only took 20 extra years to complete. I believe that the six and half year construction plan will not be met and will require the neighbors and the community to live with construction for 7–8 years. All this construction so they can have a swimming pool that they claim they will not use for swim meets. A Visual Arts Building, a 650-seat performing arts center, and don't forget a second gym. I realize they would like to have it all, but what you have to decide is if all this is worth the pain and suffering it will inflict on the quality of life for the neighbors and community. Which leads me to my first question.

Response to Comment No. 506-4

Refer to Response to Comment No. 506-2. In addition, as discussed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, the size of the Performing Arts Center has been reduced to accommodate a maximum of 395 seats.

As discussed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years.

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

Comment No. 506-5

When Archer wanted to move into the neighborhood there were many concerns and the current CUP was worked out. It allowed for a 12,000 sq. foot gym, which has never been built. The school also bought two houses that it now wants to tear down to expand. Which was never brought up during the negotiations of the CUP.

Question 1: Did the Archer School have a long-range plan to expand and modify CUP that it negotiated?

Question 2. Why does Archer feel that having 266,000 construction trips will not be a burden to the community?

Response to Comment No. 506-5

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. Refer to page I-19 of Section I, Executive Summary, of the Draft EIR and Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, for a discussion of the public review process for the Project. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

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

Refer to Section IV.K, Traffic, Access, and Parking, of the Draft EIR and Topical Response No. 6, Overview of Construction Traffic and Parking, for an analysis of the potential construction traffic impacts during Project construction and proposed mitigation measures.

Comment No. 506-6

Question 3. What, if any, concern has been given to the effect that the 266,000 construction trips will have on the roads, and the dust and dirt to the houses in the neighborhood?

Question 4. We already have an F intersection at Barrington and Sunset. The report below shows that construction phase (6–8 years) will add to the traffic and make it worse. Why does the Archer School feel that is acceptable? Please note section from DEIR below.

Response to Comment No. 506-6

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic. As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving in recent months as construction on the I-405/Sepulveda Pass project has neared completion, with the opening of the HOV lane on the northbound I-405 freeway and substantial completion of the I-405/Sunset Boulevard interchange modifications. It should also be noted that the highest level of Archer truck generation and impacts would be for relatively short periods during Phase 1 construction activities (e.g., Phase 1 excavation and haul, which is anticipated to occur over the summer months when Archer and other schools are not in session). Impacts at other times would be lower. Further, as described on page II-38 in Section II, Project Description, of the Draft EIR, the Project is proposed to be developed in phases to facilitate continued School operations and minimize disruptions to neighbors with access for haul trucks and equipment/material delivery trucks varying between the different phases of construction. Refer to Table IV.K-30 and Table IV.K-31 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR for a summary of the significant impacts during construction. The level of activity on the Project Site will vary throughout the

construction periods. To be conservative, the analysis of the construction activities in the Draft EIR was conducted for the worst-case days within each construction phase. It is anticipated that the Project's impacts would be lower throughout much of each phase than the worst-case identified in the Draft EIR.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. The mitigation measures to reduce the potential impacts of Project construction include development and implementation of a worksite traffic control plan (Mitigation Measure K-4), a construction Traffic Management Plan (Mitigation measure K-5), a construction Parking Management Plan (Mitigation Measure K-6), and a construction Pedestrian Routing Plan (Mitigation Measures K-7),

As discussed on page IV.K-82 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the haul and equipment/material delivery trips on weekdays would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) Monday through Friday and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize impacts during the weekday P.M. commute peak period.

In regard to dirt and dust, in accordance with South Coast Air Quality Management District Rule 403 as set forth in Regulatory Compliance Measure B-1 on page IV.B-32 in Section IV.B, Air Quality, of the Draft EIR, the Project shall incorporate measures to control fugitive dust, which may include watering, street sweeping, installation of wheel washers, covering of haul trucks, suspending earthmoving operations if wind gusts exceed 25 miles per hour, and installing an information sign at the entrance of the construction site that provides a telephone number to report complaints regarding excessive fugitive dust generation.

Comment No. 506-7

f. Construction Impacts

While implementation of Mitigation Measures K-4 through K-14 would serve to Reduce construction-related traffic impacts, the Project's construction-related traffic impacts would not be eliminated and would remain at the following intersections:

5. Barrington Avenue & Sunset Boulevard (A.M. and afternoon peak hours)
6. Barrington Place & Sunset Boulevard (afternoon peak hour and from 6:00 P.M. To 7:00 P.M.)

- 8. Church Lane & Sunset Boulevard (A.M. peak hour)
- 12. San Vicente Boulevard & Montana Avenue (under Haul Route Option D—Bundy—San Vicente—Wilshire only)
- 14. Barrington Avenue & San Vicente Boulevard (under Haul Route Option C—Barrington—Wilshire only)
- 15. Barrington Avenue & Wilshire Boulevard (under Haul Route Option Barrington—Wilshire only)
- 16. San Vicente Boulevard/Federal Avenue & Wilshire Boulevard

Response to Comment No. 506-7

Refer to Response to Comment No. 506-6.

Comment No. 506-8

Question 5. Below taken from [sic] the DEIR is the significant impacts after all mitigation. Both of these intersections are failed at these times. Now you're going to add more Significant Impact to already Failed intersections. Why is this ok? Why doesn't that automatically make the Archer plan not feasible?

The Project, after mitigation, is forecasted to result in two residual significant Impacts during the P.M. peak hour. The impacted locations are:

Intersection No. 3: Bundy Drive & Sunset Boulevard (P.M. peak hour); and

Intersection No. 5: Barrington Avenue & Sunset Boulevard (P.M. peak hour)

The Project, after mitigation, is forecasted to result in two residual significant impacts during the P.M. peak hour. The impacted locations are:

Intersection No. 3: Bundy Drive & Sunset Boulevard (P.M. peak hour); and

Intersection No. 5: Barrington Avenue & Sunset Boulevard (P.M. peak hour)

Response to Comment No. 506-8

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

Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Comment No. 506-9

Question 6. Nowhere in the DEIR does it show what the actual effect that the above Significant Impact will have on the actual time that would be added to a peak hour trip. When the Intersection is [sic] already failed and you wait 25 minutes to make a turn, how much longer will you now have to wait due to the Significant Impact of the added construction trucks to make that same turn?

If it now takes me 25 minutes to get from my house to the turn at sunset, how long will it take under the added construction traffic? 45 minutes or an hour?

If Archer is going to propose a plan that makes traffic worse doesn't Archer owe us at least an estimate of how much more inconvenienced and irritation that they are adding to our lives?

Response to Comment No. 506-9

The transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, the City of Los Angeles 2006 CEQA Thresholds Guide, and LADOT Traffic Study Guidelines.

The traffic analysis in the Draft EIR was conducted in accordance with LADOT traffic study guidelines and criteria, which require the use of intersection volume-to-capacity (V/C) ratio to determine intersection level of service (LOS). Analyses were not conducted to quantify potential Project impacts on travel times and delay along the Sunset Boulevard corridor. These types of analyses are not required per LADOT Guidelines. Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Also refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

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

Comment No. 506-10

Question 7. I live on Chaparal St., which is about ¼ of a mile long. There are 22 homes on Chaparal. Below you will see a chart about the construction impact on Chaparal and Barrington concerning driving on to Sunset. The first thing I want to point out is that the baseline is 1,425 trips a day is skewed. With only 22 houses on the road and giving a generous 10 trips a household that would be 220 trips. Add in another two trips for the 100 surrounding neighborhood homes, which most likely would use Barrington or Saltair instead, and you have 420 trips. So the other 1,000 trips are most likely cut through traffic. Mostly occurring from 3–7PM. So adding another 192 mostly at the 3–7pm times creates total gridlock. Why is this considered not an Impact?

Response to Comment No. 506-10

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Also refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparal Street.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site. The 1,425 baseline ADT on Chaparal Street shown in Table IV.K-31 in the Draft EIR reflects the actual count that was conducted in November 2011. This was during the construction period of the I-405/Sepulveda Pass Improvement Project. Traffic congestion along Sunset Boulevard, particularly the segment between Bundy Drive and the I-405 Freeway, has worsened over the past four years due to the construction of the I-405/Sepulveda Pass Improvement Project, which involved major improvements to the Sunset Boulevard Bridge and I-405 Freeway On/Off Ramps. The surrounding residential streets, including Chaparal Street, saw an increase in cut-through traffic) as motorists attempted to avoid the increased congestion along Sunset Boulevard during the construction of the I-405 Sepulveda Pass Improvement Project. As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving in recent months as construction on the I-405/Sepulveda Pass project has neared completion, with the opening of the HOV lane on the northbound I-405 freeway and substantial completion of the I-405/Sunset Boulevard interchange modifications. It is anticipated that as traffic in the area of the Project improves, cut-through traffic on Chaparal Street and other neighbor streets will reduce.

Comment No. 506-11

Question 8. To assume that being one tenth of a percentage point below the threshold of Significance means that there is no impact is ridiculous in this situation. I formally request a reevaluation of this based on the time of day. I would also like to know how the projected volume was calculated. Also, is Archer committed to making sure that only 192 would be allowed? How will Archer assure us that the number will never go above 192? Because one or two more cars would make it above the Significance Threshold.

Table IV.K-31 (Continued)
Construction Period Street Segment Impact Analysis—Baseline With Project Conditions

Location	Weekday Bi-Directional Daily Volume			Impact Analysis		
	Baseline ADT	Project Only	Baseline plus Project	% Change	Significance Threshold	Significant Impact?
Phase 2						
Chaparral St. between Barrington Ave. & Westgate Ave.	1,425	192	1,617	11.9%	+12.0%	No
Barrington Ave. between Sunset Bl. & Chaparral St.	5,166	192	5,358	3.6%	+8.0%	No
Source: Fehr & Peers, 2014.						

Response to Comment No. 506-11

The transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide, and the LADOT Traffic Study Guidelines.

As provided in Table IV.K-31 and Table IV.K-3 on pages IV.K-39 and IV.K-95 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, construction traffic would result in less-than-significant traffic impacts at the analyzed street segments. The daily volume for Project Construction is based on the Round Trips Per Vehicle Classification (RTVC) prepared by Paul W. Speer, Inc., which includes the round trips per vehicle classification for each week of Project construction. The RTVC is included as Appendix C.2 of the Draft EIR. To be conservative, the analysis of Phase 2 assumes 100 percent of haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Chaparral Street Driveway. The worst case for Phase 2 is summarized in the following table:

Construction Vehicle Use of Chaparal On Worst-Case Day (Phase 2)

Vehicle Class	Daily Vehicles	PCE Factor	Daily PCE Vehicles	Daily PCE Trips
I Management (2-axle)	0	1	0	0
II Visitors (2-axle)	0	1	0	0
III Trades (2-axle)	0	1	0	0
IV Deliveries (2-axle bob tail)	9	1.5	13.5	27
V Deliveries/Hauling (3-axle)	7	2	14	28
VI Deliveries/Hauling (5-axle)	7	2.5	17.5	35
VII Concrete Ready-Mix	24	2	48	96
VIII Bottom Dump/Soil & Aggregate	0	2.5	0	0
IX Special Oversize Vehicles	1	2.5	2.5	5
Total on Chaparal	48		95.5	191

It should also be noted that the highest level of Archer truck generation during Phase 2 would be for relatively short periods during Phase 2 construction activities (e.g., Phase 2 excavation activities and Phase 2 concrete pour). Truck generation at other times would be lower.

Comment No. 506-12

Question 8. In Phase 2 under both options all Construction traffic will enter and exit from the Chaparal Driveway (which does Exist) and via Barrington Avenue Driveway (Which does not exist, there is a residence there and it is right behind my house.) Barrington is the most congested street besides Sunset. How do they plan on entering and exiting this driveway, which is only 250 feet from the Sunset intersection with out disrupting traffic flow? I request a formal detailed explanation of how this will work for the four-year period in Phase 2.

Response to Comment No. 506-12

Regarding the Barrington driveway, there is an existing driveway on the Barrington Parcel.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. Mitigation Measure K-5 requires development and implementation of a construction Traffic Management Plan. Among other things, the mitigation measure requires that flaggers be used to control trucks moving into and out of the Project Site. As described on page IV.K-82 in Section IV.K, Traffic, Access,

and Parking, of the Draft EIR, most, if not all, of the haul and equipment/material delivery trips on weekdays would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) Monday through Friday and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize impacts during the weekday P.M. commute peak period.

To be conservative, the analysis of the construction activities in the Draft EIR was conducted for the worst-case days within each construction phase. It is anticipated that the Project's impacts would be lower throughout much of each phase than the worst-case identified in the Draft EIR.

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the construction period for Phase 2 is anticipated to be 24 to 38 months. Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years.

Comment No. 506-13

Question 9. At present I have two streets on two sides of my house. Never in my worst nightmare did I imagine that I would have a house torn down and a road put behind my house that would have 180–500 trips a day. The Phase two is projected for over 4 years. So my home will become an island gridlocked by traffic on three sides for over 4 years. Why is that OK? How is it fair to install a roadway in the middle of the block that will have loud trucks running from 7am till 6pm right behind my house? Please show me where me or my neighbors [sic] needs were ever considered?

Response to Comment No. 506-13

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the construction period for Phase 2 is anticipated to be 24 to 38 months. Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years.

The Barrington Parcel is located south of the commenter's residence. As described in Section II, Project Description, of the Draft EIR, 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. In addition, the Barrington Parcel will be utilized as a temporary driveway from Barrington Avenue during construction.

The source of the commenter's estimate of 180 to 500 trips per day is not clear. As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, during the North Wing Renovation and Phase 1, virtually all haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Sunset Boulevard east and west driveways. Up to 5 percent of construction vehicles were assumed to enter and exit from the Chaparal Street driveway during the overlap between the North Wing Renovation and Phase 1(a). For the remainder of Phase 1(b) through Phase 1(d) periods, haul and delivery ingress and egress would be similar, except that up to 20 percent of haul trucks and equipment/materials delivery vehicles could use the Chaparal Street or Barrington Avenue driveways. To be conservative, the Draft EIR assumed that under Phase 1, all haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Barrington Avenue driveway or the Chaparal Street driveway. Refer to Table IV.K-29 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, which shows that 131 total daily round trips are estimated during Phase 2.

Comment No. 506-14

Question 10. Currently there is a horseshoe driveway at the Barrington House, which can only accommodate a car turning into it. There is no way trucks will be able to make a turn now. Will Archer be creating a new driveway? If so what will Archer do about the sidewalk? There is only one sidewalk along this part of Barrington and it is on the same side of the street as the driveway. It is the only walking access to the neighborhood. Does Archer plan on closing it? The sidewalk is used by many people and allows us to walk into the village, which will be a major problem for many if we can't use it. The whole idea of using Barrington show [sic] a total lack of understanding of the traffic in the neighborhood and how it will effect [sic] everyday life. I formally request a detailed answer explaining how this all could possibly work.

Response to Comment No. 506-14

As described in Section IV.K., Traffic, Access, and Parking, of the Draft EIR, the Barrington Parcel will be used for construction staging and Project construction will utilize a temporary driveway from Barrington Avenue during construction.

Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, regarding construction traffic. As described therein, revised Mitigation Measure K-6 requires the preparation of a construction-period parking plan.

In addition, Mitigation Measure K-7 requires that the Project develop and submit a Pedestrian Routing Plan prior to commencement of construction that identifies safe walking routes to the Project Site. The Pedestrian Routing Plan would, at a minimum, require

maintaining pedestrian access for land uses in the vicinity of the Project Site including the residential community surrounding Archer, following generally accepted construction safety standards to separate pedestrians from construction activity, maintaining sidewalk access at least along one side of the roadway if a temporary sidewalk closure becomes necessary, and providing adequate signage to guide pedestrians.

Comment No. 506-15

Question 11. What is Archer's plan for street parking for residents and guests on Chaparal St. and Barrington? Is Archer going to not allow parking on our street so their trucks can get through? Does this mean that for 6 years I will not have parking in front of my house?

Please note DEIR statements below.

(iii) Phase 2—Option A

Under Phase 2, Option A, all haul trucks and equipment/material delivery vehicles Would enter and exit the Project Site via the Barrington Avenue driveway or the Chaparal Street driveway. After completion of construction of the Aquatics Center/Visual Arts Center and during the construction of the Performing Arts Center, all haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Barrington Avenue driveway. To be conservative, the analysis assumes 100 percent haul and non-haul using both the Chaparal Street and Barrington Avenue driveways.

(iv) Phase 2—Option B

Under Phase 2, Option B, all haul trucks and equipment/material delivery vehicles Would enter and exit the Project Site via the Barrington Avenue driveway or the Chaparal Street driveway. After completion of construction of the Performing Arts Center and during the construction of the Aquatics Center/Visual Arts Center, all haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Chaparal Street driveway. To be conservative, the analysis assumes 100 percent haul and non-haul using both the Chaparal Street and Barrington Avenue driveways.

Response to Comment No. 506-15

As described on page II-41 in Section II, Project Description, of the Draft EIR, construction workers would not park on Chaparal Street or Barrington Avenue. As set forth in Mitigation Measure K-5, as part of the Traffic Management Plan to be implemented during construction of the Project, access for land uses in proximity to the Project Site during Project construction shall be maintained and obstruction of through traffic lanes on

surrounding public streets shall be minimized. Mitigation Measure K-5 requires the establishment of requirements for loading/unloading and storage of materials on the Project Site. Additionally, per Mitigation Measure K-6, construction worker parking would be provided on- and off-site depending on the phase of construction and the availability of on-site parking but no construction worker parking would be permitted within 500 feet of the nearest point of the Project Site except in designated areas. Off-street construction worker parking facilities could include existing parking lots along Constitution Avenue, San Vicente Boulevard or Wilshire Boulevard, and/or other existing facilities with available excess parking capacity. When construction worker parking is off-site, a temporary shuttle may be operated for construction workers to and from the designated off-site parking location. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, regarding construction parking. Mitigation Measure K-4 requires that any necessary street and sidewalk closures would be identified as part of preparation of the detailed construction Worksite Traffic Control Plan. This Plan would also identify whether any temporary street parking restrictions are necessary and for how long.

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Comment No. 506-16

I have just scratched the surface on the problems with this project. I have focused on the construction period, and sadly according to the schools own projection the traffic will only be worse in 2020 when they hope it is completed. I have grave concerns about how Archer want [sic] to change the usage of the school. Which shows a total lack of respect for the CUP that was negotiated in good faith by the community 15 years ago. I understand that Archer wants to keep adding and getting better, but this isn't a modification, they are building a whole new school that is double the size was intended to be there. If any area of Los Angeles is over schooled it is our neighborhood. Archer was well aware of the restrictions that came with this location. If they had proposed this current plan when moved here, it would never have had been approved. If this is what Archer was planning to do all along, they mislead the community and should never have moved here in the first place. If Archer believes they must create the physical Plant plan they have offered, then they have options. The land the school currently owns is worth at least 50 million dollars, add to that the 30–40 million that they plan to spend building and they have plenty of money to find another location better suited to build what they want. What truly disappoints me is that the impact to the neighborhood was not really considered. This plan is [sic] far overreaches and will destroy our neighborhood.

Look forward to the responses and thank you for taking the time to hear my points.

Response to Comment No. 506-16

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project.

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

Comment Letter No. 507

Leigh Williams
11728 Chaparal St.
Los Angeles, CA 90049

Comment No. 507-1

Please see attached letter, which is in a Word document; formatting of my letter in my prior email was irregular.

Response to Comment No. 507-1

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

Comment No. 507-2

I am writing to encourage your support for Archer's Campus Preservation and Improvement Plan: Archer Forward. I am the father of a junior at Archer as well as a direct neighbor of the school. At Archer, my daughter has had the opportunity to excel in all academic areas, especially high-level math. She is also a dancer who has participated in the Archer Dance Troupe for the past six years.

There is a lot of research that correlates greater engagement for girls in high level math and science in a single-sex environment, and this is part of what accounts for the tremendous success our graduates have had gaining admission to the country's top engineering and science programs such as Stanford, MIT, UCLA, Carnegie Mellon, etc. Archer is defying the odds in STEM education but it desperately needs modern classrooms so that girls do not have to waste time traveling to off campus facilities.

Likewise, Archer has a spectacular dance program with over 100 girls participating in the annual dance concert. Unfortunately, Archer must rent space for both rehearsals and performances because the school's black box theater only seats 75—and doesn't have a stage. This is a tremendous waste of the school's resources and, again, the girls' time.

Archer has been a phenomenal neighborhood institution and our girls deserve access to the same educational facilities that students at other independent and public schools have. There is ample precedent in the city for the use of residential properties for school

advancement, and thus I urge you to support Archer's architecturally beautiful and environmentally responsible plan. Thank you for your consideration.

Response to Comment No. 507-2

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

Comment Letter No. 508

Sharifah Z. Williams
1016 N. Heliotrope Dr., Apt. 9
Los Angeles, CA 90029

Comment No. 508-1

I am a communications associate at The Archer School for Girls writing in support of Archer Forward, the school's campus improvement plan. As a long-time Los Angeles resident who has experienced first-hand the city's middle and high school education system, as a voter to whom education is a highly important issue, and as a member of the Archer community who has seen the benefits of an education at this school for girls coming from all areas of the city, I fully support Archer's Campus Plan.

Archer provides a supportive, creative, and pedagogically cutting-edge learning environment for students from a wide variety of backgrounds. The school offers an education where girls feel free to speak up in class and a curriculum tailored to their needs. I am awed by the passion and dedication for education every member of the Archer community brings to the school.

While the faculty and staff do everything in their power to provide a high quality education to Archer students, they are at a disadvantage due to the lack of modern facilities—facilities readily available to most schools. In order for Archer to better prepare this city's future female leaders, the school needs access to basic necessities like climate control in classes, sports and arts facilities, and modern classrooms. Our students do not even have a gym. Archer students spend hours traveling to different locations to participate in athletic and art events. This uses up time and money that could be better spent on education and development.

The Archer Forward plan will bring the school's campus and facilities into the 21st century, and a plan that strives to create a better learning environment for our future leaders is one I hope the city will join me in supporting.

Response to Comment No. 508-1

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

Comment Letter No. 509

Aundrea Williford
7207 Washington Ave.
Whittier, CA 90602

Comment No. 509-1

I am an Archer graduate and I am writing to voice my support for Archer's campus improvement plan, Archer Forward.

I believe that I have Archer to thank for the woman that I am today. Not only did Archer instill in me passion, drive, and confidence, the school also gave me the skills to be a leader in my own right.

I loved attending Archer, but 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 hope you will support this plan.

Response to Comment No. 509-1

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

Comment Letter No. 510

Brian Wogensen
3382 Halderman St.
Los Angeles, CA 90066

Comment No. 510-1

I am writing to urge you to support the Archer School for Girls plan to upgrade its existing campus facilities. I have been teaching English at Archer for 14 years, and know first-hand how transformative this community and an Archer education is for its students and its employees. There is a commitment here to empowering girls from throughout the city, nurturing individual passions and fostering a thoughtful and empathetic embrace of all kinds of diversity. The mission and culture her [sic] at our school are unique and, if I may say, important. Our girls leave our school with authentic connections to each other, to the needs of society, and to their own passions and aspirations. Every year graduates return to school to continue their relationship with the community, and I am continually impressed with the bold, interested and dynamic women they have become.

What our campus development plan offers us is a chance to continue this journey and mission in even more vibrant and successful ways. We struggle here with a building that, while beautiful, lacks some core elements needed in a school seeking to model effective and progressive 21st Century learning. We make due, but this is not enough. We want to make strides and make a home our girls can revel in. Most importantly, the plan allows us to better use space, both within our existing building and in relation to the campus as a whole. Reconstituted classrooms and outdoor spaces will afford our faculty the chance to be more inventive and give our students facilities at home that allow time focused on learning, training and play as opposed to off-site travel.

I hope you can recognize the value of supporting the vitality and mission of our school. Thank you for reading and considering our needs.

Response to Comment No. 510-1

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

Comment Letter No. 511

Damon Wolf
2227 Montana Ave.
Santa Monica, CA 90405

Comment No. 511-1

As a proud member of the Archer Parent Association, I am asking for your support of the Archer School for Girls in Brentwood and their campus improvement project known as Archer Forward. Because the school has dutifully complied with all requests and conditions from the City and its neighbors over the years, I strongly believe that they have demonstrated their commitment to Brentwood and should be permitted to improve the campus with their existing this [sic] good and well-thought-out plan.

In creating this project, I know that the school has taken every step to consider the needs and concerns of the community and their neighbors—they are constantly holding community meetings and sending out newsletters to inform them of campus events and updates. Our daughters volunteer all over the neighborhood, from Brentwood Green to tutoring younger students to working at a local women's shelter.

Archer Forward will provide the facilities that the school is desperately lacking—a playing field, a theater, visual arts facilities, new parking spaces underground and a common gathering area. All of this was designed with the concerns of the community in mind. I believe that this plan is the best compromise between the needs of the school and the community, and is the result of many months of negotiation and collaboration.

It is critical for Archer's future to have the facilities requested in this plan, and I hope the City will join us in support of one of our city's finest schools.

Response to Comment No. 511-1

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

Comment Letter No. 512

Wilma Wong
wilmawong@mac.com

Comment No. 512-1

I am a parent of an 8th grade student at Archer School for Girls. My daughter, Saskia Wong-Smith, has been at Archer for [sic] since 6th grade and has seen how much she has grown in confidence and eloquence.

Archer is a forward thinking school with its new engineering program and alliances with Silicon Beach to develop a STEM program many other schools could follow. Having been a former Apple employee, Archer has the best implementation and use of technology of any school in this city. I have seen other schools purchase technology but not use it to its full potential but with Archer's one to one laptop policy they have earned the playing field for each student. More importantly, the teachers are trained and know what to do with the technology. This is but one example of where Archer excels in getting our girls to be competitive and prepare them to be leaders of the new century.

With the new Archer Forward plans, Archer will be able to expand their ability to teach the girls with new modern classrooms, much needed athletic facilities and larger spaces for performing and visual arts.

Please support Archer Forward in creating an improved space for the future of Archer and girls' education.

Response to Comment No. 512-1

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

Comment Letter No. 513

Catherine Wood
526 Moreno Ave.
Los Angeles, CA 90049

Comment No. 513-1

I'm proud to live in Council District 11 and to send my daughter to The Archer School for Girls and fully support the school's plans to enhance their existing campus facilities through the Archer Forward plan. I am writing to show my support and request that you help Archer move through the City process.

For the past fifteen years, Archer has dedicated itself to being a responsible and active member of the Brentwood community. The school's administration regularly meets with the Brentwood Community Council and hosts meetings with neighbors. Archer provides tremendous benefits to the City by requiring its own student body to participate in community service regularly, by providing scholarships to students and by providing an excellent, 21st-century education for the next generation of female leaders.

The Archer Forward plan encompasses many of the values that are central to the school: a commitment to sustainability and preservation of its historic building, along with new facilities tailored for the performing arts and athletics. I agree that this is the most effective plan to meet the needs of the school and for future students. Throughout the formation of the plan, the school has sought the input of neighbors and made modifications in order to meet their concerns.

I have seen the school's dedication to providing excellent education for girls from across Los Angeles and its commitment to being a good and responsible neighbor. I hope that Archer's responsible and diligent track record will encourage you to help the Archer Forward Campus Preservation and Improvement Plan move quickly through the City review process.

Response to Comment No. 513-1

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

Comment Letter No. 514

Jennifer and Graham Woolf
129 N. Anita Ave.
Los Angeles, CA 90049

Comment No. 514-1

As a parent of a girl attending The Archer School for Girls in Brentwood, I am writing in strong support of the Archer Forward plan, and hope that you and the Los Angeles Planning Department will help move the project along in the City process. I should also mention that I live in Council District 11.

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. 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.

The Archer Forward plan provides these 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 reflect the priorities of the community. 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.

I hope that you will recognize Archer's commitment to the community and creating a good plan and help the school by moving the project through the City process as quickly as possible.

Thank you.

Response to Comment No. 514-1

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

Comment Letter No. 515

David and Zofia Wright
11845 Chaparal St.
Los Angeles, CA 90049

Comment No. 515-1

We attach our letter opposing Archer's excessive plan to expand its facilities and intensify its usage, and questioning the completeness and accuracy of its draft EIR.

Please confirm your receipt of this email and our 21-page letter. This matter is of great significance to us, since our home is less than 100 feet from the Archer property.

Thank you for your prompt response.

Response to Comment No. 515-1

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

Comment No. 515-2

We have corrected several typos and made several other changes. Please replace our original letter with the attached.

Response to Comment No. 515-2

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

Comment No. 515-3

We are nearby neighbors of the Archer School. Our home is located across Chaparal Street from Archer, with the front of our property about 100 feet diagonally from the corner of Archer's current athletic fields.

For the reasons set forth herein, we oppose the scope and duration of the very extensive and multi-phase excavation and construction project that Archer proposes, various alternatives of which are set forth in the draft EIR (DEIR) referenced above, and other

alternatives of which have been discussed in “confidential” meetings of Archer with a committee of the Brentwood Chamber of Commerce, the substance of which is not known to us. We also earnestly oppose all elements of the intensified use of the Archer property that are contemplated in the DEIR.

Background: _ [sic]

During the late 1990’s, Archer School desired to move from its then site in Pacific Palisades to its current site, which until then had been the Eastern Star Home for retired nuns. This site is a parcel of approximately 6.5 acres located on the north side of Sunset Boulevard, with almost 80% of its original perimeter bounded by residential buildings.

The property consisted (and still consists) of one large building, a hollow square structure that is a Historic/Cultural Site, meaning essentially that the extensive front part of the building is to be preserved (thereby limiting Archer’s ability to demolish the building and redesign the entire parcel should it want to do that.)

The site is also located essentially adjacent to the intersection of Sunset Boulevard and Barrington Avenue (separated on Sunset only by one apartment building)—a very heavily-trafficked intersection from about 3:00 p.m. until after 8:00 p.m. on many weekdays, and occasionally on other days and hours. Archer’s vehicle entrance driveway is in the middle of the block on Sunset—vehicles entering from the west must turn left into the driveway, and those exiting eastbound must turn left onto Sunset—which as discussed below is essentially impossible from about mid-afternoon on weekdays until late in the evening.

Virtually all of the area north of Sunset in the vicinity of the Archer property is completely residential. In contrast to the often-heavy traffic on Sunset, Chaparral Street (to the north of Archer) and the other connected small streets (Westgate, Barrington, Saltair, etc. others) are narrow roadways, have almost no sidewalks, and since the 1940s have provided residents with an semi-rural, quiet and peaceful escape from city life.

As a result, once Archer acquired the Eastern Star Home and applied to change its use to a school, the neighbors were very highly concerned. And after more than two years of negotiation and a lawsuit, Archer agreed in 1999 to approximately 50 conditions, which were then reflected in its Conditional Use Permit (herein the 1999 CUP). Most of those highly-negotiated conditions reflect very specific details designed to protect the quality of life of the residential neighbors, and to mitigate Archer’s impact on local and regional traffic.

Archer School has no doubt delivered a very high quality of education to its students over the past fifteen years, and from what we can tell (having moved into the neighborhood

three years ago) Archer has quite diligently enforced compliance with the 1999 CUP conditions relating to parking and traffic mitigation.

But now, Archer proposes to massively abrogate its posture as a “good neighbor”—to embark on at least six years of heavy excavation and construction, to greatly intensify uses of its premises both during weekdays, during weekday evenings, on Saturdays and during a summer session—none of which would have been acceptable to the neighbors in 1999, and very likely to have been rejected by the City then.

Both during Archer’s proposed multi-phase construction years, and then permanently thereafter through its proposed greatly expanded activities and a longer school year—and even adding lights over the athletic fields to permit night games!—Archer’s extensive proposals would severely degrade the wonderful quality of life that has characterized our quiet street and peaceful neighborhood for seventy years.

And the impacts on traffic congestion both during the construction phases and then permanently thereafter would be felt not only at the key intersection of Barrington and Sunset, but for a mile or more to the west, as well as on Barrington to the north and south—and according to LADOT, five other major intersections.

Alternative Approaches to Achieve Archer’s Goals with Much Less Adverse Impact:

There are several alternatives that would have much less environmental impact on the residential neighbors of Archer, as well as the already-congested nearby intersections. These include Archer proceeding with limited expansion as permitted in the current Conditional Use Permit (issued in 1999 and amended since then); a reduced expansion of facilities and usage, such as the plan set forth in Alternative 4-B of the DEIR); the relocation of Archer to a larger parcel of land; and the expansion of Archer via the acquisition of a second property and dividing the classes (currently Grades 6–12) among two sites, as several other private schools have done on the Westside.

The great majority of sizeable private schools on the Westside are located in nonresidential areas, or on sites with residences only on one side (typically across the street). The relocation of Archer School to a larger parcel, particularly in a nonresidential area, would (1) obviate some of the problems inherent in its current site, which Archer says gave rise to some of its proposed changes, see below; (2) eliminate virtually all of the environmental, traffic and other major problems inherent in the proposed excavation, construction and intensified uses described in the DEIR); and (3) allow this excellent school the ability to expand from time to time over future years and decades without again raising such serious environmental and other problems.

Archer's current proposals implicitly acknowledge that Archer made a mistake in choosing the Eastern Star Home in the 1990s as a site for a school. Archer now realizes that it "needs" very extensive onsite parking, full-size playing fields, much larger rooms than the former nuns' sleeping rooms to serve as classrooms, and a much larger parcel on which to construct the various large new special-use buildings it "needs", with appropriate setbacks from any residential streets.

Archer's neighbors (and thousands of commuters!) should not now be asked to bear the environmental consequences of a massive project to address those original deficits, plus extensive new expansions of premises and uses. The alternative of relocating the Archer School to a larger and more suitable site has not been addressed in the DEIR, and should be addressed.

Similarly, the alternative of locating part of the school onto a second parcel within a few miles would greatly reduce the problems inherent in Archer's current proposals. That alternative should also be addressed in the DEIR.

Also, Archer currently conducts its equestrian, tennis, beach volleyball and cross-country running (and track?) off campus—and its proposals contemplate no changes in those sports. So why is it necessary for Archer to expand its playing fields to accommodate onsite varsity games only in soccer and softball—with attendant serious environmental impacts on outdoor noise and traffic—on weekdays, weekday evenings, and now even on Saturdays?

I. The proposed very lengthy construction phases would unacceptably degrade our quality of life, and if approved will "substantially and unavoidably" worsen local traffic congestion:

A. As to our family and the other closest neighbors:

There will be the noise, exhaust and dust of many trucks and construction equipment on our quiet residential street during weekday daylight hours—and proposed well into the evenings—and on Saturdays(?).

It will be difficult for the neighbors' visitors, household workers and service personnel to park on Chaparal, a very narrow road.

Will Archer require that all construction workers and equipment park on its own property when not in actual use? If any vehicles involved in the construction are not prohibited from parking on Barrington, Chaparal, Westgate and Saltair, what will be the impact on the local

residents as to where their guests, domestic workers, tradesmen and delivery vehicles can park?

We personally observe daily that if even a few vehicles park on both sides of our narrow street, Chaparal, vehicles attempting to transit in one direction or the other must stop and wait for any opposing vehicles to pass the parked cars—on Chaparal there is no room beside even one parked car for two vehicles to pass it at the same time.

If all vehicles involved in the construction are not prohibited from parking on Barrington, Chaparal, Westgate and Saltair, and the result is multiple parked vehicles on both sides of Chaparal and/or Westgate, what will be the impact of such roadway impedence on other vehicles that attempt to transit the affected streets? What about emergency vehicles?

Incredibly, Archer proposes Saturday construction activities in our quiet residential neighborhood—with its perimeters now over 92% bounded by residences (unprecedented on the Westside). What will be the impact of the noise alone on the quality of life for the residents adjacent to the demolition of houses and proposed construction of two large new buildings on the small residential properties that Archer has acquired on Chaparal and Barrington?

There is likely to be dust in the air (and possible other pollutants?) during various phases of the several excavations, the deconstruction of the interiors of the north wing, etc. (?) There may also be chemical fumes in the air from the extensive painting and other resurfacing involved. What compensation will Archer pay the neighbors should we sustain impact from these nuisances?

- B. Our family and all residents and commercial neighbors within up to two miles of Archer will be impacted by the “substantial and unavoidable” increase in traffic congestion on Sunset and other local streets:

All eastbound travelers on Sunset and its tributaries for up to two miles to the west, and all residents north of Sunset, on all the streets that reach Sunset via Barrington and Saltair—will be heavily impacted during Archer’s proposed construction, for six years or more Archer proposes, as detailed below.

Congestion on eastbound Sunset Boulevard will be unacceptably increased during periods of heavy traffic—and those congested periods will unavoidably lengthen further into the evenings.

The broadest and most harmful traffic impact of Archer's oversized, multi-phase, multi-year expansion project, if approved, would be the substantial increased congestion in eastbound traffic on Sunset Boulevard, toward the 405 Freeway, during weekday afternoon and evening hours—an impact that (even with mitigation) the Los Angeles Department of Transportation has found would be “substantial and unavoidable”.

The thousands of truck and car trips inevitably involved in the Archer construction proposal will cause increased backup and transit time to all eastbound traffic for up to two miles west of Barrington. And this increased traffic burden and its consequences will exist in differing degrees for more than six years—during which the traffic burdens on eastbound Sunset will also increase for other reasons.

- Has Archer taken into account all studies by the City and private sources estimating increases in traffic on Sunset over future years? Are there any currently pending City or private studies of Sunset traffic, or of the Barrington/Sunset intersection, that have not yet been taken into account in the Archer studies?
- Has Archer taken into account the scheduled major construction project that will close portions of Pacific Coast Highway for more than twelve months, and detour thousands of southbound daily vehicle-trips onto Sunset eastbound?
- Has Archer taken into account the scheduled major project that will close portions of Wilshire Boulevard for many months?

We have personally observed periods when even in existing conditions (and even when all entrances onto the 405 have been open) it takes more than an hour to transit one mile eastbound on Sunset toward the 405 Freeway. Won't even moderately additions to that traffic flow extend the delay for thousands of eastbound vehicles (and extend the hours of such congestion), and also extend the hours that such congestion exists at every intersection that enters Sunset for up to three miles west of the 405?

On heavily congested roads, and at heavily congested intersections, even a small percentage increase in traffic will typically result in a disproportionate increase in transit time for all approaching vehicles for an extended distance upstream on a major roadway such as eastbound Sunset. Even a small increase will typically also have a ripple effect that lengthens wait times and upstream congestion over a relatively broad radius

surrounding the worst intersections—thereby also increasing noise and air pollution. What will be the magnitudes of these impacts?

In turn, increased overall transit time for several thousand vehicles during peak weekday hours would create further delays on all congested roads and intersections in the surrounding area, and may thus extend the current hours during which such congestion exists there. Has that potential extension of congestion hours on nearby heavily-trafficked roads been estimated?

If delays and transit time on eastbound Sunset are increased during hours of heavy traffic, what is the estimate of traffic that will choose to divert to San Vicente Boulevard, and thence to Wilshire Boulevard—in order to reach or cross the 405 Freeway? And what then will be the impact on existing congestion (and projected future congestion) on San Vicente and Wilshire? And on the major connecting streets such as Allenford/26th Street and South Kenter Avenue/Bundy?

An important aspect of congestion surrounding the Barrington/Sunset intersection:

During high traffic hours on weekday evenings, the short stretch of Sunset between Barrington Avenue and Barrington Place (the next traffic signal to the east) always fills to the maximum (its “storage capacity”, herein the “BIB cohort”, is only about 24 vehicles), during each light cycle at the Barrington–Sunset intersection.

Such heavily congested hours on eastbound Sunset have tended to lengthen every year, and presumably the City’s traffic studies project even more traffic in future years. What would be the impact of Archer’s project in extending the hours needed to clear all of the eastbound vehicles that will need to transit from Allenford (26th St.) in Santa Monica, and to the west of that, to Barrington (and from all interim feeder streets), and then onward to the 405 Freeway?

And what will be the ongoing, permanent impact of each of the various proposed intensified uses of the Archer property (1) during weekday afternoon hours; (2) during weekday evening hours; (3) during the newly-proposed uses of the property on Saturdays; and (4) during the newly-proposed summer sessions?

The awkward contours of the Barrington/Sunset intersection, the often-full B/B cohort, and the frustration of waiting a long time just to reach it, causes many vehicles to enter the intersection from the north and south (that is, from Barrington), and from Sunset west, illegally late in their green/yellow cycle, and then to be stuck illegally in the intersection during their red cycle. (For this reason, the theoretical throughputs of the Barrington/Sunset intersection are completely unreal in practice.)

Both the frequent lack of space at the rear of the B/B cohort, and the very frequent presence of vehicles illegally blocking the intersection, result in delay for all other vehicles attempting to enter the intersection into the eastbound lanes, and increases their frustration in turn, often leading to more bad behavior.

The hours-long chaotic mess at this intersection during the evening commute truly needs to be seen to be believed. Any significant addition to traffic arriving from the west, north (see below as to the “eastbound/westbound” traffic issue) or south will add to delay and trip time for all concerned.

Has this aspect of the key Barrington/Sunset intersection, now and as traffic is expected to expand in future years, been studied?

Increased waiting time for traffic southbound on Barrington: The southbound traffic on Barrington to the Sunset intersection is already heavily backed up during peak hours, and for the reasons stated above, typically only zero to three vehicles can turn left onto Sunset during each traffic-signal left-turn cycle.

If eastbound traffic on Chaparal increases, more vehicles will be competing to enter the intersection during each light cycle, which will result in a lengthening of the hours of congestion experienced by all neighbors to the north of Archer School that use Barrington (which has only one lane until the final 40 feet) to approach Sunset (regardless whether they plan to cross it or turn right or left).

Vehicles leaving Archer onto Sunset and circling the block clockwise at heavy traffic hours will create an “eastbound/westbound” gridlock on the small local streets:

Archer’s driveway debouches onto Sunset in the middle of a block. In the real world, if Archer provides onsite parking for up to 282 vehicles, when those vehicles exit the driveway during weekday hours it will almost never be possible for them to cross westbound traffic safely and find a safe entry into the gridlocked eastbound traffic.

So those that intend to travel eastbound will necessarily exit the Archer driveway and turn right (westbound) onto Sunset, then right again onto Westgate or Saltair, right again onto Chaparal, and right again onto Barrington, where the signaled intersection includes a short cycle for left turns onto eastbound Sunset.

Good luck with that! Even adding twenty cars an hour to that clockwise, “eastbound/westbound” flow around the block will totally congest Westgate northbound (one lane each way, “storage capacity” in that short block of only about seven vehicles, and “storage

capacity” eastbound on even narrower Chaparal of only about 25 vehicles)—with the side effect of completely blocking Chaparal to all westbound traffic if there is also a single car parked along it.

Of course, once Westgate is filled to capacity, these “eastbound/ westbound” Archer vehicles will continue west on Sunset and turn right onto Saltair, then right again onto Chaparal—simply resulting in “storing” additional vehicles on those short blocks, all waiting for that brief, often fruitless, left-turn cycle from Barrington onto Sunset.

Once the short block on Saltair is filled, these unhappy Archer vehicles will have little choice but to continue further west on Sunset, joining the masses of other vehicles who turn left during the limited left-turn cycles at Bundy and Kenter, then a few minutes later adding to the existing congestion on San Vicente Boulevard and Wilshire in their need to reach their destinations to the east.

Meantime, back at the intersection of Chaparal with southbound Barrington (already loaded to capacity), during busy traffic hours these Archer vehicles will find gridlock—and when each car finally is able to turn right from Chaparal onto Barrington, they become part of the gridlock as to everyone upstream on Barrington as well as all the Archer vehicles (and neighborhood cars) behind them on Chaparal, Westgate, and Saltair.

The gridlock on the small local streets that this “eastbound! westbound” circling will cause will also completely block emergency vehicles in either direction on Chaparal should they ever be needed. It will also likely block and/or delay residents who attempt to drive out onto Chaparal from their driveways.

At peak hours, how many vehicles per hour actually succeed in turning left from Barrington onto Sunset—into the “B/B cohort” mess described earlier? So how many hours would it take for an extra hundred cars that leave the proposed large new underground Archer garage to circle the block all the way to Barrington, alternate with the backed-up southbound drivers there, and then turn left onto Sunset?

How does Archer propose to prevent the scores of drivers who drive out onto Sunset with destinations to the east from causing this eastbound! westbound nightmare on the local streets during each of the proposed several outflows each weekday, and some evenings?

Providing extensive onsite parking at Archer’s current location is simply a very bad idea. Currently, all the above is avoided because most of the Archer vehicles approach Archer

from the south, park in the large public lot on Barrington Place, and never reach Sunset. Good plan!

Routing of construction vehicles; routing and parking of workers. There are special additional concerns for the neighbors on all nearby streets north of Sunset.

Archer is seeking permission for several thousand vehicle-trips to circle the block on which it is sited, and to use the vehicle entrance located on Chaparal Street, for six years of major excavation and construction! This will involve not only vehicles but construction equipment and many workers (see below as to the workers.) But Chaparal, as mentioned earlier, is a narrow road only two blocks long (with no through traffic) and a purely residential look and feel. Will any trucks or construction equipment be allowed to park on Chaparal, during weekdays, evenings, weekends?

The unavoidable degradation of our peaceful and clean environment from this construction traffic frankly defies exposition here—any rational person can envision the dreadful impacts this would have if it were taking place on their street! What compensation is Archer offering the residential neighbors for this massive intrusion on their peaceful enjoyment of their homes over then [sic] next six years?

And all those vehicles will also be transiting Westgate (or Saltair) and Barrington, as they approach and leave the construction work.

Moreover, as discussed above, the traffic on Barrington southbound to the Sunset intersection is already heavily congested during peak hours. Adding any vehicles to this southbound congestion on Barrington will also significantly increase transit time for all eastbound vehicles on Chaparal, northbound vehicles on Saltair and Westgate.

A similar set of issues is presented as to the many workers and planners that will be driving to the Archer construction sites, parking and later driving away. Where will they park? Will they be required to enter and leave by Archer's existing driveway on Sunset, or allowed to circle the block and add to the mess of construction equipment and vehicles on Chaparal mentioned above? How many vehicles will be allowed to arrive, and depart, during the hours when Sunset is heavily congested?

Increased waiting time for traffic northbound on Barrington: Adding to either the eastbound traffic on Sunset and/or the southbound traffic on Barrington that turns left onto Sunset (inevitable aspects of Archer's proposal) will also add to the waiting time for northbound traffic on Barrington approaching Sunset.

The reasons for this are discussed above, regarding the B/B cohort problem.

Archer's proposed non-school uses of its property. [sic]

Archer proposes to rent out its site for weddings, filmings and other uses. What hours will be involved, and will there be any limits on the number of vehicles, or their transiting of and parking on the small adjacent streets (Saltair, Chaparal, Westgate and Barrington)?

Even assuming good faith efforts by Archer to enforce any such restrictions, in the real world what are the likely impacts on our quiet neighborhood of visitors that do not abide by them?

II. After the extensive proposed expansion of Archer is complete, the proposed massive intensification of use would result in unacceptable permanent degradation of our quality of life, and local and regional traffic congestion:

A. As to our family and the other closest neighbors:

Noise: The residences on Chaparal and Westgate, and to some extent even on Barrington and Saltair—have been quiet havens for families for decades, and have relied on the original Archer CUP to maintain our quality of life. If the Archer proposals are approved, our residences (and the multi-family residences on Sunset south of the playing fields) would become subject to greatly increased and more frequent crowd noise from the proposed varsity playing fields, both during weekday evenings and on weekends.

“Quality of Life” is not an abstraction to us! Nor do we consider it to be negotiable. And no organization or group has our permission to negotiate reductions in our Quality of Life, in return for supposed compromises as to other features of the Archer proposal.

For decades those residents in the area who work for a living and return to our homes on weekday evenings, and those of us who love to be out in our yards on weekends, have been able to enjoy the peaceful ambience of a purely residential neighborhood. The nearby neighbors of Archer relied on the peaceful nature of our north-of-Sunset neighborhood when we purchased our homes or leased adjacent apartments, and we also trusted that Archer would continue to abide by its heavily-negotiated and detailed 1999 commitments to protect our quality of life when Archer was permitted to take over the Eastern Star Home, and the pending lawsuit was withdrawn.

Due to Archer's admittedly poor choice in its original site selection in 1999, the playing fields are not of the size needed for varsity soccer and softball (or presumably other full-

field sports such as track, field hockey and lacrosse—large-field sports that Archer currently offers but some of which are not addressed in the traffic, parking and noise sections of the draft EIR).

Thus Archer for fifteen years has held its varsity games in several sports on the grounds of Santa Monica College—where there just happens to be existing lighting for night games, extensive adequate parking, relatively little congestion on local streets, and zero noise impact on residences.

This very important issue of noise from athletic events was from 1997 to 1999 the subject of extensive negotiation and a lawsuit. In return for concessions from the then neighbors (and dropping the lawsuit), Archer agreed to appropriate, detailed restrictions and conditions in its 1999 CUP regarding athletic events. This resulted in a livable situation for most of the nearby residential neighbors for the past fifteen years.

It is a clear breach of faith for Archer now to propose a massive change as to the nature, frequency, scheduled times, and the amount of crowd noise that will result from its proposed massive expansion of its onsite athletic activities, increases in onsite parking and local traffic, with substantial and unavoidable degradation on the Quality of Life for scores of nearby residents, in both apartments and single-family homes.

Archer also proposes to add lights and outdoor speakers, and a PA system, each of which is inconsistent with the quiet environment that has been characteristic of our neighborhood for many decades.

A second noise issue that will impact the homes on Chaparal is that Archer proposes to vent all vehicle noise (and any fumes) from a large new underground garage, not toward the east or the south (that is, onto Archer's own property), but north onto Chaparal Street—less than a hundred feet from the nearest homes, and a few hundred feet from several more.

Did Archer consider the alternative of absorbing the vehicle noise and fumes from its proposed underground garage, by venting onto its own grounds?

Third, Archer now proposes to allow various events completely unrelated to education of its students, on its property. Weddings, filming and other rental uses obviously will create impact on the neighborhood, since the non-Archer participants will not be well-experienced in complying with the traffic and parking restrictions to which Archer agreed in 1999 as to its school activities. Whereas parents of Archer students can be sanctioned by Archer

when they violate the route and parking restrictions in Archer's CUP, visitors who traverse or park and/or walk unsafely or noisily along the small adjacent streets cannot.

What compelling reason does Archer present for its proposal to expand its school sessions into the summer, with all the resulting impacts on the neighbors and adjacent roads thereby extended into weeks during which we neighbors are accustomed to enjoying our yards and patios? Or for allowing any rental uses of its premises?

These are clearly not "needs" but merely "wants".

Archer's various proposals to intensify usage (some no doubt serious, others perhaps not so much!) would allow up to 24,000 visitors a year. It is inevitable that some such non-Archer visitors will transit [sic] the narrow adjacent streets (Saltair, Chaparal. Westgate and Barrington, looking for parking—and indeed perhaps park on those streets, and walk along them, despite the lack of sidewalks on almost all portions. Isn't this likely to be noisy at times, and at times dangerous on such narrow, poorly-lit streets?

And what does Archer propose to do that will realistically prevent this?

Tripling Archer's current onsite parking and its impact on local traffic:

Pursuant to its 1999 CUP limitations negotiated carefully and at length, in exchange for other concessions by the neighbors, Archer School currently has only 108 parking spaces on its grounds, and those are limited to use by certain categories of drivers.

Pursuant to Archer's current CUP, parents and students are not allowed to park on the property. Parking for athletic, cultural and other activities is also required to be offsite.

Yet somehow Archer has found it possible to live with those parking restrictions for fifteen years. And those agreements incidentally kept hundreds of vehicles clear of Sunset every weekday, since most of them approach Archer from the south, northbound on Barrington but then turning into the public parking lot on Barrington Place before reaching Sunset.

Archer now argues that the parking limitations it agreed to in 1999, after two years of negotiation and to settle a lawsuit, create problems, including the need for people to walk to Archer from a public parking lot several hundred yards away, and to cross the intersection at Barrington and Sunset. So Archer now wants to excavate a large underground garage with 282 parking spaces. And to vent all the related vehicle noise and emissions, not east or south into its own property, but entirely through large vents pointing north onto Chaparal

Street, with the nearest homes less than 100 feet away—here again Archer wants less than 75 feet in setback.

Why does Archer not adopt a design that would vent the vehicle noise and fumes onto its own property to the south and east? What would be the mitigation benefits of such an alternative design?

Archer's now-asserted need to almost triple the number of onsite parking spaces, however, is yet another important example of the now-admitted mistake that Archer made in its choice of the Eastern Star Home more than fifteen years ago—and another example of why Archer's most suitable "alternative" plan should be to find a different, much larger site to which it can move, preferably in a nonresidential neighborhood, and avoid most of these considerations.

What compensation does Archer offer to us and the other residents on Chaparal who will be the victims of the noise and pollution (and degradation in market value) resulting from Archer's self-centered parking structure design?

Two large new buildings proposed to be constructed adjacent to Chaparal:

The west-of-the-405 segment of Chaparal Street north of Archer is only two blocks long, and currently has the ambience (and parking and traffic capacity) of a narrow suburban lane, since even the Chaparal side of Archer's current athletic fields are visually screened by a fence and a row of trees. A person driving or walking along Chaparal under current conditions has the visual impression that it is an attractive and peaceful residential neighborhood.

Archer now proposes to construct a very large performing-arts center, and a multi-purpose center, both backing onto Chaparal Street, and to eliminate the setback requirement of 75 feet that was negotiated in 1999, such that the two tall new buildings would be only 20 feet from the Chaparal property line, and highly visible to both pedestrians and vehicle occupants—radically degrading the visual aspects of Chaparal.

What compensation does Archer offer the residents of Chaparal for these visual (and audible) nuisances?

III. Archer should seriously consider, and the EIR should reflect in detail, the mitigating impacts of the far superior alternative of selecting another, larger location for its school, that would (a) better accommodate the purposes and goals of its original 1999 plans and the massive expansions of structures and

intensifications of usage proposed now, (b) would avoid all of the serious problems identified in the draft EIR and in this and other submissions by the residential neighbors—and (c) would facilitate expansions in future years of Archer’s facilities and student body

Archer should be justly proud of its long record of delivering high-quality education to girls, and its near-perfect compliance with its detailed 1999 CUP commitments to preserve the Quality of Life of its residential neighbors.

And as with any institution that has succeeded so well in its mission, it is natural that over the years and decades to come, Archer will likely seek to expand, presumably in successive stages, in order to be able to deliver its mission to an increasing student body, as well as expanding the curriculum and resources it offers.

Unfortunately, one of the ineluctable implications of Archer’s submissions and current assertions is that the former Eastern Star Home tract of only six-plus acres (now expanded modestly by Archer’s purchase and proposed demolition of two adjacent residences) is too small and only awkwardly suited even for the current student body of 460.

Several key elements of Archer’s proposal demonstrate that Archer should have sought a different site in 1999, if it truly wanted to avoid damaging the Quality of Life of its neighbors, and to avoid the inconveniences and dangers that have resulted from its 1999 parking plan and its need to hold its varsity athletic events at a distance.

But, frankly, those are problems inherent in Archer’s own questionable decisions in 1999. Archer’s residential neighbors—and the several thousand drivers who need to travel eastbound on Sunset each evening—should not now be asked to bear the burden of curing those inherent problems.

Nor does it make sense for Archer now to attempt to cram onto a relatively small acreage a net new 80,000 square feet of building space, a large (although mostly underground) parking lot, the largest performing arts center on the entire Westside, a two-story swimming center, a large multi-purpose building, etc.

Does Archer have a long-term plan, or a draft of one, or is one in the offing—that would deal with increasing its student body? If so, how would the environmental impacts of its current proposals worsen if and when Archer next comes back to the City with its next “new” proposal? Or, is Archer again willing to agree to a stand-down period of fifteen or twenty years?

But why would a successful school with such massive financial resources agree to limit its student body for such a long period? It defies reason, frankly.

It is inarguable that both Archer's current goals and its longer-term goals can better be pursued on a larger property than Archer's current site. Archer and its experts should be required to study and present the mitigating benefits of that alternative approach to its current proposed expansions of structures and activities, including relocation onto a site in a nonresidential neighborhood.

The following are among the dozens of Westside private schools that have chosen to locate or relocate in nonresidential neighborhoods (or sites not surrounded by residences): Arete Preparatory Academy, Berkeley Hall School, Crossroads School, Curtis School, Delphi School, Loyola High School, the Lycee Francais, Marymount High School; Milken Community Middle School and High School, Notre Dame Academy Elementary School, Saint Sebastian School, Santa Monica Montessori School, Westview School, Wildwood School, and Westland School. (And there are many more such schools.)

In contrast, very few private schools appear to have chosen to locate onto sites bounded by residences on three sides. Indeed, Archer and its playing field and new accessions are now bounded by residences on over 92% of its perimeter!
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As with those schools, the current and future stakeholders in Archer would be far better served by relocating the school to a nonresidential site, one where—without all the complications, problems and expense inherent in its current expansion proposal—Archer could expand repeatedly in future years and decades, and deliver its excellent education to a growing student body.

A relocation would allow Archer to layout a purpose-designed campus; to construct buildings and other facilities from the ground up to suit a twenty-first century school, with built-in flexibility to gradually expand; to layout athletic fields without the limitations that even its current proposal would impose, perhaps with lighting for night games; and to include adequate parking for now and for the future.

Archer's stated \$67 million expansion budget, plus the eventual proceeds of selling its current campus, would be far more efficiently spent under that alternative, rather than attempting to patch up its classroom facilities demolishing some structures and interiors on a property that limits such modernization efforts when its main building is designated as a protected Cultural/Historical Monument.

And such a purpose-designed project could certainly be completed in far less than six years, as demonstrated by the several private schools now sited on Olympic Boulevard and Mulholland Drive.

Response to Comment No. 515-3

This comment represents the original letter submitted by the commenter which was superceded by the revised letter responded to below.

Comment No. 515-4

We are nearby neighbors of the Archer School. Our home is located across Chaparal Street from Archer, with the front of our property about 100 feet diagonally from the corner of Archer's current athletic fields.

Response to Comment No. 515-4

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 515-5

For the reasons set forth herein, we oppose the scope and duration of the very extensive and multi-phase excavation and construction project that Archer proposes, various alternatives of which are set forth in the draft EIR (DEIR) referenced above, and other alternatives of which have been discussed in "confidential" meetings of Archer with a committee of the Brentwood Chamber of Commerce, the substance of which is not known to us. We also earnestly oppose all elements of the intensified use of the Archer property that are contemplated in the DEIR.

Response to Comment No. 515-5

This comment expressing opposition to the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. As described in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. Regarding proposed campus operations, refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation including additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating

community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Comment No. 515-6

We also point out many deficiencies and gaps in the DEIR.

Response to Comment No. 515-6

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 515-7

Background: _ [sic]

During the late 1990's, Archer School desired to move from its then site in Pacific Palisades to its current site, which until then had been the Eastern Star Home for retired nuns. This site is a parcel of approximately 6.2 acres located on the north side of Sunset Boulevard, with almost 80% of its original perimeter bounded by residential buildings.

The property consisted (and still consists) of one large building, a hollow square structure that is a Historic/Cultural Site, meaning essentially that the extensive front part of the building is to be preserved (thereby limiting Archer's ability to demolish the building and redesign the entire parcel should it want to do that.)

The site is also located essentially adjacent to the intersection of Sunset Boulevard and Barrington Avenue (separated on Sunset only by one apartment building)—a very heavily-trafficked intersection from about 3:00 p.m. until after 8:00 p.m. on many weekdays, and occasionally on other days and hours. Archer's vehicle entrance driveway is in the middle of the block on Sunset—vehicles entering from the west must turn left into the driveway, and those exiting eastbound must turn left onto Sunset—which as discussed below is essentially impossible from about mid-afternoon on weekdays until late in the evening.

Virtually all of the area north of Sunset in the vicinity of the Archer property is completely residential. In contrast to the often-heavy traffic on Sunset, Chaparral Street (to the north of Archer) and the other connected small streets (Westgate, Barrington, Saltair, etc.) are narrow roadways, have almost no sidewalks, and since the 1940s have provided residents with a semi-rural, quiet and peaceful escape from city life.

As a result, once Archer acquired the Eastern Star Home and applied to change its use to a school, the neighbors were very highly concerned. And after more than two years of negotiation and a lawsuit, Archer agreed in 1999 to approximately 50 conditions, which were then reflected in its Conditional Use Permit (herein the 1999 CUP). Most of those highly-negotiated conditions reflect very specific details designed to protect the quality of life of the residential neighbors, and to mitigate Archer's impact on local and regional traffic.

Archer School has no doubt delivered a very high quality of education to its students over the past fifteen years, and from what we can tell (having moved into the neighborhood three years ago) Archer has quite diligently enforced compliance with the 1999 CUP conditions relating to parking and traffic mitigation.

But now, Archer proposes to massively abrogate its posture as a "good neighbor"—to embark on at least six years of heavy excavation and construction, to greatly intensify uses of its premises both during weekdays, during weekday evenings, on Saturdays and during a summer session—none of which would have been acceptable to the neighbors in 1999, and as a package, very likely to have been rejected by the City then.

Response to Comment No. 515-7

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

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

As described in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. Regarding proposed campus operations, refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation including additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. As discussed therein, in response to comments, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet with approximately 229,547 square feet of open space or approximately 72 percent of the campus. Upon full build-out of the Project, the School would comprise approximately 159,937 square feet. Thus, at build out, the Project's floor area would comprise approximately 22 percent of the total allowable floor area for the Project Site.

Comment No. 515-8

Both during Archer's proposed multi-phase construction years, and then permanently thereafter through its proposed greatly expanded activities and a longer school year—and even adding lights over the athletic fields to permit night games!—Archer's extensive proposals would severely degrade the wonderful quality of life that has characterized our quiet street and peaceful neighborhood for seventy years.

Response to Comment No. 515-8

Refer to Response to Comment No. 515-7. In addition, in response to comments on the Draft EIR, the Project has eliminated the previously proposed athletic field lighting. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 515-9

And the impacts on traffic congestion both during the construction phases and then permanently thereafter would be felt not only at the key intersection of Barrington and Sunset, but for a mile or more to the west, as well as on Barrington to the north and south—and according to LADOT, five other major intersections.

Response to Comment No. 515-9

Description, of the Draft EIR, the Project is proposed to be developed in phases to facilitate continued School operations and minimize disruptions to neighbors with access for haul trucks and equipment/material delivery trucks varying between the different phases of construction. Refer to Table IV.K-30 and Table IV.K-31 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR for a summary of the significant impacts during construction. The level of activity on the Project Site will vary throughout the construction periods. To be conservative, the analysis of the construction activities in the Draft EIR was conducted for the worst-case days within each construction phase. It is anticipated that the Project's

impacts would be lower throughout much of each phase than the worst-case identified in the Draft EIR.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. The mitigation measures to reduce the potential impacts of Project construction include development and implementation of a worksite traffic control plan (Mitigation Measure K-4), a construction Traffic Management Plan (Mitigation measure K-5), a construction Parking Management Plan (Mitigation Measure K-6), and a construction Pedestrian Routing Plan (Mitigation Measures K-7).

As discussed on page IV.K-82 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the haul and equipment/material delivery trips on weekdays would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) Monday through Friday and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize impacts during the weekday P.M. commute peak period.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 515-10

Alternative Approaches to Achieve Archer's Goals with Much Less Adverse Impact:

There are several alternatives that would have much less environmental impact on the residential neighbors of Archer, as well as the already-congested nearby intersections. These include Archer proceeding with limited expansion as permitted in the current Conditional Use Permit (issued in 1999 and amended since then); a reduced expansion of facilities and usage, such as the plan set forth in Alternative 4-B of the DEIR); the relocation of Archer to a larger parcel of land; and the expansion of Archer via the acquisition of a second property and dividing the classes (currently Grades 6–12) among two separate sites, as several other private schools have done on the Westside.

The great majority of sizeable private schools on the Westside are located in nonresidential areas, or on sites with residences only on one side (typically across one street). The relocation of Archer School to a larger parcel, particularly in a nonresidential area, would (1) obviate some of the problems inherent in its current site, which Archer says gave rise to some of its proposed changes, see below; (2) eliminate virtually all of the environmental, traffic and other major problems inherent in the proposed excavation, construction and intensified uses described in the DEIR; and (3) allow this excellent school the ability to expand from time to time over future years and decades without again raising such serious environmental and other problems.

Archer's current proposals implicitly acknowledge that Archer made a mistake in choosing the Eastern Star Home in the 1990s as a site for a school. Archer now realizes that it "needs" very extensive onsite parking, full-size playing fields, much larger rooms than the former nuns' sleeping rooms to serve as classrooms, and a much larger parcel on which to construct the various large new special-use buildings it "needs," assuming Archer would adhere to appropriate setbacks from residential streets.

Archer's neighbors (and thousands of commuters!) should not now be asked to bear the environmental consequences of a massive project to address those original deficits, plus extensive new expansions of premises and uses. The alternative of relocating the Archer School to a larger and more suitable site has not been addressed in the DEIR, and should be addressed.

Similarly, the alternative of locating part of the school onto a second parcel within a few miles would greatly reduce the problems inherent in Archer's current proposals. That alternative should also be addressed in the DEIR.

Response to Comment No. 515-10

An alternative site was studied in Section V, Alternatives, of the Draft EIR but was rejected from further consideration. Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives. In addition, as described therein, splitting the School onto two separate sites would also fail to meet project objectives.

Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. As described therein, the Project has been designed to be consistent with adjacent residential development, to shield neighbors from internal campus activities and noise, and to be cognizant of the boundaries

between the Project Site and adjacent residential lots. Further, as described in Topical Response No. 13, Use of Existing Residential Properties, school uses are permitted in the RE and R3 zones with a CUP. As described therein, many independent schools in Los Angeles have chosen to locate in residential zones.

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

Comment No. 515-11

Also, Archer currently conducts its equestrian, tennis, beach volleyball and cross-country running (and track?) off campus—and its proposals contemplate no changes in those sports. So why is it necessary for Archer to expand its playing fields to accommodate onsite varsity games only in soccer and softball—with attendant serious environmental impacts on outdoor noise and traffic—on weekdays, weekday evenings, and now even on Saturdays?

Response to Comment No. 515-11

As described on page II-7 of Section II, Project Description, of the Draft EIR, the existing space for athletics, performing arts, and visual arts is limited. Due to the inadequate athletic and visual and performing arts spaces, Archer currently rents off-site venues for athletic practices, games, and arts performances. These off-site venues require that students be routinely bused, adding to traffic congestion and reducing instructional time. By constructing a Multipurpose Facility and an Aquatics Center and enhancing its existing softball and soccer fields, Archer would be able to conduct more of its practices and host additional Interscholastic Athletic Competitions on campus.

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

Comment No. 515-12**I. The proposed very lengthy construction phases would unacceptably degrade our quality of life, and if approved will “substantially and unavoidably” worsen local traffic congestion:****A. As to our family and the other closest neighbors:**

There will be the noise, exhaust and dust of many trucks and construction equipment on our quiet residential street during weekday daylight hours—and proposed well into the evenings—and on Saturdays(?).

Response to Comment No. 515-12

Refer to Sections IV.I, Noise; IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading; IV.B, Air Quality; and IV.K, Traffic, Access, and Parking, of the Draft EIR regarding the Project’s potential construction impacts associated with noise, air quality, and traffic, respectively. Also refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. As discussed on page II-39 in Section II, Project Description, of the Draft EIR, the Project construction hours would comply with the LAMC, which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. Pursuant to the LAMC, no construction activities are permitted on Sundays. Construction hours may be extended with approval from the Executive Director of the Board of Police Commissioners.

Comment No. 515-13

It will be difficult for the neighbors’ visitors, household workers and service personnel to park on Chaparal, a very narrow road.

Will Archer require that all construction workers and equipment park on its own property when not in actual use? If all vehicles involved in the construction are not prohibited from parking on Barrington, Chaparal, Westgate and Saltair, what will be the impact on the local residents as to where their guests, domestic workers, tradesmen and delivery vehicles can park?

Response to Comment No. 515-13

As described on page II-41 of Section II, Project Description, of the Draft EIR, construction workers would not park on Chaparal Street. In addition, the Project does not

propose use of Westgate Avenue or Saltair Avenue for construction access or parking. As set forth in Mitigation Measure K-5, as part of the Traffic Management Plan to be implemented during construction of the Project, access for land uses in proximity to the Project Site during Project construction shall be maintained and obstruction of through traffic lanes on surrounding public streets shall be minimized. Mitigation Measure K-5 requires the establishment of requirements for loading/unloading and storage of materials on the Project Site. Additionally, per Mitigation Measure K-6, construction worker parking would be provided on- and off-site depending on the phase of construction and the availability of on-site parking but no construction worker parking would be permitted within 500 feet of the nearest point of the Project Site except in designated areas. Off-street construction worker parking facilities could include existing parking lots along Constitution Avenue, San Vicente Boulevard or Wilshire Boulevard, and/or other existing facilities with available excess parking capacity. When construction worker parking is off-site, a temporary shuttle may be operated for construction workers to and from the designated off-site parking location. During construction when the on-site parking capacity is insufficient to meet the School's parking demand, Archer would arrange parking for some or all of the employees, students, and guests in available nearby parking facilities. Options for off-site parking facilities could include the surface parking lot south of Sunset Boulevard at Barrington Village or private parking lots along San Vicente Boulevard and Wilshire Boulevard. During construction when School parking is off-site, Archer may provide a shuttle to facilitate access to and from the designated parking location. Upon completion of the underground parking structure, employees, students, and guests would be able to park on-site.

In addition, the Project proposes to provide adequate staging for construction on-site for all phases of construction. As discussed on page II-20 in Section II, Project Description, of the Draft EIR 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. Also refer to page II-41 in Section II, Project Description, of the Draft EIR. During the North Wing Renovation and Phase 1, on-site staging for trucks would be provided along the School's eastern or western driveway as a measure to minimize the impact of material and equipment staging on streets leading to Archer. While most truck staging would occur on-site, one to two trucks may stage curbside on Sunset Boulevard between Archer's two driveways. Temporary and occasional truck staging at this location would not be expected to result in lane closures along Sunset Boulevard. During Phase 2, work would be sequenced to allow staging to occur within the Project Site. During the heaviest periods of construction activity, if needed, truck staging could occur off-site at a designated truck staging area near the Project Site. Under this circumstance, trucks would be radioed in from the designated off-site staging area. If needed, a potential off-site location for haul truck staging could be along Sepulveda Boulevard north of Wilshire Boulevard or within a parking lot in that vicinity.

Comment No. 515-14

We personally observe daily that if even a few vehicles park on either side of our narrow street, Chaparal, vehicles attempting to transit in one direction or the other must stop and wait for any opposing vehicles to pass the parked cars—on Chaparal there is no room beside even one parked car for two vehicles to pass it at the same time.

Response to Comment No. 515-14

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

Comment No. 515-15

If all vehicles involved in the construction are not prohibited from parking on Barrington, Chaparal, Westgate and Saltair, and the result is multiple parked vehicles on both sides of Chaparal and/or Westgate, what will be the impact of such roadway impedance on other vehicles that attempt to transit the affected streets? What about emergency vehicles?

Seriously or not, Archer proposes evening and Saturday construction activities in our quiet residential neighborhood—with its perimeters now over 92% bounded by residences (unprecedented on the Westside). Why would such unusual nuisances be “necessary”? What will be the impact of the noise alone on the quality of life for the residents adjacent to the demolition of two houses and proposed construction of two large new buildings on the small residential properties that Archer has acquired on Chaparal and Barrington?

Response to Comment No. 515-15

Construction workers will not be permitted to park on local residential streets and construction loading/unloading will be required to take place on the Project Site.

Regarding public safety, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Topical Response No. 9, Emergency Vehicle Access, regarding emergency vehicle access. As discussed on page II-39 in Section II, Project Description, of the Draft EIR, the Project construction hours would comply with the LAMC. Refer to Section IV.I, Noise, of the Draft EIR for a discussion of the noise impacts of construction activities. Also refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Although, the construction period would be reduced, the noise impacts would be similar to the noise levels presented in the Draft EIR. As

discussed on page IV.I-114 in Section IV.I, Noise, of the Draft EIR, Mitigation Measure I-1 provides for the design of a Construction Noise Management Plan to reduce noise impacts associated with Project construction. Nevertheless, consistent with the conclusions reached in the Draft EIR, even with implementation of mitigation measures, noise impacts from on-site construction activities would be temporary and would remain significant and unavoidable.

Comment No. 515-16

There is likely to be dust in the air (and possible other pollutants?) during various phases of the several excavations, the deconstruction of the interiors of the north wing, etc. There may also be chemical fumes in the air from the extensive painting and other resurfacing involved. What compensation will Archer pay the neighbors should we sustain impact from these nuisances?

Response to Comment No. 515-16

As discussed in the Draft EIR, the Project would result in less than significant localized NO_x, CO, PM₁₀, and PM_{2.5} construction impacts at sensitive land uses in close proximity to the Project Site (i.e., adjacent residences) with incorporation of mitigation measures. It is important to note that the SCAQMD localized significance thresholds were established to support compliance with National and State Ambient Air Quality Standards. These standards provide public health protection, including protecting the health of “sensitive” populations, such as asthmatics, children, and the elderly.³⁷ To further reduce the potential release of pollutant emissions from painting or resurfacing, the Project would comply with SCAQMD Rule 1113. SCAQMD Rule 1113 limits the amount of VOC from architectural coatings and solvents. As a result of the Applicant’s mandatory compliance with applicable SCAQMD rules and regulations, the Draft EIR concluded no construction activities or materials are proposed which would create these types of nuisances or chemical fumes. In addition, in accordance with SCAQMD Rule 403 as set forth in Regulatory Compliance Measure B-1 in Section IV.B, Air Quality, of the Draft EIR, 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.

³⁷ USEPA. *National Ambient Air Quality Standards*. Available at www.epa.gov/air/criteria.html, accessed August 2014.

Comment No. 515-17

- B. Our family and all residents and commercial neighbors within up to two miles of Archer will be impacted by the “substantial and unavoidable” increase in traffic congestion on Sunset and other local streets:

All eastbound travelers on Sunset and its tributaries for up to two miles to the west, and all residents north of Sunset, on all the streets that reach Sunset via Barrington and Saltair—will be heavily impacted during Archer’s proposed construction, for six years or more Archer proposes, as detailed below.

Congestion on eastbound Sunset Boulevard will be unacceptably increased during periods of heavy traffic—and those congested periods will unavoidably lengthen further into the evenings.

The broadest and most harmful traffic impact of Archer’s oversized, multi-phase, multi-year expansion project, if approved, would be the substantial increased congestion in eastbound traffic on Sunset Boulevard, toward the 405 Freeway, during weekday afternoon and evening hours—an impact that (even with mitigation) the Los Angeles Department of Transportation has found would be “substantial and unavoidable”.

Response to Comment No. 515-17

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic. As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving in recent months as construction on the I-405/Sepulveda Pass project has neared completion, with the opening of the HOV lane on the northbound I-405 freeway and substantial completion of the I-405/Sunset Boulevard interchange modifications. It should also be noted that the highest level of Archer truck generation and impacts would be for relatively short periods during Phase 1 construction activities (e.g., Phase 1 excavation and haul, which is anticipated to occur over the summer months when Archer and other schools are not in session). Impacts at other times would be lower. Further, as described on page II-38 in Section II, Project Description, of the Draft EIR, the Project is proposed to be developed in phases to facilitate continued School operations and minimize disruptions to neighbors with access for haul trucks and equipment/material delivery trucks varying between the different phases of construction. Refer to Table IV.K-30 and Table IV.K-31 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR for a summary of the significant

impacts during construction. The level of activity on the Project Site will vary throughout the construction periods. To be conservative, the analysis of the construction activities in the Draft EIR was conducted for the worst-case days within each construction phase. It is anticipated that the Project's impacts would be less throughout much of each phase than the worst-case identified in the Draft EIR.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. The mitigation measures to reduce the potential impacts of Project construction include development and implementation of a worksite traffic control plan (Mitigation Measure K-4), a construction Traffic Management Plan (Mitigation measure K-5), a construction Parking Management Plan (Mitigation Measure K-6), and a construction Pedestrian Routing Plan (Mitigation Measures K-7),

As discussed on page IV.K-82 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the haul and equipment/material delivery trips on weekdays would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) Monday through Friday and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize impacts during the weekday P.M. commute peak period.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 515-18

The thousands of truck, heavy equipment and car trips inevitably involved in the Archer construction proposal will cause increased backup and transit time to all eastbound traffic for up to two miles west of Barrington. And this increased traffic burden and its consequences will exist in differing degrees for more than six years—during which the traffic burdens on eastbound Sunset will also increase for other reasons.

Response to Comment No. 515-18

As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments, the Project has been refined to reduce the construction period from six years to five years.

As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving since spring of 2014 as a result of construction on the I-405/Sepulveda Pass project nearing completion, the opening of the HOV lane on the northbound I-405 freeway, and substantial completion of the I-405/Sunset Boulevard interchange modifications. It should also be noted that the highest level of Archer truck generation and impacts would be during Phase 1 construction activities (e.g., Phase 1 excavation and haul, which is anticipated to occur over the summer months when Archer and other schools are not in session). Impacts at other times would be lower.

Comment No. 515-19

- Has Archer taken into account all studies by the City and private sources estimating increases in traffic on Sunset over future years? Are there any currently pending City or private studies of Sunset traffic, or of the Barrington/Sunset intersection, that have not yet been taken into account in the Archer studies?
- Has Archer taken into account the scheduled major construction project that will close portions of Pacific Coast Highway for more than twelve months, and detour thousands of southbound daily vehicle-trips onto Sunset eastbound?
- Has Archer taken into account the scheduled major project that will close portions of Wilshire Boulevard for many months?

Response to Comment No. 515-19

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

The transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, the City of Los Angeles 2006 CEQA Thresholds Guide, and LADOT Traffic Study Guidelines, which provide for evaluation of traffic impacts during peak hours on a daily basis.

The Draft EIR considered the effects of related infrastructure improvements including traffic diversions due to the Wilshire Bus Rapid Transit Project. Refer to

page IV.K-21 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. With regard to the pending California Incline reconstruction, since the California Incline primarily carries traffic destined to the downtown Santa Monica area, the primary effect of its temporary closure would be to divert traffic to Chautauqua/Channel and to Moomat Ahiko Way in Santa Monica, not to Sunset Boulevard in Brentwood. The traffic analysis also explicitly took into account traffic generated by known development projects in the Brentwood area and included a background growth factor to represent traffic generated by other growth outside of Brentwood but within the Westside. Refer to page IV.K-20 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR.

The Coastal Interceptor Relief Sewer Phase 2 construction project involving lane closures on portions of Pacific Coast Highway south of Entrada Drive is currently underway and is expected to be completed by April 2015, which is anticipated to be prior to the beginning of substantial Project construction.

Comment No. 515-20

We have personally observed periods when even in existing conditions (and even when all entrances onto the 405 have been open) it takes more than an hour to transit one mile eastbound on Sunset toward the 405 Freeway. Won't even moderately [sic] additions to that traffic flow extend the delay for thousands of eastbound vehicles (and extend the hours of such congestion), and also extend the hours that such congestion exists at every intersection that enters Sunset for up to three miles west of the 405?

On heavily congested roads, and at heavily congested intersections, even a small percentage increase in traffic will typically result in a disproportionate increase in transit time for all approaching vehicles for an extended distance upstream on a major roadway such as eastbound Sunset. Even a small increase will typically also have a ripple effect that lengthens wait times and upstream congestion over a relatively broad radius surrounding the worst intersections—thereby also increasing noise and air pollution. What will be the magnitudes of these impacts?

In turn, increased overall transit time for several thousand vehicles during peak weekday hours would create further delays on all congested roads and intersections in the surrounding area, and may thus extend the current hours during which such congestion exists there. Has that potential extension of congestion hours on nearby heavily-trafficked roads been estimated?

If delays and transit time on eastbound Sunset are increased during hours of heavy traffic, what is the estimate of traffic that will choose to divert to San Vicente Boulevard, and thence to Wilshire Boulevard—in order to reach or cross the 405 Freeway? And what then

will be the impact on existing congestion (and projected future congestion) on San Vicente and Wilshire? And southbound on the major connecting streets such as Barrington, Allenford/26th Street and South Kenter Avenue/Bundy?

Response to Comment No. 515-20

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Refer to Section IV.B, Air Quality, of the Draft EIR for the analysis of Project air quality impacts. As discussed therein, air quality impacts from Project operational emissions would be less than significant.

Regarding noise, as discussed on pages IV.I-110 through IV.I-111 in Section IV.I, Noise, of the Draft EIR, off-site traffic noise impacts associated with the Project would be less than significant.

Comment No. 515-21

An important aspect of congestion surrounding the Barrington/Sunset intersection: During high traffic hours on weekday evenings, the short stretch of Sunset between Barrington Avenue and Barrington Place (the next traffic signal to the east) always fills to the maximum (its “storage capacity,” herein the “B/B cohort,” is only about 24 vehicles), during each light cycle at the Barrington-Sunset intersection.

Such heavily congested hours on eastbound Sunset have tended to lengthen every year, and presumably the City’s traffic studies project even more traffic in future years. What would be the impact of Archer’s project in extending the hours needed to clear all of the eastbound vehicles that will need to transit from Allenford/26th St. in Santa Monica, and to the west of that, to Barrington (and from all interim feeder streets), and then onward to the 405 Freeway?

And what will be the ongoing, permanent impact of each of the various proposed intensified uses of the Archer property (1) during weekday afternoon hours; (2) during weekday

evening hours; (3) during the newly-proposed uses of the property on Saturdays; and (4) during the newly-proposed summer sessions?

The awkward contours of the Barrington/Sunset intersection, the often-full B/B cohort, and the frustration of waiting a long time just to reach it, causes many vehicles to enter the intersection from the north and south (that is, from Barrington), and from Sunset west, illegally late in their green/yellow cycle, and then to be stuck illegally in the intersection during their red cycle. (For this reason, the theoretical throughputs of the Barrington/Sunset intersection are completely unreal in practice.)

Both the frequent lack of space at the rear of the B/B cohort, and the very frequent presence of vehicles illegally blocking the intersection, result in delay for all other vehicles attempting to enter the intersection into the eastbound lanes, and increases their frustration in turn, often leading to more bad behavior.

The hours-long chaotic mess at this intersection during the evening commute truly needs to be seen to be believed. Any significant addition to traffic arriving from the west, north (see below as to the “eastbound/westbound” traffic issue) or south will add to delay and trip time for all concerned.

Has this aspect of the key Barrington/Sunset intersection, now and as traffic is expected to expand in future years, been studied?

Increased waiting time for traffic southbound on Barrington: The southbound traffic on Barrington toward the Sunset intersection is already heavily backed up during peak hours, and for the reasons stated above, typically only zero to three vehicles can turn left onto Sunset during each traffic-signal left-turn cycle.

Barrington has only one lane until the 40 feet, as it reaches Sunset. If eastbound traffic on Chaparral increases and merges with southbound traffic on Barrington, will that result in a lengthening of the hours of congestion experienced by all neighbors to the north of Archer School that use Barrington to approach Sunset (regardless whether they plan to cross it or turn right or left)?

Vehicles leaving Archer onto Sunset and circling the block clockwise at heavy traffic hours will create an “eastbound/westbound” gridlock on the small local streets:

Archer’s driveway debouches onto Sunset in the middle of a block. In the real world, if Archer provides onsite parking for up to 282 vehicles, when those vehicles exit the

driveway during weekday hours it will almost never be possible for them to cross westbound traffic safely and find a safe entry into the gridlocked eastbound traffic.

So those that intend to travel eastbound will necessarily exit the Archer driveway and turn right (westbound) onto Sunset, then right again onto Westgate or Saltair, right again onto Chaparal, and right again onto Barrington, where the signaled intersection includes a short cycle for left turns onto eastbound Sunset.

Good luck with that! Even adding twenty cars an hour to that clockwise, “eastbound/ westbound” flow around the block will totally congest Westgate northbound (one lane each way, “storage capacity” in that short block of only about seven vehicles, and “storage capacity” eastbound on even narrower Chaparal of only about 25 vehicles)—with the side effect of completely blocking Chaparal to all westbound traffic if there is also a single car parked along it.

Of course, once Westgate is filled to capacity, these “eastbound/ westbound” Archer vehicles will continue west on Sunset and turn right onto Saltair, then right again onto Chaparal—simply resulting in “storing” additional vehicles on those short blocks, all waiting for that brief, often fruitless, left-turn cycle from Barrington onto Sunset.

And once the northbound block on Saltair is filled and blocked, these unhappy Archer vehicles will have little choice but to continue further west on Sunset, joining the masses of other vehicles who turn left during the limited left-turn cycles at Bundy and Kenter, then a few minutes later adding to the existing congestion on San Vicente Boulevard and Wilshire in their need to reach their destinations to the east.

Under these circumstance, [sic] legitimate neighborhood drivers who live north of Sunset will experience very long delays to even enter Westgate or Saltair.

Meantime, back at the intersection of Chaparal with southbound Barrington (already loaded to capacity), during busy traffic hours these Archer vehicles will encounter lengthy gridlock—and when each car finally is able to turn right from Chaparal onto Barrington, they become part of the gridlock as to everyone upstream on Barrington as well as all the Archer vehicles (and legitimate neighborhood cars) behind them on Chaparal, Westgate, and Saltair.

The gridlock on the small local streets that this “eastbound/ westbound” circling will cause will also completely block emergency vehicles in either

direction on Chaparal should they ever be needed. It will also likely block and/or delay residents who attempt to drive out onto Chaparal from their driveways.

At peak hours, how many vehicles per hour actually succeed in turning left from Barrington onto Sunset—into the “B/B cohort” mess described earlier? So how many hours would it take for an extra hundred cars that leave the proposed large new underground Archer garage to circle the block all the way to Barrington, alternate with the backed-up southbound drivers there, and then turn left onto Sunset?

How does Archer propose to prevent the scores of drivers who drive out onto Sunset with destinations to the east from causing this eastbound/ westbound nightmare on the local streets during each of the proposed several outflows each weekday, and some evenings?

Providing extensive onsite parking at Archer’s current location is simply a very bad idea. Currently, all the above is avoided because most of the Archer vehicles approach Archer from the south, park in the large public lot on Barrington Place, and never reach Sunset. Good plan!

Response to Comment No. 515-21

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion of vehicles exiting the campus, including field observations at the Project Site indicate that exiting vehicles are generally able to make the left-hand turn from the Archer driveway onto Sunset Boulevard and a license plate matching survey that found that few vehicles exiting Archer are anticipated to cut through Chaparal Street, and a discussion regarding cut-through traffic on Chaparal Street. As described therein, although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to \$15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Regarding the intersection of Sunset Boulevard and Barrington Avenue, as part of Project Design Feature K-2, the Project Applicant would coordinate with LADOT to obtain approval for, and fund LADOT installation of a “no right-turn-on-red turn” restriction on the northbound approach of Barrington Avenue at Sunset Boulevard to facilitate eastbound through traffic along Sunset Boulevard and southbound traffic making a left turn to head eastbound on Sunset Boulevard. As part of Project Design Feature K-3, the Project Applicant would coordinate with LADOT to obtain approval for, and fund LADOT installation of additional “Do Not Block Intersection” signage, potentially on the overhead mastarm, at Sunset Boulevard and Barrington Avenue. Regarding summer school, as part of the Project, summer academic and camp programs are proposed to occur for up to six weeks when the academic year is not in session between the hours of 8:00 A.M. and 5:00 P.M. Monday through Friday. The number of students attending summer academic and camp programs will not exceed 350, which is less than the number that attend Archer when the academic year is in session. As described in Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, all participants in the summer programs would arrive and depart on buses. There would be no parent drop-offs or pick-ups allowed at Archer or in the surrounding neighborhood. Trip generation associated with this use would be less than the typical school day during the academic year, and traffic volumes are generally lower in the summer months compared to months when schools are in session. Thus, traffic impacts of the summer use would be less than significant.

As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced.

Comment No. 515-22

Routing of construction vehicles; routing and parking of workers. There are special additional concerns for the neighbors on all nearby streets north of Sunset.

Archer is seeking permission for several thousand vehicle-trips to circle the block on which it is sited, and to use vehicle entrances located on Barrington and/or Chaparal Street, for six years of major excavation and construction! This will involve not only construction vehicles but heavy construction equipment and many workers (see below as to the workers.)

But Chaparal, as mentioned earlier, is a narrow road only two blocks long (with no through traffic) and a purely residential look and feel. Will any trucks or construction equipment be allowed to park on Chaparal, during weekdays, evenings, weekends? Will Archer compensate the residential neighbors at the same daily rates that a movie studio would, as to such parking congestion?

The unavoidable degradation of our peaceful and clean environment from this construction traffic frankly defies exposition here—any rational person can envision the dreadful impacts this would have if it were taking place on their street! What compensation is Archer offering the residential neighbors for this massive intrusion on their peaceful enjoyment of their homes over then [sic] next six years?

And all those vehicles will also be transiting Westgate (or Saltair) and Barrington, as they approach and leave the construction worksite.

Moreover, as discussed above, the traffic on Barrington southbound to the Sunset intersection is already heavily congested during peak hours. Adding any project-related vehicles to this southbound congestion on Barrington will also significantly increase transit time for all other eastbound vehicles on Chaparal, and northbound vehicles on Saltair and Westgate.

A similar set of issues is presented as to the many workers and planners that will be driving to the Archer construction sites, parking and later driving away. Where will they park? Will they all be required to enter and leave by Archer's existing driveway on Sunset, or allowed to circle the block and add to the mess of construction equipment and vehicles on Chaparal mentioned above? How many vehicles will be allowed to arrive, and depart, during the hours when Sunset is heavily congested?

Increased waiting time for traffic northbound on Barrington: Adding to either the eastbound traffic on Sunset and/or the southbound traffic on Barrington that turns left onto Sunset (inevitable aspects of Archer's proposal) will also add to the waiting time for northbound traffic on Barrington approaching Sunset.

The reasons for this are discussed above, regarding the B/B cohort problem. Has the impact on northbound traffic on Barrington been considered?

Response to Comment No. 515-22

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years.

Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic. As described in Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, traffic in the area of the Project has been improving in recent months as construction on the I-405/Sepulveda Pass project has neared completion, with the opening of the HOV lane on the northbound I-405 freeway and

substantial completion of the I-405/Sunset Boulevard interchange modifications. It should also be noted that the highest level of Archer truck generation and impacts would be for relatively short periods during Phase 1 construction activities (e.g., Phase 1 excavation and haul, which is anticipated to occur over the summer months when Archer and other schools are not in session). Impacts at other times would be lower. Further, as described on page II-38 in Section II, Project Description, of the Draft EIR, the Project is proposed to be developed in phases to facilitate continued School operations and minimize disruptions to neighbors with access for haul trucks and equipment/material delivery trucks varying between the different phases of construction. Refer to Table IV.K-30 and Table IV.K-31 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR for a summary of the significant impacts during construction. The level of activity on the Project Site will vary throughout the construction periods. To be conservative, the analysis of the construction activities in the Draft EIR was conducted for the worst-case days within each construction phase. It is anticipated that the Project's impacts would be lower throughout much of each phase than the worst-case identified in the Draft EIR.

As described in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, the Project would include implementation of Mitigation Measures K-4 through K-14 to address potential traffic and access issues during construction. The mitigation measures to reduce the potential impacts of Project construction include development and implementation of a worksite traffic control plan (Mitigation Measure K-4), a construction Traffic Management Plan (Mitigation measure K-5), a construction Parking Management Plan (Mitigation Measure K-6), and a construction Pedestrian Routing Plan (Mitigation Measures K-7),

As discussed on page IV.K-82 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the haul and equipment/material delivery trips on weekdays would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) Monday through Friday and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize impacts during the weekday P.M. commute peak period.

As discussed in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, during the North Wing Renovation and Phase 1, virtually all haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Sunset Boulevard east and west driveways. Up to 5 percent of construction vehicles were assumed to enter and exit from the Chaparral Street driveway during the overlap between the North Wing Renovation and Phase 1(a). For the remainder of Phase 1(b) through Phase 1(d) periods, haul and delivery ingress and egress would be similar, except that up to 20 percent of haul trucks and equipment/materials delivery vehicles could use the Chaparral Street or Barrington Avenue driveways. To be conservative, the Draft EIR assumed that under Phase 1, all

haul trucks and equipment/material delivery vehicles would enter and exit the Project Site via the Barrington Avenue driveway or the Chaparal Street driveway.

Comment No. 515-23

II. **After the extensive proposed expansion of Archer is complete, the proposed massive intensifications of use would result in unacceptable permanent degradation of our quality of life, and local and regional traffic congestion:**

Response to Comment No. 515-23

Regarding proposed campus operations, refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation including additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to below a level of significance.

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

Comment No. 515-24

A. **As to our family and the other closest neighbors:**

Noise: The residences on Chaparal and Westgate, and to some extent even on Barrington and Saltair—have been quiet havens for families for decades, and have relied on the original Archer 1999 CUP to maintain our quality of life. If the Archer proposals are approved, our residences (and the scores of multi-family residences on Sunset south and west of the playing fields) would become subject to greatly increased and more frequent crowd noise from the proposed varsity playing fields, both during weekday evenings and on weekends.

“Quality of Life” is not an abstraction to us! Nor do we consider it to be negotiable. And no organization or group has our permission to negotiate reductions in our Quality of Life, in return for supposed compromises as to other features of the Archer proposal.

For decades those residents in the area who work for a living and return to our homes on weekday evenings, and those of us who love to be out in our yards on weekends, have been able to enjoy the peaceful ambience of a purely residential neighborhood. The nearby neighbors of Archer relied on the peaceful nature of our north-of-Sunset neighborhood when we purchased our homes or leased adjacent apartments, and we also trusted that Archer would continue to abide by its heavily-negotiated and detailed 1999 commitments to protect our quality of life when Archer was permitted to take over the Eastern Star Home, and the pending lawsuit was withdrawn.

Due to Archer’s admittedly poor choice in its original site selection in 1999, the playing fields are not of the size needed for varsity soccer and softball (or presumably full-field sports such as track, field hockey and lacrosse—other large-field sports that Archer currently offers but some of which are not addressed in the traffic, parking and noise sections of the draft EIR).

Thus Archer for fifteen years has held its varsity games in several sports on the grounds of Santa Monica College—where there just happens to be existing lighting for night games, extensive adequate parking, relatively little congestion on local streets, and zero noise impact on residences.

This very important issue of noise from athletic events was from 1997 to 1999 the subject of extensive negotiation and a lawsuit. In return for concessions from the then neighbors (and dropping the lawsuit), Archer agreed to appropriate, detailed restrictions and conditions in its 1999 CUP regarding athletic events. This resulted in a livable situation for most of the nearby residential neighbors for the past fifteen years.

It is a clear breach of faith for Archer now to propose changes as to the nature, frequency, scheduled times, and the amount of crowd noise that will result from its proposed massive expansion of its onsite athletic activities, increases in onsite parking and local traffic, with substantial and unavoidable degradation on the Quality of Life for scores of nearby residents, in both apartments and single-family homes.

What compensation does Archer propose to pay its residential neighbors to add these unprecedented nuisances?

Response to Comment No. 515-24

As discussed on page IV.I-87 of Section IV.I, Noise, of the Draft EIR, with implementation of the Project, including the development of the proposed Multipurpose Facility, Aquatics Center, and new regulation-sized soccer and softball fields, Archer would host volleyball, basketball, soccer, softball, and field hockey, swim, and water polo practices and games and matches on-site. Potential noise impacts associated with volleyball, basketball, softball, soccer, and field practices and games and swim and water polo practices, games, and meets were evaluated in Section IV.I, Noise, of the Draft EIR, beginning on page IV.I-87. Archer would continue to host certain athletic team practices and competitions off-site, including Middle School and Upper School equestrian, tennis, beach volleyball, cross-country, and track.

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

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

Comment No. 515-25

Archer also proposes to add lights and outdoor speakers, and a PA system, each of which is inconsistent with the quiet environment that has been characteristic of our neighborhood for many decades. These do not appear to be serious proposals, but perhaps efforts to offer the neighbors as sham compromises.

Response to Comment No. 515-25

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has been refined to eliminate the proposal for use of a non-permanent audio system for public address and amplified music in conjunction with Instruction, Interscholastic Athletic Competitions, and School Functions. Archer would continue to use a non-permanent audio system for use during Graduation as permitted under Archer's existing CUP.

With regard to lights, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, the athletic field lighting has been removed from the Project.

Comment No. 515-26

A third noise issue that will impact the homes on Chaparal is that Archer proposes to vent all vehicle noise (and any fumes) from a large new underground garage, not toward the east or the south (that is, onto Archer's own property), but north onto Chaparal Street—less than a hundred feet from the nearest homes, and a few hundred feet from several more.

Did Archer consider the alternative of absorbing the vehicle noise and fumes from its proposed underground garage, by venting onto its own grounds?

Response to Comment No. 515-26

Refer to Topical Response No. 8, Summary of Impacts from Parking Structure. As described therein, in response to comments on the Draft EIR, refinements have been included in the Project, including a reduction in the number of parking spaces from 212 spaces to 185 spaces. With the reduction in size, the parking structure would be located approximately 62 feet from the western property boundary, which represents an increased set back of approximately 35 feet when compared with the Project described in the Draft EIR wherein the setback was approximately 27 feet from the western property boundary. In addition, the row of parking spaces along the southern edge of the parking structure previously proposed to remain uncovered would be eliminated and replaced with an expanded landscape buffer. While the southern side of the parking structure would remain open, this design refinement would accommodate approximately 10 feet of additional landscaping and visually shield parked cars from view. The underground parking structure is proposed to be naturally ventilated along the north, south, and east. The underground parking structure could be open up to approximately 68 percent along the north side, up to approximately 100 percent along the south side, and up to approximately 42 percent along the east side. Openings on the north would consist of stair shafts and ventilation/light wells that open downward into the garage from the playing field level. These are located parallel to the north side of the soccer field and are fully screened from public view by the 8-foot-high masonry wall running the length of the Project Site along Chaparal Street. Openings along the south and east sides occur where the south and east garage walls are left open to face into below-grade landscaped areas. The parking structure would be completely closed along the western side. The use of the underground parking structure would have less than significant noise and air quality impacts and noise associated with the parking structure would be lower than existing conditions.

Comment No. 515-27

Fourth, Archer now proposes to allow various events completely unrelated to education of its students, on its property. Weddings, filming and other rental uses obviously will create impact on the neighborhood, since the non-Archer participants will not be well-experienced in complying with the traffic and parking restrictions to which Archer agreed in 1999 as to its school activities. Whereas parents of Archer students can be sanctioned by Archer when they violate the route and parking restrictions in Archer's CUP, how does Archer propose to control visitors who traverse or park and/or walk unsafely or noisily along the small adjacent streets?

What compelling reason does Archer present for its proposal to expand its school sessions into the summer, with all the resulting impacts on the neighbors and adjacent roads thereby extended into the summer weeks during which we neighbors are accustomed to enjoying our yards and patios? Or for allowing any rental uses of its premises?

These are clearly not "needs" but merely "wants".

Response to Comment No. 515-27

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Also refer to Topical Response No. 1, Refinements to Proposed Operations, for a discussion of the proposed summer academic and camp programs. Regarding filming, as discussed in Topical Response No. 1, Refinements to Proposed Operations, filming on the campus for commercial purposes would continue to be prohibited except when the School is not in session and provided the filming revenue is placed in the School's scholarship fund.

Comment No. 515-28

Archer's various proposals to intensify usage (some no doubt serious, others perhaps not so much!) would allow up to 24,000 visitors a year. It is inevitable that some such non-Archer visitors will transit the narrow adjacent streets (Saltair, Chaparal, Westgate and Barrington), looking for parking—and indeed perhaps park on those streets, and walk along them, despite the lack of sidewalks on almost all portions. Isn't this likely to be noisy at times, and at times dangerous on such narrow, poorly-lit streets?

And what does Archer propose to do that will realistically prevent this?

Response to Comment No. 515-28

Regarding the comment's estimates of visitors to the campus, the transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, the City of Los Angeles 2006 CEQA Thresholds Guide, and LADOT Traffic Study Guidelines, which provide for evaluation of traffic impacts during peak hours on a daily basis.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a detailed discussion of potential traffic impacts associated with proposed campus operations. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion of vehicles exiting the campus, including field observations at the Project Site indicate that exiting vehicles are generally able to make the left-hand turn from the Archer driveway onto Sunset Boulevard and a license plate matching survey that found that few vehicles exiting Archer are anticipated to cut through Chaparal Street, and a discussion regarding cut-through traffic on Chaparal Street.

Project Design Feature K-7 included in Section IV.K, Traffic, Access, and Parking, of the Draft EIR requires that Archer develop an Event Parking and Transportation Management Plan. As discussed in Topical Response No. 16, Environmental Review and Conditional Use Permit Process, a new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding the compatibility of the School's operations and its facilities with the surrounding neighborhood.

Measures are proposed to ensure that parents and visitors do not drive around the neighborhood to find parking. As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced. The reduced parking structure would accommodate all on-campus parking in one location and would provide approximately 185 parking spaces. The on-site parking may be expanded to accommodate a total of 251 parking spaces when necessary with use of attendant-assisted parking. In addition to attendant-assisted parking, Archer would arrange for off-site parking to accommodate excess demand over and above the 251 spaces.

Parking on the street and walking onto the site would be prohibited by requiring that persons walking onto the campus have a walking permit issued by Archer and check-in with security upon arrival to the campus.

Regarding safety, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Topical Response No. 9, Emergency Vehicle Access, regarding emergency vehicle access.

Comment No. 515-29

Tripling Archer's current onsite parking and its impact on local traffic:

Pursuant to its 1999 CUP limitations negotiated carefully and at length, in exchange for other concessions by the neighbors, Archer School currently has only 109 parking spaces on its grounds, and those are limited to use by certain categories of drivers.

Pursuant to Archer's current CUP, parents and students are not allowed to park on the property. Parking for athletic, cultural and other activities is also required to be offsite.

Yet somehow Archer has found it possible to live with those parking restrictions for fifteen years. And those agreements incidentally kept hundreds of vehicles clear of Sunset every weekday, since most of them approach Archer from the south, northbound on Barrington but then turning into the public parking lot on Barrington Place before reaching Sunset.

Archer now argues that the parking limitations it agreed to in 1999, after two years of negotiation and to settle a lawsuit, create problems, including the need for people to walk to Archer from a public parking lot several hundred yards away, and to cross the intersection at Barrington and Sunset. So Archer now wants to excavate a large underground garage with 282 parking spaces. And with large blowers to vent all the related vehicle noise and emissions, not east or south into its own property, but entirely through large vents pointing north onto Chaparral Street, with the nearest homes less than 100 feet away—here again Archer wants less than 75 feet in setback.

Why does Archer not adopt a design that would vent the vehicle noise and fumes onto its own property to the south and east? What would be the mitigation benefits of such an alternative design?

Archer's now-asserted need to almost triple the number of onsite parking spaces, however, is yet another important example of the now-admitted mistakes that Archer made in its choice of the Eastern Star Home more than fifteen years ago—and another example of

why Archer's most suitable "alternative" plan should be to find a different, much larger site to which it can move, preferably in a nonresidential neighborhood, and avoid most of these considerations.

What compensation does Archer offer to us and the other residents on Chaparal who will be the victims of the noise and pollution (and degradation in market value) resulting from Archer's self-centered parking structure design?

Response to Comment No. 515-29

Refer to Response to Comment No. 515-26 regarding potential noise and air quality impacts associated with the proposed underground parking structure and Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement. Also refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project.

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

Comment No. 515-30

Two large new buildings proposed to be constructed adjacent to Chaparal, both in violation of setback norms:

The west-of-the-405 segment of Chaparal Street north of Archer is only two blocks long, and currently has the ambience (and parking and traffic capacity) of a narrow suburban lane, since even the Chaparal side of Archer's current athletic fields are visually screened by a fence and a row of trees. A person driving or walking along Chaparal under current conditions has the visual impression that it is an attractive and peaceful residential neighborhood.

Archer now proposes to construct a very large performing-arts center, and a multi-purpose center, both backing onto Chaparal Street, and to eliminate the setback requirement of 75 feet that was negotiated in 1999, such that the two new buildings would be only 20 feet from the Chaparal property line, and visible to both pedestrians and vehicle occupants. If approved, these buildings will indeed appear just like commercial office buildings, and would radically degrading [sic] the visual aspects of Chaparal.

What compensation does Archer offer the residents of Chaparal for these visual (and audible) nuisances?

Response to Comment No. 515-30

Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. With regard to setbacks, the proposed School buildings would meet residential front yard setback of 25 feet along Chaparal Street and Barrington Avenue. The buildings along Chaparal Street would have a stepped profile and would be located behind 8-foot walls covered in vines and continuous landscaping to effectively screen the massing of the buildings along Chaparal Street with only portions of the buildings being visible along breaks in the landscaping. Additionally, the Project, as refined in response to comments, would maintain approximately 457 feet, or 64 percent, of the frontage along Chaparal Street as open space. On an overall basis, the Project would not obstruct an existing valued view, and view impacts would be less than significant.

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

Comment No. 515-31**Archer's proposed non-school uses of its property.**

Whether serious or not, Archer proposes to rent out its site for weddings, filmings and other uses. What hours will be involved, and will there be any limits on the number of vehicles, or their transiting of and parking on the small adjacent streets (Saltair, Chaparal, Westgate and Barrington)?

What is the "need" for these changes? Even assuming good faith efforts by Archer to enforce any such restrictions, in the real world what are the likely impacts on our quiet neighborhood of visitors that do not abide by them?

Response to Comment No. 515-31

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, reducing the number of proposed School Functions from 98 to 86, including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic

Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 515-32

III. Archer should seriously consider, and the EIR should reflect in detail, the mitigating impacts of the far superior alternative of selecting another, larger location for its school, that would (a) better accommodate the purposes and goals of its original 1999 plans as well as the massive expansions of structures and intensifications of usage proposed now, (b) would avoid all of the serious problems identified in the draft EIR and in this and other submissions by the residential neighbors—and (c) would facilitate expansions in future years of Archer’s facilities and student body [sic]

Archer should be justly proud of its long record of delivering high-quality education to girls, and its near-perfect compliance with its detailed 1999 CUP commitments to preserve the Quality of Life of its residential neighbors.

And as with any institution that has succeeded so well in its mission, it is natural that over the years and decades to come, Archer will likely seek to expand, presumably in successive stages, in order to be able to deliver its mission to an increasing student body, as well as expanding the curriculum and resources it offers.

Unfortunately, one of the ineluctable implications of Archer’s submissions and current assertions is that the former Eastern Star Home tract of only 6.2 acres (now expanded modestly by Archer’s purchase and proposed demolition of two adjacent residences) is too small and only awkwardly suited even for the current student body of 460.

Several key elements of Archer’s proposal demonstrate that Archer should have sought a different site in 1999, if it truly wanted to avoid damaging the Quality of Life of its neighbors, to allow classrooms of adequate size and shape, and to avoid the inconveniences and dangers that have resulted from its 1999 parking plan and its need to hold its varsity athletic events at a distance.

But, frankly, aren’t all of those problems inherent in Archer’s own questionable decisions in 1999? Archer’s residential neighbors—and the several thousand drivers who need to travel eastbound on Sunset each afternoon and evening—should not now be asked to bear the burden of curing those inherent problems.

Nor does it make sense for Archer now to attempt to cram onto a relatively small acreage a net new 80,000 square feet of building space, a large (although mostly underground) parking lot, the largest performing arts center on the entire Westside, a two-story swimming center, a large multi-purpose building, etc.

Response to Comment No. 515-32

An alternative site was studied in Section V, Alternatives, of the Draft EIR but was rejected from further consideration. Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives. In addition, as described therein, splitting the School onto two separate sites would also fail to meet project objectives.

Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. As described therein, the Project has been designed to be consistent with adjacent residential development, to shield neighbors from internal campus activities and noise, and to be cognizant of the boundaries between the Project Site and adjacent residential lots.

In addition, it is noted that the Project has reduced the proposed square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Overall, the Project's net new floor area would be reduced from 75,930 square feet to 68,989 square feet. Further, the Project, as described in the Draft EIR, did not propose a two-story swimming center. Rather, as described in Section II, Project Description, of the Draft EIR, the Project proposes an Aquatics Center with a 6-lane, 25-meter swimming pool and room for locker rooms, offices, and equipment storage. In response to comments to reduce noise from the use of the pool, the Project would fully enclose the swimming pool within the proposed Aquatics Center.

Comment No. 515-33

Does Archer have a long-term plan, or a draft of one, or is one in the offing—that would deal with increasing its student body? If so, how would the environmental impacts of its current proposals worsen if and when Archer comes back to the City with its next “new” proposal? Or, is Archer again willing to agree to a stand-down period of fifteen or twenty years?

But why would a successful school with such massive financial resources agree to limit its student body for such a long period? It defies reason, frankly. “Archer Sideways”?

Response to Comment No. 515-33

As discussed on page II-2 of Section II, Project Description, of the Draft EIR, the existing CUP (ZA 98-0158(CUZ)(PA4)) provides for a maximum enrollment of 518 students. The Project does not propose to increase the maximum enrollment cap of 518 students.

Comment No. 515-34

It is inarguable that both Archer’s initial goals, current expansion goals and longer-term goals can better be pursued on a larger property than Archer’s current site. Archer and its experts should be required to study and present the mitigating benefits of that alternative approach to its current proposed expansions of structures and activities, including relocation onto a site in a nonresidential neighborhood.

The following are among the dozens of Westside private schools that have chosen to locate or relocate in nonresidential neighborhoods (or sites not surrounded by residences): Arete Preparatory Academy, Berkeley Hall School, Crossroads School, Curtis School, Delphi School, Loyola High School, the Lycee Francais, Marymount High School, Milken Community Middle School and High School, Notre Dame Academy Elementary School, Saint Sebastian School, Santa Monica Montessori School, Westview School, Wildwood School, and Westland School. (And there are many more such schools.)

In contrast, very few private schools appear to have chosen to locate onto sites bounded by residences on three sides, as Archer did. Indeed, Archer and its playing field and new accessions are now bounded by residences on over 92% of its perimeter!

As with those schools, the current and future stakeholders in Archer would be far better served by relocating the school to a nonresidential site, one where—without all the complications, problems and expense inherent in its current expansion proposal—Archer could expand repeatedly in future years and decades, and deliver its excellent education to a growing student body.

A relocation would allow Archer to lay out a purpose-designed campus; to construct buildings and other facilities from the ground up to suit a twenty-first century school, with built-in flexibility to gradually expand; to lay out athletic fields without the limitations that even its current proposal would impose, perhaps with lighting for night games; and to include adequate parking for now and for the future.

Archer's stated \$67 million expansion budget, plus the eventual proceeds of selling its current campus, would be far more efficiently spent under that alternative, rather than attempting to patch up its classroom facilities by demolishing some structures and interiors on a property that limits such modernization efforts because its main building is designated as a protected Cultural/Historical Monument.

And such a purpose-designed project could certainly be completed in far less than six years, as demonstrated by the several private schools now sited on or near Olympic Boulevard and Mulholland Drive.

Response to Comment No. 515-34

Refer to Response to Comment No. 515-32. In addition, as detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. Regarding the historic Main Building, as described in detail in Section IV.D, Cultural Resources, of the Draft EIR, the North Wing portion of the Main Building is not historic. The historic portion of the Main Building would be preserved with the Project.

Comment Letter No. 516

Gretchen Wu
439 N. Van Ness Ave., Apt. 8
Los Angeles, CA 90004

Comment No. 516-1

My name is Gretchen Wu and I have been a Latin teacher at the Archer School for Girls for the last eight years. Archer is a unique institution that fosters a sense of collaboration, diversity, resilience, and scholarship. Although it is a relatively young school, the community has achieved so much in the fields of education, from classical Latin courses to a cutting edge STEM program, and has given back to Los Angeles neighborhoods through its strong commitment to service.

Archer's faculty and students have accomplished so much despite the current campus's lack of facilities, but as the school moves forward into the 21st century, it becomes more and more clear how necessary it is to implement the new campus plan. Even things as simple as air-conditioning are unavailable to most of the classrooms. The limited space of each individual room makes innovative teaching challenging, as so many learning activities cannot be explored because of the spatial constraints. Other schools already have these facilities and Archer students should have the same resources.

Archer's campus plan does not only help its students, but also impacts the community in a positive way. The current state of a building constructed over 70 years ago requires a lot of upkeep and renovation as it is. After the new campus is built, Archer will contribute significantly less in the way of pollution in the neighborhood. Traffic will become less of a problem after the redesign of the roads surrounding Archer and the new underground parking structure would reduce the noise levels experienced by residents of Brentwood.

These are just a few reasons why the city should allow Archer to renovate its facilities. Please support Archer's campus preservation and improvement plan.

Response to Comment No. 516-1

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

Comment Letter No. 517

Steve Wyler
11817 Chaparal St.
Los Angeles, CA 90049

Comment No. 517-1

I'm a longtime resident of the Brentwood community and have shared my neighborhood with The Archer School for Girls for many years. I actually own a home on Chaparal Street directly behind the school. Archer has been a great neighbor and I am writing to express my support for their plans to build on their campus and the use of residential lots to do so.

I believe that Archer has made every effort to ensure that the plan will benefit the community and has addressed many of the needs and concerns of its neighbors. No improvement project can take place without construction and I know that school will do everything possible to limit impacts during the construction period.

In my opinion, Archer has proven itself to be a responsible neighbor and an asset to the Brentwood community. I hope that the school can count on the support of the city to build the facilities they need.

Response to Comment No. 517-1

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

Comment Letter No. 518

Valerie N. Yoshimura, Ph.D.
11353 Ovada Pl., Apt. 8
Los Angeles, CA 90049

Comment No. 518-1

As a local resident, a member of the faculty, and a parent of a 6th grader, I write to support the Campus Plan proposed by The Archer School for Girls. Archer is an amazing resource for our city's girls, yet the current facilities compromise our ability to maximize the fulfillment of our educational mission.

As a faculty member, my pedagogy is negatively impacted by the limitations of the physical space and lack of centralized HVAC. I teach French in a west-facing second floor room; previously, I had been in an interior second floor room. The interior room suffered from miserable ventilation. My current room has two windows and two doors, so I can generate cross ventilation, but I have scant remedy against the cold or the heat. Girls regularly either huddle around my heater or languish in the heat; on multiple occasions, during heat waves, I have literally had to move my entire class to a science or art classroom with air conditioning. This is less than ideal for we do not have any of our own French curricular resources at our disposal, classroom management is more difficult, and we lose much time in transit. Moreover, 16 girls are very cramped in my space, which impedes my ability to implement core elements of my second-language pedagogy, including mingling activities, student skits/presentations, and student engagement at the board and around the room. In short, learning is compromised.

As a neighbor, I am impressed by Archer's contributions to our community and to its commitment to respect the neighbors by limiting the height of proposed structures and cultivating natural landscaped buffers. I have seen Archer students doing community service in Brentwood, both along San Vicente and regarding Sunset Boulevard safety. Archer students spearheaded a safety campaign following the death of the Harvard-Westlake girl a few years ago. Archer also installed crossing guards at the crazy intersection of Sunset and Barrington, a service from which all who visit Brentwood Village can benefit. Moreover, Archer busses the vast majority of its students, reducing the traffic burden. I can't tell you how many times I have been stuck on Sunset because traffic from Brentwood School backs up from the turn lane on (Little) Barrington Place. Archer is a good neighbor.

As a parent of a 6th grader, I realize more than ever the need for better facilities. My daughter has spent countless hours in transit to swim practice and meets, volleyball

games, and dance performances. There is enough traffic congestion in Los Angeles without having to add transportation for activities that are easily accomplished by most schools on their own campus. I have seen my daughter come home from school exhausted from the heat; I have seen her sitting on the floor or in the hot sun at meetings simply because we do not have a space large enough to seat the entire student body for school assemblies. Archer must continually hire outside venues (schools) and contractors to accommodate activities (swim, dance, basketball) that could easily be done on campus with the renovations. It frustrates me that my tuition dollars must undoubtedly go to shoulder some of these expenses. Archer students deserve facilities comparable to those at our peer institutions: Brentwood, Windward, Marlborough, Harvard-Westlake.

I believe the Campus Plan proposed by The Archer School for Girls is eminently reasonable and respectful of neighbors. *As a faculty member, as a parent, and as a neighbor, I wholeheartedly support Archer's carefully considered proposal.*

I respectfully request that you, and our great City of Los Angeles, support the Campus Plan. Please feel free to contact me if you would like to speak further.

Response to Comment No. 518-1

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

Comment Letter No. 519

Mark Zakarin
12921 Evanston St.
Los Angeles, CA 90049

Comment No. 519-1

Please keep Sunset from becoming completely un-driveable.

Response to Comment No. 519-1

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

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 519-2

Mark Zakarin
12921 Evanston Street
Los Angeles, CA 90049

Response to Comment No. 519-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 520

Peter Zeegen, M.D.
229 Oceano Dr.
Los Angeles, CA 90049

Comment No. 520-1

It would be irresponsible to allow the proposed Archer School plans for expansion since it would severely impact an already intolerable traffic condition on Sunset. This has led us to be virtually housebound for several hours a day. Please do not allow this to go through.

Response to Comment No. 520-1

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

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 520-2

I live at: 229 Oceano Dr. Los Angeles 90049

Response to Comment No. 520-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 521

Jennifer K. Zeller
753 Chapala Dr.
Pacific Palisades, CA 90272

Comment No. 521-1

I am a proud parent of a student at the Archer School for Girls and I also reside in the 11th District. I am writing to request that you support Archer Forward, the school's campus enhancement plan. Archer is a valuable asset to the City and should have the facilities that the students need to learn and be best prepared for their futures.

Right now, there is no space on campus where all the students and staff can gather together. Our girls have to take carpools and buses off campus for practices and performances as the school lacks facilities that almost every other independent school in the city already has. I know that the school has gone to great lengths to create a plan that will allow the school to work well with the neighborhood—already, parents, teachers and students must abide by a strict traffic control plan to ensure that Archer doesn't add too many more cars to the congested Sunset corridor.

This plan will provide the facilities that the school desperately needs, and I believe that Archer has shown good faith in its effort to work with the community, its neighbors and the city. I hope that the City will agree and support Archer Forward.

Response to Comment No. 521-1

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

Comment Letter No. 522

Paul Zimmerman
zimmerman@ca.rr.com

Comment No. 522-1

I am a third generation Los Angeles native. I am writing you in support of the Archer forward improvement plan. The Archer School for Girls is one of the most beautiful places in all of LA Visually and actually. My daughter has attended since 7th grade and is currently in 10th grade. Every time I visit my breath is taken away watching girls excited about learning in this unique bastion.

It is well deserving of support from neighbors and public officials. There is no downside. This is what business people like myself call a “no brainer”.

Any opposition could only be motivated by selfishness. I am told that during the origin of Archer some neighbors tried to stop it. That is embarrassing to say the least to any civic minded Los Angeleno. Please expedite the process.

Archer produces the most poised and educated young ladies I’ve ever encountered from LA high schools. I’m sure if you visit the school you will see for yourself that this institution need to promoted in every way.

Response to Comment No. 522-1

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

Comment Letter No. 523

Archer School Support Form Letter
(multiple signatures—see following list)

Comment No. 523-1

I support The Archer School for Girls and their innovative Campus Preservation and Improvement Plan, Archer Forward. (ENV-2011-2689-EIR)

This plan will provide the essential facilities that nearly all of the comparable local public and independent schools already have—including adequate space for athletics, performing and visual arts facilities, and modern classrooms. These spaces are critical to Archer being able to provide the programs that are integral to the school's high-quality curriculum and girl-centered learning environment.

Under this plan, the School will increase the percentage of students brought in by bus every day from 50 to 70 percent, while continuing its exemplary compliance with its traffic management program—the most stringent of any independent school in Los Angeles. Archer awards nearly \$3 million a year in scholarships and the school prides itself in reflecting the face of greater Los Angeles. Currently, students come from 146 different feeder schools and 92 different zip codes across the city. It is also important to note that Archer will not be increasing its enrollment cap as part of the Archer Forward plan.

Archer's community outreach for Archer Forward is unprecedented. The School has worked hard to conduct an open, transparent process, sharing information with community leaders and neighbors as it became available. Archer has held over 70 outreach meetings, knocked on over 100 neighborhood doors and sent over 11,000 pieces of mail. As a result of these meetings and outreach, Archer made a number of modifications to the plan, all designed to reduce burdens on the neighborhood.

Archer Forward honors and preserves the historic main building on Sunset Boulevard while supporting environmental best practices. Most importantly, this plan provides Archer girls access to the facilities they need and deserve.

I hope you will support Archer Forward so that generations of girls in Los Angeles are able to receive a top notch, 21st century education.

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Late Letters

June Baldwin* (4/29/2014, 8:21 p.m.)
jmbpolitics@verizon.net

Douglas Wilson* (5/21/2014, 1:21 p.m.)
Nancy Ortenberg
848 S. Sycamore Ave.
Los Angeles, CA 90036

David Higley* (4/29/2014, 6:46 p.m.)
dave@higleyco.com

*Indicates the commenter included a postscript in the letter or replied to the City planner.
All postscripts or replies are listed below and include the commenter's name.

Response to Comment No. 523-1

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

Comment No. 523-2

Dean Allgeyer: Schools such as Archer deserve city support to deliver an exceptional educational experience.

Response to Comment No. 523-2

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

Comment No. 523-3

Cynthia Ambriz: I support this plan and hope that Archer will be able to further develop in order to improve the already stellar education it provides to so many young women. I am so grateful for the opportunities Archer had to offer me during my time there, and I truly hope that future generations of Archer girls will receive a greater wealth of opportunities with the development of new facilities.

Response to Comment No. 523-3

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

Comment No. 523-4

Lauren Bahedry: I fully, 100%, support this plan for the Archer School for Girls. Archer has always been immensely conscientious of the surrounding neighbors and the school clearly

continues to put careful thought into how its actions will affect others. Archer is a cornerstone of the community and plays a hugely important role in the lives of young women all over Los Angeles. Giving the school a chance to provide top-notch facilities to its students will make a world of a difference as Archer continues to educate and empower.

Response to Comment No. 523-4

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

Comment No. 523-5

Ellie Beckman: Archer is truly a special place where girls learn to grow in an environment like no other. I do not believe I would be the confident and happy woman that I am were it not for the support I received during my 6 years there.

Response to Comment No. 523-5

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

Comment No. 523-6

Stephen Beech: I just wanted to add that we have been fortunate to have one daughter complete her 9 through 12 years of High School at Archer and is now completing her second year of college. We currently have a second daughter in the tenth grade and she is thriving in the Archer environment. There is no doubt, in order for Archer School for Girls to continue offereing [sic] a quality education the facilities should be upgraded. Archer School For Girls provides opportunity for young women in the Los Angeles Community ,especially for those young women who would not be fianancially [sic] able to attend Archer, but for the generous scholarship program offered at Archer School for Girls. Many young women are given the gift of a lifetime... an education that will move them forward in life to places they would never have dreamed of otherwise. Please support the Archer Forward plan and let dreams grow along with Archer and the the [sic] Los Angeles Community. And one other thought. I have seen the preliminary plans for the upgrade and I think they are very respectful of the neighborhood. They are low profile and very unobtrusive. An elegant design solution. Thank you so much for your thoughtful consideration regarding the Archer Forward proposal.

Response to Comment No. 523-6

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

Comment No. 523-7

Catherine Bergin: As someone who attended Archer and received a progressive, enriching education with some of the best and most supportive teachers I have ever come in contact with, I am a full supporter of Archer Forward. The girls at this school deserve the best possible education available, and this plan fully supports that. Go Archer!

Response to Comment No. 523-7

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

Comment No. 523-8

Steven Bersch: Archer has been extremely diligent about emphasizing to the school parents the importance of courtesy to the neighborhood, including as to [sic] the stringent transportation and parking procedures. I believe they are a very good neighbor and that will continue, and feel a great education facility can live in harmony with the neighborhood.

Response to Comment No. 523-8

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

Comment No. 523-9

Elana Besserman: My name is Elana Besserman and I graduated from Archer in 2002. I am writing in support of Archer's [sic] Campus Plan. Archer shaped me in so many ways. I am a small business owner and it was thanks to the empowerment I gained from Archer that I took my small passion for kettle corn and grew it into a thriving Popcorn business. Through all of the incredible opportunities [sic] at Archer (including being the only person in my Spanish class one year!), student council, sports and academics, I am a confident leader, woman, mother, wife, friend and member of the community. I support Archer's [sic] plan because girls deserve every opportunity [sic] to become leaders.

Response to Comment No. 523-9

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

Comment No. 523-10

Aaron Bush: I am very proud of what Archer has accomplished—balancing community and neighborhood awareness with such an amazing educational platform that has elevated my daughter's [sic] interest in learning and community involvement. I truly hope that our girls, and all future generations, will get to benefit from such an amazing well thought out forward plan.

Response to Comment No. 523-10

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

Comment No. 523-11

Juan Cadenas: On behalf of my wife and me, we would like to express how important it is for our girls to have a great education and Archer has provided such a great environment thus far and by you allowing us to expand it will allow our girls more access to continue this great path. We thank you in advance for helping the school and us with this modification.

Response to Comment No. 523-11

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

Comment No. 523-12

Maria Calvo: We ask that you please allow our girls to continue to thrive. Archer is a very special school and has always followed the city rules. We will continue to respect and honor any rules you might have for us. I thank you in advance for your attention to this email.

Response to Comment No. 523-12

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

Comment No. 523-13

Catherine Carmichael: Archer School for Girls is a truly inspiring educational institution and the city would be remiss to prevent them from making long overdue updates to their campus which will allow them to sustain and increase the positive impact they make on the lives of the young women who attend the school and the community at large.

Response to Comment No. 523-13

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

Comment No. 523-14

Catherine Carmichael: Archer School for Girls is a truly inspiring educational institution and the city would be remiss to prevent them from making long overdue updates to their campus which will allow them to sustain and increase the positive impact they make on the lives of the young women who attend the school and the community at large.

Response to Comment No. 523-14

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

Comment No. 523-15

Patricia K. Choate: This project will make a positive difference in the education of many girls, and these girls will help make a positive difference in the City of Los Angeles in the decades to come. Please approve Archer's [sic] improvement plan so that the deserving girls who attend this great school will have a better educational experience that will empower them to give back to our communities in Los Angeles.

Response to Comment No. 523-15

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

Comment No. 523-16

Peter Choate: This project will make a positive difference in the education of many girls, and these girls will help make a positive difference in the City of Los Angeles in the decades to come. Please approve Archer's [sic] improvement plan so that the deserving

girls who attend this great school will have a better educational experience that will empower them to give back to our communities in Los Angeles

Response to Comment No. 523-16

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

Comment No. 523-17

Lisa Claiborne: Archer is a wonderful place for girls to enjoy learning while experiencing an atmosphere unlike any other which empowers girls to give back to their communities and to have a voice where they live . It is an exemplary example of how learning should be fostered and cultivated. I am excited about its expansion and support its growth.

Response to Comment No. 523-17

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

Comment No. 523-18

Tanika Cobb-Phillips: MY DAUGHTER, REID, IS ABSOLUTELY IN LOVE WITH ARCHER! SO IS HER LITTLE SISTER, RYAN, WHO IS LOOKING FORWARD TO EVERYTHING ARCHER HAS TO OFFER.

Response to Comment No. 523-18

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

Comment No. 523-19

Kerry Cohen: Although my daughter is graduating this year, my husband and I fully support The Archer School for Girls in its Campus Preservation and Innovation Plan. Archer's [sic] forward thinking in education and its commitment to harmonizing with its neighbors and the community is unparalleled and should be a model for all Los Angeles schools. Allowing Archer to proceed with its plan will not only provide its students with facilities that fully support its amazing teachers and academic program, but it will also help the Brentwood community by maintaining its current student enrollment cap yet increasing its busing percentage. This can only positively impact both the environment and the traffic congestion in the community. We have watched our daughter grow into a joyful, confident,

and empowered young woman and we credit Archer for much of who she has become. We thank Archer for providing her with a top notch education with its supportive, caring and thought-provoking educators. It is for this reason that we stand behind Archer in its efforts to obtain the facilities it needs to support the foundation it has created in its academic program.

Response to Comment No. 523-19

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

Comment No. 523-20

Richard Colby: Archer School is doing an amazing job with the girls who are students there. Many of these young women will surely go on to become leaders in the community and use their talents and education for the benefit of us all. Please support Archer School in its effort to provide these girls with the facilities they so dearly need. Thank you.

Response to Comment No. 523-20

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

Comment No. 523-21

Hannah Cranston: My name is Hannah Cranston and I graduated from Archer in 2009. I am writing in support of Archer's [sic] Campus Plan. To put it simply, Archer is a very special school. As an incoming 6th grader, I was taught to raise my hand and ask questions. At the time, Archer's [sic] curriculum did not accommodate my accelerated math level, so Archer created a new program, then and there, to ensure I would excel. In 7th grade, Archer taught me the importance of female friendships. I met three girls who would remain, not only my friends, but my sisters, for the rest of my life. When I entered the upper school, Archer taught me that external factors, like whether a boy liked me or not, did not define me, but rather I defined myself. As a 10th grader, I was taught to speak my mind and stand up for what I believe in. Archer gave me the resources and support to create two community service clubs. In 11th grade, my boyfriend passed away in a tragic accident, and Archer was not only my greatest support, but my safe haven. During my senior year, Archer taught me to shoot for the stars and have confidence in myself and my abilities. Following graduation, I attended Duke and just recently graduated Magna Cum Laude [sic] and Phi Beta [sic] Kappa in the class of 2013. During my time at Duke, many of my professors commended me on my tenacity in and out of the classroom—an attribute I can only credit to Archer. This school has the unique ability to create unbreakable bonds

between its students, between its students and its teachers, and most importantly, between its students and the love of learning. I attribute my confidence, my kindness to others and myself, and my unwavering determination to this school. I am the woman I am today, because of Archer. Every girl deserves to have a school experience like mine. Archer has forever changed my life for the better and I think that is a rarity for many students to feel about their high schools. I hope you will support our effort to better and expand Archer\'s [sic] impact on the girls of our community. You will not regret it.

Response to Comment No. 523-21

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

Comment No. 523-22

Jennifer Black Dea: Please consider the Archer Forward plan as it would greatly enhance the Archer girls\' [sic] experience. Like other private schools in the area, the school continually reflects on how they can improve the school and provide a competitive education. The school has put a great deal of thought and planning so that the homeowners and community will not be adversely affected. Thank you,

Response to Comment No. 523-22

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

Comment No. 523-23

Maryam and Mohammad Dezgaran: We support the Archer plan for improvement which is going to provide more facilities and more space to enroll more girls from different backgrounds in different areas. There is not enough \'girls school\' [sic] with high quality like Archer. This is an amazing environment that empower and support our young girls to be leaders. Please support our future girls leaders. Thank you for your support.

Response to Comment No. 523-23

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

Comment No. 523-24

Charlie Dimont: Archer is unique on the Westside of Los Angeles in offering my daughter a girl centric place to learn. It is vital that the school improves it's [sic] campus to continue its mission.

Response to Comment No. 523-24

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

Comment No. 523-25

Devon Dunlap: As a graduate of Archer's [sic] Class of 2003, I know firsthand the profoundly positive impact that attending Archer can have on a young woman's [sic] life. Archer instilled in me a confidence, intellectual curiosity, and global conscience that enabled me to succeed at UC Berkeley and beyond in my professional career. I was a scholarship student for all of my six years at Archer and was part of Archer's [sic] earliest bus routes from the Valley, first to the old campus in the Palisades and later to our permanent home at the Brentwood campus. Even as we approach the 15th anniversary of Archer's [sic] move to Brentwood, I can still freshly remember how exciting the transition was for us students. We recognized the huge potential and opportunity, as well as the immense responsibility tied to our introduction to our new neighborhood. I knew more about CUPs (conditional use permits) and traffic flow on Sunset than the average fourteen year old and I'm [sic] proud that we lived up to the high expectations set for us. Archer did an incredible job of turning what was a very delicate and political move with huge stakes into a learning experience and an opportunity to teach civic engagement and good citizenship. And I have every confidence that this exciting new step for Archer will be handled with even greater competence, sensitivity, and achievement.

Response to Comment No. 523-25

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

Comment No. 523-26

Christopher Dunn: Our daughter has been fortunate enough to attend Archer for the past six years. We view the school as a valuable part of the west Los Angeles community, a true asset to be treasured. Thank you for considering this important proposal.

Response to Comment No. 523-26

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

Comment No. 523-27

Louraine Duntin: I love to see change. Archer has provided me the opportunity to attend college, dance, play multiple sports and create a lifetime of friends. It would be a great opportunity for future Archer girls to experience the innovative Campus Preservation and Improvement. Playing Varsity sports, I spent numerous hours on the bus traveling for games and even practices. Allowing Archer to build and essential facilities will decrease travel, increase school spirit and allow the girls to have a place to call HOME!

Response to Comment No. 523-27

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

Comment No. 523-28

Kena Efraim: Our family wholeheartedly supports the growth and endeavors of Archer. Throughout the years, Archer has consistently demonstrated to be an obedient and respectful neighbor, and we trust will continue to do so.

Response to Comment No. 523-28

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

Comment No. 523-29

Debra Escobar: I also believe that the school will help to increase the property values in the surrounding area. Archer is an amazing place and should be highly esteemed as such.

Thank you Adam. I would love to receive information regarding this project. My address is 3453 Grand View Blvd., Los Angeles, CA 90066.

Response to Comment No. 523-29

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-30

Hannah Eshaghian: The Archer School for Girls offers young women a place where they feel comfortable enough to be courageous, both in the classroom and out. Without Archer, I would not have been able to flourish as well as I have in the real world. I cannot express in adequate words how positively formative and influential Archer is on the young women it produces. Please help to expand this wonderful institution and thus allow hundreds more young women to flourish to their full potential. What we need in this world is a generation of confident, forward thinking, and innovative women whose identities are fostered in such a nurturing environment.

Response to Comment No. 523-30

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

Comment No. 523-31

Maria Euyoque: Archer is helping create the future women leaders of tomorrow and it is vital that these group on intelligent and talented young women get the well-rounded education they so well deserve. Please support Archer Forward.

Response to Comment No. 523-31

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

Comment No. 523-32

Archer has dedicated itself to nurturing the talent of so many young ladies that I believe they so well deserve to have the adequate facilities to make them the best well-rounded young female leaders of tomorrow. Please support Archer Forward plan to allow our young females to excel at a global level. Thank you.

Response to Comment No. 523-32

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

Comment No. 523-33

Wendy Felson: It is essential to have competitive schools on the westside to serve our community. Archer has gone above and beyond to be an outstanding community member and deserves to have the facilities other schools have been granted permission to have.

Response to Comment No. 523-33

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

Comment No. 523-34

Gavin Frank: I'm [sic] writing to you as an alum of the school. The impact Archer has had on my life is immeasurable. I know with this plan, Archer will continue to change the lives of many girls to come.

Response to Comment No. 523-34

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

Comment No. 523-35

Kelli Crews Freeman: I have been impressed with the way Archer has continued to consider their Brentwood neighbors. In our experience with Archer, the school has always maintained a level of excellence in educating these eager young girls. Each day, my daughter and her school friends are exposed to fine examples for how to deal with political and possibly, in this case at times, emotional adversity. While I can appreciate the neighbors resistance to change, there are many fine schools up and down the Sunset corridor, and I find it profoundly unfair that this school is being singled out and blocked from progress simply because it is the newest. I believe that in order for the Archer girl to compete on a more even playing field (no pun intended) with the neighboring schools, this gem of an institution should be allowed the same modernized amenities and access that other schools in the areas already provide and enjoy. I think these girls should feel free to move about the neighborhood, in a respectful way, without being stigmatized and would

thrive in an updated and renewed facility. Thanks for your time and thoughtful consideration.

Response to Comment No. 523-35

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

Comment No. 523-36

Jodi Friedman: Archer is an amazing school with a diverse and dynamic student body. Please support this plan that will provide our girls with the facilities comparable to other schools in Los Angeles, and will allow our daughters to reach their full potential as '\joyful, [sic] ambitious learners.\' [sic]

Response to Comment No. 523-36

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

Comment No. 523-37

Elisa Glubok: As a former athlete of volley ball and track at Archer, I know how crucial it is to have our own facilities to provide for sports. My peers and I spent countless cumulative hours traveling everyday to and from sports facilities that could have been used practicing. Please help future Archer girls out!

My USPS mailing address is as follows:

Elisa Glubok
7718 W 79th St
Playa del Rey, CA 90293

Response to Comment No. 523-37

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-38

Reena Gordon: Unique among all LA schools, whether public or private, Archer provides a girl-centric education based on the latest in research on how girls grow, learn and become leaders. The school is a critical and defining part of the LA community, and the envisioned campus improvement is essential to its future.

Response to Comment No. 523-38

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

Comment No. 523-39

Brad Gore: Archer School for Girls is a magical educational environment that the girls not only embrace but actually love. I fully support Archer Forward.

Response to Comment No. 523-39

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

Comment No. 523-40

Sharon Graves: My daughter, Rachel, has truly blossomed during her three years at Archer. It is truly an incredible place for girls to grow here in Los Angeles, and I cannot express enough how much we support and value this school for that reason alone. Even more impressive to us, though, is how thoughtful and carefully the administration has planned for the school's [sic] future growth in a way that shows respect and consideration for the neighborhood it is a part of, and how much they value their position in the community as a leader and living demonstration of stewardship and model behavior. Please support us. This special place deserves the opportunity to continue to thrive here.

Thank you. My mailing address is 4641 Libbit Ave. Encino, CA 91436.

Response to Comment No. 523-40

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-41

Kim Gregory: We bring revenue to the neighborhood. Parents shop. Try new restruants. [sic]

Response to Comment No. 523-41

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

Comment No. 523-42

Leslye Gustat: Hello, Our daughter, Annabelle is completing her first year at Archer. As parents, we knew we wanted to provide her with an exemplary education; but we also wanted to grow her awareness of her position in the world and, to know the importance of her footprint. The girls who go to Archer ARE different because they WILL make a difference in the world. With a 100% matriculation to outstanding institutions (of higher learning), these young ladies are our future doctors, scientists, mathematicians, artists and leaders. And, maybe what\'s [sic] more than that, they take with them a compassion and awareness for the person standing next to them, because it is nurtured, modeled and nothing else is acceptable at Archer.

Response to Comment No. 523-42

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

Comment No. 523-43

Barry Guterman: I am a former trustee and Brentwood resident. Archer School prides itself on working closely with the community and being a excellent neighbor. My daughter, Marisa Guterman (Class of 2006), given the opportunity to learn in a school dedicated to teaching in ways girls learn best, developed a strong sense of community and became a vibrant leader. The proposed expansion of the school will enrich the school and the surrounding community.

Response to Comment No. 523-43

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

Comment No. 523-44

Dan Halsted: i also a BHA board member

Response to Comment No. 523-44

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

Comment No. 523-45

Nicole Hart: My name is Nicole P. Hart and I graduated from Archer in 2003. I am writing in support of Archer's [sic] Campus Plan. Archer provides an incredible learning environment for young women to explore their interests both in the classroom and outside of the classroom. When I reflect on my 6 years at Archer, I know I am a team leader at my work because of my education at Archer. I feel confident leading the Concierge Team at The Peninsula Hotel in Beverly Hills. Being able to speak up, diagnose and solve problems and work in a team environment are all skills that I learned in the Archer classrooms and by being on the Archer Softball Team, Yearbook Committee and Community Service Board. I support, without question, the expansion of Archer. I know this plan will change the lives of thousands of girls in the future and I hope we can count on your support.

My USPS mailing address is:

Nicole Hart
1677 San Onofre Drive
Pacific Palisades CA 90272

Response to Comment No. 523-45

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-46

Clabe and Dorothea Hartley: Archer School for Girls is a wonderful learning place for the future women leaders of the world. To date its success rate is phenomenal. Please afford them equal opportunity as the rest of the schools in the area. Thank you in advance.

Response to Comment No. 523-46

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

Comment No. 523-47

Danielle Hausberg: I played on the basketball team for 7 years at Archer. After having losing seasons year after year on the varsity team in high school, my senior year we finally created a positive name for ourselves. I was so proud to be on the Archer basketball team. And looking back at my time spent at Archer, that season was the highlight of my high school career. The only flaw it has is that the majority of the school was not able to share the excitement with me and my teammates because all of our practices and games were off campus. Home-games didn't [sic] feel like home-games as we had to commute and had very little fan turn out in the stands. My time on the basketball team would have been that much better if my friends and classmates would've [sic] been there to cheer us on during Archer's [sic] history breaking basketball season that I was so happy to be a part of. If Archer is able to expand, students' [sic] experiences in their extracurricular programs can be enhanced for themselves but also for the entire community. Give Archer girls the opportunity to enjoy a real high school basketball game, but even more than that, an opportunity at a more fulfilling high school experience.

Response to Comment No. 523-47

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

Comment No. 523-48

Maddie Hausberg: As someone who participated in countless of sports teams at archer, this is something that will be vital to those student athletes. Archer is a home, and with any home there is always need for improvement. Make this change and Archer will be steps closer in creating that home to be that much stronger.

Response to Comment No. 523-48

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

Comment No. 523-49

Christi Heck: Archer School for Girls is an exemplary example of a grass roots effort succeeding in our community. It needs now to thrive. Your efforts on Archer\'s [sic] behalf will make all the difference. I personally have two girls attending Archer and they have since 6th grade. They have found their voices in the world thanks to this beautiful school. It is now time for Archer to be a premiere school in a premiere location!

Response to Comment No. 523-49

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

Comment No. 523-50

Molly Hogin: I fully support Archer Forward. Archer is a wonderful school that shaped me into a successful and happy woman. Many young women would benefit from it\'s [sic] expansion and the school deserves it. Thank you!

Response to Comment No. 523-50

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

Comment No. 523-51

Peter Jones: Archer has bent over backwards to meet the requirements of the traffic mangement [sic] program; as a parent I know from first hand how tight the restrictions are in terms of driving to the campus. Archer is a great asset to the community, and serves an enormous range of girls of all backgrounds by providing an exemplary education.

Response to Comment No. 523-51

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

Comment No. 523-52

Ken Kastner: I livee 6 blocks from Archer School and I support their plans 100%. My daughter, who is graduating this year, has had the most unbelievable experience at Archer. I heard all the stories about single sex schools, read all the reports, but nothing compares to experiencing it first hand. My daughter is a self confident, amazing young women, who

found her voice at Archer. To limit this schools [sic] ability to augment their existing facility, to upgrade for the years to come, would be a travesty and insult to those who have made it the institution it is today.

Response to Comment No. 523-52

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

Comment No. 523-53

Jordan Kerner: Great schools are essential to any great city, and the capacity for LA\'s [sic] companies to attract intellectual talent rests in part on the city\'s [sic] having excellent schools for those people to send their children to. Like Marlborough is to Hancock Park or Spence is to the Upper East Side of Manhattan, having a nationally-recognized [sic] independent girlsâ€™™ [sic] school enhances the reputation of the Brentwood community and the City of Los Angeles—excellent schools draw young families into a neighborhood, which is ultimately great—both economically and socially—for any community. Also it would seem discriminatory to hold Archer, an all girls school, to different standards of use than its neighbor across the street, The Brentwood School. That kind of prima facie discrimination could not be sustained in a Los Angeles Court. The laws must be equally applied.

Response to Comment No. 523-53

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

Comment No. 523-54

Nicole Khatibi: Archer School has been a wonderful experience for our daughter in the past 6 years. The school has great potential to do more by expanding and offering a better campus. The students are a great assets to the future of this city and by allowing Archer to expand their campus, they will be able to contribute so much more. Thank You.

Response to Comment No. 523-54

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

Comment No. 523-55

Richard Klein: Our family would really appreciate your support for the Archer School. Every organization needs to grow and adapt and I believe the requested improvement plan is thoughtful and respectful to the surrounding residents and community. It will insure [sic] that future generations will get a a [sic] remarkable education in state of the art facilities. Thank you in advance for your support.

Response to Comment No. 523-55

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

Comment No. 523-56

Veronica Klein: I think this expansion is critical and simply put will provide what every other school already has the privilege of having. Physical education and the ability to practice and compete in an indoor environment, sports are critical to a school and development of the student. The additional classroom space, performing and visual arts theater will support the creative, this will make Archer and its students great leaders. Archer's [sic] community and staff have made the most out of the space they have but the above enhancements are needs that are yet unfulfilled. The girls/women that grow from the Archer community are women who will make a difference. My oldest daughter has already graduated and my youngest is thriving under the education and culture of learning at Archer. I know people dislike change and after suffering the freeway enhancement and struggling still with traffic from construction that the community needs to also realize all the good that will come from the development of the campus. I strongly believe that what enhances Archer also enhances the Brentwood community itself. As a Westside Realtor for the last 17 years and a Brentwood resident for the last 33 years, I can assure you that when people make considerations about moving here it is the convenience of everything that draws people here, including the many independent schools. It is the beauty of the neighborhood and the plans for expansion will help grow our communities and bring more business and revenues to the city. Thank you

Response to Comment No. 523-56

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

Comment No. 523-57

Wendy Kretchmer: I only wish other neighboring schools would be half as respectful to the community of Brentwood due to its traffic management program. It would be wonderful if they would adopt Archer\'s [sic] stringent policy!

Response to Comment No. 523-57

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

Comment No. 523-58

Darren Leach-Rouvi: Archer is one of the premier independent schools in Greater Los Angeles; one that has overcome many challenges and obstacles in its relatively short history. We urge you to support Archer Forward so that Archer students and the wider Archer community are better served by much needed campus grounds and facilities, something many other schools already enjoy. Thank you for your consideration.

Response to Comment No. 523-58

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

Comment No. 523-59

Caroline Lee: We live in Westwood Hills and currently have one daughter at Archer, and our second daughter will join her there in the fall. Even though we live very close to the school, our daughter takes the bus to Archer and home pursuant to the school\'s [sic] transportation plan. Similarly, when I volunteer or attend meetings at the school, I am required to park [sic] a nearby public parking lot, rather than on campus. Archer is a wonderful school, but currently has no gym, pool, auditorium, or athletic fields/facilities to accommodate all of the school\'s [sic] teams. Archer students have a wide variety of interests and deserve to have the facilities to support and develop those interests. We strongly support Archer\'s [sic] Campus Improvement Plan.

Response to Comment No. 523-59

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

Comment No. 523-60

Bret Lewis: I live in the area and believe this project will be an asset to the community.

Response to Comment No. 523-60

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

Comment No. 523-61

Elaine Lipworth: Archer is a wonderful school inspiring girls to grow up as strong women who will make formidable contributions to the community. I do hope you will support out our school.

Response to Comment No. 523-61

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

Comment No. 523-62

Randolph Magnin: My daughter has attended Archer since the 6th grade and will graduate high school next year. As a parent, I can personally vouch for how stringent Archer's [sic] traffic management program is. Traffic management program rules are clearly and continually communicated to families and breaches are not tolerated. Further, Archer personnel is present daily and especially during school events making sure that Archer visitors are following the rules. From a parent perspective, It [sic] is crystal clear that Archer is committed to being a good neighbor. As a nearby resident, I am strongly in favor of Archer Forward.

Thank you Adam.

My address is:

324 Dalkeith Ave
Los Angeles 90049

Response to Comment No. 523-62

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-63

Alexa Marks: I feel very strongly about this cause because Archer played the most important role in shaping what kind of student and leader I am today. I walked into my first day at Archer a nervous and timid 6th grader and left Archer with a sense of confidence and independence I didn't [sic] know I had in me. My teachers and advisers constantly urged me to push myself outside of my comfort zone while letting me know that they were there to support me every step of the way. Archer was the best environment for me to go through the difficult middle school years, and by the time I was in the 9th grade I felt so strongly about all-girls' [sic] education that I joined the Girls Educate Girls Globally club. I traveled to India twice with this club to volunteer at a developing all-girls' [sic] school, and then went on to become the President of this club. Archer allowed me to follow my passion and taught me how to be an effective leader. Archer urges its students to get involved and give everything their all, but due to the lack of certain facilities it made it difficult for a lot of girls to fully devote themselves to their passions. I was on the swim team and since there is not a pool on the Archer grounds, our team had to drive off campus for practices. This made it difficult for many of the girls on the team, and negatively affected our team because the commute cut into our practice time. I feel so passionately about Archer and all that it does for its students, and I know that if it had all the facilities that other comparable private schools in the area have it would continue to thrive and change the lives of other young women. Archer is such a special and unique school and if it had the facilities that other schools have it would truly make it one of the best environments for girls to grow and learn. I hope that you support this plan and help Archer continue to improve. Thank you.

Response to Comment No. 523-63

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

Comment No. 523-64

Amanda Marks: Archer is a wonderful community, to which I feel privileged for my daughter to belong. The effort that has gone into creating a plan that minimizes the impact on the neighborhood, while maximizing the benefit for the student body is exemplary. Please do provide your support.

MY mailing address is:

Amanda MARKS
10551 Cushdon Ave
Los Angeles, CA 90064

Please do provide notice of progress as the project moves forward.

Response to Comment No. 523-64

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-65

Maria Martinez: Archer is a great school that deserves just as great facilities. With this plan of adding facilities to the school, my daughter, and the girls yet to come, will have an even greater learning experience than the one that they already have now.

Response to Comment No. 523-65

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

Comment No. 523-66

Sandra McClean: As an Archer parent of two students (from August), I strongly ask you to seriously support the Archer Campus Preservation and Improvement Plan, Archer Forward.

Response to Comment No. 523-66

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

Comment No. 523-67

Haley Moritz: Attending Archer from 6th to 12th grade has by far been the most influential experience of my life.

Response to Comment No. 523-67

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

Comment No. 523-68

Gerda Newbold: As a Planning Commissioner in Santa Monica, I have had the opportunity to review plans for schools in our City that would like to expand. I wish that all schools were as thoughtful, organized and cooperative as the Archer School . Archer has done an incredible job of engaging the community in this process.

Response to Comment No. 523-68

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

Comment No. 523-69

Jennifer Nye: We are so very grateful to the neighborhood and community. Our daughter was accepted to several other high quality schools in LA, but Archer is special and is educating and growing young women who will continue to improve and serve our communities throughout their lives. Thank you for helping to ensure that the girls will have adequate and modern facilities as well as for supporting Archer's [sic] goal in preserving the exquisite historic building on Sunset. In my work as a hospice chaplain, I have met women who used the building as members in the Order the Eastern Star and all have been thrilled that it continues to be a space for women. We take seriously Archer's [sic]—our—promises regarding traffic and parking in order to respect the neighborhood and ease any impact which our use has. Archer is a home for our daughter for these 6 years, and we feel that responsibility as good neighbors. Again, thank you and please continue your support of my daughter, Lucy, her friends and future girls who—thanks to Archer—are focused on learning and growing to become responsible, ethical, informed and kind leaders both locally and globally.

Response to Comment No. 523-69

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

Comment No. 523-70

Dylan Optican: Don't let anything rob the young women of Los Angeles of the education they deserve.

Response to Comment No. 523-70

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

Comment No. 523-71

Cora M. Oriel: Thanks for your email.

Please find my contact information below.

Cora M. Oriel
Asian Journal Publications, Inc.
NEW ADDRESS: 1210 S. Brand Blvd.
Glendale, CA 91204

Response to Comment No. 523-71

In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-72

Irina Oulko: Archer has allowed my daughter to thrive and I support the school growing so that it will have even more opportunities for the future students of Archer.

Response to Comment No. 523-72

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

Comment No. 523-73

Jennifer Pavia: Archer's [sic] mission to lift up girls to their full potential, who in turn serve the surrounding community with passion is one of the most notable blessings the school bestows on the neighborhood. The proposed preservation and improvement plan thoughtfully and respectfully provides the facilities to continue this ideal.

Response to Comment No. 523-73

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

Comment No. 523-74

John Perkins: As a father of the member of the founding class at Archer, I want to remind the Council of Archer\'s [sic] consistent \'good [sic] neighbor policy,\'' [sic] since moving into the Eastern Star Home. No school has gone so far or done so much to appease its neighbors. Please support Archer\'s [sic] entirely reasonable bid for what can hardly be construed as a radical request: a gym for its girls. Who, by the way, from the start, were meant to be and are the girls of L.A. Thank you.

Thanks for your note, Adam, and for all your good work for this important project!

Here it is:

John Perkins
16531 Akron St.
Pacific Palisades, CA 90272

Response to Comment No. 523-74

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-75

Tony Peyrot: I have been a resident of Brentwood for over 30 years and am within walking distance of The Archer School for Girls. I believe that the school administration [sic] ihas [sic] been respectful of the rights of the neighboring homeowners & that the campus preservation plan & poorposed [sic] development of the property will ultimately enhance the value of the neighboring properties & will provide for the needs of the student body.

Response to Comment No. 523-75

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

Comment No. 523-76

Ivania Rodriguez Pinto: I am a member of the first graduating class of the Archer School in 2001. Please support Archer Forward so that generations of girls (like me) are able to receive a stellar education and improve their futures. Thank you.

Thanks. Here's my mailing address:

721 Hill Street #103
Santa Monica, CA 90405

Response to Comment No. 523-76

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-77

Michael Powers: As a father of two girls, a brother to four sisters, and an uncle to five nieces, along with 8 years of post high school education, and a mother who retired as a college vice president, I've [sic] had ample opportunity to observe what this country's [sic] co-ed educational institutions do not do for women, namely, provide them with the skills and confidence to compete in today's [sic] world with men. As an attorney of now 30+ years I can report that I've [sic] seen far too many otherwise talented female attorneys not realizing their potential and/or not doing a good job for their clients because of an undeveloped sense of confidence. I can now see that this can be largely attributed to a co-educational environment that not only favors men, but also represses women. This is in many ways tragic, not only for women individually, but for society as a whole. Archer is all about changing the current paradigm. That's [sic] a good thing. As an attorney with a fair amount of experience in dealing with land use issues, I understand the need to address the impact of any expansion of Archer's [sic] campus on the surrounding area, particularly its residential neighbors. I also understand that when competing considerations are pitted against each other and a decision needs to be made, there will need to be, by definition, some winners and some losers. While admittedly I am not fully abreast of what the neighbor's [sic] concerns may be (although I can certainly imagine) and likewise, I'm [sic] clearly coming from a prejudiced perspective (having a young daughter at Archer), nonetheless, I can without hesitation place my full support behind Archer's [sic] plans if for no other reason than the fact that they will promote Archer's [sic] mission, which is a good thing for all (including the neighbors). For this reason alone, I ask that you consider Archer's [sic] plans favorably.

Response to Comment No. 523-77

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

Comment No. 523-78

Nancy Rabinowitz: Archer is already an amazing school which provides quality education for young women but with this proposed plan Archer can provide even more opportunities for these girls. We see that Archer has taken much into consideration with this plan which includes maintaining good relations with their surrounding neighborhood.

Response to Comment No. 523-78

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

Comment No. 523-79

Tracey Raphael: This is a l.ery special school and Archer has my complete support with respect to their improvement plan.

Response to Comment No. 523-79

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

Comment No. 523-80

Sadhvi Saini: Archer is a great community that nurtures confidence and self - respect in girls. I am proud of the opportunities my daughter has received at Archer and hope that other girls would get the same opportunities in the future.

Response to Comment No. 523-80

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

Comment No. 523-81

J. Eugene Salomon: I would be happy to speak to you at any time to discuss the Archer plan. Thanks for your time and attention to this matter.

Response to Comment No. 523-81

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

Comment No. 523-82

Suzanne and Jeff Schneider: We hope to have your support with this in order to keep Archer moving forward into a progressive and positive future.

Response to Comment No. 523-82

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

Comment No. 523-83

Daniel Schwartz: Thank you very much. Here is my address

Daniel Schwartz
2539 Aiken Avenue
Los Angeles, Ca, 90064

Response to Comment No. 523-83

In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-84

Victoria Shorr: I am co-founder of the Archer School for Girls, founding Board Chair, and a veteran of the last battle, with Marvin Braude and Cindy Miskewski standing proudly by our side! Archer first promised and now has proven to be the best of neighbors, and deserves the support of both its government and its neighbors. More than any other school in town, Archer serves the girls of Los Angeles. It is also part of the fabric of the Brentwood and West Side community, and has saved thousands of girls a drive across the city. You might also note that Archer's [sic] mission has always included a commitment to green transportation, and that the vast majority of girls arrive by bus. All families are assessed the bussing fee, to assure participation. This is only one way Archer has stepped into the lead among West Side schools. And now Archer girls are asking for what every other school on the West Side has—a gym. With no encroachment on its beloved and valued green space. Can anyone deny it? Can any of the neighbors who send their own children to schools with gyms in other people's [sic] neighborhoods in good conscience deny a gym

to the most diverse independent school for girls in Los Angeles? Certainly not. We count on your support and thank you.

Response to Comment No. 523-84

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

Comment No. 523-85

Adam Shulman: As a graduate of Harvard University, I'd [sic] like to say that Elizabeth English and her team are some of the best educators I've [sic] ever encountered. Our daughter loves learning at this school. Please help Archer build the physical plant they need to complement the amazing education it offers. It will benefit Los Angeles, and the larger community as well.

USPS 9152 Monte Mar Dr., L.A. 90035

Thank you.

Response to Comment No. 523-85

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-86

William Simon: The Archer School for Girls has been, and continues to be, a great and high quality educational institution and neighbor to its surrounding community. The School will utilize all resources to continue that commitment to its neighbors as well as the broader community. Please support this carefully and thoughtfully develop [sic] plan. Thanks.

Response to Comment No. 523-86

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

Comment No. 523-87

Lisa Skinner: Thank you for your consideration. Your investment in Archer's [sic] future will provide tremendous opportunity for so many girls and women of the city.

Response to Comment No. 523-87

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

Comment No. 523-88

Chris Slagerman: I have 2 girls at Archer. One in 7th and one in 9th. They have both enjoyed their education and experiences there and I feel that it is truly a one of a kind school. The improvement plan for the campus is much needed and will be a valuable addition to the community.

Response to Comment No. 523-88

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

Comment No. 523-89

Kevin Smith: I beg of you: please give these girls the space for facilities they'd [sic] likely already have if this were a boy's [sic] school. Thanks!

Response to Comment No. 523-89

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

Comment No. 523-90

Owen Solomon: Thank you.

My address is 4360 Lanai Road, Encino, CA 91436.

Response to Comment No. 523-90

In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-91

Lisa Statt: As a Brentwood resident for 49 years, I support Archer Forward.

Response to Comment No. 523-91

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

Comment No. 523-92

Benina Stern: Apart from giving me an education that has made me fearless in the classroom, the Archer Theatre department has distilled the confidence in me to direct and produce my own productions in college. I would love for future Archer girls to have a well-equipped space so they can discover and foster their own passions in the arts and take risks doing so.

Response to Comment No. 523-92

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

Comment No. 523-93

Ana Torres: Archer is a wonderful school that is excellent in every way except for the fact that it lacks modern facilities. As a parent of an Archer student athlete I can tell you that it is very difficult for the girls to travel off campus to practice and to play games. The importance of athletics cannot be understated so the girls are encouraged to play. Despite the major inconvenience the teachers and staff come out to the games and support the girls. This is typical of Archer teachers and staff. Archer is a more than a school; it is a family. The teachers are happy and engaged, and it shows in their teaching style. However, Archer needs properly sized classrooms to help the teachers fulfill their mission. Finally, as an Archer parent I can attest to the fact that Archer strictly promotes and enforces the traffic management program. I urge you to support Archer to move forward and modernize its facilities.

Response to Comment No. 523-93

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

Comment No. 523-94

Geffen Treiman: Archer is where I became confident enough to pursue science, be a team captain, and I fall in love with learning. I believe that the best thing that Archer can do to

continue to foster such an amazing atmosphere worthy of its students is to follow the “Archer [sic] Forward” [sic] plan, and provide the facilities vital for success.

Response to Comment No. 523-94

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

Comment No. 523-95

Matthew Vescovo: Thanks Adam.

Matthew Vescovo
250 amalfi drive
Santa monica, CA 90402

Santa monica, CA 90402

Response to Comment No. 523-95

In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-96

Annie Wands: Archer is an amazing school and should have the ability to grow it's [sic] school in a similar manner to other schools. Many other private schools have increased their campus in Los Angeles. I as a neighbor currently of Archer have no issues.

My address is 646 S Barrington ave #206.
LA, CA 90049.

Thanks for signing me up and as you can see I am also a neighbor of the school.

Response to Comment No. 523-96

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-97

Joshua Wayser: I recognize you are getting a bunch of letters from the school and potentially from neighbors adverse to any change. I felt it important to note that the school is not just a bastion of privilege, it takes girls from so many areas of the city and it has a strong financial aid program. As a parent of an African American child who attends Archer, I am so proud of its vision and mission. It's [sic] current campus is outdated and needs to be significantly improved, so its students can continue to blossom. Thank you for your consideration.

Response to Comment No. 523-97

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment No. 523-98

Jeff Weakley: Our kids, and especially our girls, are our future. Making thier [sic] education and the environment they learn in is paramount. Please allow these improvements. thank you,

Response to Comment No. 523-98

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

Comment No. 523-99

Josh Weltman: Archer is a wonderful school. My daughter Gabriella Weltman is thriving there. We love sending Gabriella to school on the school bus every morning. And when we miss the bus we are called by Archer and reminded that to be a good and welcome neighbor the school has committed to making sure that a good percentage of the girls take the bus to school, thereby reducing traffic in and out of the school and the neighborhood. The school takes its commitment to its neighbors and neighborhood very seriously, and I like that.

Response to Comment No. 523-99

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

Comment No. 523-100

Katharine Werner: Generations of girls deserve to experience of archer

Response to Comment No. 523-100

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

Comment No. 523-101

Manuela Zarate: Education and the future if [sic] our children should be our first priority. The Archer School for Girls has made a difference in my daughters [sic] life. I would like other young women to have the same opportunity.

Response to Comment No. 523-101

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

Comment No. 523-102

June Baldwin: I am a former Archer Trustee

Response to Comment No. 523-102

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

Comment No. 523-103

David Higley: I do not have a student at Archer, but I am struck by the negative campaign that tends to rage in Los Angeles against private schools.

Response to Comment No. 523-103

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

Comment No. 523-104

Douglas Wilson: All school, but particularly Archer, undertake the work of building our future. It's [sic] a terrible shame when a community puts a slightly more convenient today above a promising tomorrow.

Thank you so much. I was mad at myself for missing the deadline, but I thought I would give it a try.

I don't believe I'm registered as an interested party, so thank you so much.

Douglas Wilson
Nancy Ortenberg
848 S. Sycamore Ave.
Los Angeles, CA 90036

Response to Comment No. 523-104

This comment indicating support for the Project is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 524

Larry Watts
Chairman
Brentwood Community Council
149 S. Barrington Ave., Box 194
Los Angeles, CA 90049

Comment No. 524-1

Thank you again for the opportunity to comment on the Draft EIR for the Archer Forward: Campus Preservation and Improvement Plan. The BCC supports The Archer School for Girls as an institution in Brentwood.

Response to Comment No. 524-1

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

Comment No. 524-2

For the past several years, the BCC has participated in a community outreach process regarding Archer Forward that included representatives from The Archer School For Girls, the Brentwood Homeowners Association, a group of residents referred to as the Residential Neighbors of Archer School, and the Council office. As a group, we invested hundreds of hours since 2011, and Archer made significant changes to its proposed Project as a result. Archer identified additional strategies to reduce traffic impacts; enhanced its traffic management program; and committed to contribute funds for a pedestrian safety study in the School's vicinity and to develop and implement a traffic calming plan on Chaparal Street.

Response to Comment No. 524-2

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

Comment No. 524-3

In addition, Archer analyzed additional feedback and suggestions from the stakeholders in the Draft EIR in the form of an Alternative Site Plan called "Alternative 3." We have been informed by Archer, under a revised Alternative 3 the Performing Arts Center is proposed to be relocated to the Chaparal Parcel, the Aquatics Center would be enclosed and it and

the Visual Arts Center would be located on the Barrington Parcel. Additionally, Archer now proposes expanded buffers along the campus property boundaries; enhanced landscaping throughout the campus; and reduced noise impacts by enclosing the pool, reorienting the softball field, and moving the soccer field further away from the western property boundary.

During the outreach process, we have raised additional questions and concerns on behalf of the neighbors and the community. We have requested that Archer modify its proposal to remove the proposed athletic field lights, eliminate certain of the proposed School Functions, employ additional traffic management techniques to further mitigate potential traffic impacts, and reduce the construction period. The BCC intends to continue to work with Archer and, should Archer further refine its proposal, we are optimistic that we will be able to reach a compromise with Archer that will enable us to support a modified Project.

Response to Comment No. 524-3

As discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has eliminated the previously proposed athletic field lighting.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on Archer's operations are proposed, including reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-school users.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level.

As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years.

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

Comment No. 524-4

The Brentwood Community Council hired a planning consultant, Sandra Genis of Planning Resources, to review the Draft EIR and submit a comment letter on our behalf. The BCC did not intend to request an additional alternative that retains the existing limitations on events and hours. As explained on page 13 of the letter, we would like Archer to eliminate its significant impacts on peak hour traffic, i.e., we request that Archer mitigate all of its operational significant traffic impacts. However, we are not categorically opposed to an increase in operating hours and the number of School Functions that Archer is permitted to conduct on its campus, provided this does not generate significant adverse traffic impacts. While the additional information requested in our letter sent by Ms. Genis will provide helpful context to the community and the City's decision makers in evaluating the Project, we regret the expense and time it will take to prepare responses to the comments for inclusion in the Final EIR. Finally, given the ongoing discussions between the parties we do not believe it to be essential at this juncture to recirculate the Draft EIR.

On behalf of the Brentwood Community Council, thank you again for your continued consideration.

Response to Comment No. 524-4

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

Comment Letter No. 525

Brentwood Homeowners Assn.
Rodney Liber
Vice President
rliber@brentwoodhomeowners.org

Comment No. 525-1

Can you please advise as to when the comment letters you receive become accessible to the general public?

Response to Comment No. 525-1

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment letters are available for review in the Case file at the City of Los Angeles Department of City Planning, 6262 Van Nuys Blvd, Room 351, Van Nuys, CA 91401, and are provided in Appendix FEIR-A of this Final EIR.

Comment No. 525-2

Thank you Adam. I'm sure this is all overwhelming. Are people allowed to make an appointment and make copies of the submissions. I'm not necessarily just asking for myself, but also what others might choose to do. For instance, will Archer choose to come to your office this week or next and copy all the letters, or do they automatically get all the copies since they are the subject?

Response to Comment No. 525-2

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

Comment No. 525-3

Sorry, last question, when will you be sending them to the environmental consultant?

Response to Comment No. 525-3

Public comments received by the City were immediately provided to the environmental consultants for review and cataloging.

Comment Letter No. 526

Wendy-Sue Rosen
President
Brentwood Residents Coalition
P.O. Box 491103
Los Angeles, CA 90049

Comment No. 526-1

Please add me to the notification list for the Archer Project, ENV-2011-2689-EIR. My contact information is below. Thank you. Wendy

Wendy-Sue Rosen, President
(please note hyphen in my first name)
Brentwood Residents Coalition
PO Box 491103
Los Angeles, CA 90049
rosenfree@aol.com

Response to Comment No. 526-1

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 527

Charles Bernstein
20575 Cheney Dr.
Topanga, CA 90290

Comment No. 527-1

I am writing to say that I am opposed to Archers proposed project, *Archer Forward: Campus Preservation and Improvement Plan*.

Response to Comment No. 527-1

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

Comment No. 527-2

Archer's project represents a substantial expansion in a quiet residential neighborhood that will result not only in an increase in use but in a significant impact on traffic. I am concerned about the potential adverse effects Archer's expansion will have on our community due to the intensification of use and the resulting increase in traffic.

Response to Comment No. 527-2

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City's residential neighborhoods. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

Regarding proposed campus operations, refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, additional restrictions on campus operations are proposed, including additional limitations on the hours of operation, additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating

community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level.

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

Comment No. 527-3

Archer proposes constructing four large-scale buildings that include two gyms that could potentially accommodate 600 spectators as well as a performing arts center that could seat 650. In addition to the two gyms and performing arts center, the aquatic center and visual arts center, as well as the outdoor athletic field, could be used simultaneously after school from 3:30pm to 10:00pm and on weekends. This simultaneous use will lead to an increase in traffic as thousands of visitors use Sunset Boulevard as well as the 405 freeway to get to the campus during peak traffic periods (3:30pm to 7:00pm).

Response to Comment No. 527-3

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation; reducing the number proposed School Functions from 98 to 86, including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests; and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. The Performing Arts Center has been reduced from 650 seats to 395 seats.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Project Design Feature K-7 included in Section IV.K, Traffic, Access, and Parking, of the Draft EIR requires that Archer develop an Event Parking and Transportation Management Plan. Also refer to Mitigation Measure K-2 included in Section IV.K, Traffic Access, and Parking, of the Draft EIR. As discussed in Topical Response No. 16, Environmental Review and Conditional Use Permit Process, a new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding the compatibility of the School's operations and its facilities with the surrounding neighborhood.

Comment No. 527-4

With two gyms, an aquatic center, an outdoor field and a softball diamond, Archer proposes moving the majority of its athletic activities onto campus, increasing the number of games held on campus from the current 39 to 145. This increase will bring 6,800 visitors into the area during the peak traffic periods when previously only 1,300 visitors came to the area.

Response to Comment No. 527-4

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation; reducing the number proposed School Functions from 98 to 86, including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests; and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. The Performing Arts Center has been reduced from 650 seats to 395 seats.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a detailed discussion of potential traffic impacts associated with proposed campus operations.

Regarding the comment's estimates of visitors to the campus, refer to Appendix B-1 of the Draft EIR for the accurate description of the number of spectators.

Comment No. 527-5

With an expanded campus that now includes five buildings instead of one, Archer proposes an increase in other activities that will lead to more visitors and car trips. Archer's plan includes

- Doubling the number of special events to 98 from the currently allowed 47, bringing 24,000 visitors to the campus during the school year, an increase of 16,000 guests,
- 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, will bring 4,800 visitors that currently do not come to the campus, thus adding a new use that will contribute to traffic and noise;
- Expanding the size of events held on campus to include special events with attendance of 650 people as well as 10 Athletic Tournaments with 200 visitors in attendance will increase use on the weekends and add to traffic and noise.

Response to Comment No. 527-5

Regarding proposed campus operations, refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, additional restrictions on campus operations are proposed, including additional limitations on the hours of operation including additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. In addition, in response to comments on the Draft EIR, the size of the Performing Arts Center has been reduced to accommodate a maximum of 395 seats.

Regarding traffic, as evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to below a level of significance.

Regarding noise, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant noise impacts of the Project. With implementation of such mitigation measures, noise impacts associated with use of the athletic field for athletic activities on weekdays and use of the Aquatics Center would be reduced to a less than significant level.

Comment No. 527-6

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.

Response to Comment No. 527-6

As described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand, and Parking Enforcement, in response to comments on the Draft EIR, underground parking structure is proposed to be reduced. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion of vehicles exiting the campus.

Comment No. 527-7

Not only will this increase the number of vehicles on Sunset Boulevard, but the surrounding neighboring streets that have already seen an increase in cut through traffic from the five other schools in a one mile radius. We know from experience that our neighborhood will suffer from the impact of more traffic coming into our area at peak hours as Sunset becomes grid locked and cars cut through our neighborhood to avoid the congestion on Sunset.

Response to Comment No. 527-7

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparal Street. Based on field observations and a license plate matching survey, few vehicles exiting Archer are anticipated to cut-through Chaparal Street. In addition, although the Draft EIR determined that Project operational impacts on neighborhood streets would be less than significant, pursuant to Project Design Feature K-5, the Project Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to \$15,000 toward the development and implementation of a traffic calming plan for Chaparal

Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a detailed discussion of potential traffic impacts associated with proposed campus operations.

Comment No. 527-8

For the last five years my community has had to endure the effects of the I-405 widening project—cars backed up on Sunset Boulevard for miles making it difficult to get to our homes and an increase in cars cutting through our neighborhood trying to avoid the congestion on Sunset Boulevard to get onto the 405 freeway. 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.

Response to Comment No. 527-8

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Comment No. 527-9

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; Archer School Expansion. Not only is traffic increased because of road closures and lane reduction, but the insertion of thousands of slow moving construction vehicles into the flow of traffic. And what began as a temporary inconvenience becomes a permanent one as traffic patterns are forever altered as cars seek new ways (i.e. cutting through our neighborhood) to get to points east of the freeway.

Response to Comment No. 527-9

The Draft EIR considered the effects of related infrastructure improvements including traffic diversions due to the Wilshire Bus Rapid Transit Project. Refer to page IV.K-21 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR. With regard to the pending California Incline reconstruction, since the California Incline primarily carries traffic destined to the downtown Santa Monica area, the primary effect of its temporary closure would be to divert traffic to Chautauqua/Channel and to Moomat Ahiko Way in Santa Monica, not to Sunset Boulevard in Brentwood. The traffic analysis also explicitly took into account traffic generated by known development projects in the Brentwood area and included a background growth factor to represent traffic generated by other growth outside of Brentwood but within the Westside. Refer to page IV.K-20 in Section IV.K, Traffic, Access, and Parking, of the Draft EIR.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparral Street.

Comment No. 527-10

If Archer reduces the size and number of buildings, traffic will be mitigated through reduced programming—less events means less cars coming to campus. Archer can mitigate the impacts of traffic by reducing the size of its expansion and still meet its academic and athletic objectives.

Response to Comment No. 527-10

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Refer to Topical Response No. 12, Site Plan Consistency with the

Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

As detailed in Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years.

Comment No. 527-11

I support Alternative 4 Option B (Reduced Program within Existing Campus Boundary, No Aquatic Center) with the following modifications:

- 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,
- Renovate the North Wing,
- Eliminate the Visual Arts Center,
- 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,
- Continue to use the two residences adjacent to the school as residences,
- Maintain softball field's current orientation of northwest,
- Add more landscaping on the northern and western property lines to provide an attractive buffer between the school and residences,
- Increase the set back of the building placed adjacent to Chaparal Street,
- Maintain the number of special events at the current level permitted in the Conditional Use Permit, which, as set forth in the DEIR's analysis of Alternative II, reduces impacts to traffic to a level less than significant after mitigation;
- 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;
- Improve the school's facilities with only one phase of construction.

Response to Comment No. 527-11

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer, which is similar to the suggested alternative referenced by the commenter. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

Comment No. 527-12

Alternative 4-B has reduced impacts over the Project and the other alternatives in almost every area evaluated in the DEIR. With the modifications set forth above, the impacts are further reduced and Archer can meet nearly all of its objectives.

Response to Comment No. 527-12

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

Comment Letter No. 528

Sarah Boyd
stboyd69@yahoo.com

Comment No. 528-1

Archer's expansion plan threatens to make the drive on Sunset unbearable—it's already one of the most congested rush hour thoroughfares on the West side. When I commuted from the Valley to Santa Monica I often drove through Brentwood to get to work and this area of Sunset was horrible and slow.

The City must fully investigate the significant harms to traffic and other environmental impacts that this expansion would create.

Response to Comment No. 528-1

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

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 528-2

Please protect the residential neighborhood that Archer knowingly moved into. The school operates as a privilege in this neighborhood and their expansion MUST be carefully scrutinized [sic] by the City and kept in check.

Response to Comment No. 528-2

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be

consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City’s residential neighborhoods. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project’s consistency with the residential scale and character of the neighborhood.

As discussed in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, a new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School’s operations and its facilities with the surrounding neighborhood.

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

Comment Letter No. 529

Dehua Chen
234 S. Westgate Ave.
Los Angeles, CA 90049-4206

Comment No. 529-1

I am writing you as a resident and homeowner of 234 South Westgate Avenue. I live a few blocks from The Archer School. I am in support of the school's development plans. Please do not hesitate to contact me with any questions or comments.

Response to Comment No. 529-1

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

Comment Letter No. 530

Dehua Chen
234 S. Westgate Ave.
Los Angeles, CA 90049

Comment No. 530-1

I am a homeowner at 234 South Westgate and I have shared my neighborhood with The Archer School for Girls for many years. I fully support the school and their Campus Improvement Plan based on the school's demonstrated commitment to their students and the community.

Even though traffic is often difficult in our neighborhood, I am impressed by the efforts Archer has made to ease the burden for its neighbors during peak traffic hours. Their new plan calls for an underground parking garage on campus, which will reduce the need for students to commute around the city for practices, rehearsals and performances. Having parking on-site will also free up space for parking in the Brentwood Village.

A marvelous school like Archer deserves our support and I hope they can count on your support.

Response to Comment No. 530-1

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

Comment No. 530-2

I'm a longtime resident of Brentwood and I have shared my neighborhood with The Archer School for Girls for many years. I fully support the school and their Campus Improvement Plan based on the school's demonstrated commitment to their students and the community.

Even though traffic is often difficult in our neighborhood, I am impressed by the efforts Archer has made to ease the burden for its neighbors during peak traffic hours. Their new plan calls for an underground parking garage on campus, which will reduce the need for students to commute around the city for practices, rehearsals and performances. Having parking on-site will also free up space for parking in the Brentwood Village.

A superior school like Archer deserves our support and I hope they can count on your support.

Response to Comment No. 530-2

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

Comment Letter No. 531

Bob Cortes
bob.cortes@gmail.com

Comment No. 531-1

Olive in Brentwood mandeville canyon [road. I oppose the archer school construction proposal. Sunse [sic] blvd is a mess already why pour gas on a fire. 310-597-9147

Response to Comment No. 531-1

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

Comment Letter No. 532

Harvey Flax
2175½ Mandeville Canyon Rd.
Los Angeles, CA 90049-1824

Comment No. 532-1

I am writing about the Archer school proposal to expand their Facility at Sunset & Barrington. (ENV-2011-2689-EIR)

The Flax Family, who have lived in Brentwood for the past 30 years, are one of the overwhelming number of families that urge you to vote against this plan. You may not receive as much mail urging your vote against this issue as we have suggested, but please believe the fact that this is the topic of the day.

Response to Comment No. 532-1

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

Comment No. 532-2

I do not have to describe to you, and the rest of the council members the “nightmare” we who live in the area have to endure every time we leave our homes to head east toward the freeways, morning, noon, and evening. The traffic flow crawling toward the freeway’s [sic] is an hour of “pain”. Any plan that involves a trip to either San Fernando Valley or onto the 405 South, or to the downtown area , must start hour’s [sic] before intended.

This has become an intolerable situation which will not improve, but grow worse as population grows. To allow the Archer proposal will only make the problem that much worse, that much sooner.

Response to Comment No. 532-2

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

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 532-3

I hope this note and your understanding of this major problem will help you make the “right” decisions.

Response to Comment No. 532-3

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

Comment No. 532-4

Adam, my mail address is Po box 491148, L.A. 90049 Ca. home address is 21751/2 Mandeville Canyon Rd.

Response to Comment No. 532-4

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 533

Paul Herman
600 Hanley Way
Los Angeles, CA 90049

Comment No. 533-1

The arguments against the proposed Archer Forward are overwhelming. Proceeding with this mega-expansion or any expansion at all would be to the benefit of a few while inflicting misery on many. We live in Kenter Canyon, one mile north of Sunset, and I don't need to repeat the traffic issues we face.

Please do not support any further progress on this project. It would be a travesty for our challenged community and for many other people as well.

Response to Comment No. 533-1

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment expressing opposition to the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 533-2

Thank you. I had not known of the 4:00 pm aspect of the deadline, and very much appreciate being included.

My USPS address is: 600 Hanley Way, Los Angeles, CA 90049

That is also the address of my wife, Marcia Herman.

Response to Comment No. 533-2

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 534

Bernadette Huang
249 S. Westgate Ave.
Los Angeles, CA 90049

Comment No. 534-1

I am writing to you as a member of the Brentwood community and a neighbor of The Archer School for Girls. I want to voice my support for the school and the Archer Forward Plan. Archer has been a good neighbor and an active member of the community.

I think that the facilities the school is asking for in this plan are reasonable and on par with what other independent and public schools in the area already have.

Please join me in supporting of one of the leading schools on the Westside of Los Angeles.

Response to Comment No. 534-1

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

Comment Letter No. 535

Joyce Madeline Hyman and Peter Abrahams
847 Iliff St.
Pacific Palisades, CA 90272

Comment No. 535-1

We live in the Pacific Palisades. Rush hour traffic at the intersection of Barrington and Sunset has been a nightmare for years. This is due to construction AND school traffic AND just plain traffic. In the morning, Westbound traffic to the 405 is backed up and in the afternoon there is nothing but a big snarl of cars and people clogging that intersection.

The Archer School is a big contributor to the traffic nightmare. Archer can not possibly mitigate the traffic issues associated with this new project given its size and the proposed hours of construction. Traffic congestion associated with this project will go on for at least six years. Then there will be more permanent traffic centering on Archer than ever.

Response to Comment No. 535-1

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to below a level of significance.

Also refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities. As described therein, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years.

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

Comment No. 535-2

You have the power to control the size, scope and hours of this project. You have a duty to the community to make changes to this plan.

Response to Comment No. 535-2

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 536

Pamela and Bob Krupka
1870 Mango Way
Los Angeles, CA 90049

Comment No. 536-1

We are writing to oppose the expansion plan proposed by the Archer School, and to support the alternative plan as articulated by the Residential Neighbors of Archer.

Response to Comment No. 536-1

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

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

Comment No. 536-2

We have lived in Mandeville Canyon for six years; prior to that, we lived in Bel Air near Moraga for seven years. Thus, we have been in the vicinity of Sunset and Barrington on practically a daily basis. We routinely pass through the area and shop in the area. Our reasons for objecting follow.

Response to Comment No. 536-2

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

Comment No. 536-3

The plan proposed by Archer is too big, too ambitious and would devastatingly confound an already impossible traffic situation. The neighborhood simply cannot accommodate a performing arts center larger than the Geffen Playhouse, the Annenberg Center for the Performing Arts or the Broad Stage. The neighborhood also cannot accommodate so many additional buildings and the accompanying traffic they would generate. Bringing an additional 24,000 visitors to the campus annually is simply ridiculous, given the stress of

the roads even today. We do not need to tell you how massive the proposed project is. The neighborhood and traffic is at capacity; we invite you visit Sunset and Barrington at 3 p.m. and see for yourself.

Response to Comment No. 536-3

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Regarding the comment's estimates of visitors to the campus, the transportation analysis in Section IV.K, Traffic, Access, and Parking, of the Draft EIR was prepared in compliance with CEQA, the CEQA Guidelines, and the City of Los Angeles 2006 CEQA Thresholds Guide, and the LADOT Traffic Study Guidelines, which provide for evaluation of traffic impacts during peak hours on a daily basis.

As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, In response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the square footage and massing, width, and length of some of the proposed buildings, reducing the number of parking spaces, and creating expanded landscape buffers. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. For example, the Performing Arts Center has been reduced from 650 seats to 395 seats. As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

Comment No. 536-4

It is untenable to think of another six years of major construction and the resulting burden on the neighborhood.

Response to Comment No. 536-4

As detailed in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the Project has been refined to reduce the construction period from six years to five years. Further, as described on page II-38 of Section II, Project Description, of the Draft EIR, the Project is proposed to be developed in phases to facilitate continued School operations and minimize disruptions to neighbors with access for haul trucks and equipment/material delivery trucks varying between the different phases of construction.

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

Comment No. 536-5

Public safety would be compromised if the proposed plan was put into place. Emergency vehicles simply would not be able to move. During the ongoing 405 construction, we have seen times when emergency vehicles were hampered because there was no place for the traffic to move out of their way. As it now stands, our family emergency plan has taken UCLA Hospital off the list ... it is impossible to head east on Sunset in the afternoon. It would be reckless to further compromise public safety by supporting the Archer plan.

Response to Comment No. 536-5

Regarding public safety, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Topical Response No. 9, Emergency Vehicle Access, regarding emergency vehicle access.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Comment No. 536-6

Moreover, based on our understanding, when Archer went to its current location 15 years ago—in a residential neighborhood—they made an agreement with the local homeowners and neighbors that was balanced. Archer now attempts to sidestep that balance and push through an enormous and disruptive undertaking. Fundamental fairness dictates that Archer be bound to the agreement it made when it first came to the neighborhood.

Response to Comment No. 536-6

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

Comment No. 536-7

We are sympathetic to the needs of our educational community—schools are a good thing—and therefore support the downsized alternative plan proposed by the Residential Neighbors of Archer.

Response to Comment No. 536-7

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

Comment No. 536-8

However, we strongly object to the plan that Archer has proposed and will continue to work to ensure that our neighborhood grows appropriately.

Response to Comment No. 536-8

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

Comment No. 536-9

Thank you for your time, and for your service to our city.

Response to Comment No. 536-9

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

Comment Letter No. 537

Bret Lewis
3955 Mandeville Canyon Rd.
Los Angeles, CA 90049

Comment No. 537-1

I'm all for the Archer forward school development. I think it is important to have good schools in the neighborhood and the foundation for property values is our schools. Please do what you can to allow all these schools to exist in our community.

Response to Comment No. 537-1

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

Comment No. 537-2

3955 mandeville canyon rd
Los Angeles, ca 90049

Response to Comment No. 537-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 538

Ken Marks
kenm22@verizon.net

Comment No. 538-1

I was shocked to hear that Archer School wishes to embark upon a plan of expansion. It is beyond comprehension that any governmental agency would even consider approving an expansion that would increase traffic on Sunset Boulevard, a street that right now borders on the edge of impassible.

Response to Comment No. 538-1

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

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 538-2

Additionally, expansion would seriously degrade the quality of life of the surrounding community.

Response to Comment No. 538-2

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 538-3

Archer currently operates under a Conditional Use Permit which was painstakingly negotiated. Without these conditions Archer would not have been allowed to operate in a quiet residential neighborhood. To abrogate these negotiated conditions says one thing loud and clear to the residents... Any agreement is only temporary and can be changed any time the City feels like it. In other words, the City cannot be trusted.

Enough is enough. It is time for the City to stand firm and honor its promises to the residents. It is time for the City to shout a resounding NO! to Archer.

Response to Comment No. 538-3

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains numerous conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

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

Comment Letter No. 539

Greta McAnany
11630 Chenault St.
Los Angeles, CA 90049-4569

Comment No. 539-1

I am writing you to tell you that I oppose the Archer Expansion plan and hope that you will vote against the plan and in favor of preserving our great neighborhood.

The following reasons are more than enough evidence to shut the plan down:

Response to Comment No. 539-1

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

Comment No. 539-2**Environmental**

Tearing down two residences and erecting over 80,000 square feet of additional institutional use in a residential neighborhood; large buildings placed right next door to houses without adequate buffers or transitions.

Response to Comment No. 539-2

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. The Project would also include the use of architectural features that add visual interest and reduce massing to maintain the residential street character when viewed from Chaparal Street and Barrington Avenue. It is noted that with the refinements proposed to the Project, the Performing Arts Center is now proposed to be developed within the Chaparal Parcel and the Aquatics Center is proposed to be developed within the Barrington Parcel. With these refinements, the 25-foot front yard setbacks along Chaparal Street and Barrington Avenue would remain.

The Project proposes enhanced landscaping buffers to provide privacy and reduce noise to nearby properties. As described in more detail in Section IV.A, Aesthetics/Visual

Quality, Views, Light/Glare, and Shading, of the Draft EIR, along Chaparal Street is a solid cinderblock wall and wrought iron gate covered in vines. Also along Chaparal Street is a row of existing pine trees. In response to comments, Archer would plant additional trees along Chaparal Street and a second row of trees on the south side of the wall to create a double row of landscaping along Chaparal Street. In response to comments, the Project has also been refined to shift the athletic field approximately 7 feet 6 inches to the east. Shifting the athletic field would move the athletic field further away from the neighbors to the west of the campus property boundary while still maintaining regulation size soccer and softball fields. This expanded setback would allow for an enhanced landscape buffer along the western property boundary of the campus. In addition, in response to comments, the Project would add a row of landscaping along the southern boundary of the Barrington Parcel.

Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood. As described therein, in response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the square footage of some of the proposed buildings. Overall, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet. With these refinements, the Project would further preserve the residential scale and character of the surrounding neighborhood.

Comment No. 539-3

Traffic

Addition of thousands of cars on Sunset Boulevard during peak hours; no physical mitigation measures for the significant impacts from these car trips; extending arrival and departure times of cars so that traffic is extended into the night and the weekend; increasing daily parking from the existing 109 so that 100 more cars will leave at 3:30pm; adding more cars on the congested streets of Brentwood during the 3:30pm to 7:00pm time period by hosting athletic events that currently do not take place on campus; increasing special events that take place on campus that would occur from 7:00pm to 10:00pm.

Response to Comment No. 539-3

Refer to Topical Response No. 10, Traffic Congestion along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site. As discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant traffic impacts related to School Functions and Interscholastic Athletic Competitions to below a level of significance. The additional

mitigation measures in the Final EIR limit the total number of vehicles that can arrive at the site for events (whether a single event or simultaneous events) to levels that would not generate significant traffic impacts. Also refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

In regard to lack of physical mitigation measures, the Draft EIR did identify Mitigation Measure K-3 which consisted of a physical mitigation measure at the intersection of Sunset Boulevard and Saltair Avenue. However, with implementation of the additional operational mitigation measures discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, Mitigation K-3 providing the physical improvements at the intersection of Saltair Avenue and Sunset Boulevard would no longer be required and has been removed from the Project.

The Project does not extend arrival and departure periods into the evening and weekend; Archer's current CUP permits evening and weekend events.

In regard to the increased parking supply on campus, as described in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure is proposed to be reduced. Although the reduced garage will provide 185 parking spaces expandable to 251 with attendants, the only time the garage would be full would be for an occasional large evening or weekend event, and the departure times from these events would not be during peak periods of traffic on Sunset Boulevard.

With the Project, Archer will host weekday afternoon athletic competitions that currently do not take place on campus. However, as discussed above, the additional mitigation measures discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, the total number of vehicles that can arrive at the site for events (whether a single event or simultaneous events) will be limited to levels that would not generate significant traffic impacts.

Comment No. 539-4

Public Safety

Adding to the existing gridlock on Sunset Blvd. (at the six intersections that DOT has identified that cannot be mitigated) and surrounding streets, thus making it more difficult for

emergency responders to reach their destination; making evacuation in the case of fire or an emergency difficult

Response to Comment No. 539-4

As discussed in Topical Response No. 9, Emergency Vehicle Access, and evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, during operation, the Project would not result in a significant impact on the 10 nearby neighborhood street segments analyzed in the Draft EIR. As such, operation of the Project would not significantly interfere with emergency access along the surrounding streets. With regard to the study intersections analyzed, as evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, with implementation of the mitigation measures provided in the Draft EIR, all Project traffic impacts on non-event days would be reduced to below a level of significance. The mitigation measures provided in Section IV.K, Traffic, Access, and Parking, of the Draft EIR would also reduce the Project traffic impacts during the weekday 3:00–4:00 P.M. and Saturday 1:00–2:00 P.M. hours associated with events to below a level of significance. However, the Draft EIR determined that significant impacts would still remain during the 5:00–6:00 P.M. and 6:00–7:00 P.M. hours associated with events. As discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to fully eliminate the significant traffic impacts of the Project. With implementation of the additional mitigation measures discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, and listed in Section II, Corrections and Additions, of this Final EIR, all potential traffic impacts would be reduced to below a level of significance. Therefore, it is not expected that the Project would consistently increase interference with existing emergency response capacity to the Project area.

Comment No. 539-5

Intensification of Use

Doubling the number of special events from 47 to 98; bringing over 20,000 visitors to an already congested area during the 36 week school year not including athletic events; moving all athletic events onto campus (not including tennis), resulting in 3,300 more visitors coming to the campus during the peak traffic periods of 3:30pm and 7:00pm; adding a six week summer school; hosting special events with attendance up to 650 people and 10 Athletic Tournaments with 200 visitors in attendance thus permitting outside use not currently allowed in the CUP; extending use of all of the facilities to every Saturday

Response to Comment No. 539-5

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including reducing the number of proposed School Functions from 98 to 86, eliminating Interscholastic Athletic Tournaments, eliminating two School Functions with up to 650 guests, and eliminating community use and the rental, lease, or use of the facilities for non-School Uses.

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

Comment No. 539-6**Size**

Doubling the size of the physical foot print of the school to over 170,000 sq ft; constructing a 96,000 sq ft parking garage.

Response to Comment No. 539-6

As provided in Table II-2 in Section II, Project Description, of the Draft EIR, the net new floor area of the Project would be approximately 75,930 square feet. In addition, with the development of the parking structure underground, the Project has been intentionally designed to minimize building footprints at grade level. It is further noted that in response to comments on the Draft EIR, refinements to the Project are proposed, including a reduction in the square footage of some of the proposed buildings and a reduction in the square footage of the parking structure. Overall, with the proposed refinements, the Project's net new floor area would be reduced from approximately 75,930 square feet to 68,989 square feet, leaving approximately 229,547 square feet of open space. As discussed in Topical Response No. 3, Overview of Reduced Parking Spaces, Parking Demand and Supply, and Parking Enforcement, in response to comments on the Draft EIR, the underground parking structure has also been reduced from 212 parking spaces to 185 parking spaces, expandable to 251 parking spaces with attendant-assisted parking.

Comment No. 539-7**Construction**

Three phases of construction to 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; air pollution; soil disruption; noise pollution.

Response to Comment No. 539-7

As described in Topical Response No. 11, Overview of Construction Refinements, in response to comments on the Draft EIR, the construction period has been reduced from six years to five years. As discussed on page II-39 of Section II, Project Description, of the Draft EIR, the Project would comply with the LAMC, which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. Most, if not all, haul and equipment/material delivery trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.), Monday through Friday, and during the permitted construction work period (8:00 A.M. to 6:00 P.M.) on Saturdays, to minimize generating truck trips during the weekday P.M. peak hours. Also refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Additional mitigation measures relating to construction are provided in the Draft EIR. See Section IV.B, Air Quality; Section IV.E, Geology and Soils; Section IV.I, Noise; and Section IV.K, Traffic, Access, and Parking.

Comment No. 539-8**Aesthetics**

Large buildings set back only 20 feet from the Chaparal property line versus the requirement of 85 feet in their Current Conditional Use Permit.

Response to Comment No. 539-8

The Performing Arts Center and the Multipurpose Facility would be set back 25 feet from Chaparal Street, in compliance with residential setback requirements.

The comment also states that Archer's current Conditional Use Permit has an 85-foot setback requirement. Archer's existing CUP, CUP No. 98-0158, states: "The

physical plant shall be limited to the existing main building which contains a floor area of 95,500 square feet including eight dwelling units limited to occupancy by school personnel and visiting guests, a proposed gymnasium building with a maximum floor area of 12,000 square feet located in the southeast corner of the lots zoned RE-11 and approximately 85 feet south of the property line along Chaparal Street...” This setback requirement was specific to the proposed gymnasium building. It is not a zoning requirement. The Project would comply with required front yard setbacks pursuant to the zoning for the property.

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

Comment No. 539-9

Noise

Creating an outdoor garden that can accommodate up to 500 people; limited ingress and egress from parking garage directly into buildings; nighttime use of the athletic field.

Response to Comment No. 539-9

As discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has eliminated School Functions within the North Garden. Elimination of School Functions in the North Garden would further reduce noise impacts.

As described on page II-23 of Section II, Project Description, of the Draft EIR, the Project includes a pedestrian pathway from the parking structure and underneath the Court of Leaders to the Multipurpose Facility and the Performing Arts Center. While the Draft EIR determined that there would be less than significant impacts associated with use of the outdoor pedestrian pathways and access routes, in response to comments, the Project has been refined to provide mandatory use of the underground pedestrian pathway, which runs from the underground parking garage to the Multipurpose Facility and the Performing Arts Center, after 8:00 P.M. Mandatory use of the underground pedestrian pathway would further reduce noise impacts.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, the Project has been refined to eliminate use of the athletic field until 8:00 P.M. With the proposed refinements, use of the athletic field would end by 6:00 P.M. Therefore, nighttime use of the athletic field is no longer proposed.

Comment No. 539-10**Lights**

Precedent-setting lights on the athletic field directly adjacent to residences.

Response to Comment No. 539-10

As discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the athletic field lighting would be eliminated from the Project. Therefore, view and lighting impacts would be reduced.

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

Comment No. 539-11**Dangerous Precedents**

Other schools in close proximity to neighbors do not have lights on their field; most schools have one gym not two; similar schools do not have all of their athletic events on campus but use off-site facilities; eliminating a carefully negotiated Conditional Use Permit that allowed the school to operate successfully for the past 16 years.

Response to Comment No. 539-11

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is noted that in response to comments on the Draft EIR, the Project has eliminated the previously proposed athletic field lights. In addition, a new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

Comment No. 539-12**Outside Use**

Increasing the number of days the facilities are used by 45%, (176 regular school days, 30 summer school days, 48 outside use days). Rental or lease of the facilities, which is currently not permitted, is not consistent with the quiet residential neighborhood in which Archer operates. Archer proposes allowing weddings, private parties and club athletics to occur Monday through Saturday 8:00am to 10:00pm with a maximum of 200 guests. Currently, filming is limited to one day every five years for the Los Angeles Conservancy; Archer proposes to allow filming on campus for commercial purposes when the School is not in session.

Response to Comment No. 539-12

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

As also discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, filming on the 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. Filming would be permitted for no more than 24 days per year. In addition, all trucks and equipment would be required to use the School's underground parking structure and parking on neighborhood streets would be strictly prohibited. Hours would be restricted, with filming beginning no earlier than 9:00 A.M. and concluding no later than 6:00 P.M.

Comment Letter No. 540

Mark Mosch
221 N. Saltair
Los Angeles, CA 90049

Comment No. 540-1

For the last 19 years, I have lived on the corner of Chaparal and Saltair very near The Archer School for Girls—and have been able to observe the initial foundation as well as the development of the school over time.

Given how they shoe-horned themselves into the existing space (primarily due to the concerns of us worried neighbors), I do understand how they lack the basic facilities that many other schools in the area already have. I am writing today in support of the school and their plan to improve that situation.

I believe that Archer has made every effort to ensure that their proposed campus is respectful of the residential neighborhood and I am confident that the school will continue to be a good neighbor. They have so far done a pretty good job of being respectful of the neighborhood. I assume that if they were ok'ed to do some of their improvements, they would be similarly respectful during the construction period.

One of my biggest concerns overall on this side of town is the horrible traffic—and in this case, Archer isn't proposing to increase that, as their Archer Forward project is not supposed to be associated with any increase in enrollment. It is just making things better for the numbers of girls that already go there. I think that Archer overall serves as a positive influence in the community and I hope you'll join me in supporting their Archer Forward program.

Response to Comment No. 540-1

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

Comment Letter No. 541

Rockwell A. Schnabel
162 S. Burlingame Ave.
Los Angeles, CA 90049

Comment No. 541-1

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 overburdened area will adversely affect our local community as well the community at large.

Response to Comment No. 541-1

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City's residential neighborhoods. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a description of the proposed design refinements to the Project, including a reduction in building area, which would further the Project's consistency with the residential scale and character of the neighborhood.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level. This comment expressing opposition to the Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 541-2

Please do not support a plan that will have significant impacts that cannot be mitigated on six key intersections in Brentwood.

Response to Comment No. 541-2

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level.

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

Comment No. 541-3

Please support a downsized alternative that reduces the impacts on the neighborhood.

Response to Comment No. 541-3

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

As described in Section II, Corrections and Additions to the Draft EIR, of this Final EIR, in response to comments on the Draft EIR, the Project has been refined, including reducing the square footage and massing, width, and length of some of the proposed buildings; reducing the number of parking spaces; and creating expanded landscape buffers. Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

In addition, as discussed in Topical Response No. 1, Refinements to Proposed Operations, refinements to the Project also include additional restrictions on School operations, including additional limits on the hours of operation, reducing the number of proposed School Functions, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Further, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has been refined to remove the athletic field lighting. With the removal of the athletic field lighting, light and glare impacts from the Project would be reduced.

Additionally, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional measures are proposed to reduce noise associated with campus operations.

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

Comment Letter No. 542

Joy Stanley
Joy Stanley Law Corp.
Water Garden
2425 Olympic Blvd., Ste. 4000-W
Santa Monica, CA 90404

Comment No. 542-1

Attached please find a letter of today's date from Joy Stanley.

Response to Comment No. 542-1

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

Comment No. 542-2

My daughter Marcella has been attending The Archer School for Girls since 7th grade and is now in the 11th grade. Archer has single-handedly discovered her natural talents in art and math, and she has excelled beyond our wildest dreams. This year she won a California Gold Key Art Award and is ranked as the top math student in the school.

Archer is one of three prominent all girl high schools in Los Angeles. It is an essential addition to our community. It's [sic] expansion will only enhance the neighborhood, and will provide more opportunities for girls in our community, Archer offers a substantial amount of financial aid to young girls who would otherwise never be able to attend such a fine school.

Response to Comment No. 542-2

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

Comment Letter No. 543

Cynthia Truhan
125 N. Barrington Ave., #206
Los Angeles, CA 90049

Comment No. 543-1

Fifteen years ago, when Archer School won its fight to be located on Sunset Boulevard near Barrington Ave., it promised to keep its size and hours of the school's operation conducive to the surrounding residential neighborhood and community at large. Now that promise is being ignored.

Response to Comment No. 543-1

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains numerous conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

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

Comment No. 543-2

Archer's massive expansion plan threatens our historical quiet neighborhood, home values and the public/private safety of our residents.

Response to Comment No. 543-2

Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. Regarding public/private safety, as discussed in Section IV.J.2, Public Services—Police Protection, of the Draft EIR, the Project would incorporate various elements to promote individual and community safety including coordinating with the Los Angeles Police Department Crime Prevention Unit regarding crime prevention features appropriate for the design of the Project. Security features proposed to be implemented as part of the Project include proper lighting of the parking structure to reduce areas of concealment and lighting of building entries and

pedestrian walkways to provide for pedestrian orientation and to clearly identify a secure route between the parking structure and points of entry into buildings. In addition, landscaping would be placed so as not to impede visibility. Further, Archer would maintain existing cinderblock walls and gates to provide safety and, as provided in Project Design Feature J.2-4, where necessary, new security fences and walls would be provided or existing walls extended. As part of Project Design Feature J.2-3, Archer would also allow all student-driven carpools to park on campus, increasing safety by not having students cross Barrington Avenue and Sunset Boulevard. Additionally, as set forth in Project Design Feature J.2-7, Archer would continue to maintain a closed campus requiring all visitors, guests, and vendors to have appointments prior to being granted access as well as maintain full-time security guards during all campus hours. With implementation of these project design features, the Project would continue to provide a safe environment within and around the campus.

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

Comment No. 543-3

Diane Meehan and her supporters are attempting to ignore, with your help, the CUP's they agreed to adhere to when they moved into our neighborhood.

Response to Comment No. 543-3

Refer to Response to Comment No. 543-1.

Comment No. 543-4

I will not go into all the specific consequences of their proposed expansion as I am sure you remember sitting in Eric and Thelma Waxman's home before your election listening to the residents' concerns regarding traffic, the proposed 7 plus years of constant construction, and other quality of life issues for the surrounding areas as well as the entire community.

Response to Comment No. 543-4

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 543-5

You know Mike, if Archer wants to expand to the level that they are proposing, why don't they just sell their Sunset property and go somewhere where they can expand to their hearts content.

Response to Comment No. 543-5

This comment does not raise a specific issue relative to the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is noted that an alternative site for the Project was studied in Section V, Alternatives, of the Draft EIR but was rejected from further consideration. Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives.

Comment No. 543-6

They will ruin the very nature of the Brentwood/Barrington community—the business's [sic] will definitely be hurt as people avoid the area as a shopping/entertainment destination and many resident's [sic] will move due to even more horrific traffic and declining property values.

Response to Comment No. 543-6

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level.

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

Comment No. 543-7

I also am stunned that Archer thinks it can use its two residential properties as the proposed site of additional school campus buildings when they were and are still zoned as residential properties.

Response to Comment No. 543-7

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

Comment No. 543-8

When I hear the President of the Brentwood Homeowner's Asso. tout Archer School as a benefit to our neighborhood with its good works, please understand, Archer School is bottom-line a profit making business. Just note Archer's Head Mistress' salary below and the yearly tuition of nearly \$40,000.00 per student.

Response to Comment No. 543-8

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. It is noted that Archer is a 501(c)(3) public charity. As such, all of the School's revenue is used to support its educational mission.

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

Comment No. 543-9

Lastly Mike, could you please come up to Barrington/Sunset sometime and witness the already parking-lot like traffic we residents endure on a daily basis. If you have never been in it I have included a recent picture for your interest.

Response to Comment No. 543-9

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

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Comment No. 543-10

Can you imagine trying to get out of this area if a public disaster were to occur?

Response to Comment No. 543-10

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

Regarding public safety, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Topical Response No. 9, Emergency Vehicle Access, regarding emergency vehicle access.

Comment No. 543-11

I voted for you when you promised to protect our neighborhood—you need to do that now. “Archer, in its Co-Founder Diane Meehan’s own words, wants what Archer wants.” Well, not so fast.

Response to Comment No. 543-11

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 543-12**The Archer School for Girls**

Revenue/Expenses Trend Primary Revenue Program Expenses 2009 2010 2011 2012

\$18,534,280

Compensation of Leaders (FYE 06/2012)

Compensation	% of Expenses	Paid to	Title
\$408,918	2.18%	Elizabeth English	Head of School

Response to Comment No. 543-12

This comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. 543-13**Response to Comment No. 543-13**

This comment transmits the photograph attached to Comment Letter No. 543. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 544

Robert Turbin
426 N. Barrington Ave.
Los Angeles, CA 90049

Comment No. 544-1

Attached please find my letter expressing my opposition to the Archer Forward Plan as Proposed.

Response to Comment No. 544-1

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

Comment No. 544-2

As a native of the west side of Los Angeles, I originally moved into the Brentwood area in 1972 and currently reside at 426 N. Barrington Avenue, which is part of the horseshoe of residences most impacted by the proposed project. I am now retired but received an architectural degree and worked my entire career in real estate development. Additionally, I am a member of the steering committee of the Residential Neighbors of Archer in representing our neighbors.

Response to Comment No. 544-2

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

Comment No. 544-3

I am writing to say that I am opposed to Archer's proposed project, *Archer Forward: Campus Preservation and Improvement Plan*.

Response to Comment No. 544-3

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

Comment No. 544-4

In 1998 the City of Los Angeles granted a Use Permit to the Archer School allowing for the use of the property as a private girls school. At that time, after significantly heavy negotiations with the immediate neighbors, mitigation measures were put in place to protect the community. Under this new proposed plan, many of those measures are being taken away. The size of Archer's proposed expansion in an existing 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. While I have numerous concerns, my primary issues can be identified as follows:

- Traffic
- Intensification of Use
- Aesthetic Impacts

Response to Comment No. 544-4

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City's residential neighborhoods. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

Regarding proposed campus operations, refer to Topical Response No. 1, Refinements to Proposed Operations. As discussed therein, in response to comments on the Draft EIR, Archer proposes additional restrictions on School operations are proposed, including additional limitations on the hours of operation including additional limitations on

Saturdays, reducing the number of proposed School Functions from 98 to 86, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to a less than significant level.

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

Comment No. 544-5

More specific to each of the above referenced concerns:

Traffic

Adding more cars to the already congested Sunset Boulevard is not acceptable and traffic will only get worse in an area where streets are currently gridlocked. Under the current situation, it has taken me a maximum of 55 minutes (and my neighbor 1 hour and 7 minutes) to get from our homes to the intersection of Barrington and Sunset. That's a distance of just under a half of a mile. LA Department of Transportation (LADOT) states in the DEIR that the proposed project will create SIGNIFICANT impacts at six intersections (including Barrington Avenue and Sunset Boulevard) 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.

Response to Comment No. 544-5

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 544-6

- How will LADOT's recommendations alleviate traffic impacts when they state that even with mitigation the impact will be significant and unavoidable?

Response to Comment No. 544-6

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 544-7

- How can any new car trips be justified when LADOT concludes that the improvements proposed by Archer under Voluntary Improvements are not expected to mitigate the significant traffic impacts at any of the six impacted intersections mentioned in the report?

Response to Comment No. 544-7

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 544-8

- How will Archer prevent cars from turning right out of the parking garage onto neighboring side streets during peak hours when cars cannot go east on Sunset because of traffic?

Response to Comment No. 544-8

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparral Street. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate

Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion of vehicles exiting the campus. Refer to Topical Response No. 7, Potential Traffic Impacts Associated with Proposed Campus Operations, for a discussion regarding cut-through traffic on Chaparal Street. As provided in Project Design Feature K-5, described on page IV.K-46 of the Draft EIR, as part of the Project, the Applicant would coordinate with the City of Los Angeles and neighborhood residents to provide up to \$15,000 toward the development and implementation of a traffic calming plan for Chaparal Street between Saltair Avenue and Barrington Avenue to minimize cut-through traffic on this street.

Comment No. 544-9

- With this master gridlock any additional traffic can be catastrophic and life threatening. In an emergency, there is no way to get in or out. How can the City realistically provide fire and life safety services with no way to access this area?

Response to Comment No. 544-9

Regarding public safety, refer to Section IV.J.1, Public Services—Fire Protection, and Section IV.J.2, Public Services—Police Protection, of the Draft EIR, and Topical Response No. 9, Emergency Vehicle Access, regarding emergency vehicle access.

Comment No. 544-10**Intensification of Use**

Our nights and weekends are precious to this neighborhood for it is only then when traffic and noise abate. The plan being proposed by Archer will dramatically worsen our quality of life. Archer is now proposing to double the special events (or school functions) it is currently allowed under the existing CUP to 98. This will bring an estimated 24,000 visitors to the campus during the school year and will contribute significantly to increased noise from operations and traffic. Additionally, they propose outside rental of the facilities 24 times a year with up to 200 guests per event, six days a week until 10:00 pm. Finally, Archer, which currently takes advantage of underutilized athletic venues throughout the west side, is now proposing to bring all these activities on campus during peak traffic periods. As a trained architect and planner, shared use of underutilized existing facility is, for many reasons, always a more desired solution when contrasted with building another facility.

Response to Comment No. 544-10

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including reducing the number of proposed School Functions from 98 to 86 and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

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

Lastly, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional measures to reduce noise associated with campus operations are also proposed. With the incorporation of additional mitigation measures all operational noise impacts would be reduced to below a level of significance Monday through Friday. With the implementation of additional mitigation, Saturday significant impacts would be reduced to 10 days a year within a 4-hour time frame between 10:00 A.M. to 6:00 P.M.

Comment No. 544-11

- Why can't Archer continue to use the offsite sports venues as a way to mitigate the impacts of noise and traffic?

Response to Comment No. 544-11

Refer to Appendix B-1 of the Draft EIR. As discussed therein, by constructing a Multipurpose Facility and an Aquatics Center and enhancing its existing softball and soccer fields, Archer would be able to conduct more of its practices and host additional Interscholastic Athletic Competitions on campus. Archer would still host certain athletic team practices and competitions off-site. Regarding traffic, as evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all operational Project traffic impacts would be reduced to below a level of significance.

Regarding noise, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional operational mitigation

measures are proposed to reduce the significant noise impacts of the Project. With implementation of such mitigation measures, noise impacts associated with use of the athletic field for athletic activities on weekdays and use of the Aquatics Center would be reduced to a less than significant level.

Comment No. 544-12

- Why should the neighborhood bear the traffic and noise burden of these outside events and athletic tournaments?

Response to Comment No. 544-12

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

With regard to noise, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, in response to comments on the Draft EIR, additional operational mitigation measures are proposed to reduce the significant noise impacts of the Project. With implementation of such mitigation measures, noise impacts associated with use of the athletic field for athletic activities on weekdays and use of the Aquatics Center would be reduced to a less than significant level.

Regarding tournaments, as discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on Archer's operations are proposed, including additional limitations on the hours of operation and additional limitations on Saturdays, reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Athletic Tournaments, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses.

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

Comment No. 544-13

- How is the outside use of the school facilities for weddings and private parties essential to the operation of the school?

Response to Comment No. 544-13

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including eliminating the rental, lease, or use of the facilities for non-School Uses.

Comment No. 544-14

- The City, under the current CUP, has upheld the limitation on no outside rental or lease of the facilities. Why should this change?

Response to Comment No. 544-14

Refer to Response to Comment No. 544-13.

Comment No. 544-15**Aesthetic Impacts**

While Section II, Project Description, of the Draft EIR, states “the Project Site is located within an urban area that includes a mix of residential, educational, and commercial uses with associated parking”, it does not correctly reference that the proposed project is surrounded on three sides by residential uses, the bulk of which are single family homes located on lots zoned for residential estates (hence the City zoning designation RE).

Response to Comment No. 544-15

As described on page II-2 of Section II, Project Description, of the Draft EIR, single-family residential uses are located to the north, single- and multi-family residential uses and commercial uses are located to the south, and single- and multi-family residential uses are located to the east and west. Therefore, Section II, Project Description, of the Draft EIR provides an accurate description of uses surrounding the Project Site.

Comment No. 544-16

The existing aesthetic of the neighborhood is more rural in character with narrow non-conforming roads and no sidewalks. The design of the proposed project, with its massive multi-purpose building of approximately 200 lineal feet facing Chaparal, will create an impact which is totally uncharacteristic and in direct contrast with the nature of the surrounding residential neighborhood. Similarly, the proposed removal of two residential

units and replacing them with institutional uses as an aquatic center and a large performing arts center are not consistent with development in a residential neighborhood.

Response to Comment No. 544-16

Refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood. With regard to setbacks, the proposed School buildings would meet residential front yard setback requirements along Chaparal Street. The buildings would have a stepped profile and would be located behind 8-foot walls covered in vines and continuous landscaping to effectively screen the massing of the buildings along Chaparal Street with only portions of the buildings being visible along breaks in the landscaping. Additionally, the Project, as refined in response to comments, would maintain approximately 457 feet, or 64 percent, of the frontage along Chaparal Street as open space. On an overall basis, the Project would not obstruct an existing valued view, and view impacts would be less than significant. For a discussion of the use of residential properties for school uses, refer to Topical Response No. 13, Use of Existing Residential Properties.

Comment No. 544-17

Additionally, the traffic generated (as stated above) will exacerbate an already intolerable situation.

Response to Comment No. 544-17

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 544-18

- How can doubling the total building square footage of the Archer School (while maintaining the height limits) by adding only 16% more land be considered as honoring the surrounding neighborhood?

Response to Comment No. 544-18

As described on page IV.H-50 of the Draft EIR, LAMC Section 12.21.1.A.1 permits a maximum FAR of 3:1 in the R3-1 zone. For the RE11-1 zone, LAMC Section 12.07.01.C.5 permits a maximum residential floor area of 35 percent for lots 15,000 square feet or greater. In the RE11-1 zone, an additional 20 percent of the maximum residential floor area is allowed if certain design principles are met. Because Section 12.07.C.5 applies only to residential floor area, and Archer is not proposing any residential uses, the maximum residential floor area limits set forth in Section 12.07.C.5 are inapplicable to the Project. Therefore, the total maximum floor area for the entire Project Site, including the RE11 zones, is governed by the 3:1 floor area ratio set forth in LAMC Section 12.21.1.A.1. The existing campus and two adjacent properties contain approximately 90,948 square feet of enclosed floor area. The Project, as refined in response to comments, would result in the addition of 68,989 square feet of net new floor area. Upon full build-out of the refined Project, the School would comprise approximately 159,937 square feet. Thus, at build out, the refined Project's floor area would comprise approximately 22 percent of the total allowable floor area.

Comment No. 544-19

- Why should a residential lot which, by zoning restrictions on lot size, can not support a 22,600 square foot residence (or anything approaching that) be allowed to have a Performing Arts Center of that size constructed thereon?

Response to Comment No. 544-19

Refer to Topical Response No. 13, Use of Existing Residential Properties, for a discussion of the use of residential properties for school uses. As described therein, school uses are permitted in the RE and R3 zones with a CUP. As detailed in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments on the Draft EIR, refinements to the Project are proposed, including reducing the size of the Performing Arts Center from 22,600 square feet to 19,025 square feet.

Further, as described on Page IV.H-50 of the Draft EIR, LAMC Section 12.21.1.A.1 permits a maximum FAR of 3:1 in the R3-1 zone. For the RE11-1 zone, LAMC Section 12.07.01.C.5 permits a maximum residential floor area of 35 percent for lots 15,000 square feet or greater. In the RE11-1 zone, an additional 20 percent of the maximum residential floor area is allowed if certain design principles are met. Because Section 12.07.C.5 applies only to residential floor area, and Archer is not proposing any residential uses, the maximum residential floor area limits set forth in Section 12.07.C.5 are inapplicable to the Project. Therefore, the total maximum floor area for the entire Project Site, including the

RE11 zones, is governed by the 3:1 floor area ratio set forth in LAMC Section 12.21.1.A.1. The existing campus and two adjacent properties contain approximately 90,948 square feet of enclosed floor area. The Project, as refined in response to comments, would result in the addition of 68,989 square feet of net new floor area. Upon full build-out of the refined Project, the School would comprise approximately 159,937 square feet. Thus, at build out, the refined Project's floor area would comprise approximately 22 percent of the total allowable floor area.

Comment No. 544-20

- Why would a covered Aquatic Center and attached Visual Arts Center, with a combined footprint of approximately 15,000 square feet, be allowed be allowed on a residential lot which could not support a residence of that size be allowed?

Response to Comment No. 544-20

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

As described on Page IV.H-50 of the Draft EIR, LAMC Section 12.21.1.A.1 permits a maximum FAR of 3:1 in the R3-1 zone. For the RE11-1 zone, LAMC Section 12.07.01.C.5 permits a maximum residential floor area of 35 percent for lots 15,000 square feet or greater. In the RE11-1 zone, an additional 20 percent of the maximum residential floor area is allowed if certain design principles are met. Because Section 12.07.C.5 applies only to residential floor area, and Archer is not proposing any residential uses, the maximum residential floor area limits set forth in Section 12.07.C.5 are inapplicable to the Project. Therefore, the total maximum floor area for the entire Project Site, including the RE11 zones, is governed by the 3:1 floor area ratio set forth in LAMC Section 12.21.1.A.1. The existing campus and two adjacent properties contain approximately 90,948 square feet of enclosed floor area. The Project, as refined in response to comments, would result in the addition of 68,989 square feet of net new floor area. Upon full build-out of the refined Project, the School would comprise approximately 159,937 square feet. Thus, at build out, the Project's floor area would comprise approximately 22 percent of the total allowable floor area.

Comment No. 544-21

- Why should Archer be allowed to allocate density over the entire property and then concentrate it where it would otherwise not be allowed and where is has the maximum negative aesthetic impact to the surrounding residential estate neighborhood?

Response to Comment No. 544-21

As described on Page IV.H-50 of the Draft EIR, LAMC Section 12.21.1.A.1 permits a maximum FAR of 3:1 in the R3-1 zone. For the RE11-1 zone, LAMC Section 12.07.01.C.5 permits a maximum residential floor area of 35 percent for lots 15,000 square feet or greater. In the RE11-1 zone, an additional 20 percent of the maximum residential floor area is allowed if certain design principles are met. Because Section 12.07.C.5 applies only to residential floor area, and Archer is not proposing any residential uses, the maximum residential floor area limits set forth in Section 12.07.C.5 are inapplicable to the Project. Therefore, the total maximum floor area for the entire Project Site, including the RE11 zones, is governed by the 3:1 floor area ratio set forth in LAMC Section 12.21.1.A.1. The existing campus and two adjacent properties contain approximately 90,948 square feet of enclosed floor area. The Project, as refined in response to comments, would result in the addition of 68,989 square feet of net new floor area. Upon full build-out of the refined Project, the School would comprise approximately 159,937 square feet. Thus, at build out, the Project's floor area would comprise approximately 22 percent of the total allowable floor area.

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

Comment No. 544-22

- When setbacks are required by the zoning code, how can they be ignored on the northern property line in the case of the Aquatic Center in Alternative 3B and still have Archer contend that are maintaining the residential character of the existing neighborhood?

Response to Comment No. 544-22

Refer to Topical Response No. 13, Use of Existing Residential Properties, regarding the use of residential properties for school uses. As described therein, pursuant to LAMC Section 12.21.C.3.b, the required combined width of the two side yards along Barrington Avenue is 40 feet. It is important to note that pursuant to LAMC Section 12.07.01.C.2 if the lots were being developed with a single-family residence the required side yard would be 5 feet. It is because the development is a school that the increased side yard is required. Along the south, the Aquatics Center and Visual Arts Center are proposed to be set back approximately 20 feet from the property line, and additional landscaping along the southern property line has been integrated into the refined Project design.

As described in Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, in response to comments to reduce noise impacts from the use of the pool, the Project would fully enclose the proposed Aquatics Center. Due to the enclosure of the Aquatics Center, there would be no side yard along the northern property line at the Barrington Parcel. As such, the School is requesting relief from LAMC Section 12.21.C.3.b to allow this setback along the north side yards. Three parcels border the Barrington Parcel to the north: the Chaparal Parcel, which is owned by Archer and part of the Project Site; 11718 Chaparal Street; and 11706 Chaparal Street. The rear yards of 11718 Chaparal Street and 11706 Chaparal Street are truncated by a retaining wall and property fencing located between 8 and 13 feet from the northern Barrington Parcel property line, increasing the actual distance between development on the Barrington Parcel and adjacent residential uses. The Project would comply with side yard requirements with respect to the boundary between the Barrington Parcel and 11706 Chaparal Street, as the Project would not result in development within 20 feet of the 11706 Chaparal Street property line. The Aquatics Center would be located 24 feet 3 inches from the 11706 Chaparal Street property line. As such, the Project would remain compatible with the surrounding neighborhood.

Comment No. 544-23

- How will the installation of six - 70 foot tall light poles around the field, even when directional baffles are installed and a 8 foot high property line wall is in place, possibly prevent the overflow of 62 feet of light glow to the surrounding residences?

Response to Comment No. 544-23

As discussed in Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, an analysis of the Project's potential impacts with regard to light and glare was conducted including the potential effects from the athletic field lighting. As detailed on page IV.A-25 of Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the proposed lighting for the athletic field would represent the highest standard for achieving high quality lighting on the field while limiting light trespass and glare impacts. As explained in Project Design Feature A-8 on pages IV.A-32 through IV.A-33 of Section IV.A, Aesthetics/Visual Quality, Views, Light/Glare, and Shading, of the Draft EIR, the proposed athletic field lighting would incorporate shielding and aiming to prevent glare, light spill, and the upward emission of light. Therefore, the Draft EIR determined that light and glare impacts from the Project, including the athletic field lighting, would be less than significant. However, as discussed in Topical Response No. 2, Removal of Athletic Field Lighting and Refinements to Lighting, in response to comments on the Draft EIR, the Project has removed the athletic field lighting. With the removal of the athletic field lighting, light and glare impacts from the Project would be reduced.

Comment No. 544-24

Aesthetic impacts are not only limited the visual kind. Noise or the lack thereof is an aesthetic issue.

- Archer's original negotiations to operate at its current site included conditions to mitigate noise from the school's buildings and activities. Specifically, the proposed gym could not have operable windows and all doors had to open toward the main building or a southerly direction and had to be setback 75 feet. Yet Archer now proposes to build a gym whose doors open toward the residences to the west and is set back only 20 feet from the Chaparal property line. How will the noise from using this gym be mitigated?

Response to Comment No. 544-24

As discussed on page IV.I-82 of Section IV.I, Noise, of the Draft EIR, as part of the Project (Project Design Feature I-4), Archer would provide that the Multipurpose Facility and the Performing Arts Center be designed to provide a minimum composite noise reduction of 40 dBA. Noise levels from weekday or weekend events within the Multipurpose Facility and the Performing Arts Center would not exceed the 5-dBA L_{eq} significance threshold at any of the off-site sensitive receptors. Therefore, noise impacts from Multipurpose Facility and Performing Arts Center events were determined to be less than significant.

The Project has been designed to shield neighbors from internal campus activities and noise. In particular, as provided in Project Design Feature I-6, the Project would be designed such that there are no operable windows that open on the sides of buildings directly adjacent to Chaparal Street and Barrington Avenue. Additionally, the Project would replace existing surface parking lots with facilities scaled to the residential character of the surrounding neighborhood and would accommodate nearly all on-campus parking within a new underground parking structure to maximize open space and reduce vehicular noise to adjacent neighbors. The Project proposes fences, walls, and new landscape buffers to provide privacy and reduce noise to nearby properties. The buildings on Barrington Avenue and Chaparal Street would also act as buffers to shield neighboring uses from internal campus activities and noise. Therefore, the Project would strive to enhance the Project Site while respecting the scale and character of the surrounding residential area.

As discussed in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, a new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School's operations and its facilities with the surrounding neighborhood.

Comment No. 544-25

- Archer proposes the use of amplified music, a public address system and loud music outside. How can this possibly be mitigated to the point that the quiet residential character of this neighborhood can be maintained?

Response to Comment No. 544-25

As discussed in Section IV.I, Noise, of the Draft EIR, with the implementation of Project Design Feature I-5, which provided that the portable public address system would be calibrated for use at each proposed location, impacts due to use of the public address system would be less than significant. However, as discussed in Topical Response No. 4, Additional Measures to Reduce Noise, the Project has eliminated the proposal for use of a new non-permanent audio system. Archer would continue to use a non-permanent audio system during Graduation, as permitted under Archer's existing CUP. Elimination of the portable public address system except for use during Graduation would further reduce the incidence of noise in the community.

Comment No. 544-26

Given the significant impacts of the Archer plan, I can support an alternative project that balances the needs of the community with the realistic needs of the school. I can support a reduced plan that leaves the existing two residential homes, honors the existing campus boundary, eliminates the Aquatic and Visual Arts Centers, reduces the size of the Performing Center to seat a maximum of 300 and, maintains the current CUP conditions for no field lighting and hours of operation.

Response to Comment No. 544-26

Refer to Topical Response No. 14, Residential Neighbors' Proposed Alternative, for a detailed response to the alternative proposed by the Residential Neighbors of Archer. In response to comments on the Draft EIR, several of the modifications proposed by the Residential Neighbors of Archer have been incorporated into the Project.

Comment Letter No. 545

Bob Waldorf
212 S. Woodburn Dr.
Los Angeles, CA 90049-3029

Comment No. 545-1

We are AGAINST this plan because we already have a traffic nightmare in the area of Sunset and Barrington!

We have lived in Brentwood since 1967 and it has become unbearable to go in either direction in the morning or the afternoon. We are not against Archer making internal changes as long as it doesn't effect [sic] traffic.

Response to Comment No. 545-1

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 545-2

My address is 212 S. Woodburn Dr.
Los Angeles, CA (0049 [sic])

Response to Comment No. 545-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 546

Toby Waldorf
212 S. Woodburn Dr.
Los Angeles, CA 90049

Comment No. 546-1

We are AGAINST this plan because we already have a traffic nightmare in Brentwood. An expansion project of this nature will make our community even more gridlocked.

We have lived in Brentwood since 1967 and it has become unbearable to go east or west much of the day. We are not against Archer making internal changes as long as it doesn't effect [sic] traffic.

Response to Comment No. 546-1

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site.

As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance.

Comment No. 546-2

My home address is: 212 S. Woodburn Drive, Los Angeles, CA 90049

Response to Comment No. 546-2

In response to this comment, the commenter will be added to the EIR mailing list.

Comment Letter No. 547

Robert H. Wintroub, M.D.
Lillian Wintroub

Comment No. 547-1

As a long time Brentwood homeowner we have watched with dismay the steadily worsening problems with traffic on Sunset, which have barely lessened as the 405 work ends. The enormous construction within and around this area has led to a steady flow of construction trucks, on top of the twice daily school buses plus the steady increase in regular car traffic.

At times it can take 20 minutes to travel from Bundy to Barrington!!!

Response to Comment No. 547-1

Regarding construction traffic, refer to Topical Response No. 6, Overview of Construction Traffic and Parking. Also refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities. As described therein, in response to comments on the Draft EIR, the Project has been refined to reduce the construction timeframe from six years to five years.

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

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

Comment No. 547-2

We support the ORIGINAL Archer plan. Had they had the foresight to see growth and desire for further expansion they would have sought an original site other than on already congested Sunset Blvd

It is time for them to set up a satellite campus elsewhere rather than presume to impose this area with these expansion plans and the impossible additional construction and traffic burdens over more and more hours now extending into evenings and weekends.

We respectfully wish that you do all necessary to **block this expansion** and **encourage Archer to find additional land at another site if they must have expansion**.

Response to Comment No. 547-2

As discussed on page V-3 of Section V, Alternatives, of the Draft EIR, and Topical Response No. 15, Alternative Locations, the objectives of the Project are closely tied to the concept of improving existing operations on the Project Site by creating a cohesive and integrated campus environment with new, state-of-the-art and technologically advanced facilities. Archer has identified improvements that are needed to bring the existing campus in line with other long-established educational facilities. As such, an alternative site is not considered feasible as it would fail to achieve the basic Project objectives. In addition, development at an alternative site likely would not avoid the Project's significant impacts.

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

Comment No. 547-3

Primary and secondary schools throughout the nation in metropolitan areas rarely have the funds to insist upon expansion in urban areas. Only private schools in wealthy areas have the money and hubris necessary to construct an edifice sufficient to destroy a wonderful neighborhood rather than asking the neighborhood how they can be better neighbors.

Response to Comment No. 547-3

As evaluated in Section IV.H, Land Use, of the Draft EIR, the proposed buildings would be designed to complement the historic Main Building and respond to and respect the residential scale and character of the surrounding area. As such, the Project would be consistent with the goals, objectives, and policies of the General Plan and the Brentwood–Pacific Palisades Community Plan regarding conservation of and compatibility with the scale and character of the City's residential neighborhoods. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

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

Comment Letter No. 548

Eric Edmunds
President
Brentwood Hills Homeowners Assn.

Comment No. 548-1

As you are well aware, traffic and development have been major concerns to those on the Westside for over a decade. The Brentwood Hills Homeowners Association has confronted many issues regarding these two subjects, and we are writing today to express our concerns about the Archer Forward plan. In case you are not aware, the Archer Forward Plan equates to:

- 250,000 car trips for construction workers
- 12,000 haul trucks for 3 mos.
- 6 years of construction and traffic havoc

After months of careful consideration and review by our board and our members, the BHHA has concluded the proposal by Archer for increased size, scope and activity could represent one of the most dramatic, negative impacts on traffic flow, from a development, in decades. We also believe attempts to extract Singular impacts from the plan, in an effort to reduce the community concerns, shows a naivete about the realities of large scale development and the future dynamics of the Sunset and Barrington intersection.

Response to Comment No. 548-1

Refer to Topical Response No. 11, Overview of Construction Refinements, regarding the impacts of construction activities and the proposal to reduce the overall construction timeframe for the Project from six years to five years. Refer to Topical Response No. 6, Overview of Construction Traffic and Parking, for a detailed discussion regarding construction traffic.

Refer to Topical Response No. 10, Traffic Congestion Along Sunset Boulevard, for a detailed discussion of traffic congestion in the vicinity of the Project Site. As evaluated in Section IV.K, Traffic, Access, and Parking, of the Draft EIR, and as discussed in Topical Response No. 5, Additional Mitigation Measures to Eliminate Significant Traffic Impacts, with implementation of the operational mitigation measures presented in the Draft EIR and Final EIR, all Project operational traffic impacts would be reduced to below a level of significance. The additional mitigation measures in the Final EIR limit the total number of

vehicles that can arrive at the site for events (whether a single event or simultaneous events) to levels that would not generate significant traffic impacts.

Comment No. 548-2

Archer is a fine school, and has had wonderful success with its girls. The program is clearly working “as is”. We are happy to see that, and welcome them to stay at Sunset and Barrington—at *their current size*. No further expansion is necessary to guarantee success or make a difference—they have already achieved their goal.

Unfortunately, The Archer School has not been a good community player. They have disregarded the CUPs they promised to operate within, tossing aside all previous agreements with the new Archer Forward proposal. They “want what they want”, regardless of the Impact on the surrounding community. It is clear to us that the Archer founders picked the wrong location for a school intent on expansion. Like any institution or business, they must accept that reality and should consider relocation as a valid and ethical approach to meeting their goals of growth.

Response to Comment No. 548-2

As described in Topical Response No. 16, Environmental Review and Conditional Use Permit Processes, Archer is currently operating pursuant to CUP No. 98-0158, which was approved through the required public process and contains conditions of approval governing campus operations and physical improvements. A new CUP and other concurrent entitlement requests, if approved by the decision-makers, would subject the School to a new set of conditions of approval, including conditions regarding compatibility of the School’s operations and its facilities with the surrounding neighborhood.

Refer to Topical Response No. 15, Alternative Locations, for a detailed discussion of the analysis of alternative locations for the Project. As described therein, an alternative location would not meet many of the basic Project objectives, particularly those related to improving the existing Archer campus and ensuring the continued preservation of the historic Main Building.

As discussed in Topical Response No. 1, Refinements to Proposed Operations, in response to comments on the Draft EIR, additional restrictions on School operations are proposed, including additional limitations on the hours of operation, reducing the number of proposed School Functions from 98 to 86 including eliminating Interscholastic Athletic Tournaments and two School Functions with up to 650 guests, and eliminating community use of the facilities and the rental, lease, or use of the facilities for non-School Uses. Also refer to Topical Response No. 12, Site Plan Consistency with the Residential Scale and

Character of the Neighborhood, for a discussion of the Project's consistency with the residential scale and character of the neighborhood.

Comment No. 548-3

Brentwood Hills Homeowners Association is a strong **NO to ANY further development or expansion of The Archer School**. We have surveyed our members, and at our last Board meeting on August 20, 2014, the Board voted unanimously to oppose any further development at The Archer School for Girls. We represent over 400 homes in Mandeville Canyon and we cannot tolerate any more impact to the traffic situation along Sunset Blvd. We urge you to consider all the ramifications of the project.

Response to Comment No. 548-3

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